

ANNUAL REPORT 2024

OF THE ADMINISTRATORS OF THE COMPANY



for the financial year ended
December 31, 2024



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MESSAGE OF THE CHAIRMAN OF THE BOARD OF DIRECTORS

Esteemed shareholders,
Esteemed investors,

CONPET is a well-established company in the oil and gas sector in Romania, with a history of over 120 years in the transport of crude oil through pipelines and a modern existence of 33 years. CONPET's long history has always followed an evolutionary thread, so its existence and development have stood the test of time, gaining the status of a stable company that offers professional services to its clients and establishes, year after year, good and, above all, constant financial results.

This "Annual Report of the Administrators" highlights all aspects of CONPET's activity for 2024, which were part of the company's general policy, its vision and development strategy, as well as its values: operational effectiveness and safety, professionalism, continuous improvement and qualitative growth, social responsibility and sustainable development.

In the global context marked by multiple challenges, I am happy to say that CONPET has maintained its stability through increased responsibility, wise strategies and, last but not least, through extremely rapid adaptability. We are therefore glad that we have maintained the high standards of our services and, implicitly, the trust of our customers, shareholders, employees and the community which we are a part of, that we are a long-term business partner.

In 2024, we achieved the goals we set at the beginning of the year, fulfilling the development plans and strategies we built for operational efficiency, operational safety and sustainable development.

CONPET registered, in 2024, a turnover of 533.6 mRON, higher by 10% YoY. At the same time, the operating revenues were 606.3 million RON, registering an increase of 12.1% compared to 2023.

In 2024 the company recorded a net profit worth 49.5 million RON.

The net profit recorded in 2024 was 49.3 million RON, above the budgeted level by 5.0 million RON.

Acting as a company listed on the Bucharest Stock Exchange, in the PREMIUM category, an aspect that validates the company as an important player on the Romanian capital market, CONPET is currently included in 6 stock market indices (out of a total of 10), which indicates a recognition of financial stability, transparency and visibility, elements that maintain investor interest in our business.

In 2024, CONPET reached a capitalization of 652.8 million RON (75.40 RON/share on 31.12.2024).

The achievement of the **investment program** always represents a major objective of CONPET, given the strategic importance of the activity carried out by the company, namely

the operation of a network declared as critical infrastructure. In 2024, investments have been achieved in the amount of **70.4** mRON. The investment projects aim to increase the efficiency of transport activity, the safe operation of the National Transport System and minimize the impact on the environment, the company being aware that responsibility towards the environment is inextricably linked to the safety of the activity and the envisaged performance. In addition to the environmental protection measures that accompany our core business, CONPET has adopted **a strategy that promotes energy efficiency and sustainability**. Currently, electric and hybrid cars, photovoltaic panels, as well as electric locomotives in the railway area are used within CONPET.

Another important line of development that CONPET pursued in 2024 is represented by corporate social responsibility (CSR) actions, part of the permanent commitment that CONPET has assumed for ethical behavior in the community.

In 2024, CONPET continued to actively involve in multiple projects, in rural and urban communities, covering various fields – health, education, sports, social and culture. The attention paid to the medical sector has increased considerably in recent years, so our company has played a significant role in supporting major projects to equip hospitals with modern equipment, necessary for their optimal activity.

Also, in the sphere of the company's involvement in community life, CONPET organized, in collaboration with the Ploiești Blood Transfusion Center, for the third consecutive year, **a blood donation campaign among the company's employees**, in a gesture of solidarity and empathy with people experiencing vulnerable times.

Participating in **“Ora Pământului”** #EarthHour is another tradition that CONPET respects every year, wishing to reiterate, also symbolically, the commitment that the company has assumed to protect the environment, as well as the consistency describing the pursue of this promise.

CONPET's lines of action and development cover a wide area, from the efficiency and safety of transport activity, the interest of investors, environmental protection to the evolution of its own human resources and community involvement. CONPET's commitments are always firm and materialize in concrete actions.

CONPET carries out, with due care, an activity that contributes to keeping the world moving, being at the same time a company oriented towards the future and ecological practices, which maintains the right balance between past and future, between tradition and progress.

Sincerely yours,

Cristian-Florin GHEORGHE

CHAIRMAN OF THE BOARD OF DIRECTORS

Statement of the Management

According to the best information available, we confirm that the individual Financial Statements prepared in accordance with IFRS, in accordance with the Order of the Minister of Public Finance no. 2844/2016, with all subsequent amendments and supplements, provide a true and fair view of the financial position of CONPET S.A., its financial performance and cash flows for the year ended December 31, 2024, in compliance with the applicable Accounting Standards, and that the Report of the Administrators provides a true and fair view of the development and performance of the business and the position of the Company, as well as a description of the main risks and uncertainties associated with the expected development of the Company.

Cristian-Florin GHEORGHE
Chairman of the Board of Directors

Nicușor - Marian BUICĂ
Member

Florin – Daniel GAVRILĂ
Member

Luminița – Doina Kohalmi Szabo
Member

Andrei – Mihai ZAMAN
Member

Oana Cristina Tănăsică
Member

Alin – Mihael DĂNILĂ
Member

1. COMPANY PRESENTATION

1.1 Report grounds

The Annual Report of the Board of Directors of CONPET S.A. for the year ended December 31, 2024, was prepared in accordance with:

- Chapter 3 of the Minister of Public Finances' Order no. 2844/2016 for the approval of the accounting Regulations complaint with International Financial Reporting Standards;
- Article 65 of Law no. 24/2017, republished, regarding the issuers of financial instruments and market operations, subsequent amendments and additions;
- Annex no.15 on the requirements of the Annual Report, from Regulation no. 5/2018 regarding the issuers of financial instruments and market operations issued by the Financial Supervisory Authority;
- Art. 56 of the Government Emergency Ordinance no.109/2011 on the corporate governance of the public enterprises, subsequent amendments and additions;
- Chapter VI Art. 7 regarding the Administrator's Obligations provided in the Mandate Contracts concluded between the administrators and CONPET S.A.;
- Art. 20 Para (1) letter (e) of the Articles of Incorporation of CONPET S.A.
- Order of the Minister of Finance no. 85/2024 for regulating aspects related to the report on sustainability
- Corporate Sustainability Reporting Directive (CSRS)
- European Sustainability Reporting Standards (ESRS)

1.2 SUBSTANTIATION DATA

Date of the report	March 25, 2025
Issuer's Name	CONPET S.A.
Registered Offices	no. 1-3 Anul 1848 Street, Ploiesti, Prahova County, Zip Code 100559,
Telephone/facsimile number	0244 401360 / 0244 516451
E-mail / Internet	conpet@conpet.ro / www.conpet.ro
Trade Identification Number at the Trade Register Office	1350020
Trade Registry Number	J29/6/22.01.1991
Regulated market trading the issued securities	Bucharest Stock Exchange, Premium category
Subscribed and paid-up share capital	28,569,842.40 RON
Main features of the issued securities	8,657,528 shares with a nominal value of 3.3 RON/share.
Total market value	652,777,611 RON (75.40 RON/share at 31.12.2024)
Applied accounting standard	The International Financial Reporting Standards

Auditing	The Financial Statements concluded on December 31, 2024 have been audited

1.3 Main activities

CONPET is a strategic company, part of the architecture of the national energy system, being the operator of the crude oil national transport system via pipelines.

Since 2002, CONPET has been the concessionaire of the operation of crude oil, rich gas, condensate and ethane National Transport System, based on the oil Concession Agreement concluded with the National Regulatory Authority for Mining, Petroleum and Geological Storage of Carbon Dioxide (A.N.R.M.P.S.G.).

The Crude Oil, Rich Gas, condensate and Ethane Pipeline Transport System (.) is being defined and regulated by Law no. 238/7.06.2004 - Petroleum Law and Methodological Norms for the enforcement of the Petroleum Law, approved under. 2075/2004. The NTS is part of the State public property, being of strategic importance.

1.4 The company's mission, vision and values

CONPET mission is the operation of the National Transport System via Pipelines under safety and efficient conditions, free access to the available capacity of the system to all solicitors, authorized legal persons, under equal conditions, in a non-discriminatory and transparent manner.

CONPET mainly aims at:

- Operational effectiveness and safety;
- Performance optimization;
- Sustainable development of the company;
- Ongoing training, adaptability and qualitative increase;
- Social responsibility and respect for the environment.

Company's Values:

- Professionalism, effectiveness and performance;
- Ongoing training, adaptability and qualitative increase;
- Social responsibility and respect for the environment.

1.5 Shareholding

CONPET is a publicly owned company, listed at the Bucharest Stock Exchange, under COTE symbol.

The synthetic structure of the Shareholders, on reference date 31.12.2024, is as follows:

- 58.7162% - the Romanian State by the Ministry of Energy;
- 41.2838% - Other shareholders natural or legal persons.

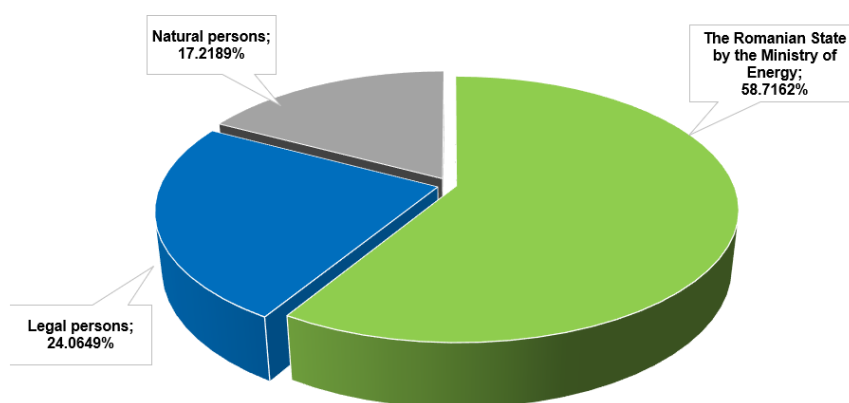


Chart 1 - CONPET S.A. Shareholding Structure on 31.12.2024

The number of CONPET Shareholders registered at Depozitarul Central S.A. at the end of 2024, 16,251 shareholders, is approximately the same with the one registered on 31.12.2023 (16,248 shareholders).

The share capital of CONPET on 31.12.2024 is 28,569,842.40 RON and is divided into 8,657,528 nominative shares, each share with a nominal value of 3.3 RON/share.

CONPET did not perform transactions having as scope its own shares and, consequently, the company does not hold own shares.

1.6 Company Organization

The Company CONPET S.A. was established in 1990, based on the Government Decision no. 1213/1990 regarding the set-up of joint-stock companies in the industry, by taking-over the entire assets and liabilities of I.T.T.C. Ploiești, being the first company established in the oil industry in Romania.

Following the take-over of all assets and liabilities of I.T.T.C. Ploiești, CONPET has become the operator of the crude oil, rich gas, condensate and ethane National Transport System. The crude oil, rich gas, condensate and ethane National Transport System (NTS) is part of the State's public property and bears strategic importance. The NTS is being defined and regulated pursuant to the Oil Law no. 238/07.06.2004 and the Methodological Norms for the Application of the Oil Law, approved pursuant to G.D. no. 2075/2004.

CONPET supplies transport services for its clients via both the National Transport System, conceded under the Concession Agreement and by rail, from the loading ramps to the refineries, for the oil areas which are not connected to the major transport lines.

1.7 Strategic development objectives

The strategic objectives established and assumed by the administrators through the Administration Plan, for the period 2023-2027, were defined in close correlation with the strategic directions, vision and expectations of the tutelary authority.

The strategic objectives are:

- increasing efficiency and improvement of the activity performance;
- ensuring effective management in human resources management;
- selection of company directors based on criteria of professionalism and integrity;
- ensuring modern management by implementing and maintaining risk management, control, ethics, integrity and corporate governance processes;
- Ensuring a balance between the dividend policy and that regarding the provision of the necessary funds for the investment programs undertaken by the company for development and modernization;
- develop new activities, related and non-related to the core business.

2. RELEVANT CORPORATE EVENTS IN 2024 AND AFTER THE DATE OF THE FINANCIAL SITUATIONS

February 28, 2024

The Ordinary General Meeting of Shareholders approved the Investment Program and the Revenues and Expenditure Budget for 2024.

April 25, 2024

The Ordinary General Meeting of Shareholders approved the Annual Financial Statements on the date and for the financial year ended on 31.12.2023. In the same meeting, the OGMS approved the distribution of the net profit for the financial year 2023 and of some amounts of the retained earnings.

October 29, 2024

The Ordinary General Meeting of Shareholders approved the rectified Investment Program and the Revenues and Expenditure Budget for 2024.

February 19, 2025

Starting with the date of 19.02.2025, by the Order of the President of the National Regulatory Authority in the Mining, Petroleum and Geological Storage of Carbon Dioxide no. 99/14.02.2025 regarding the modification of the transport tariffs, published in the Official Gazette of Romania, Part I, no. 146 of 19.02.2025, the new transport tariffs through the National Transport System for crude oil, rich gas, condensate and ethane were approved.

3. CONPET 2024 - EXECUTIVE SUMMARY

3.1 Operating Activity Indicators

The comparative situation of the quantities of products, crude oil, rich gas and condensate, transported and the revenues obtained based on tariffs approved by order of A.N.R.M.P.S.G, as well as revenues from other types of operations related to transport via the NTS, during 2022-2024, is presented below:

Indicators	M.U.	2024	2023	2022	Variation%	
					2024/2023	2023/2022
Total transported quantities	thousand tons	7,131	6,294	7,100	▲ 13.3%	▼ 11.4%
Total transport revenues	million RON	531.4	482.9	469.9	▲ 10.0%	▲ 2.8%

Table 1 - Evolution of the transported quantities and transport related revenues during 2022-2024

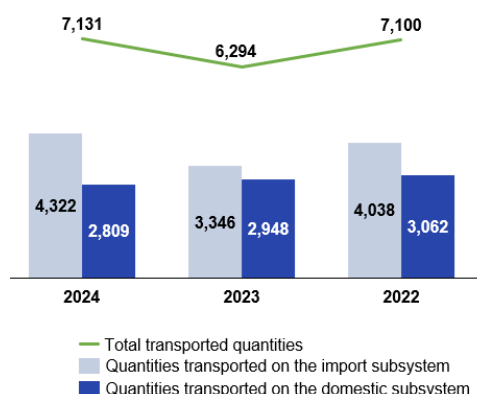


Chart 2 - Evolution of the quantities transported on the Domestic and Import subsystems during 2022 -2024 (Ktons)

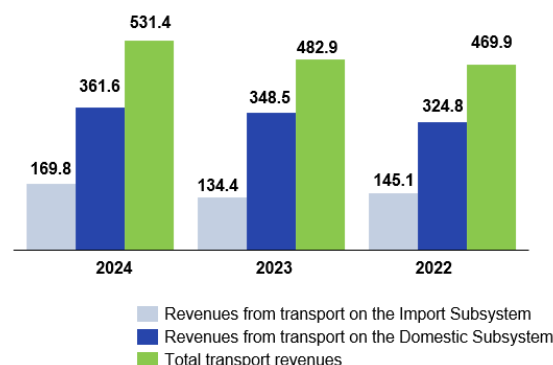


Chart 3 - Evolution of the revenues transported on the Domestic and Import subsystems during 2022-2024 (mRON)

3.2. Financial Results Indicators

The economic and financial activity of CONPET S.A. in 2024 was performed based on the revenues and expenditure budget.

The comparative evolution of the main indicators of financial results in the period 2022-2024, as well as the change in comparison to the budget, is presented as follows:

2024		Variation (%) Achieved/Budget	Indicators (mRON)	2024	2023	2022	Variation%	
Achieved	Budget						2024/2023	2023/2022
533.6	530.5	▲ 0.6%	TURNOVER	533.6	485.1	472.2	▲ 10.0%	▲ 2.7%
606.3	601.3	▲ 0.8%	Operating revenues, out of which:	606.3	540.9	522.1	▲ 12.1%	▲ 3.6%
531.4	528.5	▲ 0.6%	Transport revenues	531.4	482.9	469.9	▲ 10.0%	▲ 2.8%
556.8	553.2	▲ 0.7%	Operating Expenses	556.8	474.5	459.3	▲ 17.3%	▲ 3.3%
49.5	48.1	▲ 2.9%	EBIT (operating profit)	49.5	66.4	62.8	▼ 25.5%	▲ 5.7%
79.2	78.3	▲ 1.2%	Value adjustments of fixed assets, less adjustments related to rights of use resulted from leasing contracts	79.2	61.5	53.1	▲ 28.8%	▲ 15.8%
128.7	126.4	▲ 1.8%	EBITDA	128.7	127.9	115.9	▲ 0.6%	▲ 10.4%
6.0	4.5	▲ 33.3%	Financial Result	6.0	6.4	9.3	▼ 6.3%	▼ 31.2%
55.5	52.6	▲ 5.5%	EBT (gross profit)	55.5	72.8	72.1	▼ 23.8%	▲ 1.0%
49.3	44.3	▲ 11.3%	NET PROFIT	49.3	61.6	61.7	▼ 20.0%	▼ 0.2%

Table 2 - Evolution of the results from the operating and financial activity 2022 - 2024 and 2024 vs. Budget

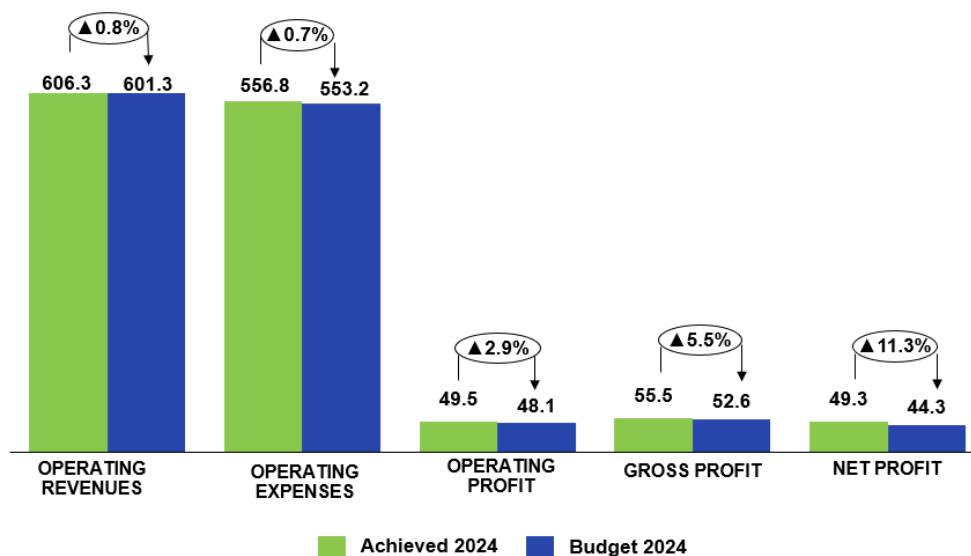


Chart 4 - Analysis of the indicators achieved in 2024 as compared to Budget (mRON)

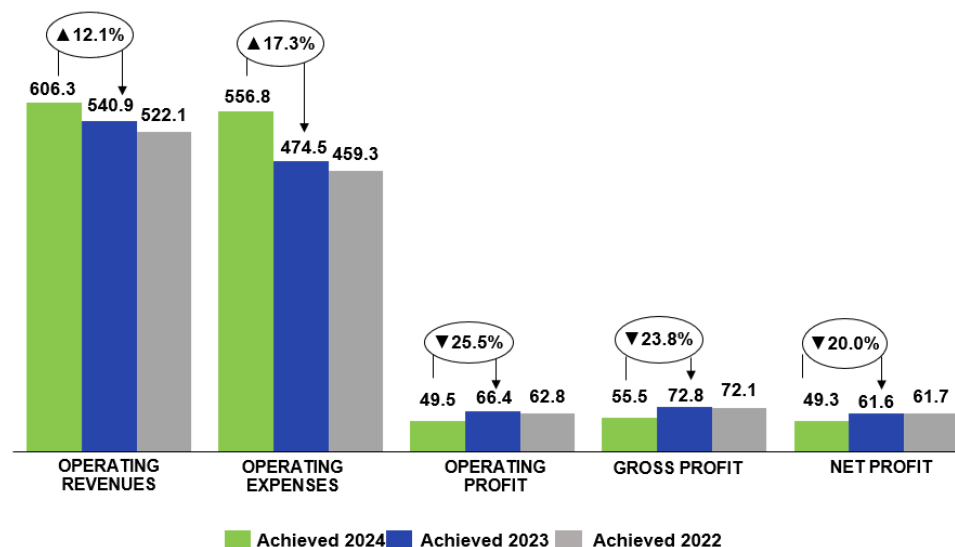


Chart 5 - Analysis of the indicators achieved during 2022-2024 (mRON)

In 2024, the turnover recorded an increase of 10.0% as compared to the level achieved in 2023. Compared to the budget, the turnover increased by 0.6% (3.1 mRON). The operating profit is in the amount of 49.5 mRON, 2.9% over the budgeted level.

As compared to 2023, the operating profit registered a decrease by 25.5% (16.9 mRON). The net profit related to 2024 is 49.3 mRON, 11.3% higher (5 million RON) than the budget. Compared to 2023, the net profit decreased by 20% (12.3 mRON).

CONPET is a company paying substantial contributions to the consolidated State budget. The total amount paid in 2024, to the state budget, was 206 million RON, out of which the most important taxes and fees paid are:

VAT	65 mRON
Tax on salaries and related contributions	83 mRON
Corporate tax	12 mRON
Oil royalty	46 mRON

3.3 Investment Activity Indicators

The investment projects within CONPET SA mainly target an increase of the efficiency of the transport activity and are financed from the modernization quota.

The investment objectives financed from the modernization quota are included in the rehabilitation, modernization and development programs and are approved annually by the National Regulatory Authority for Mining, Petroleum and Geological Storage of Carbon Dioxide (A.N.R.M.P.S.G.).

The degree of achievement of the investments, as compared to the program and the similar period in 2023, by ownership of assets, is as follows:

2024		Degree of achievement	Investments	2024	2023	2022	Degree of achievement	
Program	Achieved						2024/2023	2023/2022
85,000	70,445	82.9%	Total investments, out of which:	70,445	83,062	148,712	84.8%	55.9%
65,000	56,139	86.4%	Public domain	56,139	71,580	137,008	78.4%	52.2%
20,000	14,306	71.5%	Operating domain	14,306	11,482	11,704	124.6%	98.1%

Table 3 - Investments achieved years 2024 vs. program and compared to the period 2022-2024(kRON)

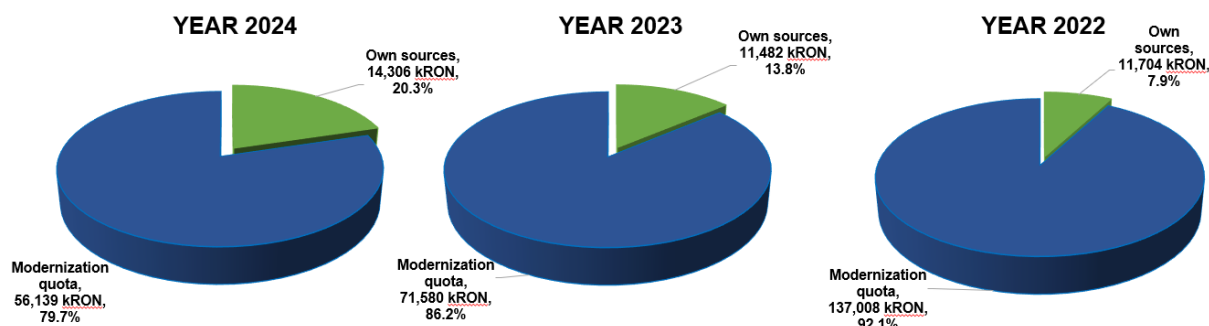


Chart 6 - Share of investments by financing sources in 2022 -2024

3.4 Company's Stock Market Indicators

The market capitalization amounted to 652.78 million RON (75.40 RON/share) on 31.12.2024, respectively 708.19 million RON (81.80 RON/share) on 31.12.2023.

The evolution of COTE shares and market capitalization during 2022 - 2024 is as follows:

Indicators	M.U.	Dec. 31, 2024	Dec. 31, 2023	Dec. 31, 2022
COTE closing price	RON/share	75.40	81.80	67.80
Market capitalization	million RON	652.78	708.19	586.98
	million Euro	131.17	142.36	118.64

Table 4 - Evolution of COTE share and market capitalization during 2022 - 2024

On 31.12.2024, CONPET S.A. ranked 34 according to capitalization, with a value of 652.78 million RON, holding a share of 0.19% in total market capitalization.

The Company CONPET S.A. is being included in 6 indices out of 10 of the Bucharest Stock Exchange, namely BET-NG, BET-XT, BET-XT-TR, BET-BK, BET-XT-TRN and BET Plus. Following the quarterly index review carried out by the global index provider MSCI, starting with 01.09.2023, CONPET was included in the MSCI Frontier IMI and MSCI Romania Investable Market Indices (IMI).

In 2024, 13,452 stock transactions have been recorded, with a traded volume of 504,432 shares, the total value of the transactions being 42.08 million RON. During 01.01.2024 - 31.12.2024, the minimum trading price amounted to 73 RON/share and the maximum price of 91.8 RON/share. On average, 2,018 shares/day have been traded, the average value of a trading day amounting to 168,327 RON/day (250 days).

The net profit per share is 5.70 RON/share in 2024.

4. ANALYSIS OF THE COMPANY'S BUSINESS

4.1 Analysis of the operating activity

4.1.1 The regulatory Framework

CONPET SA is the operator of crude oil, rich gas, condensate and ethane National Transport System (NTS). The transport service is being supplied under the natural monopoly regime based on the tariff set by A.N.R.M.P.S.G..

The NTS is being defined and regulated pursuant to Oil Law no. 238/7.06.2004 and the Methodological Norms for the Application of the Oil Law, approved pursuant to GD no. 2075/2004.

4.1.2 The crude oil, condensate, rich gas and ethane transport activity

CONPET S.A. supplies transport services for its clients both via NTS according to the Oil Concession Agreement of the National Transport System of crude oil, rich gas, condensate and ethane, as well as by rail, from the loading ramps to the refineries, for the oil areas not connected to the transport major pipelines.

The NTS was built taking into account the natural distribution of the oil fields, so as to ensure the transport of crude oil from all these fields to the refineries. The system operation is being made based on the local dispatch centers, coordinated from the Company's Central Dispatch.

The pipeline network of the NTS is approximately 3,800 km long, currently being used a pipeline network of 3,161 km.

The Crude Oil, Rich Gas, Condensate and Ethane Transport System has in composition more transport subsystems, as follows:

- **The domestic crude oil and condensate transport subsystem:** consisting of pipelines through which crude oil and condensate are transported from extraction units throughout the country to refineries. The domestic crude oil and condensate production is transported both via pipelines and by rail or combined (rail and pipelines).
- **The rich gas transport subsystem:** is meant for the rich gas transport from the rich gas separation units in Ardeal (Calacea și Abrămuț) to Petrobrazi refinery.
- **The ethane transport subsystem** provides the ethane transport from Turburea ethane separation platform to Arpechim Pitesti refinery. Currently, due to the inactivity of the Arpechim refinery, the subsystem is used only on the pipeline section linking Hurezani and Căpreni warehouses to Petrobrazi refinery, for the transport of condensate.
- **The import crude oil transport subsystem** ensures the transport of crude oil from the Oil Terminal Constanta to the refineries in Ploiești (Petrobrazi și Lukoil), Arpechim-Pitești terminal and Petromidia refinery.

The transport of quantities of domestic crude oil, imported crude oil, rich gas and condensate is carried out from the product delivery points by producers or importers, from the extraction areas or from the Oil Terminal, to the processing units (refineries), using the facilities at the pumping stations and reception points.

These facilities shall consist of crude oil and condensate storage tanks, tanks for the storage of rich gas, technological pipes from the pumping/receipt warehouses, pumping aggregates, major pipelines, crude oil and rich gas loading and unloading ramps, rail tank cars.

For the crude oil, rich gas and condensate transport service, CONPET has to develop, on an annual basis, a proper transport program so as to provide free access to the available capacity of the system to all applicants, authorized legal persons, under equal conditions, on a non-discriminatory and transparent basis.

The available throughput represents the difference between the total physical throughput of the system and the crude oil scheduled for transport in the given year.

The transport contracts signed with the beneficiaries of the services are compliant with the regulated frame contract approved by A.N.R.M.P.S.G. and provide the legal framework for the supply of the transport services.

The transported volume by type of products (crude oil, rich gas and condensate), programmed and achieved in 2024 and the extent of usage of the transport throughput, is as follows:

Transport Subsystem	Indicators and products	2024	2023	2022	Variation (%) 2024/2023
DOMESTIC	Domestic crude oil, condensate and light condensate				
	- programmed quantities (thousand tons)	2,789	2,982	3,058	▼ 6.5%
	- achieved quantities (thousand tons)	2,792	2,930	3,045	▼ 4.7%
	- degree of achievement	100.1%	98.3%	99.6%	+1.8 p.p.
	- degree of use of the transport throughputs	45.2%	47.4%	49.2%	-2.2 p.p.
	Rich gas				
	- programmed quantities (thousand tons)	14	11	9	▲ 27.3%
	- achieved quantities (thousand tons)	17	18	17	▼ 5.6%
	- degree of achievement	121.4%	163.6%	188.9%	-42.2 p.p.

Transport Subsystem	Indicators and products	2024	2023	2022	Variation (%) 2024/2023
	- degree of use of the transport throughputs	23.4%	24.0%	24.7%	-0.6 p.p.
	Total domestic subsystem				
	- programmed quantities (thousand tons)	2,803	2,993	3,067	▼ 6.3%
	- achieved quantities (thousand tons)	2,809	2,948	3,062	▼ 4.7%
	- degree of achievement	100.2%	98.5%	99.8%	+1.7 p.p.
	- degree of use of the transport throughputs	44.9%	47.1%	49.0%	-2.2 p.p.
IMPORT	Imported crude oil				
	- programmed quantities (thousand tons)	4,272	3,358	4,039	▲ 27.2%
	- achieved quantities (thousand tons)	4,322	3,346	4,038	▲ 29.2%
	- degree of achievement	101.2%	99.6%	99.9%	+1.6 p.p.
	- degree of use of the transport throughputs	35.7%	27.7%	34.2%	+8.0 p.p.
TOTAL	- programmed quantities (thousand tons)	7,075	6,351	7,106	▲ 11.4%
	- achieved quantities (thousand tons)	7,131	6,294	7,100	▲ 13.3%
	- degree of achievement	100.8%	99.1%	99.9%	+1.7 p.p.
	- degree of use of the transport throughputs	38.9%	34.3%	39.3%	+4.6 p.p.

Table 5 - Transported quantities by types of products between 2022-2024

The degree of use of the transport system in 2024 was up by 4.6 p.p. vs. 2023, due to the increase, by 837 thousand tons, of the transported quantities.

Out of the total quantity of crude oil, condensate and rich gas from domestic production, transported and delivered, approximately 33.5% (942 thousand tons) were transported by rail.

The evolution of the standardized technological consumption per product as recorded between 2022 -2024, is as follows:

Products	2024			2023			2022		
	Standardized	Achieved	Variation	Standardized	Achieved	Variation	Standardized	Achieved	Variation
Imported crude oil	0.240%	0.183%	-0.06 p.p.	0.260%	0.195%	-0.065 p.p.	0.244%	0.171%	-0.073 p.p.
Domestic crude oil, condensate and light condensate	0.372%	0.363%	-0.01 p.p.	0.368%	0.350%	-0.018 p.p.	0.368%	0.361%	-0.007 p.p.
Domestic rich gas	7.383%	2.627%	-4.76 p.p.	7.383%	3.179%	-4.204 p.p.	7.383%	3.367%	-4.016 p.p.

Table 6 - The evolution of the standardized technological consumption as compared to the one achieved between 2022-2024

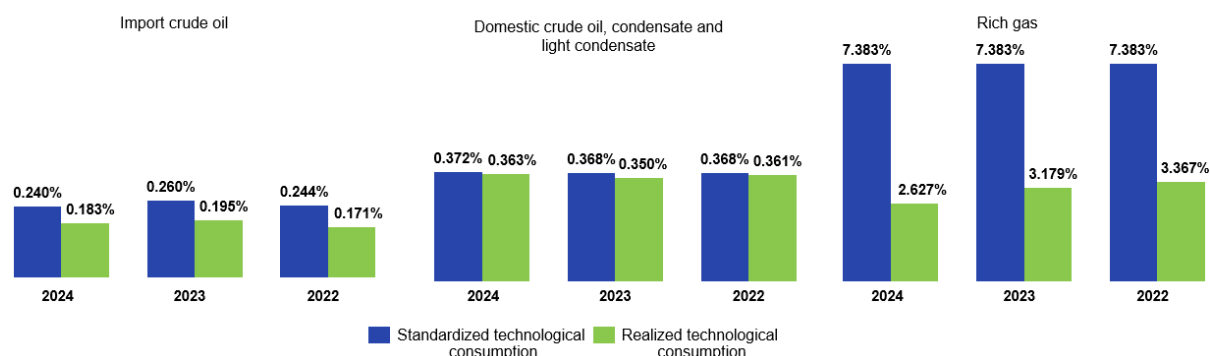


Chart 7 - The evolution of the technological standardized consumption as compared to the one achieved during 2022-2024

The technological consumption recorded during transport are within the permissible limits, provided in the transport contracts.

The tariffs for the supply of the crude oil, rich gas, condensate and ethane are regulated and approved by the National Regulatory Authority in the Mining, Petroleum and Geological Storage of Carbon Dioxide and are distinguished for each transport subsystem.

For the transport of crude oil through the Import subsystem, differentiated tariffs are applied depending on the intervals of transported quantities.

In the reporting period, the following tariffs were applied:

- Tariffs from transport services on the Domestic Subsystem

Period	Transport Tariffs RON/ton	Approved by NAMR Order no.
January 1, 2023 - December 31, 2023	117.95	364/2022
starting January 1, 2024	128.00	340/2023

Table 7 - Transport tariffs Domestic Subsystem

- Tariffs for transport services on the Import Subsystem

Period	Batches	Arpechim Refinery	Ploiesti Basin *)	Petromidia Refinery	Approved by NAMR Order no.
	thousand tons/month	RON/ton	RON/ton	RON/ton	
January 1, 2023 - December 31, 2023	no more than 80	52.25	51.60	20.73	364/2022
	between 80-120	41.80	41.28	16.59	
	between 120-160	31.35	30.96	12.44	
	over 160	23.51	23.22	9.33	
Starting 01.01.2024	no more than 80	55.00	39.85	26.50	340/2023
	between 80-120	54.79	39.70	26.40	
	between 120-160	54.59	39.55	26.30	
	over 160	54.38	39.40	26.20	

*) Petrobrazî Refinery and Lukoil Refinery

Table 8 - Transport tariffs through the Import Subsystem

The transport tariffs include a modernization quota meant exclusively for the financing of the investments related to the National Transport System.

The company holds a monopoly position in the pipeline transport market, not having competitors in its main area.

Transport services are performed based on contracts concluded with customers, developed according to the framework contract approved annually by the National Regulatory Authority for Mining, Petroleum and Geological Storage of Carbon Dioxide (ANRMPSG).

The revenues from the provision of transport services and invoiced to beneficiaries increased by 10.0% compared to 2023, reaching the value of 531.4 million RON.

The statement on revenues for each client and their share in the total transport revenues are as follows:

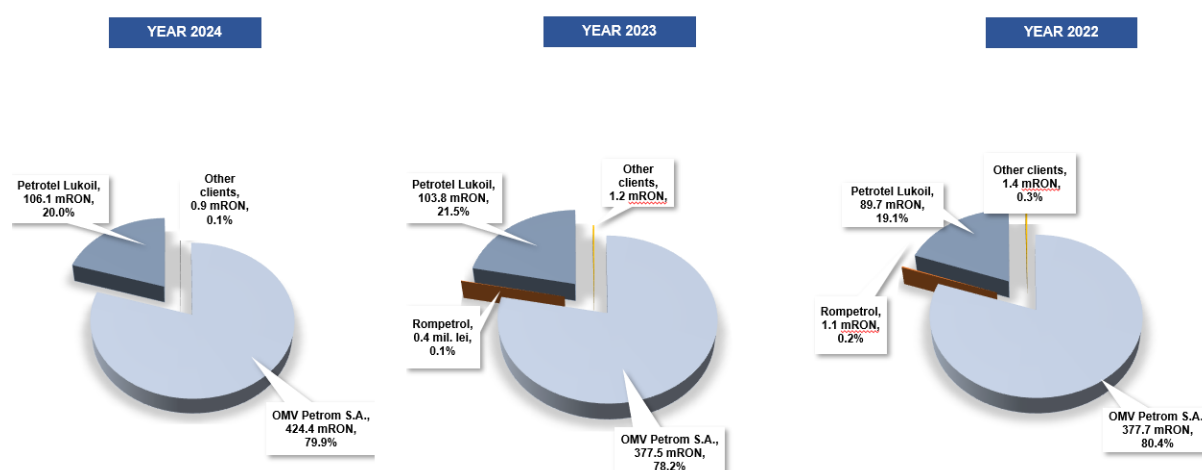


Chart 8 - The evolution of the transport revenues per clients, achieved during 2022-2024

The transport services supplied by the company are addressed to a reduced number of clients, the quantities of crude oil transported being closely related to their commercial policy.

The revenues from the transport services supplied for OMV Petrom account for 79.9% in the total transport revenues of the company.

4.1.3 Other activities

The revenues from other activities hold a share of 0.4% in turnover decreasing by 0.6% (14 thousand RON) compared to 2023, coming from leases of land and telecommunication equipment, rail shunting etc.

4.1.4 Analysis of the operating activity

In the table below is presented the evolution of the transport services supply and other services, for the period 2022-2024:

Indicators	2024	2023	2022	Variation%	
				2024/2023	2023/2022
Revenues from transport services Domestic Subsystem	358,670	343,752	321,320	▲ 4.3%	▲ 7.0%
Revenues from transport services Import Subsystem	167,786	130,096	144,044	▲ 29.0%	▼ 9.7%
Total Transport Revenues*)	526,456	473,848	465,364	▲ 11.1%	▲ 1.8%
Revenues from other operations related to transport by NTS	4,935	9,025	4,493	▼ 45.3%	▲ 100.9%
Total general transport revenues	531,391	482,873	469,857	▲ 10.0%	▲ 2.8%
Revenues from rents	1,906	2,078	1,966	▼ 8.3%	▲ 5.7%
Other revenues	321	163	410	▲ 96.9%	▼ 60.2%
Turnover	533,618	485,114	472,233	▲ 10.0%	▲ 2.7%

*) Revenues related to transported quantities for which tariffs regulated by A.N.R.M.P.S.G. are applied

Table 9- Evolution of turnover revenues during 2022- 2024(kRon)

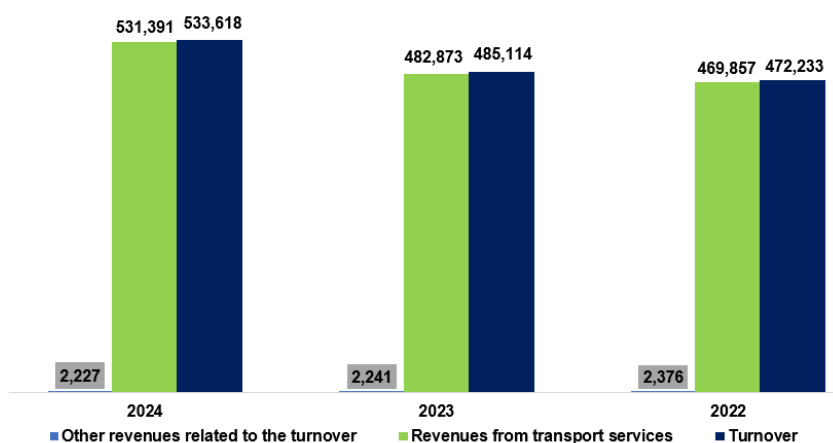


Chart 9 - Evolution in turnover during 2022 - 2024 (thousand RON)

4.1.5 Analysis of the supply activity

Procurement activity

The procurement activity performed in compliance with the provisions of the Internal Procurement Norms of CONPET S.A. and other internal procedures.

During January-December 2024, have been initiated 120 procurement and concluded 117 contracts in total amount of 95,442 thousand RON and 2,128 thousand Euro.

At the end of December, a number of 3 procurement procedures were in progress, in total estimated value of 10,768 thousand RON.

The contracts for the procurement of products and works with a value higher than 500,000 euros and the services procurement contracts with values higher than 100,000 Euro, concluded between 01.01.2024 - 31.12.2024, were presented in the form of annexes to the

preliminary report drawn up for the year 2024, uploaded on the CONPET website on February 27, 2025.

The List of important contracts concluded by the company in 2024 is presented in **Annex no. 5**.

4.1.6. Legal papers concluded according to Art. 52 para. (1) and (3), GEO no. 109/2011

According to the provisions of Article 52 para. (6) of GEO no. 109/2011 "In the half-yearly and annual reports of the Board of Directors [...] shall be mentioned, in a special chapter, the legal acts concluded under the conditions of para. (1) and (3), [...]".

The transactions concluded according to Article 52 of GEO no. 109/2011 in 2024H2 can be found in **Annex no. 2**.

4.1.7 Company mergers and reorganizations, procurements and disposals of assets

There were no mergers and reorganization activities in the reported period, January – December 2024.

The company has no open subsidiaries in Romania or abroad.

Purchases of tangible and intangible assets in the period January - December 2024 were made in accordance with the investment program and the approved revenues and expenditure budget and are intended for deployment and modernization. In 2024, an urban land with the use category of construction-yards was purchased from OMV Petrom, through a sale-purchase contract, with a measured area of 4,820 m.p. on which an industrial railway line is located, with a built-up area of 630 sq.m., for crude oil transport activities from the loading ramp located in the Suplacul de Barcău locality.

4.1.8 Development of the internal control management system

The internal/management control system

The company CONPET S.A., defined as a public entity in accordance with the Order of the Secretary General of the Government No. 600/2018, applies the Code of the internal control management of public entities approved by the aforementioned legislation.

CONPET S.A. does annual self-assessment of the degree of implementation of the internal control management standards and reports in accordance with the legal requirements.

According to the provisions of OGSG no. 600/2018 for approving the Internal Control Management Code of public entities, the Monitoring committee of the internal control management system was appointed, by decision of the Director General.

The Monitoring committee of the internal control management system has the following duties:

- Draws up the Development Program of the internal control management system covering the objectives of CONPET S.A. in internal control management, including, for each standard of internal control management, activities, officers in charge and deadlines, as

well as other relevant elements in implementing and developing the internal control management system.

- Surveys the deployment and provides upgrade of the development program of the internal control management system.
- Coordinates the process of updating the general and specific objectives, the procedure activities, the risk management process, the system performance monitoring, the procedure situation and the monitoring and, respectively, information to the Director General.
- Centralizes, by means of the technical secretariat provided by the Management Systems and Managerial control Department, the significant risks in the Risk Registry of CONPET S.A., based on the identification of risks by the risk management teams at divisions, departments and offices directly subordinated to the Director General.
- Analyzes and gives priority to significant risks, that might affect achieving the objectives of CONPET S.A., by establishing the risk profile and risk tolerance.
- Analyzes and endorses annually the risk profile and the risk tolerance limit proposed by the technical secretariat based on the Risk Registry within CONPET S.A. and submits to approval of the Director General.
- Analyzes the annual plan of implementation of the control measures for the significant risks within CONPET S.A., drafted by the technical secretariat and submits to the approval of the Director General.
- Drafts, through the technical secretariat, annual information to the Director General, approved by the President of the Monitoring Committee, on the deployment process of risk management and monitoring of performance at CONPET SA, based on reports from the directorates, departments and bureaus directly subordinated to the Director General.
- Analyzes the annual Report on internal control management system and submits it for the approval to the Director General.
- Analyzes and endorses the Report on the stage of implementation of the actions of the Program for the development of the internal control management system, elaborated according to the provisions of the operational procedure "Monitoring and reporting of key performance indicators.

The Commission shall cooperate with all organizational entities so as to implement and develop the internal control management system. Each member of the Monitoring Committee is responsible for fulfilling the tasks from the development program of the internal control management system and for compliance with established deadlines.

The Internal Public Audit Office shall advise the Monitoring Commission and attend its meetings. The Internal Public Audit Bureau monitors the activities of the Monitoring Commission and regularly informs the Director General on the activity of the Monitoring Committee and the problems they are facing and which may affect the process of implementing and maintaining the internal control management system.

The Development Program of the internal control management system of CONPET is analyzed annually, on the self-evaluation of the implementation degree, according to O.S.G.G. no. 600/2018. The development program of the internal control management system of CONPET S.A. for 2023 has been approved by the Director General.

According to the provisions of the system procedure "Setting the objectives of CONPET S.A.", specific SMART objectives have been defined and approved for 2024, at the level of

all organizational entities. During 2024, some of the specific objectives were revised because of changing the assumptions/premises underlying their formulation.

In 2024, meetings of all risk management teams (EGR) were held, in which each team reassessed the risks corresponding to the established objectives and analyzed the status of implementation of control measures. Control measures have been proposed to mitigate risks, as well as deadlines for their implementation, according to the provisions of the system procedure "Risk management". The significant risks and their control measures were the subject of debate within the meetings of the Commission for the monitoring of the internal control management system.

Following these sessions, the risk profile at CONPET S.A. level is as follows:

- 121 tolerable risks (with exposures from 1-4);
- 75 high tolerability risks (exposure between 5-8);
- 9 low tolerability risks (exposure between 9-12);
- 0 intolerable risks (exposure 15-25).

The risk profile at CONPET S.A. in 2024 as compared to 2023 and 2022, is as follows:

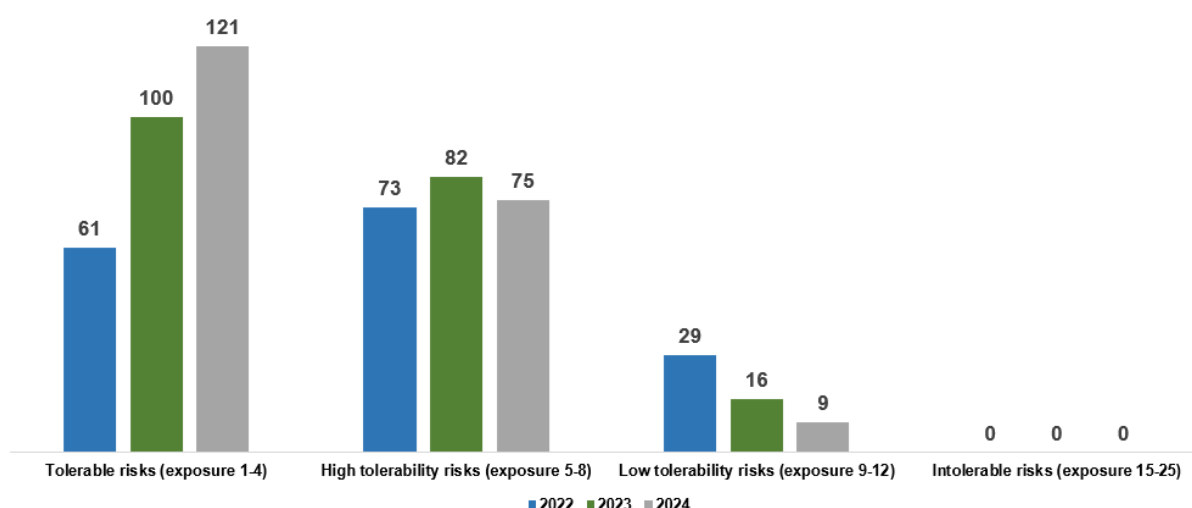


Chart 10 - Risk profile CONPET SA- comparative presentation 2022-2024

The Technical Secretariat of the Monitoring Committee has drafted the Significant Risk Registry within CONPET S.A. (with a tolerance level higher than or equal to 9). The actions to deal with significant risks were centralized and the Annual Plan for the implementation of control measures for significant risks was developed.

Based on the Risk Register at CONPET level and the methodology established by the system procedure "Risk Management", the risk tolerance limit at CONPET S.A. level for 2024 is exposure maximum 12, the risk appetite being at a medium level. The management of the company does not tolerate risks with exposure higher than 12. If the exposure of a risk increases above the tolerance limit, the Monitoring Commission shall meet for an analysis/proposal of urgent measures. Following the risk analyses carried out during 2024, no intolerable risks were identified.

In 2024, all the actions included in the development program of the internal control management system at CONPET S.A. have been made within the deadlines set in the program.

Following the self-assessment of the internal control management system in accordance with OGSF no. 600/2018, it has been declared compliant on 31.12.2024 with all 16 implemented standards.

The results of the self-assessment and the details regarding the stage of implementation and development of the internal control system were included in the Report on the managerial internal control system and in the centralizing situation regarding the stage of implementation, on December 31, 2024 (**Annex no.4**). These reports were also communicated to the tutelary authority.

The maintenance and improvement of the integrated management system

Certification of the **Integrated management system quality - environment - occupational health and safety** was held for the first time in September 2007 with recertification every three years.

In September 2016 **the energy management system** certification took place, implemented and integrated with previous management systems.

Following the external recertification audit, carried out by the BUREAU VERITAS body, in September 2022, the certificates for the management systems of quality, environment, health and safety at work and energy were issued:

- Certificate no. RO22. RO22.4340383Q, in accordance with the requirements ISO 9001:2015;
- Certificate no. RO22. RO22.4340383E, in accordance with the requirements ISO 14001:2015;
- Certificate no. RO22. RO22.4340383S, in accordance with the requirements ISO 45001:2018;
- Certificate no. CZE - 2200254, in accordance with ISO 50001:2018 requirements.

Between 16 and September 20, 2024, the external surveillance audit took place for the management systems of quality, environment, health and safety at work, energy, according to the requirements of ISO 9001:2015, ISO 14001:2015, ISO 45001:2018 and ISO 50001:2018, audit performed by the BUREAU VERITAS certification body.

Following the external surveillance audit for the management systems of quality, environment, occupational health and safety, energy, no non-conformities were identified.

The audit team of the BUREAU VERITAS body concluded that the organization CONPET S.A. has established and maintained an integrated management system in accordance with the requirements of the reference standards and has demonstrated its ability to meet the requirements according to the policy, objectives and scope of the organization. As a result, the certification body BUREAU VERITAS recommended maintaining the certificates for quality, environment, occupational health and safety and energy management systems, issued for the organization CONPET S.A.

Starting 2010, within CONPET S.A. **the railway safety management system** is being implemented and maintained in accordance with the national legal requirements on railway

safety, in compliance with the national legal requirements on rail safety and the reference European directives. The field of application of this system includes railway ramps where CONPET carries out railway shunting, for which the company holds the “License for the performance of rail transport services (railway shunting)”, granted by the Romanian Railway Authority (AFER)

Also, for the railway ramps where CONPET S.A. only performs railway shunting in its own interest/for third parties/on an industrial railway line that is not the property of the company, the Romanian Railway Safety Authority (A.S.F.R.) issued the Single Safety Certificate, in accordance with the provisions of the Order of the Minister of Transport, Infrastructure and Communications no. 743/ 2020 for the issuance of the single safety certificate to operators who only carry out railway shunting on Romanian railways. The certificate is updated whenever CONPET S.A. requests the amendment of Annex B containing the list of motor railway vehicles with which the company carries out the railway shunting.

On 31.12.2024, the Single Safety Certificate No. OMF 2024007 is in force, valid until 20.09.2025.

Starting January 2021, within CONPET **the anti-bribery management system** implementation program has been deployed, as required by SR ISO 37001:2017, program which finalized in June 2022.

In July 2022, following the external audit performed by the certification body SRAC CERT, the following certificates have been issued:

- SRAC nr.28/13.07.2022;
- IQNet nr. RO-0028/13.07.2022

asserting compliance with the requirements of the anti-bribery management system implemented by CONPET S.A. in compliance with the requirements of ISO 37001 standard.

Following the external surveillance audit of June 2024, the SRAC CERT certification body recommended maintaining the compliance certificate no. 28/13.07.2022 for the anti-bribery management system implemented in the CONPET S.A. organization.

In order to determine the effectiveness of the integrated quality - environment - health and safety - energy – and railway safety management system, in May 2024 the Management Analysis no. 32 was carried out.

All the actions included in the Action Plan of AEM 32 have been implemented.

Within the energy management system, the energy objectives and targets for the year 2024 were established as follows:

Energy objective 2024	Energy target 2024
O1: Maintaining energy efficiency for electricity use.	O1/T1: Maintaining the annual average of the specific technological consumption of electricity in the Transport Operations Unit at a maximum level of 3.2 KWh/ton produced. O1/T2: Maintaining the electricity annual average consumption in Conpet administrative buildings at the level of the reference period 2019.
O2: Increasing energy efficiency for the uses of natural gas.	O2/T1: Reducing natural gas consumption at CONPET as compared to the reference period 2019.

Energy objective 2024	Energy target 2024
O3: Increasing energy efficiency for uses of diesel.	O3/T1: Reduction of specific diesel consumption for the rail shunting within CONPET as compared to the 2019 reference period.
O4: Increasing energy efficiency for the uses of automotive fuels.	O4/T1: Maintaining the auto fuel consumption in CONPET as compared to the reference period 2019.
O5: Increasing energy performance for the uses of water	O5/T1: Maintaining water consumption at CONPET level, for every location by the observance of the Water Management Rights Permit.

Table 10 - Energy objectives and targets 2024

In order to meet these targets, was developed and approved the document: "Action plan for achieving 2024 energy objectives and targets".

The status of the actions included in this plan will be reported by the Energy Manager in the next management review meeting, which will review the entire year of 2024.

The internal audit of the integrated quality– environment– occupational health and safety management system and the railway safety management system shall provide information regarding the compliance with the requirements of the references and applicable legal requirements. Internal audits are also aimed at assessing the effectiveness and continuous improvement of the implemented management systems.

The internal audits were conducted in accordance with the approved program for the year 2024 and the audit criteria established in the audit plans. The results were communicated to the audited people by distributing the audit reports, to which were attached reports of non-compliance and corrective action opened during audits. The company annually provides resources to develop adequate internal audit, mandatory requirement of the reference standards SR SR EN 9001:2015, SR SR EN ISO 14001:2015, SR ISO 45001:2023, SR EN SR 50001: 2019 EN ISO 37001:2017, as well as the regulations on railway safety.

4.1.9 Risk management

Within CONPET S.A. the Internal Control Management System has been implemented and developed, containing the 16 standards included in the Internal control management code of the public entities.

Implementation of the requirements of standard no. 8 "Risk management" was a priority, by documenting and applying the provisions of the "Risk Management" process documents (process sheet, flow diagram and system procedure).

In 2024 have been identified, assessed/reassessed and centralized risks that may affect the achievement of objectives. At CONPET level, a significant risk register (with exposure level equal to or higher than 9) and an annual plan containing measures to control significant risks, responsible and timeframes for the measures were developed.

In paragraph 4.1.8 "The development of the internal management control system" includes detailed information on risk management in 2024 within CONPET SA..

During 2024, the executive management developed the "Risk Management Policy", through which the company's top management commits to:

- Develop a culture of risk-based approach in all its processes and decisions and encourage immediate reporting of any new risks identified by any employee.
- Establish, maintain and document appropriate risk assessment methods, plan and monitor significant risk control measures.
- To allocate necessary resources for risk management, namely resources for staff training/instruction/awareness and resources for implementing approved measures to address risks.
- Establish clear responsibilities of personnel involved in risk management.
- To systematically report relevant risk management data to stakeholders.

The "Risk Management Policy" was approved by the Decision of the Board of Directors of CONPET S.A. no. 22/ 29.10.2024 (art. 1) and was posted on the company's website, to be available to relevant stakeholders.

As regards the risks which may affect the strategic objectives of CONPET S.A., the updated information for 2024 is the following:

- Operational risk

Operational risk comes from the Degradation of the National Pipeline Transport System (NTS) due to the low level of utilization (small quantities, reduced frequency) and the potential escalation of the criminal acts related to pipeline attacks bearing significant impact on the National Transport System via pipelines and the environment and the impossibility to carry out railway transport schedules for reasons exclusively related to the railway operator.

In order to control these risks, measures have been established such as: redefining the transport infrastructure according to the demand perspective, extending the implementation of the pipeline leak detection and location system, calculating penalties according to the contract or purchasing the rail transport service with another railway operator for routes on which the pipeline transport program is not achieved.

- The Market Risk

The market risk stems from the fact that the company is not interconnected to other transport systems in the region, being strictly dependent on the level of crude oil processing in Romanian refineries.

With the support of the main shareholder, the Ministry of Energy , and the Activity Regulatory Authority (National Agency for Mineral Resources – A.N.R.M.), CONPET is making efforts to identify new opportunities that will lead to increasing the use of the system, while getting involved in regional projects started in its industry, as well as in developing activities related to the core business (provision of crude oil storage services/petroleum products, provision of crude oil transport services with own road tankers etc.).

- Credit Risk

Credit risk is the risk that the company bears the financial loss due to the failure of contractual obligations by a customer or counterpart to a financial instrument, and this risk results mainly from trade receivables, cash and cash equivalents and short-term investments of the company.

The company is less exposed to this risk due to the specific nature of the services sold, which are aimed at large companies with a particular financial situation.

The company has implemented a series of policies that ensure that the sale of services are made to customers with a rapid collection. The value of net claims (without adjustments for depreciation) represents the maximum amount at risk of collection.

Credit risk related to trade receivables is low because of the regular collection of counter transport services and guarantees received from customers (letters of guarantee). Even though there is significant concentration, the customer base is extremely low, the management considers that the commercial credit risk is low.

- Risk related to the regulation and authorization

It is identified whenever the company must obtain and periodically renew a series of approvals, authorizations, obtain certificates and attestations. The company is subject to a large volume of regulations in various fields, which can lead to additional expenses and delays in starting or completing works, with possible negative effects on achieving objectives.

The regulatory framework from the point of view of environmental protection applicable to CONPET S.A. is complex due to the activity of crude oil/ condensate/ transport gas via pipelines and railways and, for good compliance all applicable legal requirements and how to implement them have been identified in separate registers elaborated on environmental factors (water, soil-basement, air, protected areas), regulations (permits), SEVESO, waste.

Controlling the risk related to the regulatory framework is done by closely monitoring newly emerged legal requirements or changes in applicable regulations, as well as by implementing the necessary actions to comply with them. It is also considered to develop and submit proposals for amendments appropriate to the framework in which CONPET operates, when draft regulations are under public debate.

- LIQUIDITY RISK

The liquidity risk is the Company's risk of facing difficulties in the achievement of the liabilities associated with the financial debts that are being settled in cash or by the transfer of other financial assets.

The liquidity risk is managed by the Company's management by the application of a permanent insurance policy of liquidity meant to cover the settlement of the due financial liabilities.

- Exchange Rate Risk

The company may be exposed to fluctuations in the exchange rate of the currencies by means of cash and cash equivalents, short-term investments, long-term loans or trade liabilities expressed in foreign currencies.

The functional currency of the Company is the Romanian Leu. Currently, the company is exposed to currency risk through purchases made in a currency other than the functional one. The currencies exposing the Company to such a risk are mainly EUR, USD and GBP. The debts in foreign currency are subsequently expressed in RON, at the exchange rate of

the date of the balance sheet, communicated by the Romanian National Bank. The resulting differences are included in the profit and loss account, but do not affect the cash flow up to the moment of the liquidation of liability.

The Company's exposure to the exchange rate risk expressed in RON was insignificant. The level of this risk analyzed was negligible; it is a tolerable risk for which no necessary special measures are needed to keep it under control.

- Risk related to significant environmental aspects

The risk related to significant environmental aspects comes from the production of technical/caused damage, which can lead to pollution with significant impact on the environment.

This risk shall be contained by developing, implementing and monitoring environmental management program, which include appropriate actions to control significant aspects of the environment, including major-accident hazards involving dangerous substances.

- Risk of disputes

The risk related to litigation is one of the important risks to which the company is currently exposed, as concessionaire of the National Crude Oil, Rich gas, Ethane and Condensate Transport System, having as source the legal regime of the lands under/over crossed by the major transport pipelines established by the provisions of the Petroleum Law no. 238/2004. The number of private properties under/over crossed by pipelines is very high and there is a possibility that more and more owners bring proceedings in Court against the Company in order to obtain substantiated compensations based on the simple presence of the pipelines on their lands.

Due to the defective way in which the legal regime of the lands under/over crossed by the major transport pipelines has been regulated, CONPET was and currently is engaged in a series of trials where the owners of those lands claim for the transport pipelines be either lifted, or moved to other sites (and the expense be borne by CONPET), or be granted annual compensations representing consisting amounts of money. Moreover, even some public authorities have laid pecuniary claim about the presence of components belonging to the NTS on the lands owned or managed by them.

Within the last years, the Company has prepared various legislative proposals to amend Law no 238/2004 - Petroleum Law, hoping for a coherent and clear regulation of the legal regime of lands under/over crossed by the transport major pipelines. Essentially, these proposals are based on the following assumptions:

- public property (over the major pipelines) must coexist with private ownership of land, which leads to the conclusion that the state must be acknowledged the exercise, free of charge, of certain categories of real rights (servitudes etc.) for the presence of the pipes on the ground;
- CONPET must fully compensate the landowner for any action that would require temporary occupation of land for repair or damage suffered by owners due to damage.

- The Risk Determined by the Correlation with the Global Market Evolution

The geopolitical tensions in the Middle East, amplified by the conflicts between Israel and

Iran, as well as by groups supported by this state, such as Hamas and Hezbollah, add significant risk to oil prices. In addition, uncertainties surrounding the re-election of Donald Trump as US president are increasing oil market volatility.

While there is no certainty about what specific policy measures might be implemented, some of these could have contradictory effects on oil supply and prices.

The war in Ukraine has prompted a global reassessment of energy security. States have begun to rethink their energy strategies, not just for oil, but also for natural gas, coal, and renewable energy sources.

In the European Union, energy security has become a strategic priority, spurring the acceleration of renewable energy projects and the expansion of liquefied natural gas (LNG) infrastructure, thus reducing dependence on Russian energy resources.

Another key factor is China's role as the main buyer of Russian oil. After many Western countries stopped importing oil from Russia, China took advantage of lower prices, and its crude oil imports increased considerably. This has allowed Russia to maintain its oil export revenues, bypassing traditional Western markets. The growing economic ties between Russia and China, particularly in the energy sector, could significantly influence the global oil market in the long term, especially if China continues to reduce its reliance on the US dollar in its trade transactions.

Overall, these interconnected factors have significantly increased uncertainty and risks for the oil market.

In December 2024, oil prices fluctuated in a stable range, with investor sentiment influenced by the prospects of possible higher taxes in the United States and a relative balance in the market for 2025. The forecast for Brent oil prices suggests a gradual decline, from 81USD/barrel in 2024 to 74USD/barrel in 2025 and 66USD/barrel in 2026, as a result of increased global production and weaker demand. At the same time, OPEC+ production will remain restricted to prevent a too sharp decline in prices, and investors in the United States may reduce drilling activity due to low prices.

Oil prices fell by about 3% in 2024, marking the second consecutive year of decline, as the post-pandemic global demand recovery faced difficulties. Factors contributing to the decline include China's sluggish economy and rising crude production in the United States and other non-OPEC countries, which kept the global market well supplied. On the last trading day of 2024, Brent futures closed at 74.64USD/barrel, down about 3% from the 2023 closing price of 77.04 USD/barrel. U.S. West Texas Intermediate (WTI) crude ended the year at 71.72USD/barrel, almost unchanged from the previous year's close.

In September 2024, Brent futures fell below 70USD/barrel for the first time since December 2021, reflecting a general cooling in prices as post-pandemic demand began to decrease.

Oil price forecast for 2025 points to weak demand from China and rising supply. A Reuters poll expects oil prices to hover around 70 USD/barrel in 2025, amid weak demand from China and rising global supply, which will counter OPEC+'s efforts to stabilize the market. Both the Organization of the Petroleum Exporting Countries (OPEC) and the International Energy Agency (IEA) have revised downward their oil demand growth forecasts for 2024 and 2025,

due to a weaker economic outlook in China. The IEA expects a surplus of oil on the market until 2025, despite OPEC's decision to postpone production increases until April 2025. The EIA forecasts Brent crude oil prices to be 74USD/barrel in 2025, similar to 2024 levels. Record US oil production has also had an impact on prices.

In October 2024, US oil production reached a record high of 13.46 million barrels per day (bpd), and estimates point to an increase to 13.52 million bpd in 2025, according to the US Energy Information Administration (EIA).

In parallel, the global transition to renewable energy sources, such as solar and wind, is placing increasing emphasis on the development of efficient energy storage solutions. These sources are intermittent and require advanced technologies to ensure a continuous and stable supply. Energy storage technologies, including batteries, hydrogen and thermal storage, will play a crucial role in balancing supply and demand, ensuring the reliability of electricity grids.

The sanctions imposed on Russia had a profound impact on the global oil market, with significant implications for trade flows and prices. In particular, the sanctions imposed by the G7 and other Western states in response to the conflict in Ukraine have reshaped the structure of the global energy market.

The impact of the Russia-Ukraine conflict has led to a considerable revision of energy strategies and policies worldwide, prompting states and companies to reassess their dependence on traditional energy sources and accelerate the transition to more sustainable alternatives. In South-Eastern and Southern Europe, the ban on oil transport via the Druzhba pipeline has not had a significant impact on the refineries in Ploiesti and Burgas, which continue to be supplied exclusively via the Black Sea terminals.

Another important aspect was the significant progress in negotiations between Georgia and Kazakhstan for an agreement to allow the transport of Kazakh oil via the Baku – Tbilisi – Ceyhan (BTC) pipeline to the European market. This development is crucial in the current geopolitical context and for the diversification of energy sources, thus strengthening Georgia's position as an energy transport hub in the region. The Western Route Export Pipeline, the first built since the collapse of the USSR, allows Azerbaijani oil to bypass Russia and reach Europe.

In parallel, regional economic trajectories are increasingly divergent, and the rapid implementation of clean energy technologies is contributing to a slowdown in oil demand growth. Global oil demand is expected to plateau in the final years of the forecast, until 2030. In this context, emerging economies in Asia, especially China and India, are the main drivers of demand growth, in contrast to the significant decline in demand in advanced economies. These trends highlight the need for continued strategic adjustments in global energy markets.

Impact on the activity of CONPET S.A.

CONPET S.A. watches carefully the evolution of the conflict in Ukraine and analyzes the possible consequences of sanctions and counter sanctions associated with it. The company is constantly reviewing the potential impacts on its operations, considering the current volatility and geopolitical risks.

Continued disruptions or escalation of commodity flows from Russia to Europe could lead to

further price increases in the European region, and this remains a major concern.

In the short term, the company's activity has not experienced significant disruptions, and the transport and delivery infrastructure has been adapted to maintain operational stability. However, the medium and long-term impact of the conflict and the sanctions imposed on Russia remains difficult to accurately estimate. Given that part of CONPET S.A.'s operations depend on areas affected by sanctions, including activities related to Russia, the company continuously analyzes possible scenarios and risks.

At the same time, CONPET S.A. identifies factors that suggest a stable continuation of the activity, even in the face of external uncertainties. Adaptability and diversification of operations are key elements for maintaining stability in the face of economic and geopolitical changes. In this context, the company anticipates that the impact on it will be minimal, and the adjustment plans will allow the continuation of the activity in an efficient and sustainable manner in the long term.

- The Capital Market Risk

The Romanian capital market registered a positive evolution during the year 2024, continuing the positive upward trend started at the time of evolution to the emerging market status.

The daily average liquidity for all types of financial instruments has recorded an upward trend during the analyzed period. Romania's representativity within the indexes of Emerging Markets has improved significantly from year to year. Given that the company CONPET S.A. is included in the composition of the FTSE Global Microcap index, the risk of reduced liquidity is diminished.

- Legislative-related Risks

The frequent amendment of the normative acts, here included those that bear direct impact on CONPET business, may trigger risks for the company.

The effort of the company CONPET to constantly adapt to changing legislative requirements may generate additional costs and possible future changes in the legislative framework could have negative effects on the activity and profitability of CONPET (increased taxes, introduction of new taxes and duties, reduction or suspension of tax concessions, etc.).

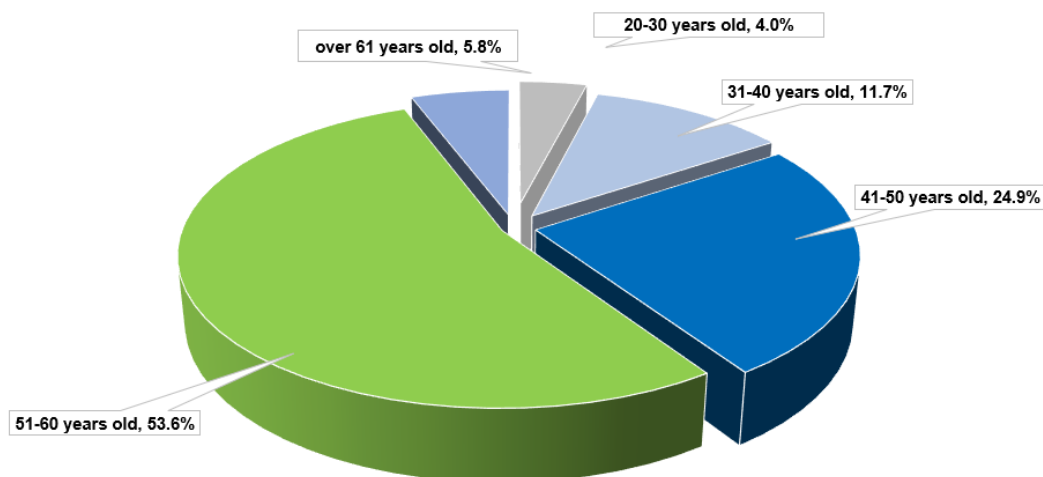
Specifically, the changes in tax legislation, consisting of increasing the level of the royalty paid for the use of the National Transport System and the payment of an additional tax on the income generated by oil companies, led to an increase in transport tariffs and, subsequently, the consequences can also be found on the pump price of finished products resulting from the processing of crude oil.

An important risk is being represented by the loss of the facility regarding the expenses borne by the Romanian State in order to provide the guard and protection of the pipelines by gendarmes, regulated by the GD. no. 1107 dated November 14, 2012, which amends and complements GD no. 1486/2005.

- Personnel Risk and the Waging System

On December 31, 2023, the structure according to age is not balanced, the age category with the highest rate ratio in the company is ranging between 51 - 60 years old (53.65%) and between 41-50 years old (24.89%).

The mean age of the company CONPET personnel is high (50 years old) and the advantage it brings is the work experience accumulated by employees within the company, which



indicates stability and professionalism. The mean age of the personnel employed within the last two years is 40 years, with an average work experience of 14 years.

Chart 11 - Personnel structure by age groups in 2024

However, the risk of personnel in the future is the company to deal with staff shortages due to departures of the employees reaching retirement age.

The level of this risk analyzed was low, a risk with high tolerability for which measures to keep it under control are established in the medium and long term through personnel policy and monitoring of personnel fluctuation (inflows/outflows).

The main potential risks in the social and Salary field relate to:

- lack of qualified personnel in order to ensure the continuity of certain activities (e.g. staff with responsibilities in traffic safety) in the case of departures from the system;
- constraints and budget limitations that can restrict the initiation/development of projects in the field of human resources;
- high personnel fluctuation, decreased rate of retention of newly hired personnel or occupying key positions.

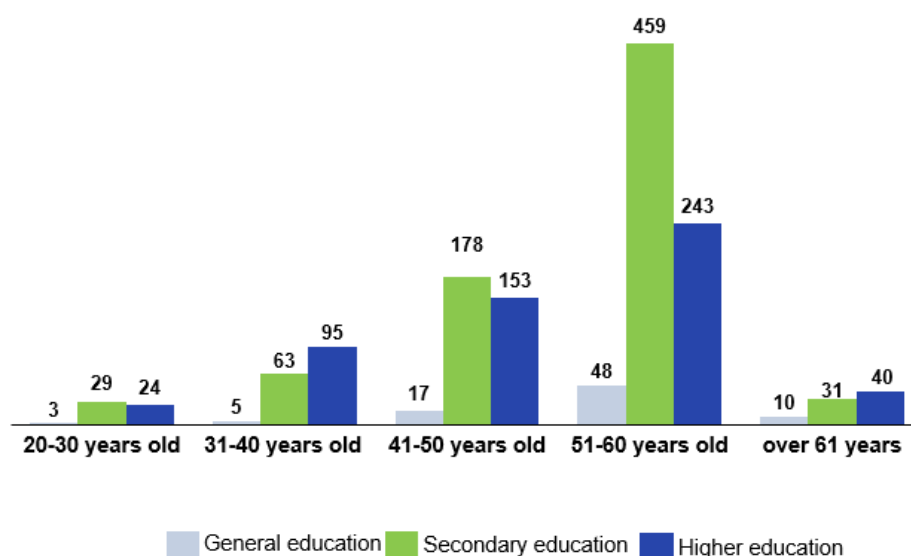


Chart 12 - Personnel structure by studies and age groups in 2024

In terms of level of education, the highest share is for the employees who have medium and higher education and ages ranging from 41 to 60 years old.

It should be noted that the age group of 41-50 years is relatively well represented by the scale of employees who will reach the standard retirement age in at least 12 years and a maximum of 25 years, and about 80.6 % of this echelon has a seniority in society of more than 10 years.

In this regard, the immediate needs for filling vacancies should be carefully monitored in relation to the needs required by organizational entities, the complexity and diversity of activities, the professional skills required, as well as the responsibilities associated with the positions.

4.1.10 Internal and external audit

Internal audit

The internal public audit activity within CONPET S.A. is organized at the level of the Internal Public Audit Office and is carried out in accordance with the provisions of Law no. 672/2002, on internal public audit, republished, Government Decree no. 1086/December 11, 2013 for the approval of the General Norms regarding the exercise of the internal public audit activity, O.M.F.P. no. 252/2004 for the approval of the Code regarding the ethical conduct of the internal auditor, GEO no. 109/2011 regarding the corporate governance of public enterprises, updated, as well as the own methodological Norms regarding the organization and exercise of the internal public audit activity within CONPET S.A. and the Internal Audit Charter applicable at the company level, harmonized with the provisions applicable to internal audit in the public and private system. The Internal Public Audit Office is functionally and administratively subordinated to the Director General and functionally to the Board of

Directors (through the Audit Committee).

The internal public audit activity in 2024 was performed based on the revised Internal Public Audit Plan endorsed by the Audit Committee and approved by the Director General of CONPET SA..

The core component of the system for reporting the results of internal audit activity is represented by the internal audit reports, which are compiled at the end of each completed mission and are endorsed by the Director General. The reports include the findings, conclusions and recommendations made by the auditors in order to improve the audited activities, as well as their opinion in relation to the level of functionality and efficiency of the internal control system attached to the areas assessed. The audit team made up of 4 (four) internal auditors annually produces the report on the internal public audit activity carried out at company level, report subject to the endorsement of the Audit Committee and the approval of the Director General.

In 2024, 6 assurance audit missions were carried out, o/w: one on information technology, four on compliance and one system audit, framing in the areas "information system", "strategic projects and European funds", "revenue generation", "human resources", "communication and corporate governance", "procurement of goods and services" and 11 recommendations were formulated. At the same time, an informal advisory mission was carried out in the field of "Information Security", following which proposals for solutions were formulated.

The missions carried out in accordance with the Internal Public Audit Plan 2024, revised, approached the following topics:

- The adequacy of the Enterprise Resource Planning (ERP) solution within CONPET S.A.;
- Management of development opportunities at CONPET S.A.;
- Evaluation of the conclusion of crude oil transport contracts within CONPET S.A.;
- Development, approval and application of the Internal Regulations;
- Conformity of CONPET S.A. to capital market requirements;
- Implementation of the annual public procurement program.

The informal advisory mission had as scope:

- Compliance with Legal Requirements in the Field of Information Security

The recommendations formulated during 2024 and the previous year by the internal auditors have been implemented or are in the process of being implemented by the audited structures within the established deadline; there have been no cases of obsolescence of the recommendations formulated by internal auditors and no cases of unappropriated recommendations have been recorded. The Internal Public Audit Office permanently monitors the implementation status of the recommendations and reports semi-annually to the Director General and the Audit Committee on the status of unimplemented and ongoing recommendations.

External audit

The 2024 annual financial statements were audited by the independent financial auditor PKF Finconta S.R.L., appointed by the OGMS Resolution no. 6 dated 28.10.2022 for a period of 3 years.

4.1.11 Assessment of human resources and social dialog activity

Personnel structure

The effective number of employees on December 31, 2024 was 1,398 persons.

Following the adoption of certain measures meant to resize the human resource, as well as of certain voluntary, or triggered to other causes personnel termination, the effective number of employees on December 31, 2024 decreased by 59 persons as compared to December 31, 2023.

The evolution of personnel structure by education categories reveals the interest of the company in covering the staff needs with high qualification specialists and by the continuous improvement of the existing staff.

On December 31, 2024, the number of higher education employees decreased to 555 people compared to 563 at the end of 2023, while the number of employees with secondary and general education decreased from 894 people to 843 people, for the same time period.

Studies	Total	% in total employees	Women	% in total employees	Men	% in total employees
General	83	5.9%	7	0.5%	76	5.4%
Secondary education	760	54.4%	71	5.1%	689	49.3%
Higher education	555	39.7%	209	14.9%	346	24.8%
Total	1,398	100.0%	287	20.5%	1,111	79.5%

Table 11 - Personnel structure by education level and gender on December 31, 2024

The evolution of the personnel structure by education and gender categories reveals that the company promotes non-discriminatory behavior by hiring female specialists with higher education and professional skills who contribute to increasing the company's activity results.

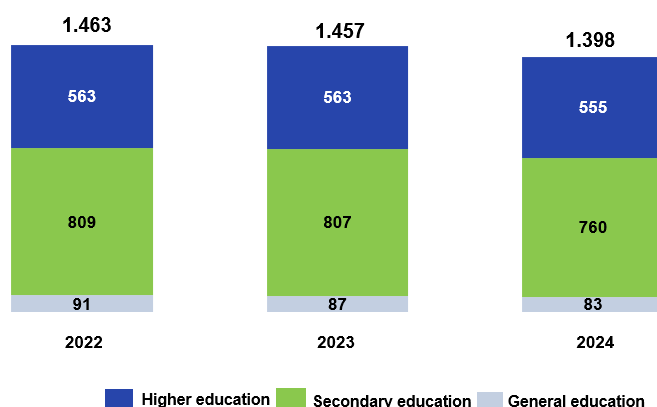


Chart 13 - Evolution of the personnel structure by level of studies between 2014 -2024

The personnel with managerial positions account for 5.3% in the total number of employees and the executive personnel amounts to 94.6%. Of all employees with managerial positions, 32% is represented by female persons.

In 2024 the structure of employees by categories was the following:

- General service 113 employees;
- Indirectly productive 198 employees;
- Administrative 255 employees;
- Technically productive 318 employees;
- Directly productive 514 employees.

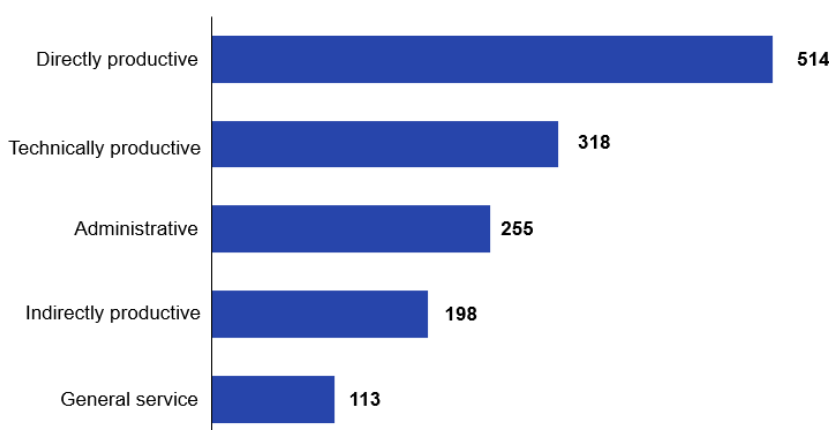


Chart 14 - The structure of employees by categories in 2024

The degree of unionization of the workforce at the end of 2024 is 98.49%. During 2024, there have been no elements of conflicting nature between employees and the management of the company.

Aspects regarding the Collective Labor Agreement

Since the Collective Labor Agreement ceased to be applicable on 07.06.2024, the Board of Directors mandated the executive management to start the negotiation procedures of a new Collective Labor Agreement.

Between April and May 2024, negotiation meetings took place, which resulted in the conclusion of a new collective labor agreement applicable starting from 07.06.2024.

The Collective Labor Agreement is concluded for a period of 2 years, starting with 07.06.2024.

In application of the approved Collective Labor Agreement, 5 protocols were concluded in the year 2024.

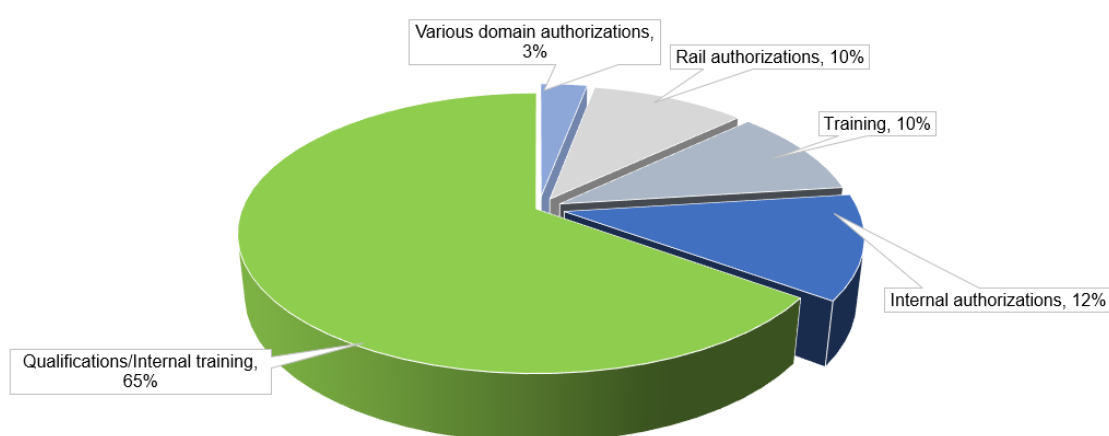
Professional Training and Authorization Activity

In order to maintain and/or develop specific skills and basic abilities of the human capital, the training activities are carried out on an ongoing and planned basis, based on the professional training and authorization programs of the company, following the identification and prioritization of the training needs of CONPET S.A. personnel.

Training of company personnel is achieved mainly through participation in external courses, organized in collaboration with certified trainers for all fields of activity within the company. Also, training is conducted internally by trainers and/or experts of the company, with a good knowledge and experience relevant to the activity of the company. They support professional training sessions and training courses with the aim of updating job-specific knowledge and skills, as well as examining or checking the employees participating in the respective sessions.

The training of the employees has two components: professional (technical, economic and other specialties) necessary to perform duties in the job description and a general one on training and/or professional licensing in various fields.

CONPET S.A. management assures annually, by the Revenues and Expenditure Budget, sources for the provision of training. Special attention is paid to the training of technical staff (maintenance and operations), mainly for acquiring new skills necessary to carry out the safe operation of the National Transport System.



Crt. No.	Type of professional training/authorization	Number of participations		
		2024	2023	2022
1	Various fields authorizations (specific per activity)	111	106	119
2	Railway authorizations	372	376	251
3	Training	371	464	413
4	Internal authorizations	428	407	450
5	Qualifications/internal instructions	2,327	1,345	1,167
6	Total number of training courses/authorizations	3,609	2,698	2,400

Table 12- Structure of training/professional authorization courses in 2022 -2024

Chart 15 - Type of professional training and authorization in 2024

The situation of professional training expenses made during 2022 - 2024 is presented as follows:

Indicators	2024	2023	2022
Authorization courses	317	228	188

Training courses	266	365	401
Total personnel training expenses	583	593	589

Table 13 - Expenses for training and professional authorization of personnel 2022- 2024 (thousand RON)

The training and professional authorization activities of the company's employees for 2022 - 2024 were carried out by framing within the approved revenues and expenditure budget.

Regulation on the assessment of the professional performance of CONPET S.A. employees

The professional performance evaluation of CONPET S.A. employees is carried out in accordance with the Regulation on the evaluation of individual professional performance of Conpet employees - Annex to the Internal Regulation.

The Regulation is in line with the provisions of the GSG Order no. 600/20.04.2018 approving the Code of Internal Control Management, Law no.53/2003 republished - the Labor Code, as well as with the Board of Directors requests, that focus on individual professional performance, a basic principle in labor relations.

The action for assessing the professional performance of employees for the activity carried out in 2023 took place in 2024Q1, in accordance with the Regulation for assessment of the performance of the employees.

After the centralization and processing of the information resulting from the evaluation of the professional performance of the employees for the activity carried out in 2023, the evaluation report of the performance of the employees was drawn up and submitted to the management. The assessment report includes the results obtained by the employees following the performance of their evaluation, inclusive of the degree of achievement of the SMART individual performance objectives of the employees occupying management positions. The evaluation of the professional activity of employees for 2024 will be carried out in the first quarter of 2025.

At the end of 2024, addenda to the individual employment contracts were concluded for the employees with management positions, which contain individual objectives, performance indicators, target values and their associated weights for the activity from the year 2025.

4.1.12 Analysis of the HSEQ activity

Identification of the environmental aspects and environmental impact assessment

The environmental impact assessment activity is carried out in the production sectors whenever changes occur in the system involving environmental impact activities, the list of significant impact issues identified at company level being the basis for the development of the Environmental Management Programme and the Action Plan for the achievement of environmental objectives.

During 2024 environmental aspects were reviewed at the site level, focusing on identifying environmental aspects, including, how risks and opportunities related to environmental aspects are treated to prevent and limit their consequences on human health and the

environment, using opportunities both for the benefit of the organization, and, as well as the environment. The following documents have been reviewed:

- Registers of environmental legal requirements for the water and air environmental factor;
- Register of Environmental Legal Requirements – regulations;
- Register of Environmental Legal Requirements – waste;
- Register of Environmental Legal Requirements – protected areas;
- The Environmental and Actions Management Program containing: the commitments associated to the environmental policy, general objectives and measurable environmental targets, the performance indicators on environmental protection, the positions responsible for the achievement of the environmental targets; as well as actions to achieve environmental objectives, which took into account the significant environmental aspects identified at the level of CONPET S.A., the measures in the inspection reports/ minutes-authorities on compliance with legal requirements and other applicable requirements;
- The list of significant environmental aspects and associated impacts generated at the level of CONPET S.A. company.;
- Register of environmental opportunities.

The status of achievement of the objectives and targets set and the stage of the implementation of the actions set for the achievement of the environmental objectives are analyzed annually by the executive management, in the framework of the analysis carried out by the management.

Regulation of activities in terms of environment and water management

In terms of environmental protection and water management, CONPET S.A. activity is authorized in accordance with the provisions of GEO 195/2005 on environmental protection, as supplemented and amended and Water Law no.107/2005, with subsequent amendments and additions.

CONPET S.A. activity is authorized in all counties by the regulatory authorities (A.N.P.M./National Agency for Environmental Protection, county A.P.M./Agency for Environment Protection, A.N.A.R./National Administration „Romanian Waters”, A.B.A./Water Basin Administration, S.G.A./Water management Unit), holds 38 water management authorizations and 22 environmental authorizations.

For the legal operation from the environmental protection point of view, for the year 2024, the annual visas of the environmental authorizations were obtained. Furthermore, there have been revised:

- Environmental Permit for pipeline transport in Constanta County;
- Environmental Permit for crude oil transport pipelines Ø10" Ghercești - Icoana - Cartojani and transport pipelines Ø12", Ø14" Cartojani-Ploiești, on the territory of Dolj, Olt, Argeș, Teleorman, Giurgiu, Dâmbovița, Prahova counties, including the oil pumping stations Ghercești, Icoana, Cartojani;
- Environmental Permit for the activity carried out in the Mislea crude oil pumping station, Prahova County;
- Environmental Permit for the activity carried out in the Moreni, Teiș, Ochiuri crude oil pumping station, including the local pipelines related to them;
- Environmental Permit for the activity carried out at the Cireșu crude oil loading ramp, Brăila County.

As regards water management regulation, all along 2024, 9 water permits have been renewed for the watercourse crossings by the NTS-related piping routes.

Considering the provisions of the Emergency Ordinance no. 52 of 31.05.2023 for the amendment and completion of certain normative acts in the field of water, which establish new tariffs for the use of the public domain for the crossing/undercrossing of waters, their implementation generating an impact on the financial indicators of our company, we specify the following aspects:

- The active/inactive/conserved transport pipelines, managed by our company, cross watercourses - a natural monopoly of strategic interest held by the National Administration „Romanian Waters“;
- The administration of crude oil/rich gas/ethane/fiber optic pipelines is regulated in terms of water management, with a number of 38 water management authorizations at company level, their content includes, among others the crossing points of the watercourses, as well as the crossing lengths;
- According to the current legislative amendments - Art. 81, Paragraph 34 of the Water Law no.107/1996: „For the use of the public domain, in order to cross/under cross the goods managed by the "Romanian Waters" National Administration, a charge of use is established“;

Assessments of compliance with legal requirements and other environmental requirements

The assessment of compliance with the legal requirements or other applicable environmental requirements is carried out by:

- inspections carried out by the environmental authorities (representatives of central and local environmental and water management authorities),
- inspections carried out by HSEQ supervisors and the personnel of the Environmental Protection Department;
- external audits carried out by bodies certifying the environmental management system integrated in the company's integrated management system;
- internal audits performed by the internal auditors within the Management Systems and Internal Control Management Departments and the Internal Public Audit Department.

The environment and water management authorities are carrying out scheduled audits in CONPET S.A. sites, unscheduled and thematic with regards to the observance of the legal requirements and other environmental regulations, not having been found major nonconformities.

To verify compliance with the legal requirements in 2024, 48 external inspections of the environmental authorities of the counties on the territory of which CONPET S.A. operates were registered (36 to verify compliance with legal requirements, planned inspections and 12 as a result of accidental pollution and/or monitoring the implementation of measures ordered at previous events).

The personnel within the sectors, namely the HSEQ responsible persons perform scheduled inspections, as per the annual Chart of inspection with regards to the compliance of the legal requirements and other applicable requirements, but also unscheduled inspections as per the attributions of the job description.

During 2024, an external audit was carried out by the BUREAU VERITAS certification body, to verify compliance with the requirements of the ISO 14001:2015 standard that refers to the

environmental management system. No non-conformities/deviations were found regarding the compliance obligations in this area.

Following the internal audits established in the annual internal audit program, the non-conformities identified in the environmental management system were identified and corrected in time.

Pollutions bearing significant impact on the environment

During the pumping of crude oil, accidental pollution can occur on the transport pipelines, from internal or external causes, generating pollution of the geological environment that can have a significant impact. Therefore, in 2024 there have been reported accidental pollutions in the areas: Lukoil, Tătărăni, Lipănești (Prahova county), Cireșu (Brăila county), Lumina - milestone 46 (Constanța county), Malul Spart (Giurgiu county), Hurezani (Gorj county), Corbu, Milcov (Olt county), left bank overcrossing Căteasca, Oarja (Argeș county).

The expenses made in 2024 for the decontamination of the affected areas reached 374.6 thousand RON.

For compliance with the regulations required by the national legislation in force on the environment, regarding management of dangerous waste, "paraffin - type" and "tank sludge", the company CONPET has the obligation to contract services for recovery/disposal thereof avoiding sanctions provided by GEO no. 195/2005 on environmental protection, Law 17/2023 on the approval of GEO no. 92/2021 on waste regime and GD no. 1061/2008 on the transport of hazardous waste in Romania.

Hazardous waste "tank sludge-type" is generated from the activity of storage of the crude oil in tanks (in time, mechanical impurities from crude oil settles generating this sludge), it must be periodically evacuated, in order to ensure the necessary storage space for the crude oil, respectively repairs/calibration of tanks, as , well as the need to eliminate the risk of fires or pollution from oil storage tanks, tanks leaks, decanters and sewage that is no longer present in the technological and sludge deposits.

The expenses for the execution of the slurry cleaning services carried out in 2024 were 509.7 thousand RON.

Within the technological flows carried out by CONPET Ploiesti, periodically, based on maintenance programs, the main and/or local crude oil transport pipelines are subjected to cleaning operations of the inner space with special devices called "pigs". Following the execution of inside cleaning of these pipelines, of the related keyboards, of the filters from pumps or skids, paraffin is generated which is a hazardous waste according to environmental legislation in force. This waste was stored in metal dumps, located in the technological premises of the company, until its disposal by authorized operators, contracted by the company.

The expenses related to the paraffin cleaning services carried out in 2024 amounted to 10.8 thousand RON.

Monitoring environmental factors

Based on the requirements of the chapter "Environmental Monitoring" included in the environmental permits, *"The annual program for monitoring and measuring the*

characteristics of the environmental factors 2024” has been developed, which has included the performance of the following parameters:

- concentration of pollutants in the exhaust emissions from the water surface into the water in the sewer networks and the concentration of pollutants in the groundwater (existing monitoring wells) determining the level of pollution in the event of accidental pollution of rivers;
- concentration of pollutants in atmospheric emissions of stationary sources and/or movable (thermal power stations, oil storage tanks), and the concentration of pollutants in the ambient air;
- concentration of specific pollutants from soil samples;
- noise level.

To determine the level of pollution for the environmental factors: water, air, soil and noise, analysis are being conducted by certified laboratories. The values recorded for each measured indicator were below the maximum limits provided by the regulation, according to test reports issued. The physical and chemical analysis to monitor environmental factors were taken through laboratories accredited according to SR EN 17025: 2005.

The results of monitoring the environmental factors are communicated to the environmental authorities as required by environmental permits. In 2024, the costs for environmental factors monitoring amounted to 34.3 thousand RON.

4.2 Analysis of the Development Activity

4.2.1 Main components of the NTS infrastructure

Below is represented, on the map of the country, the Crude oil, Condensate, Rich gas and Ethane National Transport System.

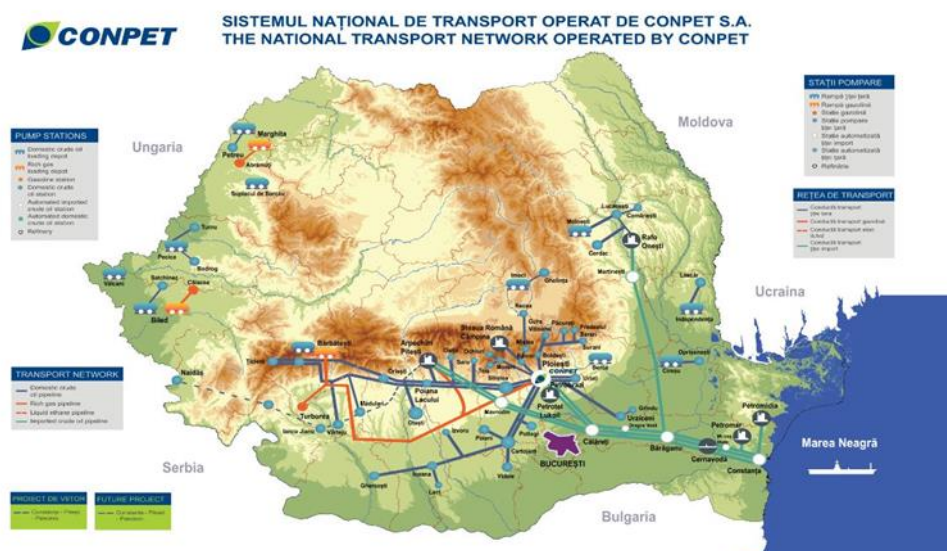


Chart 16 - The National Transport System operated by CONPET

Given the natural distribution of the oil fields spread over the entire Romanian territory, the National Transport System was built so as to meet the transport needs from all those fields to the refineries. The system operation is being made based on the local dispatch centers, coordinated from the Company's Central Dispatch.

The Crude Oil, Rich Gas, Condensate and Ethane National Transport System has in composition 4 transport subsystems, grouped according to the transported products as follows:

The domestic crude oil and condensate subsystem transport

The subsystem contains pipelines describing approx. 1,581 km, for the transport of crude oil and condensate from the production units of OMV Petrom and third parties, operating areas throughout the country, to the refineries.

This subsystem has the following main components:

- Ardeal component, used to transport crude oil from the deposit to the railway loading ramps in rail tanks and by rail to the refineries in Ploiești or to Bărbătești unloading ramp.
- Moldova component used to transport crude oil from the production units related to Lucăcești, Comănești and Cerdac pumping stations to Rafo Onești and Dărmănești refineries. Currently, as the processing plants of crude oil from Rafo Onești and Dărmănești refineries do not operate anymore, the pumping of the crude oil taken over for transport is taken to the warehouse of Moinești loading ramp. From here the oil is transported by rail tanks to Petrobrazî, Petrotel- Lukoil refineries or other destination, depending on customer requests. During 2017, following the takeover of the concession by Mazarine of several oil fields in the region of Moldova, the Cerdac deposit was closed. The crude oil extracted from this area is being transported by the storage trucks to Ghelînța/Comănești deposit.

Starting 2019, the crude oil from Ghelînța storage warehouse is transported by tankers to the loading dock Imeci, loaded into railway tanks and transported to Petrobrazî/Lukoil refinery.

- Ghercești - Ploiești component includes takeover of the crude oil from the production units related to Ghercești, Lact, Izvoru, Videle, Poeni, Roata and Potlogi pumping stations and transport of crude oil by pipeline to Petrobrazî refinery in Ploiești.
- Ticleni–Ploiești component includes two main lines with a length of approx. 250 km, line I and line II.

Thread I major pipeline ensures the transport of crude oil from Țicleni and from Bărbătești unloading ramp to the refineries in Ploiești (with the possibility of pumping to Arpechim Pitești refinery, as well).

Thread II major pipeline collects the crude oil and condensate from the pumping and repumping stations Mădulari, Orlești, Otești, Poiana Lacului, Oarja, Saru, Siliște and Bucșani for supply to the refineries in Ploiești (or to the terminal in Arpechim Pitești).

- Muntenia basin pipeline component includes pipelines used to transport the crude oil from the stations and deposits close to the city of Ploiești.
- the local pipeline component used to transport crude oil from deposits to the loading ramps in railway tanks, and from here to the refineries in Ploiești.

The rich gas transport subsystem

The subsystem is intended for the transport of rich gas from the recovery plants in Ardeal, Oltenia and Muntenia to the refineries in Pitești and Ploiești. The transport subsystem has the following composition:

- major pipeline thread I Țicleni-Ploiești (served the region from Oltenia and Muntenia and today is no longer used following the closure of production facilities by OMV Petrom);
- local piping in Ardeal.

Rich gas transport via pipeline in Arpechim refinery has been suspended since April 2011. In 2017, the stock of the rich gas pipeline 65" line I Bărbătești – Ploiești has been discharged, in length of 289 km.

Currently, there are running 2 recovery plants (Abrămuț and Calacea). Produced rich gas is transported via pipeline from the ramp Abrămuț to Marghita ramp, and from the ramp Calacea to Biled ramp, and from here by railway to Petrobrazi.

The ethane transport subsystem

This subsystem has been allocated for the transport of ethane from the deethanizer platform Turburea to Arpechim refinery Pitesti. At present, due to the inactivity of Arpechim refinery, the subsystem is not used. Ethane transport has been suspended since November 2008. Currently, a part of this pipeline (11 km) is used to transport condensate from Hurezani and Capreni deposits to Petrobrazi refinery, with the approval of NAMRPSG.

Import crude oil transport subsystem

The import crude oil transport subsystem ensures the transport of crude oil from the Oil Terminal Constanta to the refineries in Ploiești, Petromidia Refinery and Arpechim Pitesti. The import crude oil transport subsystem consists of the following pumping stations: Constanța South, Mircea Vodă, Bărăganu, Dragoș Vodă, Călăreți, Mavrodin și Mărtinești. Depending on the chosen pumping type, different pumping scenarios can be performed for each transport relationship.

In 2023, the new under crossings of pipelines 20" and 28" Constanta – Bărăganu were put into operation, at the Danube under crossing points C1 – C2 and Borcea arm under crossing C3 – C4.

The crude oil, condensate and rich gas domestic production is transported via pipeline, either by rail tanks, or combined (rail and pipeline).

During the transport process, CONPET uses approximately 90 tanks of various capacities. Starting 2019, CONPET runs a big process of rehabilitation of tanks and replacing those with high degree of wear and storage capacity over the necessary of transport stream with new ones to meet the needs of current production, environment and energy consumption. The modernization and development process will be completed in 2030.

On 31.12.2024, the company also owns a fleet of 247 vehicles, intended for the transport of personnel for work purposes, means of intervention vehicles, off-road vans and mixed transport of persons and goods and special vehicles (emptying, cranes, diggers, etc.).

4.2.2 The wear degree of the company's properties

In order to perform the transport of crude oil and rich gas, from and to all its business partners, in conditions of maximum operation, high efficiency and operating costs as low as possible, in compliance with the Legislation in force relating to environmental protection and labor protection and the other normative acts in the field, CONPET carries out a continuous activity on the improvement of the technical condition of the National Transport System.

In the period of 1995- 2007, through the Modernization Project co-financed by the World Bank, works consisting of the rehabilitation and modernization/refurbishment of the Crude Oil National Transport System have been conducted. This project has targeted:

- pipelines rehabilitation;
- rehabilitation of the pumping stations on the major pipelines and two crude oil and rich gas loading/unloading ramps;
- automation of the transport system and introduction of the SCADA system;
- introduction of crude oil tax measurement systems;
- development of a telecommunication system.

After 2007, the emphasis has been mainly placed on the further modernization of the pipeline system.

In order to correctly determine the parts of the pipes to be replaced, periodically the pipes of the transport lines are inspected with smart pigging for the determination of the parts of the worn pipe.

Furthermore, for safe operation, monitoring and maintenance of the National Transport System via pipelines, it was considered the performance of works intended to secure the infrastructure of the water crossings designed to enhance the degree of safety in operation of the pipelines in question, indirectly, and the protection of the waters crossed against pollution.

The pipelines that make up the Crude Oil National Transport System over cross/under cross various watercourses.

Another important component in terms of safe operation and environmental protection in order to pay attention to the investment process was to secure the crossings. The works carried out were:

- low weirs;
- bank protections upstream and downstream of the low weir;
- wave crushers;
- piles foundation consolidation;
- bank protections on the route of the pipelines which are parallel with the river bed (damaged bank);
- other works related to pipeline consolidation.

In 2023, the new under crossings of pipelines 20" and 28" Constanta – Bărăganu were put into operation, at the Danube under crossing points C1 – C2 and Borcea arm under crossing C3 – C4.

The modernization of the pipeline transport subsystems also included the investments made at the other technological components of the system, namely:

- pumping stations;
- technological installations;
- PSI facilities;
- technological and administrative buildings;
- energy, thermal and telecommunication installation;
- other auxiliary components.

The improvement of the technical status of the transport system, led to:

- reduced technological costs in the storage and transport process;
- minimized energy, fuel and lubricant consumptions;
- minimized operating costs and reduced operating difficulties;
- improved safety and flexibility of the system;
- reduced environmental impacts;
- improved quantitative and qualitative measurements of the crude oil transported.

Compared to the above, it can be appreciated that the technical condition of the Crude oil National Transport System via pipelines, operated by CONPET, is an appropriate one.

4.2.3 Investments achieved in 2024

The achievement of the investment program approved for the year 2024 is the following:

Crt. No.	Name of the element – thousand RON	2024 Program	Achieved 2024	Degree of achievement %
	TOTAL GENERAL, out of which:	85,000	70,445	82.9%
I	PUBLIC DOMAIN	65,000	56,139	86.4%
1	Pipelines rehabilitation, o/w:	30,000	27,705	92.4%
1.1	Pipeline replacement	28,165	27,461	97.5%
1.2	Safe disposals	1,835	244	13.3%
2	Modernization and monitoring of the cathodic protection system related to the NTS Domestic and Import	539	432	80.2%
3	Technical support and consultancy	25	0	-
4	Tanks	6,479	5,128	79.2%
5	Energy works	1,504	1,489	99.0%
6	Telecommunication works	1,100	452	41.1%
7	Pumping systems modernization	7,297	6,511	89.2%
8	Stations/ramp modernization	5,162	4,188	81.1%
9	Buildings, fences stations	5,372	4,593	85.5%
10	Automation and SCADA works	7,472	5,641	75.5%
11	Other expenses	50	0	-
II	OPERATING DOMAIN	20,000	14,306	71.5%
	Investment objectives, o/w:	16,050	10,463	65.2%
1	Pipelines rehabilitation	1,860	1,703	91.6%
2	Buildings, fences stations	1,522	735	48.3%
3	LDH and tank cars	10,108	7,520	74.4%
4	Other works	2,405	420	17.5%
5	Intangible investments	155	85	54.8%
	Independent facilities and equipment	3,950	3,843	97.3%

Table 14 - The achievement of the investment program 2024 as compared to Program

The main objectives of investments completed and commissioned in 2024:

- Modernization of Mislea station;
- Modernization of Potlogi pumping station;
- Integration of Moreni automation instruments and equipment;

- Modernization of Moreni pumping system;
- Biled Fire Prevention and Security tank;
- Modernization of Ciresu ramp;
- Modernization and monitoring of the cathodic protection system related to the NTS Domestic and import, in three locations;
- Replacement of pipeline Ø 20" Constanța - C1 - 8 sections - completed: section 3 (A,B,D,E,F), section 4 (A,B) and section 5 (A);
- Smart pigging, detection of pipeline status Ø10 ¾" L1 Bărbătesti– Ploiesti West and Ø 10¾" L2 Orlesti– Ploiesti (Petrobrazii);
- System related to the tele-transmission and tele-management of the power consumptions in 7 locations belonging to CONPET S.A;
- Modernization of Ochiuri pumping station;
- Replacement of pipeline Ø 20" Constanța - C1 - 8 sections - completed: tronson1 (A, B,D); section 2 (A,B); section 3 (C); section 7;
- Replacement of pipeline Ø 20" Constanța - C1 - 8 sections - completed: section 2 (D, F,G); section 5 (B,C,D,E,F), section 6; section 8;
- Extension of SCADA system - 4 ramps and 5 stations;
- GPS, RTK, GNSS receivers package;
- RR planned repair to locomotive LDH 790-1;
- Transformation of the LDH 92 53 0850 130 -1;
- Type RP-FIR planned repair to 3 rail tanks of 80 cubic m for rich gas transport and 38 rail tanks of 60 cubic m fir crude oil transport and assembly of 108 axles;
- Replacement of pipeline section Ø 6½" Warehouse Petrom Orzoaia de Sus – Urlați crude oil station, about 1,600 m in length.

Significant investment objectives in progress on 31.12.2024

PUBLIC DOMAIN

In 2024 have been achieved investments in the public domain amounting to 56,139 thousand RON, representing 86.4 % of the annual program, as follows:

- Replacement of pipeline Ø 20" Constanța - C1 - 8 sections;
- Crude oil storage Berca village;
- Modernization and monitoring of the cathodic protection system related to the NTS Domestic and Import;
- Modernization of Satchinez pumping station;
- Modernization of Slobozia crude oil station;
- New tank PSI Independența Buffer Deposit;
- Installation and initial metrological verification of four measuring skids in Petrobrazii P3, Poiana Lacului, Videle and Otesti locations;
- Modernization of the multiplexor network;
- Rehabilitation of the pump hall C+D+E Călăreți station and Rehabilitation of the building related to connections 6 kV, electrical distributors 6/0.4 kV A+B Local Dispatch, electrical distributors CDE, Călăreți station.

OPERATOR FIELD

In 2024 have been achieved investments in the operator domain amounting to 14,306 thousand RON, representing 71.5 % of the annual program, as follows:

- Rehabilitation of buildings at Headquarters 2 Workshops - Building C4, C5, C10, C11;
- Replacement of the Ø 6" Urlați-Ploiesti crude oil transport pipeline, in the DN1A Moara Nouă-Corlătesti area.

Commissioning achieved in 2024 amounted to 85,426 thousand RON, out of which, per financing sources:

- 69,744 thousand RON out of the modernization quota;
- 15,682 thousand RON out of other own sources;

4.2.4 Litigations and other aspects on the company's tangible assets

During 2024 CONPET SA was involved in a total of 148 litigations. Among them, 50 litigations have been completed.

The most important disputes in which the company is involved are presented below:

a) The disputes concerning the ownership of the tangible assets of the company

CONPET S.A. is not involved in trials regarding the claim of ownership of certain real estate.

b) Litigations in connection with the claims of the owners of the lands crossed by the Crude Oil National Transport System

On 31.12.2024, CONPET S.A. had a number of 10 files before the courts in different procedural stages, having as subject the claims of the landowners related to the lack of use of the owned lands transited by the major pipelines that are part of the Crude Oil National Transport System. We hereby outline a number of 7 causes which we find important under the aspect of the amount of claims of the plaintiffs and representative by the legal content of the trial files (the rest of the causes repeating, in broad terms, some of the types of action listed below):

1. Case File no. 3451/108/2016*– High Court of Cassation and Justice– pending**

Trial stage: Appeal– retrial

Parties: CONPET S.A.– defendant

Administrative Territorial Unit (Ro. UAT) Pecica City - claimant

Object: Administrative Territorial Unit (Ro. UAT) ATU of Pecica town filed a request for a summons requesting:

Mainly:

- the obligation of the defendant Conpet S.A. to divert the crude oil pipeline that crosses a number of 22 plots of urban land, intended for the construction of houses, located in our property, in a total area of 20,287 sq. m.
- order the defendant Conpet S.A. to pay the amount of EUR 65,000 representing the equivalent value of the house located in plot no. A141.7760 / 5/174, entered in L.B. no. 306869 because it can no longer be capitalized by the subscriber.

Subsidiarily:

- order the defendant Conpet S.A. upon payment of an annual rent, during the existence of the pipeline, as a result of the encumbrance of the areas shown above by the right of legal easement exercised by Conpet SA; NOTE: The annual rent has not been quantified.
- order the defendant Conpet S.A. to the granting of compensations for the period 31.10.2014 – 31.05.2016 as a result of the limitation of the attributes of the property right of the 22 urban land plots and of the decrease of the circulation value of the land on the real estate market due to the restrictions imposed by Order 196/2006 of NAMR on construction;
- order the defendant Conpet S.A. that every 3 years to adapt the amount of compensation to the value of circulation at that time of similar lands and the provisions of future orders of the N.A.M.R.;
- the setting by the court of the due date on which the compensations will be paid annually, following the non-payment at the due term to attract the payment of the legal interest related to the amount received as compensation for the delay period;
- grant the legal expenses incurred in the event of opposition.

Mentions: By the **Conclusion no. 40/26.01.2017**, the Arad Court rejects the request to show the right holder formulated by the defendant Conpet SA in contradiction with the claimant ATU of Pecica City and with the respondents the Romanian State through the Ministry of Public Finance and the National Agency for Mineral Resources. The decision was appealed by Conpet (File no. 3451/108/2016 * / a1 - Timisoara Court of Appeal. By the Decision no. 211/20.03.2017 the Timișoara Court of Appeal rejected the appeal.

By the **Sentence no. 336/18.05.2017**, the Arad Court rejects the civil action filed by the claimant ATU of Pecica City in contradiction with the defendant SC Conpet SA having as subject the obligation to act and claims. No legal expenses. The decision was appealed by the ATU Pecica City.

By **Decision no 761/23.11.2017** the Court of Appeal Timisoara admits the appeal. It annuls the appealed sentence and sends the case for retrial to the Arad Court. Conpet filed an appeal.

Through the Report of 07.06.2018, the High Court of Cassation and Justice found the inadmissibility of the Conpet appeal, the latter being promoted against a final decision, which does not fall within the hypothesis regulated by art. 483 para. 1 Code of Civil Procedure. The parties submitted a written opinion on the report. By the Conclusion of 10.10.2018, the HCCJ admits in principle the appeal declared by the appellant-defendant Conpet S.A.

By the **Decision no. 615/22.03.2019** the HCCJ admits the appeal declared by the appellant-defendant Conpet S.A., it quashes the appealed decision and sends the case to a new court of the same court of appeal.

By the **Decision no. 306/07.06.2021**, Timisoara Court of Appeal rejects the appeal declared by the appellant-claimant, the Administrative Territorial Unit of the City of Pecica.

The claimant, the Territorial Administrative Unit of the City of Pecica, filed for an appeal.

By the **Decision 641/15.03.2023** the HCCJ admits the appeal. It dismisses the appealed decision and sends the case for a new trial to the same court.

By the **Decision no. 621/13.12.2023** the Timișoara Court of Appeal admits the appeal filed by the claimant-appellant the Administrative Territorial Unit of Pecica City. It partially changes the appellant's sentence in the sense that it admits in part the request for summons made by the claimant the ADMINISTRATIVE TERRITORIAL UNIT OF THE CITY OF PECICA in opposition to the defendant CONPET S.A. and obliges the defendant to pay the amount of EUR 137,045.69 euro as compensation in favor of the claimant. It upholds the rest of the

appealed sentence. It obliges the respondent to pay in favor of the appellant the amount of 17,579 RON as legal expenses. Conpet filed for an appeal.

Court hearing: 21.05.2025

2. Case File no. 5413/204/2017 *– Prahova Tribunal – pending

Trial stage: Merits – retrial

Parties: CONPET S.A.

NAMR defendant

Dobrogeanu Păun Ioan - claimant

Object: Dobrogeanu Dumitru and Dobrogeanu Păun Ioan filed a petition of trial asking the court to rule the obligation of CONPET SA to pay an annual rent for the land plots occupied by the two oil products pipelines (crude oil) starting 01.07.2014 and in the future, for the entire duration of the pipelines, to pay the compensation for the losses incurred by not reaching certain economic objectives on the remaining area between the two pipes after their restriction and the area along the national road DN1 (E60) and payment of court costs. The first head of the claim was estimated by the claimants at the amount of 48,000 EUR/year (220,000 RON), and the second head at the amount of 25,000 RON/year.

Mentions: By the **Sentence no. 2446/28.08.2018** the Prahova Tribunal admits the exception of the lack of passive capacity to stand trial, invoked by the defendant National Agency for Mineral Resources. It dismisses the action, in contradiction with that defendant, as being brought against a person without procedural capacity. It admits the exception of the res judicata. It dismisses the claim filed against the defendant SC Conpet SA, as there is res judicata. It finds that the defendants have not applied for legal expenses.

The decision was appealed by Dobrogeanu Dumitru.

By the **Decision no. 2804/11.11.2019** the Ploiești Appellate Court rejects the appeal declared by the appellant Dobrogeanu Dumitru as unjustified. It admits the plea of inadmissibility of the cross-appeal. It dismisses as unfounded the cross-appeal declared by the appellant Dobrogeanu Păun Ioan.

The decision was attacked with recourse by Dobrogeanu Dumitru and Dobrogeanu Păun Ioan.

By the **Decision no. 206/04.02.2021**, the High Court of Cassation and Justice rejects the appeal filed by the claimant Dobrogeanu Păun Ioan. Admits the appeal declared by the applicant Dobrogeanu Dumitru. It quashes the appealed decision and the civil sentence no. 2446/28.08.2018 of the Prahova Court and sends the case for retrial to the Prahova Court.

Court hearing: 22.05.2025

3. Case File no. 4395/270/2020 - Onești Court - pending

Trial stage: First court

Object: Onești Municipality and the Local Council of Onești Municipality, Bacău County, have sued Conpet S.A. asking the court:

“1. The obligation of the defendant at the conclusion of the agreement for the exercise of the right of legal easement over the lands with an area of 11,474.5 sq.m, crossed and affected by crude oil transport pipelines within the municipality of Onești, equivalent to the payment of an annual rent, during the existence of the pipelines, to the local budget of Onești municipality, determined according to the principle of the least violation of the property right and calculated taking into account the circulation value of the affected real estate, established under the law, at the time of the damage.

2. Obligation of the defendant to pay material damages, representing the consideration of

the lack of use of land in the surface of 11,474.5 sq.m under crossed and affected by crude oil transport pipelines within the radius of the municipality of Onești, established according to the Market Study approved by the Decision of the City Council no. 199 of 29.11.2018, respectively according to the Updated Market Study approved by the City Council Decision no. 122 of 29.06.2020, calculated starting from 2017 until the date of conclusion of the Convention for the exercise of the right of legal servitude on such land, plus late increases, interest and late payment penalties in the amount provided for in the Code of Tax Procedures applicable during that period.

3. The obligation of the respondent to pay the trial costs incurred by this trial.”

Deadline: 13.05.2025

4. Case File no. 1657/91/2020 *– Vrancea Tribunal – pending

Trial stage: First court

Parties: Vasile Maria - Ilaria - at S.C.P.A. Buruian, Caracaș and Associates - Plaintiff

Dragu Georgeta - at S.C.P.A. Buruian, Caracaș and Associates - Plaintiff

CONPET S.A.- defendant

The Romanian State - by the Ministry of Public Finance - defendant

The National Agency for Mineral Resources– defendant

Object: By their summons, the claimants Vasile Maria-Ilaria and Dragu Georgeta requested to the court to:

A. Mainly, to oblige the defendant to pay an annual rent of 496.64 Euro for the pipe protection area belonging to the defendant and passing through the private property of the undersigned, starting from the date of registration of this application for legal action;

B. Mainly, to oblige the defendant to pay an overall compensation of 508,080 Euro for the assignment of the attribute of use of the good according to its intended purpose, i.e. that the undersigned cannot build construction on the private property;

C. Mainly, order defendant to pay legal interest on the annual rent provided for in item A, starting from the date of registration of the present summons.

D. Mainly, order the defendant to pay legal interest for the global indemnification provided for in item B, starting from the date of registration of the present summons.

E. In the alternative, we request you to order the other two defendants to pay the amounts indicated in the preceding paragraphs.

Conpet filed a counterclaim in this case, requesting the court:

1. To oblige the complainants Vasile Maria – Ilaria, Dragu Georgeta and Dragu Maria to allow the company CONPET S.A. the exercise of the right of legal services established by the provisions of Art. 7 et seq. of Law no. 238/2004 on the land owned by them, situated in Focsani city, Vrancea County. The exercise of the right of legal easement is to be carried out in a passage of 2.4 meters wide located along the Ø 20” Bărăganu - Borzești/Rafo Onești crude oil transport pipeline standing for purposes of permanent access to the pipeline in order to verify the day-to-day management of the status of the pipe and the execution of any repair works. The exercise of the right of easement is to be carried out throughout the existence of the pipeline located on the claimants' land, but not later than the date of termination of the oil concession agreement concluded by us, signed by CONPET S.A., with the Romanian State.

2. To establish the amount of the annual rent provided by law due by us, the undersigned CONPET SA, to the claimants Vasile Maria - Ilaria, Dragu Georgeta and Dragu Maria in exchange for exercising the right of legal easement, rent consisting in the equivalent value of the annual land use affected by the exercise of the legal easement.

Deadline: 20.05.2025

5. Case File no. 32294/299/2020 - Bucharest District 1 Courthouse - in the course of settlement

Trial stage: First court

Parties: CONPET SA – defendant - counterclaimant

Bob Mihăiță - claimant-defendant

NAMR - defendant

Object: Bob Mihăiță files a summons requesting the court to order:

1. The obligation of Conpet SA and NAMR to move the crude oil pipeline crossing the land owned by the claimant located in Cernavoda, plot 1, plot A6/2, Constanța county.
2. The establishment of the equivalent value of the lack of use, for a period of three years, prior to the formulation of the summons, amounting to 150,000 RON;
3. In the alternative, the obligation of Conpet SA to pay an annual rent for the use of the land owned by the claimant, from the date of filing the summons, in the amount of 5 Euro/sq.m/year for the area of 14,645 sq.m, land affected by the protection and safety area, during the existence of legal easement.
4. Payment of legal fees.

Conpet formulated the counterclaim/re conventional petition requesting the court:

1. To order the claimant to allow CONPET S.A. the exercise of the right of legal servitude established by the provisions of Art. 7 et seq. of Law no. 238/2004 on the land owned by the claimant Bob Mihăiță located in Cernavoda, plot 1, plot A6/2, Constanța County. The exercise of the right of legal servitude is to be carried out on a 2.4 meter wide corridor located along each of the main crude oil transport pipelines that under-cross the claimant's land, respectively the F1 main crude oil transport pipeline Ø 14¾ ", F2 main crude oil transport pipeline Ø 20 ", and Pipeline 28 Constanța - Bărăganu of crude oil transport Ø 28", for the purpose of permanent access to pipelines for daily verification of the condition of pipelines and execution of possible repair works. The exercise of the right of legal servitude is to be carried out throughout the existence of the pipelines located on the land of the claimant, but no later than the date of termination of the oil concession agreement concluded by us, the undersigned Conpet SA, with the Romanian State;
2. To establish the amount of the annual rent provided by law due by us, the undersigned, to the claimant in exchange for exercising the right of legal easement.

Conpet S.A. filed an impleader of the Romanian state represented by the Ministry of Finances and NAMR.

Conpet S.A. formulated a request of identifying the holder of the right in rem.

Mentions: By the **Conclusion dated 06.08.2021**, the Bucharest District 1 Courthouse rejects the exception of the lateness of the request for impleader and of the request for showing the right holder, invoked by the National Agency for Mineral Resources, as unfounded. It rejects the exception of the lack of representative capacity of the National Agency for Mineral Resources, invoked ex officio, as unfounded. It rejects the request for an impleader from the Romanian State, through the Ministry of Finance and the National Agency for Mineral Resources, as inadmissible in principle. It rejects the request to show the right holder of the Romanian State, through the Ministry of Finance and the National Agency for Mineral Resources, as inadmissible in principle. The conclusion can be appealed with the merits.

Deadline: 13.05.2025

6. Case File no. 2323/120/2018 – Ploiești Court – pending

Trial stage: Appeal - retrial

Parties: CONPET SA – defendant– counterclaimant

Buzatu Florin – claimant-respondent

Object: Buzatu Florin has filed a sue petition, asking the court:

1. Order the respondent Conpet SA to pay the claimant the amount of 150,000 EUR, payable at the BNR exchange rate on the day of the payment (amount to be reassessed upon completion of the expert real estate appraisal report to be carried out in probation, we shall resize and specify the value of the claims, corroborated with the appropriate adjustment of the stamp duty), representing the fair and equitable compensation for the damage suffered by restricting the possibility of exercising its right to property on the land area of 5,980 sqm located in the urban space of Slobozia Moară, Dâmbovița County, having the cadastral number 70618, registered with the land registry under 70618/UAT Slobozia Moară, Dâmbovița County, on which are found the underground gas pipelines and the overground devices of the respondent, land that cannot be used for the purpose of constructing a building;
2. Order the respondent Conpet SA to pay a 1,000 EUR monthly indemnity payable at the BNR exchange rate on the payment day, starting with the delivery of the Decision throughout the existence of the underground pipelines and overhead devices on the land owned by the respondent and to bear all the costs incurred by the claimant for the pre-authorization stages of the construction;
3. In alternative, it orders the respondent to erect all the constructions built on the claimant's property, namely the gas pipelines and the overhead devices, to bring the land to its original condition or to enable the claimant to perform the obligation to do so, at the exclusive expense of the respondent;
4. Order the defendant Conpet SA to pay the legal expenses incurred in the present legal proceedings.

Conpet has filed a counterclaim requesting that the plaintiffs be ordered to allow our company to exercise the right of legal easement established by the provisions of art. 7 et seq. of Law no. 238/2004 and the determination of the amount of the annual annuity provided for by law due by Conpet to the applicants in exchange for the exercise of the right of legal easement.

Mentions: By **Sentence nr.602/10.03.2022** the Dâmbovița Court rejects plea of lack of passive locus standi of the defendant applicant Conpet S.A. as regards the heads of claim for compensation and annuity, raised by it. It admits the claimant Conpet S.A.'s lack of passive procedural capacity as regards the head of claim concerning the obligation to raise the above-ground pipes and devices and to restore the land to its original condition or to empower the applicant to do so, invoked by it and consequently rejects that head of claim in contradiction with the defendant-claimant Conpet S.A. as being formulated against a person without passive procedural capacity. It admits in part the summons. The court partially admits the counterclaim. It obliges the defendant claimant to demolish the construction without authorization (foundation) existing on the land belonging to him, with cadastral no. 70618, registered in the land book no. 70618 of Slobozia Territorial Administrative Unit Slobozia Moara, Dambovita county identified according to the sketch drawn up in the expertise report in the topography specialty dated 04.11.2019 (f 300, vol. I). It establishes the amount of the annual rent due by the claimant defendant to the defendant claimant for exercising the right of legal easement on the land with an area of 890 sq.m related to crude oil pipelines Ø143" and Ø" identified according to the sketch prepared in the expertise report dated 02.11.2019 (f. 357, vol. I), to the amount of 284.8 Ron and obliges the plaintiff defendant to pay to the defendant plaintiff from the date of the final stay of the present sentence.

Dismisses the remainder of the summons and the counterclaim. It rejects the request to show the right holder formulated by the claimant defendant in contradiction with the Romanian State, through the Ministry of Public Finance and the National Agency for Mineral Resources. Orders the restitution to the plaintiff defendant of the stamp duty paid and not due in the amount of 1,143.4 RON. It compensates the costs within the limit of 1,172.7 RON and orders the plaintiff to pay to the defendant the uncompensated difference of 836 Ron in court costs. Buzatu Florin filed an appeal.

By **Decision no. 482/09.03.2023** Ploiesti Court of Appeal rejected the appeal, as unfounded. The decision was appealed by the plaintiff.

By the **Decision of 11.04.2024**, the High Court of Cassation and Justice rejects the exception of the nullity of the appeal, invoked by the respondent-intervening National Agency for Mineral Resources. It admits, in principle, the appeal filed by the appellant-claimant Buzatu Florin.

By **Decision no. 1161/28.05.2024**, the High Court of Cassation and Justice admits the appeal filed by the appellant-claimant Buzatu Florin. It dismisses the appealed decision and sends the case for a new trial to the same court Appeal.

By the **Decision no.106/30.01.2025**, the Ploiești Court of Appeal admits the appeal. It partially changes the appealed sentence in the sense that it: it establishes the amount of the annual rent owed by the defendant-claimant to the defendant-claimant for the exercise of the right of legal easement over the land with an area of 5,696 sq.m. in the amount of 1,217.2 RON and obliges the defendant claimant to pay it to the defendant claimant starting from the date of the finality of the present sentence. - It compensates the legal expenses within the limit of the amount of 2,008.7 RON and obliges the defendant claimant to pay the uncompensated difference of 2,088.79 RON as legal expenses to the defendant claimant. It maintains the rest of the provisions of the appealed sentence. It obliges the respondent to pay the legal expenses in the amount of 3,615.09 RON (RON 45.09 judicial stamp duty and 3,570 RON defense fee). With appeal within 30 days of communication.

Deadline: --

7. Case File no. 1541/262/2023- Moreni Court – pending

Stage of trial - merits

Parties: CONPET SA – defendant - counterclaimant

Mapi Imobiliare S.R.L. – plaintiff - defendant

Object: To oblige Conpet to pay an annual annuity according to art. 7 of Law nr. 238/2004 and compensation, including for the past as of 20.01.2023.

Conpet formulated the counterclaim/re conventional petition requesting the court:

1. The obligation of the claimant Mapi Imobiliare S.R.L. to allow the company CONPET S.A. the exercise of the right of legal servitude/easement established by the provisions of Art. 7 and et seq. of Law no. 238/2004 on the land owned by her, located in the Ocnița commune, Ochiuri village, Dâmbovița county. The exercise of the right of legal easement is to be carried out in a passage of 2.4 meters wide located along the pipe buses to transport crude oil Ø 6 5/8" Ochiuri - Moreni for purposes of access to the pipe in order to verify the day-to-day management of the status of the pipe and the execution of any repair works. The exercise of the easement right is to be carried out throughout the existence of the pipeline located on the claimant's land, but not later than the date of the termination of the concession oil contract concluded by us, the undersigned company CONPET S.A., with the Romanian State.
2. The establishment of the amount of the annual rent provided by the law due to us, the undersigned company CONPET S.A., to the claimant Mapi Imobiliare S.R.L. in exchange for

exercising the right of legal servitude/easement starting from the date of the definitive decision given in the present case, rent consisting in the value of the annual use of the plot of land affected by the exercise of servitude/easement.

At the same time, Conpet filed a warranty claim against the Romanian State, represented by the Ministry of Public Finance and the National Agency for Mineral Resources, requesting the court to be compensated by the defendants in guarantee, who will be jointly and severally liable for any amounts we will be obliged to pay to the applicant Mapi Imobiliare S.R.L..

in case the request for summons filed by it will be admitted in whole or in part.

Mentions: By the **Sentence no. 885/22.10.2024**, the Moreni Courthouse rejects, as unfounded, the exception of the lack of passive procedural quality of the defendant-claimant Conpet S.A. with regard to the claims for compensation and rent, invoked by it. Rejects, as unfounded, the plea of lack of passive locus standi of the defendant - applicant Conpet S.A. as regards the heads of claim for compensation and annuity, raised by him. It rejects the claim for summons in guarantee of the Romanian State represented by the Ministry of Public Finance and the National Agency for Mineral Resources. It rejects as unfounded the exception of the lack of passive procedural quality formulated by the National Agency for Mineral Resources. The court partially admits the counterclaim. It rejects as unfounded the counterclaim.

The decision was appealed by Conpet S.A. and Mapi Imobiliare S.R.L.

Mapi Imobiliare S.R.L. filed a request for clarification of the Sentence no. 885/22.10.2024.

By the conclusion of 11.02.2015, Moreni Court rejects the complaint.

Deadline: --

c) Litigations related to the structure of the share capital

CONPET S.A. has pending before courts 1 litigation, respectively:

Case File no. 5212/105/2018 – Ploiești Court of Appeal – pending

Trial stage: Appeal - retrial

The Proprietatea Fund SA filed a petition for trial requesting the court to rule the following:

1. To request CONPET to pay the amount of 734,747.04 RON representing the net value of dividends related to a percentage of 6% of Conpet's share capital, respectively for a number of 524,366 shares held by the claimant by the registration date of the OGMS of CONPET on 25.04.2007 (i.e. 14.05.2007), related to the financial year 2006.
2. The obligation of Conpet to pay compensatory damages, namely the legal interest related to the dividends from maturity due date requested in item 1 and until the date of the introduction of the petition for trial (i.e. 09.11.2018) in the amount of 579,015.97 RON.
3. The obligation of CONPET to pay the legal interest related to the net value of the dividends, subsequently, from the date of the petition for trial and until the actual payment of the requested amounts.
4. To request Conpet to pay the costs of this dispute.

Mentions: Conpet S.A. filed an impleader of the Romanian State through the Ministry of Finance and A.A.A.S.

By the **Conclusion of 25.06.2019**, the Prahova Court rejected as unfounded the impleader of the Authority for the Administration of State Assets, formulated by the defendant Conpet S.A. Against this decision of the court, Conpet and the Romanian State through the Ministry of Public Finance filed an appeal. By the same Conclusion of 25.06.2019, the court admitted in principle the impleader of the Romanian State by the Ministry of Public Finance, formulated by the defendant Conpet S.A. and rejected as unfounded the plea of the lack of passive procedural quality of the Romanian State by the Ministry of Public Finance. The appeal was

registered before the Court of Appeal Ploiesti with no. 5212/105/2018/a2. By the decision no. 515/05.11.2019 Ploiești Court of Appeal admits the plea of the inadmissibility of the appeal declared by the Ministry of Public Finance. The court rejects this appeal as inadmissible. The court rejects the exception of the lack of interest and the exception of the inadmissibility of the appeal declared by Conpet. Dismisses this appeal as unfounded. Final judgment.

By **the Conclusion of 20.09.2019**, the Prahova Tribunal suspends the trial of the case until the settlement of the appeals made against the decision pronounced on 25.06.2019. This conclusion remained final by non-recurrence.

By **Sentence no. 633/02.06.2021** The Prahova Tribunal rejects as ungrounded the exception of the prescription of the right to action. It admits the action. It obliges the defendant CONPET to pay to the claimant the amounts of 734,747.04 RON representing the value of dividends, of 579,015.97 RON, representing dividends for the period 26.10.2007 - 09.11.2018, and the legal interest related to the net value of the dividends from 09.11.2018 and until the actual payment of the main debit. It admits in part the warranty claim. It obliges the summoned in guarantee The Romanian State to pay to the defendant Conpet S.A., the amount of 734,747.04 RON, representing the value of dividends, and the legal interest related to this amount starting with 17.12.2018 and until the date of restitution to the defendant of the amount of 734,747.04 RON. With the right to appeal within 30 days from communication. The decision was appealed by Conpet S.A. and the Romanian State through the Ministry of Public Finances.

By **the Decision no. 814/01.07.2021** the Court admits the request for correction of the material error made by the claimant. It corrects the material error crept into the content of paragraph 3 of the operative part of sentence no. 633 / 02.06.2021 pronounced by the Prahova Court, in the sense that it is written: "It obliges the defendant Conpet S.A. to pay to the claimant the amounts of 734,747.04 RON representing the main debit and of 579,015.97 RON, representing dividends for the period 26.10.2007-09.11.2018, and the legal interest related to the net value of the dividends from 09.11.2018 until the actual payment of the main debit." It admits the request for completion of the decision made by the claimant. It orders the completion of the civil sentence no. 633/02.06.2021 in the sense that it also provides: reduces the fee of the claimant's lawyer to 70,000 RON. obliges the defendant Conpet S.A. to pay the claimant the following legal expenses: 20,347.63 RON representing judicial stamp duty, 4,300 RON expert fee, 8,481.87 RON expert fee, 70 RON lawyer's fee and 1,125 RON other expenses. obliges the summoned in guarantee the Romanian State to pay to the defendant Conpet S.A. legal expenses in amount of 16,943 RON. The decision was appealed by Conpet S.A.

Conpet S.A. also filed a request to correct the material errors in the contents of sentence no. 633 of 02.06.2021 pronounced by the Prahova Court in the file no. 5212/105/2018, device that was the object of correcting the material error pronounced by the court by sentence no. 81 of 01.07.2021. Through the Conclusion of Correction of Material Civil Error, dated 12.09.2022, the Prahova Court admitted the request to correct the material errors of the disposition of the civil sentence no. 633/02.06.2021 and no. 814/01.07.2021, pronounced by the Prahova Court, in the file no. 5212/105/2018, formulated by Conpet S.A., against the claimant, Fondul Proprietatea S.A., against the defendant Conpet S.A., the summoned in guarantee the Romanian State, through the Ministry of Public Finances. It corrects the material errors in the content of sentences no. 633/02.06.2021 and no. 814/01.07.2021 pronounced by the Prahova Court, in the sense that it is changed: It obliges the defendant S.C. Conpet S.A. to pay the claimant the amount of 734,747.04 RON representing the net value of the dividends and 579,015.97 RON, representing the legal interest related to the net

value of the dividends for the period 26.10.2007-09.11.2018, and the legal interest related to the net value of the dividends from 09.11.2018 and until the actual payment of the main debit. By the **Decision no. 245/08.12.2022** the Ploiești Court of Appeal admits the exception of the ineligibility of the appeal invoked ex officio. It rejects the appeal as unfounded. Final judgment.

By the **Decision no. 109/29.03.2023**, the Ploiești Court of Appeal admits the appeal. It changes the entire sentence. It admits the statute of limitations exception and dismisses the claim as statute of limitations. Rejects the warranty claim. It obliges the claimant to pay the defendant 16,943 RON in legal expenses incurred at the trial in the first instance. It obliges the respondent-claimant to pay the appellant-defendant 17,785 RON in legal expenses in the appeal.

Fondul Proprietatea S.A. filed an appeal.

On 14.02.2024 the H.C.C.J. admits in principle the appeal declared by the appellant-claimant Fondul Proprietatea S.A. against the decision no. 109/29.03.2023, pronounced by the Ploiești Court of Appeal - Civil Division II. It establishes a term for judging the appeal.

By the **Decision no. 860/17.04.2024** the H.C.C.J. admits the appeal; it quashes the appealed decision and sends the case for a new trial to the appellate court.

By the **Decision no. 67/26.02.2025** the Ploiești Court of Appeal rejects the appeal filed by the summoned in guarantee the Romanian State, represented by the Ministry of Finances. It admits the appeal filed by the defendant Conpet S.A. It changes in part the sentence no. 633/02.06.2021, as directed by the conclusion of 12.09.2022, in the sense that the impleader will be accepted in its entirety and the Romanian State represented by the Ministry of Finance will be obliged to pay the defendant the amount of 579,015.97 RON representing the interest to be paid by the defendant to the claimant for the period between 26.10.2007 - the due date for payment of dividends due for the 524,366 shares and the date of filing the impleader - 09.11.2018, as well as the legal interest starting with 09.11.2018 and until the moment this court decision becomes final. It obliges the defendant-appellant to pay the claimant-respondent the legal expenses in the amount of 30,000 RON representing defense fees incurred in the appeal trial in both procedural cycles. It obliges the defendant-appellant to pay the claimant-respondent the legal expenses in the amount of 50 RON the judicial stamp duty paid in the appeal as well as 31,197.58 RON defense fees paid in the appeal - HCCJ - in the first procedural cycle. It maintains the other provisions of the sentence no. 633/02.06.2021. With appeal within 30 days of communication.

Deadline: --

d) Litigations brought before the administrative court

CONPET S.A. has 7 litigations pending before courts, respectively:

1. Case File no. 5971/2/2022 – Bucuresti Court of Appeal – pending

Procedural status: First court

Parties: OMV Petrom SA - claimant

NAMR - defendant

CONPET S.A. – defendant

Object: The court is requested that, by the judgment that will be pronounced, to order:

1. Regarding the Order 229/2021:

1.1. Partial annulment of art. 1 of Order 229/2021 regarding the tariffs established in the Annex 1 and Annex 3 and, accordingly, the Annexes 1 and 3 of Order 229/2021; and by way of consequence

1.2. Obliging NAMR to issue a new order for the approval of transport tariffs through the National System for the transport of crude oil, rich gas, condensate and ethane for the year 2022, which includes tariffs modified accordingly with regard to tariffs in the COUNTRY (Annex 1) and tariffs in import for refineries in the Ploiești Basin (Annex 3), as a result of the recalculation of the tariffs included in the Order 229/2021 in a transparent and non-discriminatory manner, in accordance with the constitutional provisions and those of the primary and secondary petroleum and competition legislation, as they are exposed by means of this summons;

2. Regarding Order 53/2008, the partial cancellation of art. 3-8 of the Annex to Order no. 53/2008, as well as obliging NAMR to issue a new order to properly complete the Order no. 53/2008, by reference to the following:

2.1. the method of determining in the Methodology the operating cost lacking transparency and clarity, with regard to (i) its component elements, the structure of each of these elements, not specifically provided for, along with (ii) the cost calculation algorithm of operation by referring to these elements and (iii) by taking into account only those elements that constitute, by their nature, operating costs, so that these secondary normative provisions are aligned with the requirements of art. 20 of the Petroleum Law;

2.2. The algorithm for determining the modernization quota that does not provide in a specific, clear and transparent manner (i) the effective percentage of the modernization quota, (ii) the basis on which it is applied, (iii) the concrete investments in order to carry out pay the modernization quota by the beneficiaries of the transport system, (iv) the method of managing the surplus of amounts collected as modernization quota and unused until the end of the financial year that were charged for the realization of investments, by taking into account these amounts in the calculation of the modernization quota that the beneficiaries must pay in the following year, by referring to the investments considered within it and such amounts available for investments carried over from previous years, as well as (v) the method of managing the bank interest collected by the holder of the concession agreement as a result of depositing the sums received as a modernization quota and not used by him, in the sense of using the interests according to the same destination and taking into account these sums in the calculation of the modernization quota that the beneficiaries must pay in the following year with this title, so that these secondary normative provisions are aligned with the requirements of art. 20 of the Petroleum Law;

2.3. the algorithm from which does not result in a specific, clear and transparent manner (i) the method of determining the level of the rate of profit considered to be reasonable or (ii) of a profitability interval whose lower and upper limits should be established on the basis of comparative studies, by referring to the practice in the field of other comparable European transport operators, as well as (iii) specific requirements for transparent justification by Conpet of the studies to substantiate any increases in the profitability rates considered in the establishment of transport tariffs, so that these secondary normative provisions are aligned with the requirements of art. 20 of the Petroleum Law;

2.4. the tariff systems that are not currently focused on similar criteria and calculations for the two subsystems they regulate (i.e. the domestic and the import) that meet the requirements of ensuring equal treatment between the beneficiaries of the public transport service for the two types of subsystems, so that these secondary normative provisions are aligned with the requirements of art. 20 of the Petroleum Law;

2.5. the procedural elements to ensure in a clear, transparent and efficient manner the right of Conpet customers to express their point of view regarding the advanced tariff proposals for approval by Conpet, based on specific documentation made available to them

respectively to the revision/update requests of the rates sent by Conpet to N.A.M.R. and related documentation, as well as to receive a reasoned response from N.A.M.R. regarding the views expressed if they are not taken into account in full or in part by N.A.M.R., so that these secondary normative provisions are aligned with the requirements of art. 20 of the Petroleum Law and the transparency requirements applicable to the adoption of normative acts in compliance with the general European and national principle of good administration.

3. Order the respondent to pay the court costs.

After the communication of the summons request, but before the first court term (17.01.2023) OMV PETROM amended the summons request regarding the first petition of the request asking the court to order:

1. Regarding Order no. 229/2021:

Partial annulment of art. 1 of Order 229/2021 regarding the tariffs established in Annex 1 and Annex 3 and, correspondingly, of Annexes 1 and 3 of Order 229/2021 regarding the tariffs for the DOMESTIC subsystem and the IMPORT subsystem, within the limit of the amount of the tariffs that will be established as legal as a result of their recalculation in a transparent and non-discriminatory manner, in accordance with the constitutional provisions and those of the primary and secondary petroleum and competition legislation, as they are submitted through this summons.

2. Regarding Order no. 53/2008: partial cancellation of art. 3-8 of the Annex to Order no. 53/2008, as well as the obligation of N.A.M.R. upon issuing a new order to properly complete Order no. 53/2008, by reference to the following:

2.1. the method of determining in the Methodology the operating cost lacking transparency and clarity, with regard to (i) its component elements, the structure of each of these elements, not specifically provided for, along with (ii) the cost calculation algorithm of operation by referring to these elements and (iii) by taking into account only those elements that constitute, by their nature, operating costs, so that these secondary normative provisions are aligned with the requirements of art. 20 of the Petroleum Law;

2.2. The algorithm for determining the modernization quota that does not provide in a specific, clear and transparent manner (i) the effective percentage of the modernization quota, (ii) the basis on which it is applied, (iii) the concrete investments in order to carry out pay the modernization quota by the beneficiaries of the transport system, (iv) the method of managing the surplus of amounts collected as modernization quota and unused until the end of the financial year that were charged for the realization of investments, by taking into account these amounts in the calculation of the modernization quota that the beneficiaries must pay in the following year, by referring to the investments considered within it and such amounts available for investments carried over from previous years, as well as (v) the method of managing the bank interest collected by the holder of the concession agreement as a result of depositing the sums received as a modernization quota and not used by him, in the sense of using the interests according to the same destination and taking into account these sums in the calculation of the modernization quota that the beneficiaries must pay in the following year with this title, so that these secondary normative provisions are aligned with the requirements of art. 20 of the Petroleum Law;

2.3. The algorithm does not result in a specific, clear and transparent manner (i) the way to determine the level of the rate of profit considered to be reasonable or (ii) of a profitability interval whose lower and upper limits should be established based on comparative studies, by reference to the practice in the field of other comparable European transport operators, as well as (iii) specific requirements for transparent justification by CONPET of studies to substantiate any increases in profitability rates considered in the establishment of transport

tariffs, so that these secondary normative provisions are aligned with the requirements of art. 20 of the Petroleum Law;

2.4. Tariff systems that are not currently focused on similar criteria and calculations for the two subsystems they regulate (i.e. the domestic and the import) that meet the requirements of ensuring equal treatment between the beneficiaries of the public transport service for the two types of subsystems, so that these secondary normative provisions are aligned with the requirements of art. 20 of the Petroleum Law;

2.5. Procedural elements to ensure in a clear, transparent and efficient manner the right of Conpet customers to express their point of view regarding advanced tariff proposals for approval by Conpet, based on specific documentation made available to them respectively to requests for revision/update of tariffs sent by Conpet to N.A.M.R. and related documentation, as well as to receive a reasoned response from N.A.M.R. regarding the points of view formulated if they are not taken into account in whole or in part by N.A.M.R. so that these secondary normative provisions are aligned with the requirements of art. 20 of the Petroleum Law and the transparency requirements applicable to the adoption of normative acts in compliance with the general European and national principle of good administration.

3. Order the respondent to pay the court costs.

Mentions: By the **Sentence no. 898/28.05.2024**, the Bucharest Court of Appeal rejects as unfounded the claimant's exception of lack of interest. It rejects as unfounded the exception of lack of passive procedural quality of the defendant Conpet S.A. It rejects as unfounded the request for summons, as amended. It rejects as unfounded the claimant's request to order the defendants to pay the legal expenses. With appeal after communication.

Deadline: --

2. Case File no. 7035/2/2022– Bucuresti Court of Appeal – pending

Trial stage: Merits- suspended

Parties: OMV Petrom SA - claimant

NAMR - defendant

CONPET S.A. – defendant

Object: The court is requested that, through the decision that will be pronounced, to order:

1. Partial annulment of the art. 3 of Addendum no. 2 regarding the tariffs on the DOMESTIC subsystem and the IMPORT subsystem charged for the transport services provided by Conpet and established by Order no. 229/2021, within the limit of the amount of the tariffs that will be established as legal following the administrative litigation proceedings carried out by the Company regarding the tariffs with NAMR;

2. Partial annulment of the art. 1 and 4 of Addendum no. 2, 6 and 9, respectively of art. 1 and 3 of Addenda 3, 4, 5, 7 and 8 by which the duration of the Transport Contract was extended for the period 01.01.2022 - 31.08.2022 with the application of the new tariffs approved by the Order 229/2021, within the limit of the amount of the tariffs that will be established as legal following the administrative litigation proceedings carried out by the Company regarding the tariffs with N.A.M.R. and, as a consequence;

3. The obligation of CONPET to pay to the Company, as compensation as a result of the partial cancellation of the Addenda, but also its illegal act of providing erroneous data that was the basis of the tariff development process by N.A.M.R. based on the Order no. 229/2021 and then upon their payment by the Company based on the Addenda, of the amounts representing:

(i) the difference between the amount of the tariffs provided for in the Addendum no. 2 to

the transport contract, concluded as a result of the new tariffs adopted by the Order 229/2021, paid by the Company in the period 01.01.2022 – 31.08.2022 as a result of the extension of the contractual period through the Addenda and the amount of the tariffs that will be established as legal in the result of the administrative litigation proceedings carried out by the Company regarding them with N.A.M.R., updated according to the inflation index, as well as the related legal interest calculated from the date of payment of the tariff difference;

(ii) the difference between the amount of the tariffs paid by the Company for the transport of crude oil, through the DOMESTIC subsystem, from the Midia Terminal, and the amount of the tariffs established proportionally, by reference to the tariffs of DOMESTIC and IMPORT according to the subsystem actually used for the transport of marine crude oil, updated in depending on the inflation index, as well as the related legal interest calculated from the date of payment of the tariff difference, for the following quantities transported from the Midia Terminal and for which the tariff for the country subsystem was illegally calculated and paid:

- 13,905 tons from the art. 2 letter a) from Addendum no. 4 for March 2022;
- 13,171 tons from the art. 2 letter a) from Addendum no. 5 for April 2022;
- 13,307 tons from the art. 2 letter a) from Addendum no. 6 for May 2022;
- 12,633 tons from the art. 2 letter a) from Addendum no. 7 for June 2022;
- 12,072 tons from the art. 2 letter a) from Addendum no. 8 for July 2022;
- 12,900 tons from the art. 2 letter a) from Addendum no. 9 for August 2022;

(iii) any other amounts representing natural fruits that Conpet acquired or could have acquired in connection with the amounts illegally charged from the Company based on the tariffs;

4. Obligation to pay legal expenses.

The claimant OMV PETROM filed a request to change the heads of request no. 2 and 3 of the petition of the introductory action in the sense that, in addition to Addenda no. 2 – 9, the Company understands to challenge through this action the last 4 additional documents on the basis of which transport services were provided by Conpet between September and December 2022 for the benefit of the company, as follows:

- Addendum no. 10/23.08.2022;
- Addendum no. 11/22.09.2022;
- Addendum no. 12/31.10.2022;
- Addendum no. 13/22.11.2022.

Therefore, considering the request to modify the preliminary action, the claimant OMV PETROM requests the court to order, through the judgment that will be ruled:

1. 1. Partial annulment of the art. 3 of Addendum no. 2 regarding the tariffs on the domestic subsystem and the import subsystem charged for the transport services provided by Conpet and established by the Order no. 229/2021, within the limit of the amount of tariffs that will be established as legal following the administrative litigation proceedings carried out by the Company regarding the tariffs with N.A.M.R.;
2. 2. Partial annulment of Art. 1 and 4 of Addendum no. 2, 6, 9 and 12 respectively of Art. 1 and 3 of Addenda 3, 4, 5, 7, 8, 10, 11 and 13 by which the duration of the Transport contract was extended for the period 01.01.2022 - 31.12.2022 with the application of the new tariffs approved by Order no. No. 229/2021, within the limit of the amount of the tariffs that will be established as legal following the administrative litigation proceedings carried out by the Company regarding the tariffs with N.A.M.R. and consequently;

3. Obliging Conpet to pay the Company, in the form of compensation as a result of the partial cancellation of Addenda no. 2 -13, but also of her illegal act of providing erroneous data that was the basis of the tariff development process by N.A.M.R. based on the Order no. 229/2021 and then upon their payment by the Company based on the Addenda, of the amounts representing:

(i) the difference between the amount of the tariffs provided for in Addendum no. 2 to the transport contract, concluded as a result of the new tariffs adopted by Order no. 229/2021, paid by the Company in the period 01.01.2022 - 31.12.2022 as a result of the extension of the contractual period through the Addenda and the amount of the tariffs that will be established as legal following the administrative litigation proceedings carried out by the Company regarding them with the N.A.M.R., updated according to the inflation index, as well as the related legal interest calculated from the date of payment of the tariff difference;

(ii) the difference between the amount of the tariffs paid by the Company for the transport of crude oil, through the DOMESTIC subsystem, from the Midia Terminal, and the amount of the tariffs established proportionally, by reference to the tariffs of DOMESTIC and IMPORT according to the subsystem actually used for the transport of marine crude oil, updated in depending on the inflation index, as well as the related legal interest calculated from the date of payment of the tariff difference, for the following quantities transported from the Midia Terminal and for which the tariff for the country subsystem was illegally calculated and paid:

- 13,905 tons from the art. 2 letter a) from Addendum no. 4 for March 2022;
- 13,905 tons from the art. 2 letter a) from Addendum no. 4 for March 2022;
- 13,171 tons from the art. 2 letter a) from Addendum no. 5 for April 2022;
- 13,307 tons from the art. 2 letter a) from Addendum no. 6 for May 2022;
- 12,633 tons from the art. 2 letter a) from Addendum no. 7 for June 2022;
- 12,072 tons from the art. 2 letter a) from Addendum no. 8 for July 2022;
- 12,900 tons from Art. 2 letter a) from Addendum no. 9 for August 2022;
- 12,213 tons from Art. 2 letter a) from Addendum no. 10 for September 2022;
- 12,411 tons from Art. 2 letter a) from Addendum no. 11 for October 2022;
- 11,836 tons from Art. 2 letter a) from Addendum no. 12 for November 2022;
- 12,048 tons from Art. 2 letter a) from Addendum no. 13 for December 2022.

(iii) any other amounts representing natural fruits that Conpet acquired or could have acquired in connection with the amounts illegally charged from the Company based on the tariffs;

4. Obligation to pay legal expenses.

Mentions: By the **Conclusion dated 24.05.2023**, the Court of Appeal of Bucharest rejects the application for revocation of the claimant from submitting the request to amend the heads of claims 2 and 3 of the request for summons as ungrounded. Based on art. 413 paragraph 1 point 1 of the Code of Civil Procedure, it orders the suspension of the trial of the case until the final resolution of the case that is the subject of file no. 5971/2/2022 of the Bucharest Court of Appeal, Section IX of Administrative and Fiscal Litigation. With the right of appeal for the duration of the suspension.

Deadline: --

3. Case File no. 4988/2/2023 – Bucuresti Court of Appeal – pending

Procedural status: Merits- suspended

Parties: OMV Petrom SA - claimant
NAMR - defendant

CONPET S.A. – defendant

Object: The court is requested that, by the judgment that will be pronounced, to order:

1. The partial annulment of art. 1 and art. 3 of the Addenda no. 10, no. 11 and no. 13, respectively of art. 1 and 4 of the Addendum no. 12, by which the duration of the transport contract was extended for the period 01.09.2022 - 31.12.2022 with the application of the new tariffs approved by the Order 229/2021, within the limit of the amount of the tariffs that will be established as legal following the administrative litigation proceedings carried out by the Company regarding tariffs with N.A.M.R. and, as a consequence,

2. Obliging CONPET to pay the Company, by way of compensation as a result of the partial cancellation of the Addenda no. 10-13, but also of its illegal act of providing erroneous data that formed the basis of the tariff development process by N.A.M.R. based on the Order no. 229/2021 and then upon their payment by the Company based on the Addenda, of the amounts representing:

i. the difference between the amount of the tariffs provided for in the Addendum no. 2 to the transport contract, concluded as a result of the new tariffs adopted by the Order 229/2021, paid by the Company in the period 01.09.2022 - 31.12.2022, as a result of the extension of the contractual period by the Addenda no. 10-13 and the amount of the tariffs that will be established as legal following the administrative litigation proceedings carried out by the Company regarding them with N.A.M.R., updated according to the inflation index, as well as the related legal interest calculated from the date of payment of the tariff difference;

ii. the difference between the amount of tariffs paid by the Company for the transport of crude oil, through the domestic subsystem, from the Midia Terminal, and the amount of the tariffs established proportionally, by reference to the domestic and import tariffs according to the subsystem actually used for the transport of marine crude oil, updated according to the index of inflation, as well as the related legal interest calculated from the date of payment of the tariff difference, for the following quantities transported from the Midia Terminal and for which the tariff for the country subsystem was illegally calculated and paid;

- 12,213 tons from art. 2 letter a) from the Addendum no. 10 for September 2022;
- 12,411 tons from Art. 2 letter a) from Addendum no.11 for October 2022;
- 11,836 tons from Art. 2 letter a) from Addendum no.12 for November 2022;
- 12,048 tons from Art. 2 letter a) from Addendum no.13 for December 2022.

iii. any other amounts representing natural fruits that Conpet acquired or could have acquired in connection with the amounts illegally charged from the Company based on the tariffs;

3. Ordering the defendants to pay legal expenses.

Mentions: On the term dated 15.11.2023, the Bucharest Court of Appeal ordered the suspension of the trial of this case until the final resolution of the case which is the subject matter of the file no. 7035/2/2022 of the Bucharest Court of Appeal. With the right of appeal for the duration of the suspension.

Deadline: --

4. File no. 5559/2/2023 - Bucharest Court of Appeal - Suspended

Trial stage: First court

Parties: OMV Petrom SA - claimant

NAMR - defendant

CONPET S.A. – defendant

Object: The court is requested that, by the judgment that will be pronounced, to order:

1. The partial annulment of art. 1 of the Order no. 364/2022 regarding the tariffs established in Annex 1 and Annex 3 and, accordingly, Annexes 1 and 3 of the Order no. 364/2022,

regarding the tariffs for the DOMESTIC subsystem and the IMPORT subsystem, within the limit of the amount of tariffs that will be established as legal as a result of their recalculation in a transparent and non-discriminatory manner, in accordance with the constitutional provisions and those of the legislation primary and secondary oil and competition, as they are exposed through the present summons;

2. Ordering the defendants to pay legal expenses.

Mentions: By the Conclusion of 18.04.2024, the Bucharest Court of Appeal rejects the connectedness challenge, as unfounded. Based on srt. 413, para.1. Item 1 from the Civil Procedure Code, it suspends the trial of the case until the final resolution of the file pending before the Bucharest Court of Appeal, Division IX of Administrative and Fiscal Litigation under no. 5971/2/2022. With appeal during the suspension.

Deadline: --

5. File no. 8213/2/2023 - Bucharest Court of Appeal

Trial stage: Merits- suspended

Parties: OMV Petrom SA - claimant

CONPET S.A. – defendant

NAMR - defendant

Object: The court is requested that, by the judgment that will be pronounced, to order:

1. The partial annulment of art. 1 and art. 3 of the Addendum no. 14, of art. 1 and 4 of the Addenda no. 15, no. 16, no. 17, respectively of art. 1 and 5 of the Addendum no. 18 by which the duration of the Transport Contract was successively extended for the period 01.01.2023 - 31.12.2023, with the application of the new tariffs mentioned in the Notification no. 811/06, 01.2023 sent by Conpet regarding the change in transport tariffs through the National System for the Transport of Crude Oil, Rich gas, Condensate and Ethane ("SNT") starting from January 1, 2023, based on the Order 364/2022 (Annex 4), within the limit of the amount of the tariffs that will be established as legal as a result of the administration of evidence from this case;

2. The partial annulment of art. 2 of the Addenda no. 14-18 in the sense of:

i. the elimination of the quantities of 5-417 tons mentioned in the content of art. 2 letter a) from the Addendum no. 14 for the period January 1-15, 2023 that were transported from the Midia Terminal from the quantities transported through the domestic subsystem and the inclusion of the first quantities in those in point b) of the same article regarding the quantities transported through the import subsystem;

ii. the elimination of the quantities of 15,061 tons from art. 2 letter a) from the Addendum no. 15 for the period January 16 - February 28, 2023 transported from the Midia Terminal from the quantities transported through the domestic subsystem and the inclusion of the first quantities in those in point b) of the same article regarding the quantities transported through the import subsystem;

iii. the elimination of the quantities of 40,859 tons from art. 2 letter a) from the Addendum no. 16 for the period March 1 - June 30, 2023 transported from the Midia Terminal from the quantities transported through the domestic subsystem and the inclusion of the first quantities in those in point b) of the same article regarding the quantities transported through the import subsystem;

iv. the elimination of the quantities of 28,811 tons mentioned in the content of art. 2 letter a) from the Addendum no. 17 for the period July 1 - September 30, 2023 transported from the Midia Terminal from the quantities transported through the domestic subsystem and the inclusion of the first quantities in those in point b) of the same article regarding the

quantities transported through the import subsystem;

v. the elimination of the quantities of 28,898 tons mentioned in the content of art. 2 letter a) from the Addendum no. 18 for the period October 1 - December 31, 2023 transported from the Midia Terminal from the quantities transported through the domestic subsystem and the inclusion of the first quantities in those in point b) of the same article regarding the quantities transported through the import subsystem;

3. Obliging Conpet to pay the Company, in the form of compensation - as a result of the partial cancellation of the Addenda, but also of its illegal act of providing erroneous data that was the basis of the tariff development process by N.A.M.R. based on the Order no. 364/2022 and then upon their payment by the Company based on the Addenda, of the amounts representing:

i. the difference between the amount of the tariffs provided for in the Addenda no. 14 -18 to the Transport Contract concluded as a result of the new tariffs adopted by the Order no. 364/2022, paid by the Company in the period 01.01.2023 - 31.12.2023 and the amount of tariffs that will be established as legal following the administrative litigation proceedings carried out by the Company regarding them with N.A.M.R., updated according to the inflation index, as and the related legal interest calculated from the date of payment of the tariff difference;

ii. the difference between the amount of tariffs paid by the Company for the transport of crude oil, through the country subsystem, from the Midia Terminal, and the amount of the tariffs set proportionally, by reference to the country and import tariffs according to the subsystem actually used for the transport of marine crude oil, updated according to the index of inflation, as well as the related legal interest calculated from the date of payment of the tariff difference, for the following quantities transported from the Midia Terminal and for which the tariff for the country subsystem was illegally calculated and paid:

- 5,417 tons from Art. 2 letter a) from Addendum no.13 for January 01 - 15, 2023;
- 15,061 tons from Art. 2 letter a) from Addendum no.15 for January 16th - February 28th, 2023;
- 40,859 tons from Art. 2 letter a) from Addendum no.16 for March 01st - June 30th, 2023;
- 28,811 tons from Art. 2 letter a) from Addendum no.13 for July 01st - September 30th, 2023;
- 28,898 tons from Art. 2 letter a) from Addendum no.18 for October 1st - December 31st, 2023;

iii. any other amounts representing natural fruits that Conpet acquired or could have acquired in connection with the amounts illegally charged from the Company based on the tariffs;

4. Ordering the defendants to pay legal expenses.

Clarifications: By the Decision no. 775/26.04.2024, it admits the motion to dismiss for lack of jurisdiction. It declines the jurisdiction to resolve the case in favor of the Bucharest Court of Appeal, Administrative and Fiscal Litigation Division.

By the **Decision no. 6402/01.10.2024**, the Bucharest Court of Appeal admits the motion to dismiss for lack of jurisdiction. It declines the jurisdiction to resolve the application in favor of the Bucharest Court of Appeal. It finds that a negative conflict of jurisdiction has arisen. It forwards the file to the High Court of Cassation and Justice for the resolution of the negative conflict of jurisdiction.

By the **Decision no. 5860/06.12.2024**, the HCCJ establishes the jurisdiction to resolve the case concerning in favor of the Bucharest Court of Appeal.

By the **Conclusion of 11.03.2025**, the Bucharest Court of Appeal suspends the trial of the case until the final resolution of file no. 5559/2/2023 of the Bucharest Court of Appeal.

Deadline: --

6. Case File no. 5071/2/2024 – Bucuresti Court of Appeal – pending

Trial stage: First court

Parties: OMV Petrom SA - claimant

The National Regulatory Agency for Mining, Petroleum and Geological Storage of Carbon Dioxide-A.N.R.M.P.S.G. (formerly N.A.M.R.) - defendant

CONPET S.A. – defendant

Object: The court is requested that, by the judgment that will be pronounced, to order:

1. Partial annulment of art. 1 of Order no. 340/2023 regarding the tariffs established in Annex 1 and Annex 3 and, accordingly, of Annexes 1 and 3 of Order no. 340/2023, regarding the tariffs for the Domestic subsystem and the Import subsystem, within the limit of the amount of the tariffs that will be established as legal as a result of their recalculation in a transparent and non-discriminatory manner, in accordance with the constitutional provisions and those of the primary and secondary petroleum and competition legislation, as they are set out in this application for summons;
2. Ordering the defendants to pay legal expenses.

Mentions: By the **Conclusion of 29.11.2024**, the Bucharest Court of Appeal suspends the trial of the case until the final resolution of file no. 5971/2/2022 pending before the Bucharest Court of Appeal. With the right of appeal for the entire period of suspension.

Deadline: --

7. File no. 8081/2/2024 - Bucharest Court of Appeal

Parties: OMV Petrom SA - claimant

CONPET S.A. – defendant

The National Regulatory Agency for Mining, Petroleum and Geological Storage of Carbon Dioxide-A.N.R.M.P.S.G. (formerly N.A.M.R.) - defendant

Object: Request for summons against Addendum no. 19 of 22.12.2023 and Addendum no. 20 of 19.03.2024 to the Contract for the transport of crude oil, rich gas and condensate no. BC OMV 108/25.03.2020 concluded between OMV Petrom S.A. and Conpet S.A.

The court is requested that, by the judgment that will be pronounced, to order:

1. Partial annulment of art. 3 of Addendum no. 19, as well as art. 1 and 4 of Addendum no. 20, by which the duration of the Transport Contract was extended monthly, successively, for the periods 01.01.2024 - 31.03.2024 and, respectively, for 01.04.2024 - 30.06.2024, regarding the tariffs established by N.A.M.R. Order no. 340/2023 regarding the approval of transport tariffs through the National Transport System for crude oil, rich gas, condensate and ethane ("Order 340/2023", Annex 3), within the limit of the amount of the tariffs that will be established as legal, as a result of the administration of the evidence in this case;
2. Partial annulment of art. 2 of Addenda no. 19-20, in the sense of:
 - (i) the elimination of the quantities of 28,163 tons, mentioned in art. 2 letter a) of Addendum no. 19, for the period 01.01.2024 — 31.03.2024, transported from the Midia Terminal from the quantities transported through the Domestic subsystem and the inclusion of the former quantities in those in point b) of the same article relating to the quantities transported through the Import subsystem;
 - (ii) the elimination of the quantities of 23,881 tons, mentioned in art. 2 letter a) of Addendum no. 20, for the period 01.04.2024 - 30.06.2024, transported from the Midia Terminal from the

quantities transported through the Domestic subsystem and the inclusion of the first quantities in those in point b) of the same article relating to the quantities transported through the Import subsystem,

3. Obliging Conpet to pay to the Company, as compensation as a result of the partial annulment of the Addenda, but also of its unlawful act of providing erroneous data that formed the basis of the tariff development process by N.A.M.R. based on the Order no. 340/2023 and then upon their payment by the Company based on the Addenda, the amounts representing:

(i) the difference between the amount of the tariffs provided for in Addenda no. 19 -20 to the Transport Contract concluded as a result of the new tariffs adopted by the Order no. 340/2023, paid by the Company during the period 01.01.2024 — 30.06.2024 and the amount of the tariffs that will be established as legal following the administrative litigation proceedings carried out by the Company regarding them with N.A.M.R., updated according to the inflation index, as well as the related legal interest calculated from the date of payment of the tariff difference;

(ii) the difference between the amount of tariffs paid by the Company for the transport of crude oil, through the Domestic subsystem, from the Midia Terminal, and the amount of tariffs established proportionally, by reference to the Country and Import tariffs depending on the subsystem actually used for the transport of marine crude oil, updated according to the inflation index, as well as the related legal interest calculated from the date of payment of the tariff difference, for the following quantities transported from the Midia Terminal and for which the tariff for the Domestic subsystem was illegally calculated and paid:

- 28,163 tons from art. 2 letter a) of Addendum no. 19 for the period 01.01.2024-31.03.2024;
- 23,881 tons from art. 2 letter a) of Addendum no. 20 for the period 01.04.2024 - 30.06.2024;

(iii) any other amounts representing natural fruits that Conpet acquired or could have acquired in connection with the amounts illegally charged from the Company based on the tariffs;

4. Ordering the defendants to pay legal expenses.

Mentions: --

Trial stage: First court

Deadline: --

The list of litigations in which Conpet S.A. is a party, pending before the courts on 14.03.2025 can be found in **Annex no. 6**.

Other aspects related to the company's tangible assets

State of the lands not included in the share capital

Currently, all the lands owned by CONPET S.A. are registered in the Integrated Cadastre System and the Land Registry.

On 31.12.2024 Conpet has registered in the company's patrimony land with an area of 738,292 sq.m, with a fair amount of 30,050,103 RON, held based on the Land Ownership Certificates and sale-purchase contracts.

The company augmented its share capital only by a part of the land plots held under the land ownership certificates, not being included in the share capital lands in surface of 554,537.61 sq.m., (554,201 sq.m according to the latest land register update documents), which are contained in 48 CADP. The Ownership certificates for these lands have been issued between

2001 - 2005 and the value evaluated at the time of issuing the certificates, established according to GD no. 834/1991 is of 26,708,233 RON. These lands have been recorded in the company's patrimony at the expense of equity. The fair value of these land plots on 31.12.2023, according to the report prepared by an ANEVAR authorized appraiser, amounts to 16,293,210 RON.

The Board of Directors has undertaken all steps in view of augmentation of the share capital by the value of land held based on the land ownership certificates.

Thus, based on the land appraisal reports, in compliance with the provisions of Art. 6 Para (3) of GD no.834/1991 subsequent amendments and completions, drafted by expert appraiser, the Board of Directors has summoned the Extraordinary General Meeting of Shareholders, on 19.05.2016, in first call, namely 20.05.2016, in second call. At both EGMS meetings the quorum has not met.

Although two general meetings of shareholders have been convened, the Board of Directors has summoned a new EGMS for 05.07.2016, with the same Agenda. Following the cast vote by the shareholders present and represented, the proposal to augment the share capital has not been approved, due to the lack of necessary quorum for approval votes.

Subsequently, there have been undertaken all necessary steps for the augmentation of the share capital, and on 26.03.2019, the EGMS approved the initiation of the procedure for the augmentation of the share capital and the appointment by the Trade Register Office Prahova of an expert authorized to assess the lands brought as contribution to the share capital.

Based on the new appraisal report has been convened the EGMS, on 04.07.2019 in first call and 05.07.2019 in second call, with the Agenda - Approval of the augmentation of the share capital by maximum value of 101,763,954.60 RON, representing contribution in kind (lands) in amount of 59,751,935.10 RON and cash amounting to maximum 42,012,019.50 RON, from the current value of 28,569,842.40 RON at the value of maximum 130,333,797 RON, by issuing a number of maximum 30,837,562 new, nominative, dematerialized shares, at a price of 3.3 RON/share, equal to the nominal value, without share premium.

In both EGMS meetings has not been met the attendance quorum provided by the law, necessary for the augmentation of the share capital with contribution in kind.

On 24.09.2020, the EGMS issued Resolution no. 1, by which it approved the initiation of the operation to augment the share capital by the value of the lands held based on the 48 ownership certificates and the initiation of formalities to the N.R.C. with a view to appoint an authorized appraiser for the valuation of the lands.

In order to comply with the EGMS Resolution, between September and December 2020, three requests were made to the Prahova Trade Register Office for the appointment of an appraiser to draw up the land evaluation report in accordance with Art. 6, Para. 3 of GD no. 834/1991.

In March 2021, by Resolution no. 1 dated 10.03.2021 and Resolution no. 2 dated 11.03.2021, the EGMS did not approve the augmentation of the share capital by the value of the lands not included, as during the two meetings the attendance quorum provided by law (85%) was not met.

On 28.04.2022, the EGMS issued Resolution no.1, by which it approved the initiation of the operation to augment the share capital by the value of the lands held based on the 48 ownership certificates and the initiation of formalities to Prahova Trade Register Office to appoint an authorized appraiser for land valuation.

In May 2022, two requests were made to the O.R.C. Prahova, for the appointment of an appraiser to draw up the land evaluation report, in accordance with art. 6, para. 3 of GD no. 834/1991.

Based on the evaluation report, prepared by the evaluator appointed by O.R.C. Prahova, Nitu Cornel, ANEVAR member with card no. 14579, by Resolution no. 2 dated 20.09.2022 and Resolution no. 3 dated 21.09.2022, the EGMS of Conpet did not approve the augmentation of the share capital by the value of the unincluded land plots, as, at the two meetings, the quorum of attendance provided for by the law was not met (85%).

To date, the share capital has not been augmented by the value of the not included land plots.

In 2023, GEO no. 26/20 April 2023 was adopted for amending and supplementing Art. 12 of Law nr. 137/2002 on some measures to accelerate privatization, which brought a new provision regarding the value by which the share capital is increased with the lands for which CADP was obtained in the sense that "the increase of the share capital provided for in para. (4¹) with the contribution in kind of the state or of an administrative-territorial unit, as the case may be, representing the lands for which certificates attesting the ownership right have been obtained, shall be made at the fair value (our note) determined no later than 90 days before the date of convening the extraordinary general meeting of shareholders for the approval of the share capital increase."

However, for the maintenance in force of the provisions of Article 6 Para. 3 of GD no. 834/1991, the issue of the value by which the share capital is augmented requires clarifications, which leads to delays in convening again the General Meeting of Shareholders in order to increase the share capital.

In order to clarify this issue, we addressed the Ministry of Energy, the guardianship authority, in order to indicate the criterion for determining the value of land, respectively the one regulated by Art. 6 of GD no. 834/1991 (by updating with the inflation index) or the one regulated by Art.12 of Law no. 137/2002 (by fair value measurement), as amended by GD no. 26/2023.

4.3 Analysis of the Financial Activity

The financial information presented in this report is taken from financial statements for the period ended December 31, 2024, prepared in accordance with Order of the Minister of Public Finances no. 2844/2016, audited.

4.3.1 Statement of the Financial Standing

Indicators	2024	2023	2022	Variation%	
				2024/2023	2023/2022

ASSETS

Fixed assets

Indicators	2024	2023	2022	Variation%	
				2024/2023	2023/2022
Tangible assets	664,781	670,831	607,025	▼ 0.9%	▲ 10.5%
Intangible assets	3,038	5,559	6,855	▼ 45.4%	▼ 18.9%
Financial Assets	535	2,523	2,537	▼ 78.8%	▼ 0.6%
Deferred corporate tax receivables	2,876	-	6,153	-	-
Total non-current assets	671,230	678,913	622,570	▼ 1.1%	▲ 9.1%
Current assets					
Inventories	6,016	6,520	6,867	▼ 7.7%	▼ 5.1%
Trade receivables and other receivables	39,442	52,981	49,187	▼ 25.6%	▲ 7.7%
Cash and cash equivalents	136,177	107,742	127,673	▲ 26.4%	▼ 15.6%
Prepaid expenses	687	698	1,252	▼ 1.6%	▼ 44.3%
Total current assets	182,322	167,941	184,979	▲ 8.6%	▼ 9.2%
TOTAL ASSETS	853,552	846,854	807,549	▲ 0.8%	▲ 4.9%
EQUITY AND LIABILITIES					
Equities					
Subscribed and paid-up share capital	28,570	28,570	28,570	-	-
Legal reserves	5,714	5,714	5,714	-	-
Revaluation reserves	43,539	49,838	17,101	▼ 12.6%	▲ 191.4%
Other reserves	558,423	547,585	533,898	▲ 2.0%	▲ 2.6%
Retained earnings	45,124	36,971	37,149	▲ 22.1%	▼ 0.5%
Result of the year	49,323	61,617	61,664	▼ 20.0%	▼ 0.1%
Total equities	730,693	730,295	684,096	▲ 0.1%	▲ 6.8%
Long-term liabilities					
Liabilities to employees	30,237	25,765	23,069	▲ 17.4%	▲ 11.7%
Other long-term liabilities	2,423	2,793	2,749	▼ 13.3%	▲ 1.6%
Deferred Tax Liabilities	-	901	-	-	-
Total long-term liabilities	32,660	29,459	25,818	▲ 10.9%	▲ 14.1%
Current liabilities					
Trade liabilities	26,574	33,092	43,915	▼ 19.7%	▼ 24.6%
Current corporate tax	-	1,808	1,997	-	▼ 9.5%
Other liabilities	33,028	28,764	27,569	▲ 14.8%	▲ 4.3%
Liabilities to employees	14,276	14,143	14,364	▲ 1.0%	▼ 1.5%
Short-term provisions	16,321	9,293	9,790	▲ 75.6%	▼ 5.1%
Total current liabilities	90,199	87,100	97,635	▲ 3.6%	▼ 10.8%
Total liabilities	122,859	116,559	123,453	▲ 5.4%	▼ 5.6%
TOTAL EQUITIES AND LIABILITIES	853,552	846,854	807,549	▲ 0.8%	▲ 4.9%

Table 15 - Company's Statement of the financial standing during 2022- 2024 (thousand RON)

The total assets of the company register an increase by 0.8% (6,698 thousand RON) compared to December 31, 2023, mainly due to the increase in fixed assets.

The intangible assets recorded a 1.1% decrease as compared to December 31st, 2023, mainly generated by inflows of tangible and intangible assets in total value lower than the decrease in the value of depreciated assets recorded in 2024.

The current assets increased by 14,381 thousand RON (8.6%), from 167,941 thousand RON on 31.12.2023 to 182,322 thousand RON on 31.12.2024.

In structure, the evolution of the main elements is different, the cash available registering an increase by 26.4% (28,435 thousand RON), while receivables decreased by 25.6% (13,539 thousand RON).

The equity registered a slight increase of 0.1% (398 thousand RON) as to December 31st, 2023 reaching 730,693 thousand RON.

The total liabilities increased by 6,300 thousand RON on December 31st, 2024, as compared to the value on December 31, 2023 due to the increase in long-term liabilities.

The long-term liabilities record an increase by 3,201 thousand RON as compared to December 31, 2023.

Current liabilities, in amount of 90,199 thousand RON, are increasing by 3,099 thousand RON as compared to December 31, 2023, mainly due to the increase of the short-term provisions.

Trade Liabilities and Other Liabilities

On December 31, 2024 and December 31, 2023, the trade liabilities and other liabilities look as follows:

Liabilities	December 31, 2023	December 31, 2024	Maturity date for the balance on December 31, 2024		
			Under 1 year	1-5 years	Over 5 years
Trade liabilities	33,092	26,574	26,574	-	-
Liabilities to the employees	39,908	44,513	14,276	4,764	25,473
Current Corporate Tax	1,808	-	-	-	-
Deferred Tax Liabilities	901	-	-	-	-
Provisions liabilities	9,293	16,321	16,321	-	-
Other liabilities	31,557	35,451	33,028	1,717	706
Total	116,559	122,859	90,199	6,481	26,179

Table 16 - Status of the trade liabilities and other liabilities on December 31st, 2024 (kRON)

On 31.12.2024, the company Conpet S.A. did not register outstanding payments.

The trade liabilities related to the purchases of goods and services intended for operating activities have a weight of 73.9% in total commercial debts, and those representing purchases of fixed assets have a weight of 26.1%

The debts to employees, in balance on the date of 31.12.2024, also include the future debts for the benefits granted to employees on retirement or death, for the employees' share of profit, for the untaken leaves of the employees, debts that are recognized as provisions.

The statement of the employee-related liabilities, fiscal liabilities and other maturity date liabilities look as follows:

Table 17 - Situation regarding contributions related to salaries and other fiscal liabilities on December 31, 2024 (kRON)

On 31.12.2024, leasing liabilities comprise recognized rights of use for leases and concessions of land, buildings and rail tanks.

The liabilities related to the rights of use recognized for the lease and concession contracts of some lands, buildings and rail tanks have been assessed at the value of rent fees/royalties along the remaining contractual period, discounted with the credit rate for real estate loans.

The statement of debts to employees on maturity terms reveals the following:

Debts	December 31, 2023	December 31, 2024	Maturity date for the balance on December 31, 2024		
			Under 1 year	1-5 years	Over 5 years
Salaries contributions	6,222	6,689	6,689	-	-
Royalty due to the State Budget	10,271	11,682	11,682	-	-
Payable VAT	4,111	5,061	5,061	-	-
Other interests and debts - Budget	1,221	1,910	1,910	-	-
Payable Dividends	5,444	5,718	5,718	-	-
Leasing related liabilities	3,347	3,621	1,742	1,380	499
Accrued revenues	696	613	82	324	207
Other liabilities	245	157	144	13	-
Total	31,557	35,451	33,028	1,717	706

Debts	December 31, 2023	December 31, 2024	Maturity date for the balance on December 31, 2024		
			Under 1 year	Over 1 year	Over 5 year
Salaries and assimilated debts	7,140	8,044	8,044	-	-
Liabilities for benefits granted on retirement	22,090	26,479	581	4,565	21,333
Liabilities for the benefits granted in case of death	4,156	4,339	-	199	4,140

Debts	December 31, 2023	December 31, 2024	Maturity date for the balance on December 31, 2024		
			Under 1 year	Over 1 year	Over 5 year
Liabilities for the employees' share of profit	6,003	5,064	5,064	-	-
Liabilities for untaken leaves	519	433	433	-	-
Liabilities for other employee benefits	-	154	154	-	-
Total	39,908	44,513	14,276	4,764	25,473

Table 18 - Statement of the liabilities to the employees on December 31st, 2024 (kRON)

On December 31, 2024, the Company mainly comprises at this chapter the salaries and assimilated debts, as well as future debts for benefits granted upon retirement or death and for the employees share of profit, recognized as provisions.

4.3.2. The global result statement

The evolution of the main financial indicators of the profit and loss account and of other global result elements, during 2022- 2024, is presented below:

Indicator	2024	2023	2022	Variation%	
				2024/2023	2023/2022
Revenues from contracts	533,618	485,114	472,233	▲ 10.0%	▲ 2.7%
Gain from disposal of assets	-	612	5,402	-	▼ 88.7%
Other revenues	72,664	55,208	44,425	▲ 31.6%	▲ 24.3%
Total operating revenues	606,282	540,934	522,060	▲ 12.1%	▲ 3.6%
Inventories Expenses	6,145	6,543	6,934	▼ 6.1%	▼ 5.6%
Expenses with energy and water	20,916	18,597	33,739	▲ 12.5%	▼ 44.9%
Personnel expenses	210,186	194,395	180,923	▲ 8.1%	▲ 7.5%
Value adjustments of fixed assets, less adjustments related to rights of use resulted from leasing contracts	79,156	61,485	53,075	▲ 28.7%	▲ 15.9%
Value adjustments on rights of use resulted from leasing contracts	2,141	2,051	1,987	▲ 4.4%	▲ 3.2%
Value adjustments on current assets	7,641	(239)	(767)	-	-
Expenses related to external services	144,041	126,936	114,242	▲ 13.5%	▲ 11.1%
Provision adjustments	12,193	2,446	6,753	▲ 398.5%	▼ 63.8%
Loss from disposal of assets	91	-	-	-	-
Other expenses	74,286	62,357	62,405	▲ 19.1%	▼ 0.1 %
Total operating expenses	556,796	474,571	459,291	▲ 17.3%	▲ 3.3%
Operating Profit	49,486	66,363	62,769	▼ 25.4%	▲ 5.7%
Financial Revenues	6,384	6,690	9,839	▼ 4.6%	▼ 32.0%
Interest expenses related to leasing contracts	238	175	236	▲ 36.0%	▼ 25.9%
Other financial expenses	94	84	233	▲ 11.9%	▼ 64.0%
Financial Expenses	332	259	469	▲ 28.2%	▼ 44.8%
Financial profit	6,052	6,431	9,370	▼ 5.9%	▼ 31.4%
Profit before corporate tax	55,538	72,794	72,139	▼ 23.7%	▲ 0.9%
Expenses with current corporate tax	10,227	10,587	11,686	▼ 3.4%	▼ 9.4%

Indicator	2024	2023	2022	Variation%	
				2024/2023	2023/2022
Expenses with (revenues coming from) deferred corporate tax	(4,012)	590	(1,211)	-	-
PROFIT OF THE YEAR	49,323	61,617	61,664	▼ 20.0%	▼ 0.1%
Actuarial gain (loss) granted upon retirement and death benefits	1,230	531	(1,599)	▲ 131.6%	-
Surplus from revaluation of the tangible assets	-	35,055	-	-	-
Other elements of the equities - retained earnings:	755	-	-	-	-
Total other global result elements that will not be subsequently reclassified as profit or loss	1,985	35,586	(1,599)	▼ 94.4%	-
Net increase of the modernization quota reserve	7,844	6,870	17,409	▲ 14.2%	▼ 60.5%
Total other global result elements that will be subsequently reclassified as profit or loss	7,844	6,870	17,409	▲ 14.2%	▼ 60.5%
TOTAL OTHER ELEMENTS OF THE GLOBAL RESULT	9,829	42,456	15,810	▼ 76.9%	▲ 168.5%
TOTAL GLOBAL RESULT	59,152	104,073	77,474	▼ 43.2%	▲ 34.3%
Result per share	5.70	7.12	7.12	▼ 19.9%	-

Table 19 - Statement of the global result during 2022- 2024 (thousand RON)

The synthesis of the financial results, in evolution 2022- 2024, is as follows:

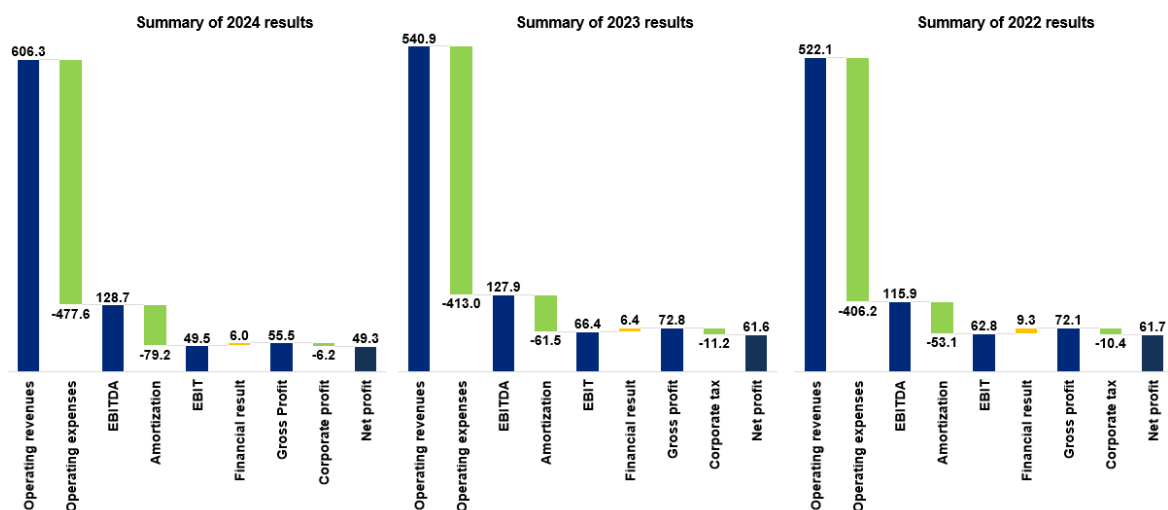


Chart 17 - Synthesis of the financial results during 2022- 2024 (mRON)

Operating Revenues

As compared to the approved budget and the previous period (2022 - 2023), the total revenues of the operating activity and the transported volume in 2024 is as follows:

2024		Variation (%) Achieved/ Budget 2024	Indicators	2024	2023	2022	Variation%	
Achieved	Budget						2024/ 2023	2023/ 2022
Transport services based on tariffs approved by A.N.R.M.P.S.G. Order - Domestic Subsystem								
2,802	2,793	▲ 0.3%	thousand tons	2,802	2,915	3,046	▼ 3.9%	▼ 4.3%
358,670	357,526	▲ 0.3%	thousand Ron	358,670	343,752	321,320	▲ 4.3%	▲ 7.0%
Transport services based on tariffs approved by A.N.R.M.P.S.G. Order - Import Subsystem								
4,206	4,184	▲ 0.5%	thousand tons	4,206	3,072	3,944	▲ 36.9%	▼ 22.1%
167,786	166,458	▲ 0.8%	thousand Ron	167,786	130,096	144,044	▲ 29.0%	▼ 9.7%
Total quantities and revenues from transport services based on tariffs approved by A.N.R.M.P.S.G. Order								
7,008	6,977	▲ 0.4%	thousand tons	7,008	5,987	6,990	▲ 17.1%	▼ 14.4%
526,456	523,984	▲ 0.5%	thousand Ron	526,456	473,848	465,364	▲ 11.1%	▲ 1.8%
Other types of operations related to the N.T.S.								
123	97	▲ 26.8%	thousand tons	123	307	110	▼ 59.9%	▲ 179.1%
4,935	4,486	▲ 10.0%	thousand Ron	4,935	9,025	4,493	▼ 45.3%	▲ 100.9%
Total general crude oil, rich gas and condensate transport activity								
7,131	7,074	▲ 0.8%	thousand tons	7,131	6,294	7,100	▲ 13.3%	▼ 11.4%
531,391	528,470	▲ 0.6%	thousand Ron	531,391	482,873	469,857	▲ 10.0%	▲ 2.8%
1,906	1,888	▲ 1.0%	Revenues from rents	1,906	2,078	1,966	▼ 8.3%	▲ 5.7%
321	180	▲ 78.3%	Other Turnover Revenues	321	163	410	▲ 96.9%	▼ 60.2%
533,618	530,538	▲ 0.6%	Turnover	533,618	485,114	472,233	▲ 10.0%	▲ 2.7%
59,600	59,588	-	Write-back to revenues of reserve constituted based on the expenses with the modernization quota	59,600	51,226	39,912	▲ 16.4%	▲ 28.3%
-	-	-	Earnings from disposal of assets	-	612	5,402	-	▼ 88.7%
13,064	11,171	▲ 16.9%	Other revenues	13,064	3,982	4,513	▲ 228.1%	▼ 11.8%
72,664	70,759	▲ 2.7%	Total other operating revenues	72,664	55,820	49,827	▲ 30.2%	▲ 12.0%
606,282	601,297	▲ 0.8%	Total operating revenues	606,282	540,934	522,060	▲ 12.1%	▲ 3.6%

Table 20 - Operating income statement year 2024 compared to the Budget and compared to the period between 2022- 2023 (thousand RON)

The revenues achieved from transport on subsystems in 2024, compared to the budget and the period 2022 - 2023, are as follows:

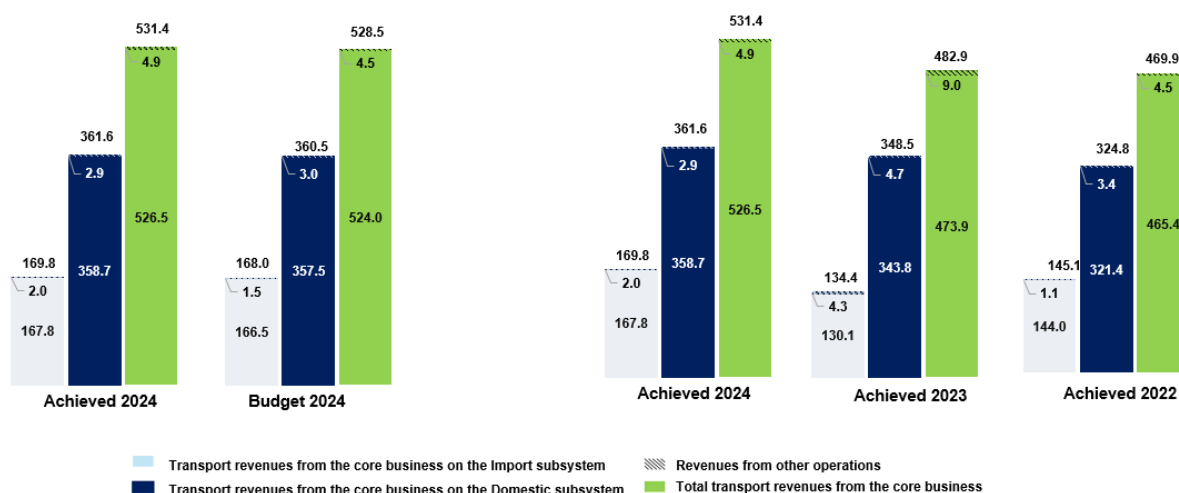


Chart 18 - The evolution of the revenues achieved from transport on subsystems 2022 - 2023 vs. Budget 2024 (mRON)

The operating revenues recorded an increase by 0.8% as compared to Budget. Compared to 2023 the increase in the operating revenues was 12.1% (65,348 thousand Ron).

The transport revenues hold a share of 99.6% in turnover, the difference of 2,227 thousand RON (0.4%) representing revenues from various activities such as: leases of lands and telecommunication equipment, rail shunting, etc.

The revenues from the reserve representing the modernization quota are also recognized in the operating income, revenues recognized at the level of depreciation of the fixed assets financed from this quota. These revenues hold 82% of other operating revenues. In 2024, there was an increase of 16.4%, compared to the same period of 2023, due to the increase in the depreciation of fixed assets financed from the modernization – quota, thus increasing the revenues recorded from reserve – the modernization quota.

The category “Other revenues” mainly includes the amounts to be recovered (debts) established by final court decisions in forced execution (8,002 thousand RON).

Operating Expenses

The operating expenses achieved in 2024, as compared to the last 2 years and the budget provisions, are as follows:

Achieved 2024	Budget 2024	Variation% Achieved/ Budget 2024	Indicators	2024	2023	2022	Variation%	
							2024/ 2023	2023/ 2022
6,145	6,566	▼ 6.4%	Material expenses, out of which:	6,145	6,543	6,934	▼ 6.1%	▼ 5.6%
3,427	3,385	▲ 1.2%	- expenses with consumables	3,427	3,489	3,629	▼ 1.8%	▼ 3.9%
1,956	2,085	▼ 6.2%	- fuel expenses	1,956	2,102	2,253	▼ 7.0%	▼ 6.7%
20,916	21,654	▼ 3.4%	Other external expenses (with energy and water)	20,916	18,597	33,739	▲ 12.5%	▼ 44.9%
210,186	210,619	▼ 0.2%	Personnel expenses, out of which:	210,186	194,395	180,923	▲ 8.1%	▲ 7.5%

Achieved 2024	Budget 2024	Variation% Achieved/ Budget 2024	Indicators	2024	2023	2022	Variation%	
							2024/ 2023	2023/ 2022
164,820	164,995	▼ 0.1%	- salaries expenses	164,820	155,825	143,346	▲ 5.8%	▲ 8.7%
4,118	4,160	▼ 1.0%	- expenses related to insurance, social protection and other legal obligations	4,118	4,157	4,060	▼ 0.9%	▲ 2.4%
41,248	41,464	▼ 0.5%	- other personnel expenses	41,248	34,413	33,517	▲ 19.9%	▲ 2.7%
79,156	78,272	▲ 1.1%	Value adjustments of fixed assets, less adjustments related to rights of use resulted from leasing contracts	79,156	61,485	53,075	▲ 28.7%	▲ 15.9%
2,141	2,158	▼ 0.8%	Value adjustments for rights of use resulted from leasing contracts	2,141	2,051	1,987	▲ 4.4%	▲ 3.2%
144,041	145,767	▼ 1.2%	Expenses with external services, out of which:	144,041	126,936	114,242	▲ 13.5%	▲ 11.1%
3,104	3,382	▼ 8.2%	- maintenance (maintenance, current repairs)	3,104	2,532	2,789	▲ 22.6%	▼ 9.2%
78,209	78,046	▲ 0.2%	- expenses with crude oil transport by railway	78,209	71,645	61,430	▲ 9.2%	▲ 16.6%
563	1,467	▼ 61.6%	- expenses with decontamination works	563	296	1,939	▲ 90.2%	▼ 84.7%
47,589	47,419	▲ 0.4%	- oil royalty	47,589	38,519	36,511	▲ 23.6%	▲ 5.5%
14,576	15,453	▼ 5.7%	- other services performed by third parties	14,576	13,944	11,573	▲ 4.5%	▲ 20.5%
7,641	7,789	▼ 1.9%	Value adjustments on current assets	7,641	(239)	(767)	-	-
12,193	8,196	▲ 48.8%	Provisions adjustments	12,193	2,446	6,753	▲ 398.5%	▼ 63.8 %
91	67	▲ 35.8%	Loss from disposal of assets	91	-	-	-	-
74,286	72,109	▲ 3.0%	Other operating expenses, out of which:	74,286	62,357	62,405	▲ 19.1%	▼ 0.1%
67,445	64,892	▲ 3.9%	- modernization quota expenses	67,445	58,084	57,321	▲ 16.1%	▲ 1.3%
556,796	553,197	▲ 0.7%	Total operating expenses	556,796	474,571	459,291	▲ 17.3%	▲ 3.3%

Table 21 - Operating income statement year 2024 compared to the Budget and compared to the period between 2022- 2023 (thousand RON)

The operating expenses achieved during January - December 2024 increased by 17.3% as compared to 2023, from 474,571 thousand RON to 556,796 thousand RON.

The increase in operating expenses was mainly driven by the increase in some operating expenses, of which we exemplify: rail transport services, expenses calculated on the basis of revenues (oil royalty and modernization quota), personnel expenses, provisions and value adjustments for current assets and fixed assets (depreciation).

Provisions and adjustments for the impairment of current assets are recorded for debts related to legal files pending in court and debts recorded in the accounting records based on final judgments obtained in court, subject to enforcement, as well as fines paid and in the appeal procedure, for benefits granted to employees upon retirement or death, for the employees' share of profit.

As compared to the budget approved for 2024, the operating expenses achieved on 31.12.2024 were higher by 3,599 thousand RON (0.7%). The budget execution table dated 31.12.2024 shows that there were savings on some types of expenses (materials - 421 kRON, electricity and natural gas - 738 kRON, personnel expenses - 433 kRON, provided services - 1,726 kRON), but also overruns on other types of expenses (depreciation 884 kRON, provisions and adjustments for the depreciation of other receivables 3,996 kRON, oil royalty 170 kRON, etc.).

The statement of the personnel expenses achieved in 2022 - 2024, is as follows:

Indicators		2024	2023	2022
Total personnel expenses, out of which:		210,186	194,395	180,923
a).	Salary expenses	164,820	155,825	143,346
b).	Bonuses awarded as per CLA	28,281	25,284	21,171
c).	Expenses on severance payments related to personnel layoffs	2,641	40	3,912
d).	Expenses related to the mandate contracts of the Board of Directors and the Directors with a mandate contract	6,212	5,251	4,848
e).	Labor insurance contribution expenses	4,114	3,838	3,585
f).	Company's contribution to voluntary pension schemes	2,722	2,774	2,872
g).	Company's contribution to voluntary health insurance premiums	1,396	1,383	1,189

Table 22 - Statement of personnel expenses in 2022 – 2024 (thousand RON)

The operating profit achieved in 2024, in amount of 49,486 thousand RON, decreased by 16,877 thousand RON as compared to 2023 and increased by 1,386 thousand RON as compared to the budget amount.

The financial profit achieved in 2024 is higher by 1,552 thousand RON compared to budget. As compared to 2023, the financial profit decreased by 379 thousand RON as a result of the decrease in interest income collected by the company.

The net profit amounting to 49,323 thousand RON, is 5,011 thousand RON higher than budgeted and 12,294 thousand RON below the level recorded in 2023.

Financial Result

Indicator (thousand RON)	2024	2023	2022	Variation%	
				2024/2023	2023/2022
Revenues from interests	6,365	6,653	9,737	▼ 4.3%	▼ 31.7%
Other financial revenues	19	37	102	▼ 48.6%	▼ 63.7%
Total financial revenues	6,384	6,690	9,839	▼ 4.6%	▼ 32.0%
Total financial expenses	332	259	469	▲ 28.2%	▼ 44.8%

Indicator (thousand RON)	2024	2023	2022	Variation%	
				2024/2023	2023/2022
Financial Result	6,052	6,431	9,370	▼ 5.9%	▼ 31.4%

Table 23 - Financial result during 2022-2024

The financial revenues are lower by 4.6% in 2024, compared to the same period of the previous year, due to the decrease in interest income received by the Company.

The financial expenses increased by 73 thousand RON in 2024 compared to 2023.

Based on this evolution, **the financial result** lowered by 5.9% in 2024, as compared to 2023 (from 6,431 thousand RON to 6,052 thousand RON).

The company ended in 2024 with a **net profit** amounting to 49,323 thousand RON, 11.3% over the budgeted level, and 20% lower as compared to 2023.

4.3.3 Economic-Financial Indicators

Name of the indicators	Calculation formula	2024	2023	2022	Variation%	
					2024/ 2023	2023/ 2022
Profitability indicators						
Gross sales margin	EBIT (operating profit)	9.3%	13.7%	13.3%	▼ 4.4 p.p.	▲ 0.4 p.p.
	Turnover					
Operating profit margin	EBIT (operating profit)	8.2%	12.3%	12.0%	▼ 4.1 p.p.	▲ 0.3 p.p.
	Operating Revenues					
EBITDA in total sales	EBITDA (operating profit + value adjustments on tangible and intangible assets)	24.1%	26.4%	24.5%	▼ 2.3 p.p.	▲ 1.9 p.p.
	Turnover					
Adjusted EBITDA (thousand RON)	Adjusted EBITDA = Operating profit - write-back to revenues of the reserve out of the modernization quota + Expenses regarding the modernization quota + Value adjustments of tangible and intangible assets, here included the tangible revaluation differences.	136,486	134,706	133,253	▲ 1.3 %	▲ 1.1 %
EBITDA in equity	EBITDA	17.6%	17.5%	16.9%	▲ 0.1 p.p.	▲ 0.6 p.p.
	Total equity					
EBIDTA adjusted in equity	Adjusted EBITDA	18.7%	18.4%	19.5%	▲ 0.3 p.p.	▼ 1.1 p.p.
	Total equity					
Gross Profit Rate	Gross result	10.4%	15.0%	15.3%	▼ 4.6 p.p.	▼ 0.3 p.p.
	Turnover					

Name of the indicators	Calculation formula	2024	2023	2022	Variation%	
					2024/ 2023	2023/ 2022
Liquidity Indicators						
Current liquidity indicator (times)	Current assets	2.0	1.9	1.9	▲ 5.3 %	-
	Current liabilities					
The quick ratio indicator (acid test)	Current assets - Inventories	2.0	1.9	1.8	▲ 5.3%	▲ 5.6%
	Current liabilities					
General solvency	Total Liabilities	0.1	0.1	0.2	-	▼ 50.0 %
	Total Assets					
Profitability indicators						
Return on Assets (ROA)	Net result	5.8%	7.3%	7.6%	▼1.5 p.p	▼ 0.3 p.p.
	TOTAL ASSETS					
Return on Equity (ROE)	Net result	6.8%	8.4%	9.0%	▼ 1.6 p.p.	▼ 0.6 p.p.
	Total equity					
Return on Sales (ROS)	Net result	9.2%	12.7%	13.1%	▼ 3.5 p.p.	▼ 0.4 p.p.
	Turnover					
OPERATIONAL INDICATORS						
Inventories turnover speed (days)	Medium stock X 360	367	367	316	-	▲ 16.1%
	Sales costs					
Duration of inventory turnover (times)	Sales costs	1.0	1.0	1.1	-	▼ 9.1%
	Average inventory					
Rotation speed of the clients debits (days)	Average balance Clients X 360	28	28	29	-	▼ 3.4%
	Turnover					
Rotation speed of supplier credits (days)	Average balance suppliers X 360	29	29	26	-	▲ 11.5%
	Procurement from suppliers of goods and services					
Fixed assets rotation speed (no. of times)	Turnover	0.8	0.7	0.8	▲ 14.3%	▼ 12.5%
	Fixed assets					
Rotation speed of assets	Turnover	0.63	0.59	0.60	▲ 6.7%	▼ 1.7%
	Average value of all assets ((Total assets1+Total assets0)/2)					
Capital expenditure rate	Capital expenditure (achieved investments)	8.3%	9.8%	18.4%	▼1.5 p.p.	▼8.6 p.p.
	Total Assets					
Risk indicators						
	Borrowed capital	0.3%	0.3%	0.3%	-	

Name of the indicators	Calculation formula	2024	2023	2022	Variation%	
					2024/ 2023	2023/ 2022
Leverage degree indicator	Total equity					

Table 24 – Economic-Financial indicators during 2022- 2024

4.3.4 Execution of the revenues and expenditure budget

The Revenues and Expenditure Budget for the year 2024 has been approved by the OGMS in the meeting dated February 28th, 2024, as per the provisions of the Government Ordinance no. 26/2013.

During 2024, the Revenues and Expenditure Budget has been amended, with the legal provisions contained in:

- the Government Ordinance no. 26/2013 on the reinforcement of the financial discipline at the level of some economic operators to which the State or the administrative - territorial divisions act as unique or majority shareholders or hold directly or indirectly a majority participation, subsequent amendments and additions;
- Law no. 421 from December 28th, 2023 of the State budget for the year 2024, Art. 73;
- Order of the Ministry of Public Finance no. 3818/2019 for the approval of the format and structure of the revenues and expenditure budget, as well as the substantiation annexes thereof.

The implementation of the rectified Revenues and Expenditure Budget for 2024 is presented as follows:

Crt. no.	Indicators		Row no.	Rectified Budget YEAR 2024	Achieved year 2024	%
0	1		3	4	5	6= 5/4
I.		TOTAL REVENUES (Row1=Row2+Row5)	1	606,249	612,666	101.1%
	1	Total operating revenues, of which:	2	601,297	606,282	100.8%
		a) subsidies, as per the legal provisions in force	3	0	0	-
		b) transfers, as per the legal provisions in force	4	0	0	-
	2	Financial Revenues	5	4,952	6,384	128.9%
II		TOTAL EXPENSES (Row 6=Row 7+Row 19)	6	553,649	557,128	100.6%
	1	Operating Expenses, (Row 7=Row 8+Row9+Row10+Row18), o/w:	7	553,197	556,796	100.7%
		A. Goods and Services Expenses	8	127,358	124,289	97.6%
		B. Taxes, fees and similar levies related expenses	9	53,104	53,154	100.1%
		C. Personnel expenses (Row 10=Row11+Row14+Row16+Row17), out of which:	10	210,619	210,186	99.8%
		C0 Salaries expenses (Rows 11=Row12+Row13)	11	193,349	193,101	99.9%
		C1 Salary expenses	12	164,995	164,820	99.9%
		C2 Bonuses	13	28,354	28,281	99.7%
		C3 Other personnel expenses, out of which:	14	2,808	2,641	94.1%

Crt. no.		Indicators		Row no.	Rectified Budget YEAR 2024	Achieved year 2024	%
0		1		3	4	5	6= 5/4
			expenditure with severance payments relating to personnel layoff	15	2,808	2,641	94.1%
		C4	Expenses related to the Contract of Mandate and other management and control bodies, committees and commissions	16	6,214	6,212	100.0%
		C5	Expenses with contributions due by the employer	17	8,248	8,232	99.8%
		D.	Other operating expenses	18	162,116	169,167	104.4%
	2	Financial Expenses		19	452	332	73.5%
III		GROSS RESULT (profit/loss)(Rd.20= Rd.1- Rd.6)		20	52,600	55,538	105.6%
IV	1	CURRENT CORPORATE TAX		21	10,790	10,227	94.8%
	2	DEFFERED CORPORATE TAX		22	2,289	854	37.3%
	3	REVENUES FROM DEFFERED CORPORATE TAX		23	4,791	4,866	101.6%
	4	TAX SPECIFIC TO CERTAIN ACTIVITIES		24	-	-	-
	5	OTHER TAXES MISSING FROM THE ABOVE ITEMS		25	-	-	-
V		PROFIT/NET LOSS OF THE REPORTING PERIOD (Row 26=Rd.20-Rd.21-Rd.22+Rd.23-Rd.24-Rd.25), of which:		26	44,312	49,323	111.3%
	1	Legal reserves		27	-	-	-
	2	Other reserves representing fiscal incentives provided by Law		28	500	2,993	598.6%
	3	The coverage of accounting losses from previous years		29	-	-	-
	4	Establishment of own financing sources for the projects co-financed through foreign loans, as well as for the establishment of the necessary sources to reimburse capital rates, interests, commissions and other costs related to these loans		30	-	-	-
	5	Other allocations stipulated by law		31	-	-	-
	6	Accounting profit remaining after deducting the amounts from Rows 27, 28, 29, 30, 31 (Row 32=Row26-(Row27 to Row 31)>= 0)		32	43,812	46,330	105.7%
	7	Employees profit sharing schemes within the limit of 10% of the net profit but no more than the monthly average base salary achieved at the level of the economic operator reported in the reference financial year		33	4,800	5,058	105.4%
	8	Minimum 50% transfers to the state or local budget in case of regies autonomes or dividends due to shareholders in case of the societies/national companies or state-owned or majority companies, out of which:		34	41,320	46,330	112.1%
	a)	- dividends payable to the state budget		35	24,262	27,203	112.1%
	b)	- dividends payable to the local budget		36	-	-	-
	c)	- dividends due to other shareholders		37	17,058	19,127	112.1%

Crt. no.			Indicators	Row no.	Rectified Budget YEAR 2024	Achieved year 2024	%
0			1	3	4	5	6= 5/4
	9		The profit not distributed to the destinations provided for in Row 33 – Row 34 shall be distributed to other reserves and shall constitute its own source of financing	38	2,492	0	-
VI			REVENUES FROM EUROPEAN FUNDS	39	-	-	-
VII			ELIGIBLE EXPENSES FROM EUROPEAN FUNDS, out of which:	40	-	-	-
		a)	material expenses	41	-	-	-
		b)	salaries expenses	42	-	-	-
		c)	expenses on provision of services	43	-	-	-
		d)	advertising and publicity expenses	44	-	-	-
		e)	other expenses	45	-	-	-
VII I			INVESTMENT FINANCING SOURCES, out of which:	46	85,000	70,445	82.9%
	1		Budget allocations	47	-	-	-
			budget allocations related to payments of the commitments from previous years	-	-	-	-
IX			EXPENSES FOR INVESTMENTS	49	85,000	70,445	82.9%

Table 25 - Implementation of the Revenues and Expenditure budget for the year 2024 (thousand RON)

4.3.5 Cash-flow

Elements		12 months 2024	12 months 2023	12 months 2022	Variation%	
					2024/2023	2023/2022
Cash flows from operating activities:						
+	Proceeds from services supply	582,922	520,121	509,861	▲ 12.1%	▲ 2.0%
+	Proceeds from interests related to banking placements	6,331	6,576	9,872	▼ 3.7%	▼ 33.4%
+	Other proceeds	8,278	4,251	13,518	▲ 94.7%	▼ 68.6%
-	Payments to the suppliers of goods and services	(153,460)	(140,226)	(140,569)	▲ 9.4%	▼ 0.2%
-	Payments to and on behalf of the employees	(206,739)	(192,207)	(176,585)	▲ 7.6%	▲ 8.8%
-	VAT payments	(64,997)	(54,309)	(42,222)	▲ 19.7%	▲ 28.6%
-	Corporate tax payments	(12,216)	(10,776)	(11,738)	▲ 13.4%	▼ 8.2%
-	Other payments regarding the operating activity	(54,102)	(46,815)	(45,623)	▲ 15.6%	▲ 2.6%
A	Net cash from operating activity	106,017	86,615	116,514	▲ 22.4%	▼ 25.7%
Cash flows from investment activities:						
+	Proceeds from sale of tangible assets	11	621	303	▼ 98.2%	▲ 105.0%
+	Proceeds from modernization quota	67,445	58,084	57,321	▲ 16.1%	▲ 1.3%
-	Payments for purchase of tangible/intangible assets	(85,403)	(104,205)	(172,138)	▼ 18.0%	▼ 39.5%
B	Net cash from investment activity	(17,947)	(45,500)	(114,514)	-	-
Cash flows from financing activities:						
-	Paid dividends	(56,894)	(57,664)	(62,865)	▼ 1.3%	▼ 8.3%
-	Payments on account of leasing debt	(2,497)	(3,196)	(3,015)	▼ 21.9%	▲ 6.0%
-	Interest payments	(244)	(185)	(199)	▲ 31.9%	▼ 7.0%
C	Net cash from financing activities	(59,635)	(61,045)	(66,079)	-	-

Elements	12 months 2024	12 months 2023	12 months 2022	Variation%	
				2024/2023	2023/2022
Net increase of the cash and cash equivalents =A+B+C=D2-D1	28,435	(19,930)	(64,079)	-	-
D1 Cash and cash equivalents at the beginning of the period	107,742	127,672	191,751	▼ 15.6%	▼ 33.4%
D2 Cash and cash equivalents at the end of the period	136,177	107,742	127,673	▲ 26.4%	▼ 15.6%

Table 26 - Cash flow statement for 2022- 2024 (thousand RON)

The balance of cash and cash equivalents on 31.12.2024 is higher by 26.4% compared to December 31st, 2023 (136,177 kRON compared to 107,742 kRON), as a result of the increase by 4.9 million RON of the cash from the modernization quota existing in bank accounts on 31.12.2024, but also of the collection before maturity of the equivalent value of some transport services provided in December.

Out of the total availability in cash on 31.12.2024, the share of the modernization quota is in amount of 36,936 thousand RON.

The effects of the three activity areas (operation, investment and financing) on the cash in the 12-month period of 2024 reveal the following:

- the operating activity triggered a cash-flow in amount of 106,017 thousand RON;
- the investment activity ended with a negative cash-flow in amount of 17,947 thousand RON;
- the financing activity decreased the total cash flow by 59,635 thousand RON.

The value of net cash flows from operating activity increased by 19.4 mRON compared to the same period of the previous year due to the increase in revenues from transport services.

Compared to the previous year, the net cash flow from investment activity (cash deficit) decreased by 27.6 mRON. The decrease in the deficit was driven by a lower volume of fixed asset payments compared to the same period of 2023.

The net cash from the financing activity registers in both compared periods, 2024 and 2023, negative amounts determined by the payment of dividends to the shareholders and the amounts related to leasing.

4.3.6. The internal control and the risks management systems in the financial reporting process

The internal control and the risks management systems in the financial reporting process have the following main objectives:

- Compliance with the financial-accounting legislation in force and the reporting standards;
- Application of approved accounting policies and instructions drafted by the management with regards to financial information;
- Ensuring the reliability of the financial information. The objective aims to ensure that accounting, financial and management information communicated or published are complete and accurately reflect the activity and situation of the entity;

- Prevention and detection of frauds and accounting and financial irregularities.

The fulfilment of these objectives is being supported by:

- Personnel with an adequate level of competence, in compliance with the company's needs and the existence of a continuous professional development plan to enable the upgrade of knowledge related to the accounting and fiscal legislation;
- Clear definition of the responsibilities related to each person involved in the financial reporting process, respectively the separation of attributes, so that the approval, audit and registration attributions be, in a fair measure, awarded to different persons (as per the company's organization chart).
- Internal procedures regarding the fair accounting treatment and proper authorization of the financial - accounting operations and settlement of an information circuit and the related audits thereof, to ensure the quick, fair and complete centralization of the financial information, as per the internal procedures manual;
- The financial system of preventive control;
- Identification of risks in relation to the financial reporting process, the assessment of the effectiveness and efficiency of the application of the internal procedures regarding the processes relevant to the financial reporting by the internal audit department and communication of the identified shortcomings to the Board of Directors;
- The accounting policies manual drafted as per the legislation in force, approved by the Board of Directors;
- The existence of a calendar and a well-defined process with regards to the elaboration of accounting and financial information compliant with the reporting requirements (financial-accounting of the capital market) and the checking and appropriate approval thereof by the Board of Directors, in view of publication thereof.

4.3.7 Affiliated Parties

Between 01.01.2024 - 31.12.2024, the Company carried out the following significant transactions with related parties:

Procurement from affiliated parties

Partner	Unsettled amounts at December 31, 2023	Procurements during 01.01.2024-31.12.2024	Settlements during 01.01.2024-31.12.2024	Unsettled amounts at December 31, 2024
SPEEH HIDROELECTRICA S.A.	6,533	-	6,376	157

*The amounts include VAT as well

Table 27 - Purchases from affiliated parties (thousand RON)

Guarantees granted to affiliated parties

Partner	December 31, 2024	December 31, 2023
SPEEH HIDROELECTRICA S.A.	-	1,989
ELECTRICA FURNIZARE S.A.	282	277

Table 28 - Guarantees granted/received with/from related parties (thousand RON)

4.4 Analysis of the corporate activity

4.4.1 Capital market business

Evolution of “COTE share“

The shares issued by CONPET S.A. are traded on the regulated market administered by the Bucharest Stock Exchange, on the Principal segment, at Equity sector - category Premium, under “COTE” symbol.

At the end of 2024, the trading price of CONPET shares recorded a decrease by 7.82% compared to the closing price of the last trading day of the previous year.

In summary, the transactions recorded with CONPET shares on Bucharest Stock Exchange, in 2024, are as follows:

- 13,452 transactions have been performed, 4% less than in 2023 (13,961 transactions);
- the total volume of traded shares amounted to 504,432 shares, 1.1% lower than the volume recorded in 2023 (509,910 shares);
- the total value of trades amounted to 42,081,831 RON, 8% higher than the value recorded in 2023 (38,961,152 RON);
- the average trading price was 83.38 RON/share, higher by 7.88 RON/share versus the average price of the shares registered during 2023 (75.50 RON/share);
- the trading price registered the maximum value, respectively 91.80 RON/share at the end of May;
- the Market capitalization at the end of December 2024 was of 652,777,611 RON, decreasing by 7.8% as compared to the value recorded at the end of 2023 (708,185,790 RON).

The main trading indices of 2024 for the shares issued by CONPET S.A. are presented in the following table:

Indices Month	Average price (RON/share)	No. of trades	No. of traded shares	Value of trades (RON)
January	84.80	1,317	73,171	6,198,709
February	85.61	847	32,369	2,770,489
March	86.47	976	54,453	4,711,809
April	88.15	846	30,802	2,712,023
May	89.21	1,436	72,632	6,461,889
June	86.89	1,244	49,723	4,327,811
July	88.09	750	17,692	1,556,471
August	84.88	927	19,083	1,610,327
September	78.11	2,237	68,339	5,261,417
October	77.15	770	18,419	1,419,377
November	76.67	852	28,809	2,193,425
December	74.54	1,250	38,940	2,858,084
Cumulated	83.38	13,452	504,432	42,081,831

Table 29 - Main trading indices

Currently CONPET S.A. is included in 6 indices of the total of 10 of the Bucharest Stock Exchange, namely **BET- NG, BET-XT, BET-XT-TR, BET-BK, BET-XT-TRN and BET Plus.**



Chart 19 - Evolution of COTE share vs. stock indices (rebased) where it is included in 2024

Graphically, the evolution of the trading price of CONPET S.A. shares, in 2024, compared to 2023. is the following:

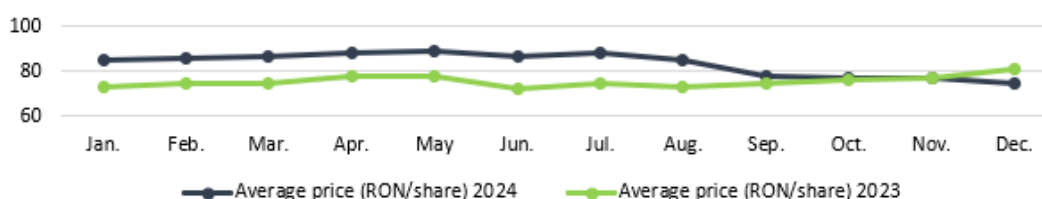


Chart 20 - Evolution of the share trading price (RON/share)

Stock Market indicators	2020	2021	2022	2023	2024
PER	11.20	12.13	10.00	12.42	11.29
P/BV	1.01	1.09	0.91	1.07	0.93
EPS	6.80	6.51	6.78	6.59	6.68
DIVY (dividend yield)	9.26	8.73	7.28	6.87	9.00

Table 30 - Main indicators of stock market performance

As of 31.12.2024, according to the top capitalization of companies in the Premium section of issuers by capitalization, CONPET ranked 34th, with a market capitalization of 652,777,611 RON (131.17 million EURO), which represents a share of 0.19% in total market capitalization.

The Dividend Policy

Within the last 5 years, CONPET fulfilled its commitment to award a yield to its shareholders by means of a sustainable dividend policy and distributed dividends in a quota comprised between 94% and 98% of the net accounting profit.

The dividend policy of the company CONPET S.A. was approved by the Board of Directors in January 2021.

The net profit distribution decisions concern the company's options between partial or full reinvestment of the net profit and/or distribution in the form of dividends.

Depending on the situation existing at the time of formulating the profit distribution proposal, deviations from the Policy may occur as a result of specific legal requirements applicable at

that date, the modification of the tax framework and depending on the capital requirement for investments.

The dividends' distribution ratio, set out in the dividend policy, which the Board of Directors will consider in the formulation of the proposal to the General Meeting of Shareholders of CONPET S.A. will be between 85 % and 100 % of the net accounting profit.

The gross dividend per share is the share of the company's net profit that is calculated and paid to shareholders for each share held.

The evolution of the dividends distributed from the net profit for the period 2021 - 2023 is as follows:

Share of profit	GMS date	Registration Date	Total gross dividends due - RON-	% of net profit	Gross dividend/share - RON-	Paid gross dividends - RON-	Net dividends accumulated on 31.12.2024
2021-Dividend out of the profit of the year, from reserves and retained earnings	28.04.2022	25.05.2022	63,057,849	97.1%	7.28	61,315,778.24	1,742,070.76
2022-Dividend out of the Profit of the year, from reserves and retained earnings	27.04.2023	25.05.2023	59,510,161	94.9%	6.87	57,416,516.78	2,093,644.22
2023-Dividend out of the Profit of the year, from reserves and retained earnings	25.04.2024	29.05.2024	58,753,534	94.0%	6.79	57,891,137.00	862,397.00

Table 31 - Evolution of dividends distributed in the period 2021- 2023

The return on investment and dividend yield in the period 2020-2024 are shown in the chart below:

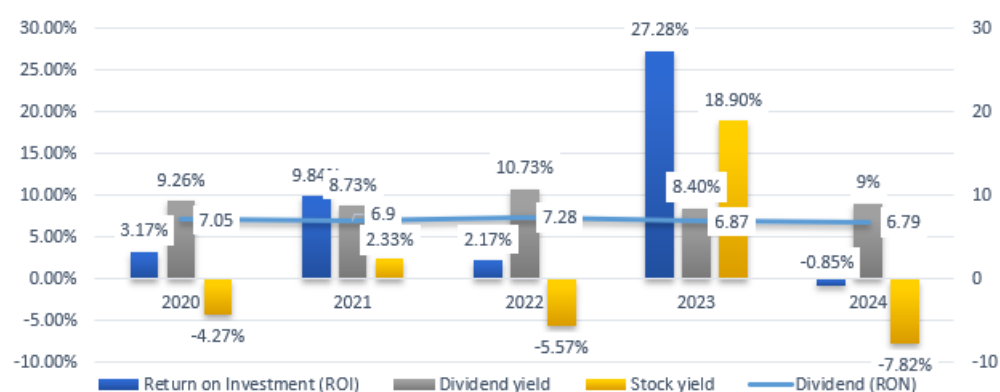


Chart 21 – Evolution of return on investment and dividend yield

Total dividend per share was 6.79 RON, thus offering its shareholders a dividend yield of 9%, therefore ranking 2 in the top of dividends awarded by a company listed on the Bucharest Stock Exchange, Premium category.

Own shares, issuance of bonds or other debt instruments

CONPET did not perform transactions having as scope purchase of own shares and does not hold own shares at the end of 2024.

CONPET has no branches and there are no shares issued by the parent company and owned by the branches.

CONPET has not issued bonds or other debt instruments.

4.4.2. Corporate Governance

Corporate governance continues to be in a process of adapting to the demands of a modern economy, to the obvious globalization of social life as well as to the information needs of investors and third parties interested in the activity of the companies.

The corporate governance at the level of CONPET is organized and conducted in accordance with the Romanian legislative framework, namely the Companies Law no. 31/1990 and the Government Emergency Ordinance no. 109/2011 on corporate governance of the public enterprises.

CONPET shares are traded starting with September 5th, 2013 on the regulated market managed by the Bucharest Stock Exchange (BSE), at category I, under the COTE symbol. Starting January 5th, 2015, CONPET S.A. is included in the PREMIUM category of the regulated market managed by the Bucharest Stock Exchange.

The Corporate Governance system of CONPET is constantly improved, as to be compliant with the rules and recommendations applicable to a company listed at the BVB.

Among the measures already implemented, please note:

- the inclusion in the administrators' annual report of a chapter devoted to corporate governance with reference, inter alia, to the information related to the Board of Directors and the consultative committees namely: the Audit Committee, the Nomination and Remuneration Committee, the Development and Investors and Authorities Relation Committee and the Risks Management Committee;
- diversification of communication with shareholders and investors through the inclusion on the web page of the releases addressed to market participants, half-yearly financial statements, annual reports, procedures to be followed in access and participate in the GMS;
- the establishment of a specialized entity dedicated to the relationship with investors and shareholders.

The Corporate Governance Rules

As an issuer listed on the Bucharest Stock Exchange, CONPET has promoted the CONPET Corporate Governance Rules. This document represents the voluntary assumption by the Company of the corporate governance principles, taking into account the characteristics and its specific activity in accordance with the principles set out in the Corporate Governance Code of Bucharest Stock Exchange. The regulation is a public document and can be viewed on the company's website by accessing the link <https://www.conpet.ro/wp->

Other applicable documentation

For the application of the general regulatory framework, CONPET has adopted documents by which corporate governance is transposed into practice:

- The Articles of Incorporation of CONPET, comprising provisions relating to the management bodies (General Meeting, Board of Directors, Executive Management) as well as their powers and operating procedures (**Annex 7**);
- The Rules of Organization and Functioning of the Board of Directors, which detail and operationalize the way in which this body meets, the way it analyzes, debates and makes decisions, the way it interacts with the executive management and other parties.
- The Internal Regulation of Organization and Functioning of the Advisory Committees established at the level of the Board of Directors, which establishes the attributions and responsibilities of the four Advisory Committees.
- The Regulation for the Organization and Functioning of CONPET, the Code of Ethics, the Internal Regulation, which incorporate, detail and operationalize certain aspects incident to the governance framework of the company.

Statement on Conformity with the Provisions of the Corporate Governance Code issued by Bucharest Stock Exchange

The Provisions of the Corporate Governance Code	Complies	Fails to comply or partially complies	Explanations of Compliance/ Reason for Non-Compliance
A.1. All the companies should have internal regulation of the Board which includes terms of reference/responsibilities of the Board and key management functions of the company, applying, among others, the General Principles of Section A.	YES		Delimitation of BoD responsibilities of the ones of the Director General is provided in the Corporate Governance Regulation.

The Provisions of the Corporate Governance Code	Complies	Fails to comply or partially complies	Explanations of Compliance/ Reason for Non-Compliance
A.2. Provisions for the management of conflict of interest should be included in the Board regulation. In any event, members of the Board should notify the Board of any conflicts of interest which have arisen or may arise, and should refrain from taking part in the discussion (including by not being present where this does not render the meeting non-quorate) and from voting on the adoption of a resolution on the issue which gives rise to such conflict of interest.	YES		Both the Rules of Organization and Operation of the Board of Directors of the company CONPET S.A and the Corporate Governance Rules approved by the Board of Directors contain provisions concerning the management of the conflict of interests. In practice, the members of the Board inform the Board, whenever needed, on any conflict of interests having arisen or that may arise and refrain from taking part to discussions and from the voting for the adoption of a Resolution regarding the issue giving rise to such conflict of interests.
A.3. The Board of Directors or the Supervisory Board should have at least five members.	YES		
A.4. The majority of the members of the Board of Directors should be non-executive. In case of the Premium Tier companies, at least two non-executive members of the Board of Directors should be independent. Each independent member of the Board of Directors should submit a declaration at the moment of his/her nomination for election or re-election as well as when any change in his/her status arises, on the grounds on which he/she is considered independent in character and judgment in practice and according to the following criteria: A.4.1. is not Director General/executive officer of the company or of a company under his/her control and did not hold such position for the previous five (5) years; A.4.2. is not the employee of the company or of a company under his/her control and was not in such position for the previous five (5) years; A.4.3. does not receive and did not receive additional remuneration or other advantages from the company or from a company under his/her control, apart from	YES		

The Provisions of the Corporate Governance Code	Complies	Fails to comply or partially complies	Explanations of Compliance/ Reason for Non-Compliance
those corresponding to the capacity of non-executive administrator; A.4.4. is not or has not been an employee of, or does not have or did not have any contractual relationship, during the previous year, with a significant shareholder of the company, controlling over 10% of the voting rights, or with a company under his control; A.4.5. does not have and did not have, during the previous year, a business or professional relationship with the company or with a company under his/her control, either directly or as a customer, partner, shareholder, member of the Board/Administrator, Director General/executive director or employee of a company having such a relationship if, by its substantial character, this relationship could affect his/her objectivity; A.4.6. is not and was not, in the last three years, the external or internal auditor or a partner or associate employee of the current external financial auditor or internal auditor of the company or of a company under his/her control; A.4.7. is not Director General/executive officer in another company where another Director General/executive officer of the company is a non-executive administrator; A.4.8. has not been a non-executive director of the company for more than twelve years; A.4.9. does not have family ties with a person in the situations referred to at items A.4.1. and A.4.4.			
A.5. Any relatively permanent professional commitments and engagements of a member of the Board, here-included the executive and non-executive Board positions in companies and not-for-profit institutions, should be disclosed to shareholders and to potential investors before appointment and during his/her mandate.	YES		Part of the professional commitments and obligations are communicated in the Statements of Assets and Liabilities of the Board members (in compliance with provisions of Law 176/2010 regarding integrity in the exercise of the positions and public dignities, for the amendment and complementation of Law no.144/2007 regarding the

The Provisions of the Corporate Governance Code	Complies	Fails to comply or partially complies	Explanations of Compliance/ Reason for Non-Compliance
			incorporation, organization and operation of ANI, as well as for the amendment of other normative acts).
A.6. Any member of the Board should submit to the Board, information on any relationship with a shareholder who holds directly or indirectly shares representing more than 5% of all voting rights. This obligation concerns any kind of relationship which may affect the position of the member on issues decided by the Board.	YES		The existing provisions included in the independence statements, respectively in the Corporate Governance Rules regarding the conflict of interest provide compliance with the requirement.
A.7. The company should appoint a secretary of the Board responsible for supporting the activity of the Board.	YES		
A.8. The corporate governance statement should inform on whether an evaluation of the Board has taken place under the leadership of the Chairman or the nomination committee and, if so, summarize the key action points and changes resulting from it. The company should have a policy/guidance regarding the evaluation of the Board containing the purpose, criteria and frequency of the evaluation process.		Partially compliant	In compliance with the provisions of the GEO 109/2011, the assessment of the administrators' activity is being performed annually by the general meeting of shareholders and is aiming at both the contract execution and the administration plan. The Nomination and Remuneration Committee drafts a report regarding the administrators' evaluation, also considering the assessment surveys filled in for every BoD member. On 27.02.2025 the Board of Directors approved the Policy on the evaluation of the Board of Directors of CONPET S.A.
A.9. The corporate governance statement should contain information on the number of meetings of the Board and the committees during the past year, attendance by the administrators (in person and in absentia) and a report of the Board and committees on their activities.	YES		
A.10. The corporate governance statement should contain information on the precise number of the independent members of the Board of Directors or of the Supervisory Board.	YES		

The Provisions of the Corporate Governance Code	Complies	Fails to comply or partially complies	Explanations of Compliance/ Reason for Non-Compliance
A.11. The Board of Premium Tier companies should set up a nomination committee formed of non-executives, which will lead the process for new Board appointments and make recommendations to the Board. The majority of the members of the nomination committee should be independent.	YES		The procedure for the appointment/nomination of the Board members is performed in compliance with the provisions of the GEO no.109/2011 on the corporate governance of the public enterprises.
B.1. The Board should set up an audit committee where at least one member should be an independent non-executive. The majority of the members, including the President, should have proven an adequate qualification relevant to the functions and responsibilities of the committee. At least one member of the audit committee should have proven an adequate audit or accounting experience. In the case of Premium Tier companies, the audit committee should be composed of at least three members and the majority of the audit committee members should be independent.	YES		
B.2. The President of the audit committee should be an independent non-executive member.	YES		
B.3. Among its responsibilities, the audit committee should undertake an annual assessment of the system of internal audit.	YES		
B.4. The assessment should consider the effectiveness and scope of the internal audit function, the adequacy of risk management and internal audit reports to the audit committee of the Board, management's responsiveness and effectiveness in dealing with identified internal audit failings or weaknesses and their submission of relevant reports to the Board.	YES		
B.5. The audit committee should review conflicts of interests in relation to the transactions of the company and its subsidiaries with related parties	YES		
B.6. The audit committee should evaluate the efficiency of the internal control system and risk management system.	YES		
B.7. The audit committee should monitor the application of statutory and generally	YES		

The Provisions of the Corporate Governance Code	Complies	Fails to comply or partially complies	Explanations of Compliance/ Reason for Non-Compliance
accepted standards of internal auditing. The audit committee should receive and evaluate the reports of the internal audit team.			
B.8. Whenever the Code mentions reviews or analysis to be exercised by the Audit Committee, these should be followed by recurrent (at least annual), or ad-hoc reports to be submitted to the Board afterwards.	YES		
B.9. No shareholder may be given undue preference over other shareholders with regard to transactions and agreements concluded by the company with shareholders and their related parties.	YES		The company CONPET SA complies with the recommendation of the BVB Corporate Governance Code.
B.10. The Board should adopt a policy ensuring that any transaction of the company with any of the companies it has close relations with, that is equal to or bigger than 5% of the net assets of the company (as stated in the latest financial report), should be approved by the Board following an obligatory opinion of the Board's audit committee, and fairly disclosed to the shareholders and potential investors, to the extent that such transactions fall under the category of events subject to disclosure requirements.	YES		The Company has adopted an affiliated party transaction policy, which aims to identify, approve, monitor and report these transactions in accordance with the applicable law in force.
B.11. The internal audits should be carried out by a separate structural division (internal audit department) within the company or by hiring an independent third-party entity.	YES		
B.12. To ensure the fulfillment of the core functions of the internal audit department, it should report functionally to the Board via the Audit Committee. For administrative purposes and in the scope related to the liabilities of the management to monitor and mitigate risks, it should report directly to the Director General.	YES		
C.1. The company should publish a remuneration policy on its website and include in its annual report a remuneration statement on the implementation of this	YES		

The Provisions of the Corporate Governance Code	Complies	Fails to comply or partially complies	Explanations of Compliance/ Reason for Non-Compliance
policy during the annual period subject to review.			
D.1. The company should have an Investor Relations department - indicating, to the general public, the person/persons responsible for the organizational unit. In addition to the information required by legal provisions, the company should include on its website a dedicated Investor Relations section, both in Romanian and English, with all relevant information of interest for investors, including:	YES		
D.1.1. The main corporate regulations: the Articles of Incorporation, the procedures on General Shareholders' Meetings;	YES		On the company website relevant information is published for the investors (Articles of Incorporation, shareholders' rights etc.). The General Meetings of Shareholders are held by the observance of the legislation in force regarding the companies and the capital market, in compliance with the legal provisions regarding the call and performance of the general meetings.
D.1.2. Professional CVs of the members of the governing bodies of the company, other professional commitments of the Board members, including the executive and non-executive Board positions in companies or non-profit institutions;	YES		
D.1.3. Current and periodic reports (quarterly, semi-annual and annual reports) – at least the ones provided at item D.8 – including current reports with detailed information related to non-compliance with this Code;	YES		
D.1.4. Information related to the General Meetings of Shareholders: the agenda and supporting materials; the procedure for the election of Board members; the rationale for the proposal of candidates for the election to the Board, together with their professional CV's; shareholders' questions related to the agenda and the company's answers, including the decisions made;	YES		

The Provisions of the Corporate Governance Code	Complies	Fails to comply or partially complies	Explanations of Compliance/ Reason for Non-Compliance
D.1.5. Information on corporate events, such as payment of dividends and other distributions to the shareholders or other events leading to the acquisition or limitation of rights of a shareholder, including the deadlines and principles applied to such operations. Such information should be published within a timeframe that enables investors to make investment decisions;	YES		
D.1.6. The name and contact data of a person who should be able to provide, upon request, relevant information;	YES		
D.1.7. Company's presentations (e.g. investors presentations, quarterly results presentations, etc.), financial statements (quarterly, semi-annual, annual), auditor reports and annual reports.	YES		
D.2. The company should provide a policy related to the annual distribution of dividends or other benefits to shareholders, proposed by the Director General or the Management Board and adopted by the Board of Directors, as a set of directions the company intends to follow regarding the distribution of net profit. The principles of the annual dividend distribution policy should be published on the company's website.	YES		
D.3. The company should adopt a policy in relation to forecasts, whether they are disclosed or not. Forecasts refer to the quantified conclusions of studies aimed at determining the global impact of a number of factors related to a future period (so called assumptions): by nature, such a task is based upon a high level of uncertainty, with results sometimes significantly differing from forecasts initially presented. The forecast-related policy will establish the frequency, the period considered and content of forecasts. Forecasts, if published, may only be part of annual, semi-annual or quarterly reports. The forecast related policy should be published on the corporate website.	YES		The forecasts have been presented in the summary of the Administration Plan approved in the GMS dated 19.12.2023, published on the company website.

The Provisions of the Corporate Governance Code	Complies	Fails to comply or partially complies	Explanations of Compliance/ Reason for Non-Compliance
D.4. The rules of general meetings of shareholders should not restrict the participation of shareholders in general meetings and the exercising of their rights. Amendments to the rules should take effect, at the earliest, as of the next general meeting of shareholders.	YES		
D.5. The external auditors should attend the shareholders' general meetings when their reports are presented therein.	YES		
D.6. The Board should present to the annual general meeting of shareholders a brief assessment of the internal audit and significant risk management systems, as well as opinions on issues subject to resolution at the general meeting.	YES		
D.7. Any professional consultant, expert or financial analyst may participate in the shareholders' meeting upon prior invitation from the Board. Accredited journalists may also participate in the general meeting of shareholders, unless the President of the Board decides otherwise.	YES		
D.8. The quarterly and semi-annual financial reports should include information, in both Romanian and English, regarding the key drivers influencing the change in sales, operating profit, net profit and other relevant financial indicators, both on quarter-on-quarter and year-on-year terms.	YES		
D.9. A company should organize at least two meetings/conference calls with analysts and investors each year. The information presented on these occasions should be published in the "Investors Relation" section of the company website at the time of the meetings/conference calls.	YES		
D.10. If a company supports various forms of artistic and cultural expression, sport activities, educational or scientific activities, and considers the resulting impact on the innovativeness and competitiveness of the company is part of its business mission and development strategy, it should publish the policy guiding its activity in this area.	YES		

Table 32 – Statement on Conformity with the Provisions of the Corporate Governance Code
Issued by the Bucharest Stock Exchange

Actions for further improvement of CONPET corporate governance

With its listing at BVB, CONPET has undertaken the application of the Corporate Governance Code of Bucharest Stock Exchange and, therefore, of the highest corporate governance standards currently existing in Romania.

One of the goals of the company CONPET S.A. is to increase the transparency and visibility of the company on the stock market and to ensure greater openness to shareholders and investors in order to increase the credibility of the company.

Transparency, information and communication

As a company listed in the Premium category of Bucharest Stock Exchange, CONPET fully complies with the obligations of reporting to the investors and the market in general, drafting and submitting the periodic and current reports required by the regulations of the Stock Exchange.

As a company that operates in a competitive environment of great significance for the economy in general, CONPET S.A. aims to achieve the appropriate balance between information of a confidential nature and those of public interest. Internal regulations have been adopted for the dissemination of information and compliance with confidentiality.

In accordance with the corporate governance principles, CONPET has announced the timetable for meetings with analysts and investors. In 2024, conference calls with financial analysts from the capital market have been organized, for the analysis of the periodic reports of the company. The presentation materials prepared on the events mentioned above have been published on the company's website.

Furthermore, particular importance has been given to the relationship with shareholders and investors, by showing increased transparency. The company's representatives answered positive to all the participants to the capital market.

In 2024, CONPET took part in numerous events organized within the capital market, showing openness towards both institutional and individual investors.

The company has also provided a contact number and an email address (infoinvestitori@conpet.ro), through which investors can clarify certain aspects or ask various questions, thus getting in direct contact with the company's investors' relation team.

The evolution of CONPET S.A. share is monitored by the research departments of the major financial investment services companies from the Romanian capital market. Furthermore, the entity that manages the relationship with the investors maintains a permanent connection with all financial analysts in the capital market.

At CONPET level, the corporate governance structures are:

- The General Meeting of Shareholders;
- The Board of Directors and the Consultative Committees;
- The Director General/The Directors with mandate contracts.

General Meeting of Shareholders

On reference date 31.12.2024, the total number of shares issued by the company CONPET S.A was 8,657,528, owned by 16,251 shareholders. The shareholding structure, in accordance with the consolidated synthetic structure on the shareholders on the same date is the following:

- The Romanian State by the Ministry of Energy (1 Shareholder)	
Number of shares:	5,083,372
Value of contribution to the share capital (RON):	16,775,127.6
Share of participation on profit and loss (%):	58.7162
- Legal persons (100 shareholders)	
Number of shares:	2,083,424
Value of contribution to the share capital (RON)	6,875,299.2
Share of participation on profit and loss (%):	24.0649
- Natural persons (16,150 shareholders)	
Number of shares:	1,490,732
Value of contribution to the share capital (RON)	4,919,415.6
Share of participation on profit and loss (%):	17.2189

The shareholders exercise their rights at the General Meeting of Shareholders ("GMS"), which is the highest decision-making body of the company. The powers of approval of the General Meeting of Shareholders, the organization and validity conditions of these meetings are set out in the Articles of Incorporation of the company, in accordance with the applicable regulations, and are supplemented with the incident legal provisions. Both the Articles of Incorporation of the company and shareholders' rights are posted on the company's website at the following addresses:

https://www.conpet.ro/wp-content/uploads/2015/11/Articles-of-Incorporation_27.04.2023.pdf

<https://www.conpet.ro/en/investors-relation/info-shareholders/>

According to the law, each subscribed and paid share gives the holder the right to one vote in the General Meeting of Shareholders, the right to elect and to be elected to the governing bodies, the right to participate in the distribution of dividends according to the provisions of the Articles of Incorporation and of the legal dispositions, as well as other rights provided for by them.

The shareholders are entitled to fair and complete information in the General Meeting of Shareholders on the company's situation. In the case of the issuance of new shares, the existing shareholders have preferences for the right to subscription under the law.

The General Meetings are ordinary and extraordinary.

The General Meeting of Shareholders is convened by the Board of Directors, whenever necessary. The call for the General Meeting of Shareholders shall comply with the legal provisions regarding the companies, as well as the capital market regulations and the

provisions of these Articles of Incorporation. The meeting time limit cannot be shorter than 30 days after the publication of the call in the Official Gazette of Romania, part IV.

In order to provide equal treatment and full and fair exercise of all shareholders' rights, CONPET makes available to them all relevant information regarding the GMS and adopted resolutions, according to the law, both by mass communication means and in the special section opened on the company's website.

CONPET pays all diligence, in compliance with the requirements of the relevant legislation, to ease the participation of the shareholders in the sessions of the General Meetings, as well as for the full exercise of the rights thereof. The shareholders may take part and vote, in person, in the General Meeting of Shareholders, but also have the possibility to exercise the vote by representation or by correspondence.

The General Meeting of Shareholders is opened and presided by the Chairman of the Board of Directors or, in his absence, by another administrator appointed by the Chairman of the Board of Directors.

Each shareholder may address questions to the administrators regarding the company activity, according to the legal provisions.

The decisions made by the General Meetings of Shareholders within the limits of the law and of the Articles of Incorporation are mandatory even for the shareholders who did not take part in the meeting or voted against.

The decisions of the General Meeting of Shareholders, which are contrary to the law, or the Articles of Incorporation can be challenged in court, according to the law.

The Ordinary General Meeting of Shareholders has the following main responsibilities:

- discusses, approves or modifies the annual financial statements, based on the administrators' report and the financial auditor's report;
- elects and revokes the administrators according to the law; at the appointment, the OGMS shall bear in mind that the majority of BoD members should be non-executive and independent;
- appoints or revokes the financial auditor and sets forth the minimum duration of the financial audit contract;
- sets the remuneration level and any other amounts and advantages due to the administrators for the financial year in progress [...] as well as the general limits of the remuneration of the directors;
- approves the Organization and Functioning Regulation of the Board of Directors and sets out the competencies thereof;
- approves the Revenues and Expenditure Budget (R.E.B.) and the investment program for the next financial year;
- approves the profit distribution as per the provisions of the normative acts in force and the fixing of dividend per share;
- passes judgments over the administrators' management and the means to recover the losses they have caused to the company;
- decides upon the pledging, leasing or dissolution of one or several units of the company;
- performs any other duty established by law in his charge.

The Extraordinary General Meeting of Shareholders has the following main responsibilities:

- changing the legal form of the company;

- changing the location of the company's headquarters;
- changing the company's line of business;
- establishment or disestablishment of subsidiaries;
- prolongation of the company's life;
- augmentation of the share capital;
- reduction of the share capital or replenishment thereof by issuing new shares;
- merger with other companies or division of the company;
- anticipated dissolution of the company;
- conversion of the shares from one category into another;
- conversion of a category of bonds into another category or into shares;
- bond issuance;
- change of nominal value and number of shares;
- decides on the contracting of medium and long-term bank loans, including external ones;
- establishes the competences and the level of contracting of current bank loans, commercial credits, as well as the level of guarantees;
- decides upon the participation, according to the law, to the establishment of new legal persons or in association with other legal or natural persons in the country or abroad, except for the non-profit organizations established under the law, for which the competence to approve the accession/withdrawal of companies from the capacity of member belongs to the Board of Directors.
- decides on what market the securities issued by the company are to be traded and chooses the authorized independent registrar that manages the registers of the shares issued by the company;
- any other amendment of the Articles of Incorporation or any other decision for which the approval of the Extraordinary General Meeting of Shareholders is asked.

The Board of Directors

The company is administered in a unitary system by a Board of Directors made of 7 administrators, appointed by the Ordinary General Meeting of Shareholding for a period of 4 years, with the possibility of re-election for further periods of 4 years. The administrators can act as shareholders. For the appointment of an administrator to be legally valid, the person appointed must expressly accept. The identification data of the administrators are being registered at the Trade Register Office as per the legal provisions.

The Board of Directors is ruled by a Chairman. The Chairman is elected by the Board of Directors, among its members. The removal from office of the chairman is also attribute of the Board. The decision on the appointment or revocation shall be taken by the majority vote of the members of the Board.

The Chairman of the BoD of the company cannot be the Director General.

The Board of Directors usually meets at the company's headquarters or any place of business of the company or in any place disclosed in the convening notice. Operational meetings of the Board of Directors may be organized by means of remote communication meeting the technical conditions necessary for the identification of the participants, their effective participation to the meetings of the Board of Directors and the retransmission of the deliberations on a continuous basis (via e-mail, telephone, video call or other communication equipment), whenever necessary, but at least every 3 months, at the call of the Chairman or at the reasoned request of 2 of its members or of the Director General/Directors. In this case,

the Agenda is being established by the authors of the request. The Chairman must act on such a request.

The Board of Directors cannot decide upon certain issues that are not included on the Agenda, except for the emergencies. To decide on emergency, the absent members will be consulted upon, by various means of distance communication. The Chairman shall decide on the urgency of the problems. The Board of Directors operates under its own rules and regulations in force.

For the validity of resolutions, the presence (directly or by proxy) of at least five council members is required and decisions are taken by the majority vote of the members present. The chairman of the Board of Directors will have a casting vote in case of equal votes. The "Abstention" position adopted by an administrator regarding the items included on the agenda of the general meeting of shareholders is not deemed expressed vote.

The members of the Board of Directors can only be represented at meetings of the respective body by other members herein. A member present may represent one absent member.

For the decisions taken in meetings in which a board member did not attend, he remains liable if, within 30 days since he took notice of them, he did not make resistance in the forms specified by law.

The Agenda is set by the Chairman. The call, the agenda and the meeting materials will be sent to the administrators in sufficient time before the date of the meeting; the deadline can be established by the own regulation of the Board of Directors. The minutes of the meeting shall be comprised in a Journal of the Meetings and BoD Deliberations, by courtesy of the Chairman of the Board.

The protocol of the meeting shall be drawn up by technical editing by the BoD Secretariat and shall comprise the name of the participants, the order of the deliberations, the decisions made, the number of votes cast and separate opinions. This will be signed by the Chairman of the Board of Directors, the BoD members. (only those who participate directly in the meeting may also have a mandate of representation given by another administrator) and by the BoD Secretariat.

The protocol contains the names of participants, policy deliberations, decisions, number of votes and dissenting opinions. It is signed by the Chairman of the Board, the other administrators and the BoD secretariat, being contained in the register of meetings and deliberations of the Board. The BoD Secretariat is being provided from among the personnel within the BoD and GMS Secretariat.

The structure of the Board of Directors is diverse in both men and women of different professions (engineers, lawyers and economists) with professional experience in energy, banking, investment, capital market analysis, legal fields.

The management of the company was carried out in 2024 by the administrators appointed by the OGMS Resolution no. 4/18.08.2023, with a term of office of 4 years, following the

selection procedure carried out in accordance with the provisions of G.E.O. no. 109/2011, by the cumulative voting method.

Structure of the Board of Directors:

Chairman of the BoD: Mr. Cristian – Florin Gheorghe, appointed by Decision no. 22/18.08.2023

Members: Mr. Nicușor - Marian Buică, Mrs. Luminița – Doina Kohalmi - Szabo, Mrs. Oana – Cristina Tănăsică, Mr. Florin – Daniel Gavrilă, Mr. Andrei – Mihai Zaman, Mr. Alin – Mihael Dănilă.

The CV's of the members of the Board of Directors of CONPET S.A. are available on the company's website <https://www.conpet.ro/en/corporate-governance/board-of-directors/> and are presented in **Annex 8**.

Within the Board of Directors, out of a number of 7 non-executive directors, 5 members are male and 2 members are female (29%), following the selection carried out by the Public Supervisory Authority in 2023, prior to the appearance of the amendments to Law no. 24/2017 on issuers of financial instruments and market operations, intervened by Law no. 11/ 2025.

Information on diversity in terms of management and management bodies can also be found in the Annual Sustainability Report 2024.

In 2024, the members of the Board of Directors did not own shares in CONPET SA.

Consultative Committees

Within the Board of Directors there are constituted the following consultative committees:

- The Nomination and Remuneration Committee;
- The Audit Committee;
- The Risk Management Committee;
- The Committee for Development and Relation with the Investors and Authorities.

Composition of the Consultative Committee

The composition of the Consultative Committees during 2024 remained unchanged compared to 31.12.2023 and is presented as follows:

The Nomination and Remuneration Committee is made out of 5 non-executive administrators: Zaman Andrei - Mihai - President; members: Mr. Cristian - Florin Gheorghe, Mrs. Oana – Cristina Tănăsică, Mr. Alin – Mihael Dănilă, Mrs. Luminița – Doina Kohalmi - Szabo.

The Audit Committee is made out of 3 non-executive administrators: Mr. Florin- Daniel Gavrilă - President; members: Mr. Nicușor – Marian Buică, Mr. Cristian – Florin Gheorghe.

The Risk Management Committee is made out of 3 non-executive administrators: Mrs. Luminița – Doina Kohalmi - Szabo - President; members: Mr. Alin – Mihael Dănilă, Mr. Nicușor – Marian Buică.

The Committee for Development and Relation with the Investors and Authorities is made up of 3 non-executive administrators: Mrs. Oana – Cristina Tănăsică - president; Members: Mr. Florin – Daniel Gavrilă, Mr. Andrei – Mihai Zaman.

All 7 administrators are non-executive members, of which: 1 non-independent administrator (Mr. Gheorghe Cristian – Florin, member in the Nomination and Remuneration Committee and the Audit Committee), the other 6 administrators being independent and ensuring the administration of the company.

The terms of reference and attributions of the Board of Directors and of the Consultative Committees may be consulted at the web pages: <https://www.conpet.ro/wp-content/uploads/2015/11/Rules-on-the-Organization-and-Functioning-of-the-BoD.pdf> for the Board of Directors, respectively <https://www.conpet.ro/wp-content/uploads/2015/11/Internal-rules-and-functioning-of-the-Committees5.pdf> for the Consultative Committees established at the BoD level.

The Consultative Committees meet whenever necessary at the convening of the President of each committee, and the proposals/recommendations made to the Board of Directors (to substantiate its decision-making) are adopted by a majority of the votes cast. The duties and responsibilities of the consultative committees are being established by the Board of Directors.

The Summary of the activities performed in 2024

In 2024, the Board of Directors held 26 meetings. The Consultative Committees also held 36 meetings, as follows: 10 meetings of the Nomination and Remuneration committee, 10 meetings of the Audit committee, 5 meetings of the Risk management committee and 11 meetings of the Development and Investor and Authorities Relation committee.

The meetings of the Board of Directors have been carried out according to the agenda transmitted to the administrators, the main decisions made having as object the following:

- endorsement of 2024 Revenues and Expenditure Budget (Budget) by the OGMS (also comprising the estimates for 2025- 2026);
- endorsement of 2024 Investment Program (and estimates of the Investment Expenditures for 2025 and 2026) proposed by Substantiation note to the OGMS;
- endorsement of the Investment Program for 2024 - Annex no. 1 (detailed structure by objectives which also includes estimates for the years 2025 and 2026) and Annex no. 2 (independent facilities and equipment for 2024), according to the Report drafted to the BoD;
- approval of the Investment Program for the year 2024 and estimates for the years 2025 and 2026, Annex no. 1 (structure by types of works), Annexes no. 2 (details on objectives), no. 3 (Independent equipment and machinery 2024), no. 4 (2024– 2026 investment, endowment and financing sources program).
- approval of the Report regarding the status of the sponsorships granted by CONPET S.A. in the year 2023;
- analysis of the company's business presented by the executive management in the monthly reports;
- periodical analysis of the physical and value-related implementation of the 2024 Investment Program;

- analysis and endorsement/approval of the Consultative Committees Reports, as appropriate;
- approval of the Convening Notices of the General Meeting of Shareholders and of the materials related to their Agenda;
- monitoring the implementation/stage of implementation of the measures ordered by the BoD Decisions;
- the appointment of a Deputy Director General 3, with a mandate starting from 15.01.2024 to 19.10.2027 (inclusive of) and the approval of the mandate contract, following the completion of the selection procedure for DDG3, the approval of the management component of the Management Plan, drawn up by DDG3, the approval of the level of the variable component of his remuneration and the method of calculation and granting, for each year of mandate, within its general limits, approved by Resolution of the OGMS no. 6/19.12.2023, the approval of the financial and non-financial key performance indicators and the conclusion of Addendum no. 1 to the mandate contract;
- approval of the preliminary report for the period January - December 2023, accompanied by the non-audited preliminary financial statements at the date and for the financial year ended December 31st, 2023;
- analysis and approval of the results of 2023 a inventory of the elements similar to assets, liabilities and equities, related to the company's patrimony;
- endorsement of the results of 2023 inventory of the elements similar to assets related to public and private domain of the State.
- approval of the accounting policies Manual of the company CONPET S.A. - updated;
- approval of the dissolution of a number of 27, respectively 29 positions within certain organizational entities of the company and the corresponding modification of the list of functions, by eliminating the existing positions;
- endorsement of the Policy relating to the remuneration of administrators and directors with a mandate contract, published on CONPET S.A. website, following the approval thereof by the OGMS; April 2024;
- endorsement of the financial statements at the date and for the financial year concluded on 31.12.2023;
- approval of the Annual Report of the company's administrators for the financial year ended 31.12.2023, report presented in the OGMS;
- endorsement of the proposals of the executive management to the Ordinary General Meeting of Shareholders concerning the distribution of net profit related to the financial year 2023 and of the amounts from the retained earnings, setting the registration date and the date of dividends payment to the shareholders; endorsement of Mentions to the OGMS regarding the distribution of profit;
- endorsement of the proposal to the OGMS regarding the discharge of administration of the administrators for the activity of 2023;
- approval of the report of the directors with mandate contracts for the activity ended 31.12.2023;
- approval of the Report of Directors with mandate contract to monitor the framing of key financial and non-financial performance indicators (KPIs) for 2023 within the limits approved by the Board of Directors; approval of the total degree of fulfillment of the financial and non-financial key performance indicators (KPIs) for 2023 for directors with mandate contracts, namely 105.4% for indicators established for the period 01.01.2023 - 19.10.2023 and 106.0% for indicators established for the period 20.10.2023 - 31.12.2023 and approval of granting the variable component due to the directors for the mandate

- periods carried out in 2023, in accordance with the provisions of the mandate contracts and within the limits established by the OGMS;
- submission for approval of the OGMS of the Board of Directors Report on the administration activity in 2023, prepared in compliance with the provisions of Article 55 of GEO 109/ 2011 on corporate governance of public enterprises and the provisions of the mandate contract;
 - endorsement of the report of the Nomination and Remuneration Committee on the evaluation of the company's administrator's activity in 2023;
 - approval of the Report of the Nomination and Remuneration Committee on the evaluation of the activity of directors with mandate contract for 2023;
 - endorsement of the Report prepared by directors with mandate contract regarding the total degree of achievement of the financial and non-financial key performance indicators (KPIs) for 2023 for the company's administrators;
 - endorsement of the Report of the Board of Directors for the monitoring of the framing of the key performance indicators (KPIs) of the administrators for 2023 within the limits approved by the OGMS and the submission for approval to the General Meeting of the proposals for the approval of the total degree of fulfillment (102.2%) of the financial and non-financial key performance indicators (KPIs) for the year 2023 and for granting the variable component due to the directors for the term of office carried out in 2023, respectively for the period 22.08.2023 - 31.12.2023, in accordance with the provisions of the mandate contracts;
 - endorsement of the Annual Report of the Nomination and Remuneration Committee to the OGMS related to the remunerations and other benefits awarded to the administrators and the directors with mandate contract during 2023 financial year (Remuneration Report);
 - approval of the annual report the Audit Committee for 2023;
 - approval of the annual report of the Risk Management Committee for 2023;
 - delegating to the Director General and the Economic Director of the power to approve the revision (modification) of the Investment Program within the same values approved by the OGMS; the general review of the Annual Investment Program and the approval of changes beyond the approval limits delegated to the Directors General and the Economic Director remain within the approval competence of the Board of Directors;
 - approval of revision of the Investment program for 2024 and estimates for the years 2025 and 2026, within the same values;
 - delegating to the Director General of CONPET S.A. the power to approve the revision (modification) of the Annual Procurement Program within the limit of the maximum value of 200,000 euro/acquisition for the newly introduced acquisitions in the program or to modify the estimated value/acquisition within the maximum value of 200,000 euro/acquisition for the existing acquisitions in the Annual Procurement Program; the general review of the Annual Procurement Program and the approval of changes beyond the approval limits delegated to the General Manager remain within the approval competence of the Board of Directors;
 - approval of the revision of the Procurement Program for 2024, according to the proposals;
 - approval of the criteria for granting the amounts paid as employees' share of profit for 2023;
 - approval of the decommissioning/downgrade of the goods (fixed assets and inventory goods in use/ Inventories), whose operation is no longer justified and the approval of the proposed means to capitalize these goods;

- endorsement of the decommissioning of the assets belonging to the public domain of the state (fixed assets and inventory objects of the nature of fixed assets) and the approval of the proposed valuation methods for these assets;
- approval of the 2024 annual Procurement Program - periodic changes/revisions;
- approval of Current Repairs Program for 2024/ rectification approval;
- approval of Current Repairs Program for 2024/ rectification approval;
- approval of the Technical Revision Program planned for 2024/rectification approval;
- approval of the Code of Ethics and Integrity of CONPET S.A.- Revision;
- approval of the Quarterly Activity Reports of Directors with mandate contract, in accordance with the provisions of GEO no.109/2011 *on the corporate governance of public enterprises* and the provisions of the contract of mandate;
- approval of the Quarterly report on the economic and financial activity of CONPET S.A. , accompanied by the financial statements prepared in compliance with the Ministry of Public Finance Order no. 2844/2016 and the International Accountancy Standard 34,"Interim financial reporting".
- endorsement of the Quarterly Report regarding the monitoring of the financial and non-financial key performance indicators of the administrators and directors with mandate contract;
- approval of the participation of the Director General and certain BoD members to certain events/conferences and approval of the travel report.
- approval of the proposals regarding the opportunity to maintain CONPET S.A. capacity as a contributing member to the non-governmental organizations where the company is operating;
- monitoring the activities and actions carried out monthly by the non – governmental organizations in which CONPET SA is a member;
- approval of sponsorship requests and periodical monitoring of sponsorship contracts concluded by the company;
- the empowerment of the Director General to initiate the negotiation procedure for the conclusion of the Collective Labor Agreement applicable at unit level;
- the empowerment of the Director General of the Company for the negotiation and conclusion, with CONPET Free Union, of an Addendum to the Collective Labor Agreement applicable at Company level.
- approval of the delegation to the Director General of the power to sign the minutes of decommissioning of fixed assets, decommissioning of inventory/decommissioning objects of material goods, approved at decommissioning by the Board of Directors;
- approval of the investment strategy of the financial resources of CONPET S.A., respectively the establishment of bank deposits;
- approval of the starting price at auction for the stock of recovered pipe and for some vehicles, approved for recovery by auction;
- the Information on the Report on the management control system as of 31.12.2023 and the status of the implementation of the actions included in the Program for the development of the internal control management system for 2023 was noted;
- the Information on the findings and recommendations contained in the Compliance Audit Report of the Court of Accounts, recorded in the Plan of Measures drawn up by the executive management for their implementation, was noted;
- the Information regarding the analysis of the anti-bribery compliance function and the analysis carried out by the management for the anti-bribery management system implemented in CONPET S.A. was noted;

- the Information on the monitoring of the performance of the internal managerial control system and risk management at the level of CONPET S.A. in 2023 was noted;
- approval of the delegation of duties and responsibilities at the level of directors with a mandate contract, in certain situations;
- approval of the Half-yearly Report of the Board of Directors to the General Meeting of Shareholders for the first half of 2024, accompanied by the Financial Statements as of 30.06.2024;
- endorsement of the fulfillment of the statute of limitation of the shareholders to the dividends related to 2020 financial year and submission of the proposal to the OGMS approval;
- endorsement of 2024 rectified Revenues and Expenditure Budget (Budget) by the OGMS (also comprising the estimates for 2025 - 2026);
- approval of the rectification of the Budget for the year 2024, respectively of Annex no.1 - Rectified budget for 2024, Annex no. 2 – Detailing the economic and financial indicators provided for in the rectified Budget for the year 2024 and the distribution by quarters thereof and Annex no. 4 - The Investment program, endowments and financing sources – rectified for the year 2024;
- approval of the Risks management policy of CONPET S.A.;
- approval of the Procedural Internal Procurement Norms Revision;
- the Information on how to implement the recommendations contained in the Compliance Audit Report of the Court of Accounts, fully implemented within the established deadlines, was noted;
- approval of the Corporate Governance Regulation, updated;
- approval of the Regulation concerning the organization and carry out of the GMS within CONPET S.A.;
- approval of the Visual Identity Manual of CONPET S.A., revised;
- approval of the passing on to the company's costs of a fine received by the company;
- approval of the Technical Revision Program planned for 2025;
- approval of the Annual Procurement Program Draft for 2025;
- approval of the updated Organizational and Functioning Rules of the company CONPET S.A.;
- approval of the Internal Regulation of CONPET S.A.;
- analysis of the Revenues and Expenditure Budget for the year 2025 projection (preliminary document);
- analysis of the Information regarding the necessity and opportunity of the objectives/works contained in the projection of the Investment Program for 2025 -2027.

The Directors with mandate contracts

The Director General

Following the performance and completion of the procedure for recruitment and selection of the Director General, Deputy Director General and Economic Director, carried out in compliance with the provisions of GEO no. 109/2011 on the corporate governance of the public enterprises, the Board of Directors, by Decision no. 31/19.10.2023, appointed Mr. Dorin Tudora in the capacity of Director General for a 4 years' mandate, starting 20.10.2023

until 19.10.2027, delegating to him the management of the company in accordance with the legal provisions in force, the Articles of Incorporation and the contract of mandate.

The Deputy Director General

Following the performance and completion of the procedure for recruitment and selection of the Director General, Deputy Director General and Economic Director, carried out in compliance with the provisions of GEO no.109/2011 on the corporate governance of the public enterprises, the Board of Directors, by BoD Decision no. 31/19.10.2023, appointed Mrs. Mihaela - Anamaria Dumitrache in the capacity of Deputy Director General for a 4 years' mandate, starting 20.10.2023 until 19.10.2027, delegating to her the management of the company in accordance with the legal provisions in force, the Articles of Incorporation and the contract of mandate.

The Economic Director

Following the performance and completion of the procedure for recruitment and selection of the Director General, Deputy Director General and Economic Director, carried out in compliance with the provisions of GEO no.109/2011 on the corporate governance of the public enterprises, the Board of Directors, by BoD Decision no. 31/19.10.2023, appointed Mrs. Sanda Toader in the capacity of Economic Director for a 4 years' mandate, starting 20.10.2023 until 19.10.2027, delegating to her the management of the company in accordance with the legal provisions in force, the Articles of Incorporation and the contract of mandate.

The Deputy Director General 3

The Board of Directors, by Decision no.33/01.11.2023 approved the initiation of the recruitment and selection procedure of the Deputy Director General 3.

Following the performance and completion of the procedure for recruitment and selection carried out in compliance with the provisions of GEO no.109/2011 on the corporate governance of the public enterprises, the Board of Directors, by Decision no.1/12.01.2024 appointed Mr. Radu - Florentin Necşulescu in the capacity of Deputy Director General 3, with a mandate starting 15.01.2024 until 19.10.2027 (inclusive of), delegating the management of the company in accordance with the legal provisions in force, the Articles of Incorporation and the contract of mandate.

Directors with mandate contracts have the attributions specified in the contract of mandate, supplemented by provisions of the Articles of Incorporation, the Rules of Organization and Operation, completed with applicable legal provisions.

The Director General supplies to the Board of Directors, regularly and comprehensively, detailed information regarding all outstanding aspects for the company business. Additionally, any outstanding event is immediately communicated to the Board of Directors.

Moreover, any member of the Board of Directors may request the Director General information regarding the operative company management.

The management bodies and the administration bodies are active, have the freedom to adopt the decisions they consider right, acknowledge their role and are permanently capable of

supporting their decisions against the administration structures or other interested parties that have the right to obtain such information.

The Remuneration Policy

The remuneration policy of the administrators and directors with mandate contract, which also includes the remuneration criteria thereof, was approved by the OGMS Resolution no. 2/25.04.2024 and is posted on the company's web page.

- The Board of Directors

Remuneration for the members of the Board of Directors, respectively the non-executive administrators is determined by the General Meeting of Shareholders in the structure and limits set by GEO no. 109/2011, consisting of monthly gross fixed allowance and a variable component.

In 2024, the administrators of CONPET S.A. carried out their activity based on mandate contracts whose form and content were approved by the General Meeting of Shareholders.

The remuneration of the administrators appointed for a period of 4 years starting with 22.08.2023 until 21.08.2027 (inclusive of) consists of a monthly fixed allowance and a variable component.

The Gross Fixed Allowance

According to OGMS Resolution no.4 dated 18.08.2023, the members of the BoD have a monthly gross fixed allowance equal to twice the average for the last 12 months of the average gross salary per month for work done according to the core business recorded by the Company, at class level according to the classification of the national economy, announced by the National Institute of Statistics prior to the appointment.

The gross fixed remuneration due to the members of the BoD for the period 01.01.2024 - 31.12.2024 was of 1,797,432 RON.

Variable component

The variable component is determined based on financial and non-financial performance indicators negotiated and approved by the General Meeting of Shareholders.

The variable component due to administrators is granted in conjunction with the annual total degree of fulfillment of financial and non-financial KPIs approved in the contract of mandate.

In the meeting dated 25.04.2024, the OGMS has approved the total degree of achievement (102.2%) of the financial and non-financial key performance indicators for the year 2023, based on the Board of Directors' monitoring report on the framing of the performance indicators for the year 2023 in the limits approved by the OGMS and granting the variable component due to administrators for the term of office in 2023, as per the provisions of the mandate contract.

The total gross variable component related to 2023 and paid in April 2024 was in amount of 647,465 RON.

The financial statements of 2024 include provisions representing variable allowances related to mandate contracts for non-executive administrators in the amount of 1,797,432 (1,837,874 RON with the employer's contribution) and shall be paid after the approval of its distribution by the OGMS.

The Directors with mandate contracts

The Director General

For the period 01.01.2024 – 31.12.2024, the Board of Directors has settled the monthly gross fixed allowance of the Director General for the execution of the entrusted mandate for a period of 4 years (20.10.2023 – 19.10.2027), in amount of 66,636 RON, respectively 6 times the average on the last twelve months of the monthly gross average earnings for the activity performed as per the core business registered by the company, at level of class as per the classification of the activities in the national economy, communicated by the National Institute of Statistics prior to the appointment.

The gross fixed allowance granted to the Director General of CONPET SA between 01.01.2024 – 31.12.2024 was of **799,632 RON**.

The gross variable component related to 2023 and paid in 2024 to the Director General amounted to **669,772 RON**.

Deputy Director General

For the period 01.01.2024 – 31.12.2024, the Board of Directors has settled the monthly gross fixed allowance of the Deputy Director General for the execution of the entrusted mandate for a period of 4 years (20.10.2023 – 19.10.2027), in amount of 55,530 RON, namely 5 times the average on the last twelve months of the monthly gross average earnings for the activity performed as per the core business registered by the company, at level of class as per the classification of the activities in the national economy, communicated by the National Institute of Statistics prior to the appointment.

The fixed gross allowance granted to the Deputy Director General of CONPET SA between 01.01.2024 - 31.12.2024 was **666,360 RON**.

The gross variable component for the year 2023 and paid in 2024 to the Deputy Director General amounted to **189,481 RON**.

The Economic Director

For the period 01.01.2024 – 31.12.2024, the Board of Directors established the monthly gross fixed allowance of the Economic Director for the execution of the entrusted mandate for a period of 4 years (20.10.2023 – 19.10.2027), respectively 55,530 RON, i.e. 5 times the average on the last 12 months of the average gross salary for the activity carried out according to the main object of activity fully registered by the company, at class level according to the classification of activities in the national economy, communicated by the National Institute of Statistics prior to the appointment.

The fixed gross allowance granted to the Economic Director of CONPET SA between 01.01.2024 - 31.12.2024 (inclusive of) was of **666,360** RON.

The gross variable component related to 2023 and paid in 2024 to the Economic Director amounted to **131,253** RON.

The Deputy Director General 3

For the period 15.01.2024 – 31.12.2024, the Board of Directors has settled the monthly gross fixed allowance of the Deputy Director General 3, for the execution of the entrusted mandate for the period 15.01.2024 – 19.10.2027, in amount of 55,530 RON, respectively 5 times the average on the last twelve months of the monthly gross average earnings for the activity performed as per the core business registered by the company, at level of class as per the classification of the activities in the national economy, communicated by the National Institute of Statistics prior to the appointment.

The gross fixed allowance granted to the Deputy Director General 3 of CONPET SA between 15.01.2024 – 31.12.2024 (inclusive of) was of **644,148** RON.

The total gross fixed remuneration due to the directors with mandate for the period 01.01.2024 – 31.12.2024 was 2,776,500 RON.

The general limits of the variable component have been approved by the OGMS in the meeting dated 19.12.2023. The variable component is being paid following the approval of the annual financial statements, according to the degree of achievement of the key performance indicators.

In the meeting dated 25.04.2024, the OGMS approved:

- The Annual Report of the Nomination and Remuneration Committee related to the remunerations and other benefits awarded to the administrators and the directors with mandate contract during 2023 financial year.
- Total degree of achievement of the financial and non-financial key performance indicators of the directors with contract of mandate for the period 01.01.2023 - 19.10.2023 accounted for 105.4%, and for the period 20.10.2023 - 31.12.2023 accounted for 106%, as per the reports mentioned above and approved by BoD Decision no.8 dated 20.03.2024.

The total gross variable component related to 2023, paid in April 2024 amounted to **990,506** RON.

The variable component of 2024 will be paid following the approval of the financial statements, according to the degree of achievement of the key performance indicators.

The financial statements of 2024 include provisions representing variable allowances for mandate contracts for directors with mandate contracts, in amount of 2,776,500 (2,838,971 with the employer's contribution), and will be paid after the approval of the financial statements in relation to the total degree of fulfillment of the key performance indicators.

Status of achieving the Key Performance Indicators for 2024

Total Degree of achievement of the performance indicators (GT_{ICP}) is the amount of the degree of achievement of every KPI (GI_{ICP}) weighted by the weighting coefficient (W_{ICP}) related to every KPI.

The calculation formula is the following:

$$GT_{ICP} = \sum_{i=1}^n GI_{iICP} \times W_{iICP}$$

where:

GT_{ICP} = Total annual degree of achievement of the KPI

W_{ICP} = Weighting Coefficient (weight) for every KPI

GI_{ICP} = Degree of achievement of the individual KPI

The degree of achievement of every KPI (GI_{ICP}) is the degree of achievement of every KPI, considering the means of calculation provided at every KPI, subsequently weighted by the weighting coefficient (W_{iICP}) related to each KPI.

The variable component of the remuneration due to the administrators will be directly proportional to the GT_{ICP} for the corresponding financial year or part of the corresponding financial year and is being awarded as follows:

In the event that:

a) $GT_{ICP} \geq 100\%$, the maximum variable remuneration component approved by the OGMS for each administrator is granted in the maximum amount approved by the OGMS.

b) $80\% \leq GT_{ICP} < 100\%$, the maximum variable component of remuneration approved by the OGMS for each administrator with contract of mandate is being awarded in proportion to the total degree of achievement of the performance indicator

c) $GT_{ICP} < 80\%$, the variable component shall not be awarded.

- **Financial and non-financial Key performance indicators for 2024 approved for the administrators of the company**

According to the OGMS Resolution no. 6/19.12.2023, the financial and non-financial performance indicators (KPIs) of the company's administrators were approved, for the period 2023-2027, which will be used for determining and granting the variable remuneration component of administrators during the execution of the contract of mandate.

The structure of the financial and non-financial KPIs, the performance objectives of every KPI, their weight and the degree of achievement are shown in the table below:

Crt. no.	Performance indicator	Performance objective	MU	(Period 01.01. - 31.12.2024)			Degree of achievement KPIs (%)	KPIs weights for the settlement of the remuneration	Weighted KPI Achievement Degree
				Target values	Achieved values				
A. FINANCIAL KEY PERFORMANCE INDICATORS: 20%									
1.	Achievements of the investments	Realization of minimum 75% of the annual Investments Plan financed out of the modernization quota	%	≥75%	83.2%	100.0%	3.0%	3.0%	
2.	Current liquidity	Ensuring the ability to pay current liabilities from current assets		≥1.0	2.0	100.0%	3.0%	3.0%	
3.	Turnover ratio of assets	Ensuring the efficiency of assets management		≥0.5	0.6	100.0%	3.0%	3.0%	
4.	Return on equity (ROE)	Maintaining ROE higher than 5%	%	>5%	6.8%	136.0%	3.0%	4.1%	
5.	Dividends distribution ratio from the net profit of the year	Maintaining a sustainable dividend policy	%	≥65%	93.9%	100.0%	5.0%	5.0%	
6.	Total expenses per each 1000 RON of total revenues	Maintaining the level provided in the annual Budget	RON	913	909	100.4%	3.0%	3.0%	
B. NON- FINANCIAL KEY PERFORMANCE INDICATORS: 80%									
B1. KEY OPERATIONAL PERFORMANCE INDICATORS: 20%									
7.	Monitoring the annual electricity average specific consumption for technological purposes	Maintenance of the annual electricity average specific technological consumption at a level of max 3.2 Kwh/to	Kwh/to	Max 3.2 Kwh/to	3.2	2.7	100.0%	10.0%	10.0%
8.	Ensuring the NTS maintenance	Achieving at least 90% of the Annual Program of planned technical revisions	%	≥90 %	90.0%	100.0%	10.0%	10.0%	
B2. KEY PERFORMANCE INDICATORS OF CORPORATE GOVERNANCE: 55%									
9.	The number of meetings of the Board of Directors held along the year	Minimum one BoD meeting per month	number of meetings	min.one meeting/month	12	26	100.0%	15.0%	15.0%
10.	Timely reporting of the degree of achievement of the performance indicators of the company	Framing within the reporting due deadlines	%	100%	100.0%	100.0%	20.0%	20.0%	
11.	Implementation of the actions set out in the Program for the development of the internal control management system	Development of the internal control management system implementation in compliance with the legal requirements in force	%	≥90 %	90.0%	100.0%	15.0%	15.0%	
12.	The settlement of the risks management policy	Efficient and effective risk management that could affect the achievement of the company's objectives	confirmation (YES/NO)	YES	YES	YES	5.0%	5.0%	
B3. KEY PERFORMANCE INDICATORS ORIENTED TOWARDS PUBLIC SERVICES: 5%									
13.	Satisfaction score of the customers from the crude oil and derivatives transport business (number of replies of 4 and 5 scoring in total number of customer replies)	Satisfying the customers in the crude oil and derivatives transport activity (number of replies of 4 and 5 scoring in total number of customer replies at least 90%)	%	≥90 %	90.0%	100.0%	5.0%	5.0%	
Total degree of achievement of the performance indicators								101.1%	

Table 33 - 2024 key performance indicators

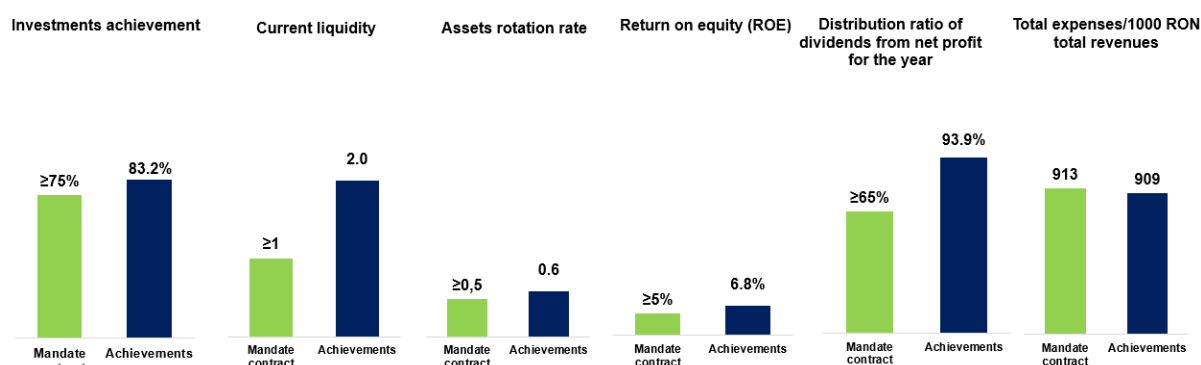


Chart 22 - Financial key performance indicators

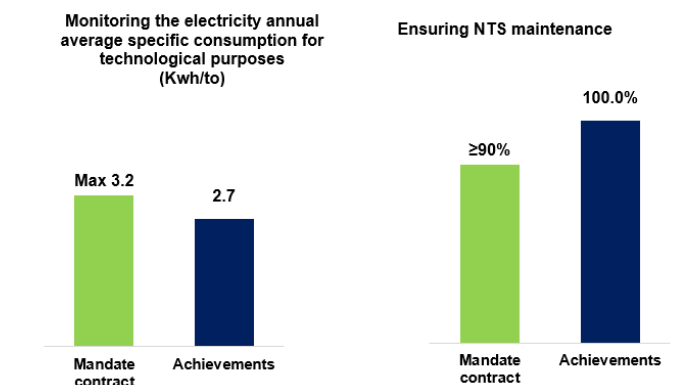


Chart 23- Operational non-financial Key Performance Indicators

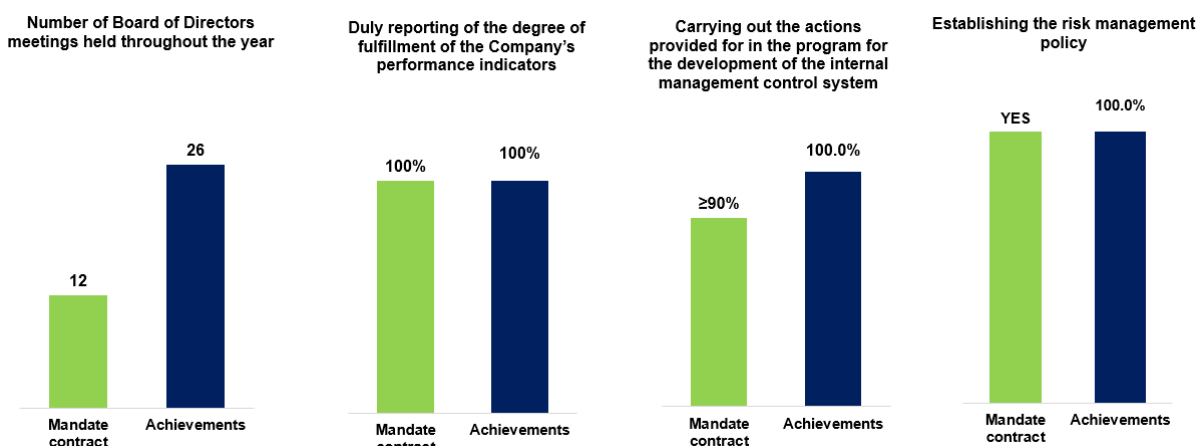


Chart 24 - Key non-financial governance performance indicators

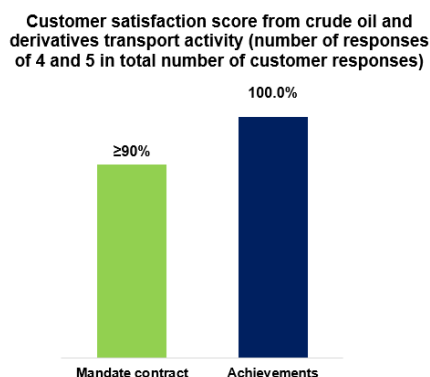


Chart 25- Non-financial key performance indicators oriented to public services

For the year 2024, the total degree of achievement of the key financial and non-financial performance indicators for the administrators was **101.1 %**.

- **Financial and non-financial key performance indicators for 2024 set for the directors with contract of mandate**

Key performance indicators - mandate period 01.01.2024 – 31.12.2024

The total degree of fulfillment of the key performance indicators underlying the variable component granting, for the period 01.01-31.12.2024, included in the mandate contracts of the directors is 104.5%.

In structure, the degree of achievement of the performance indicators reveals the following:

Key Performance Indicators	Degree of achievement of key performance indicators 2024		
	Mandate Contract	Achieved	Variation
A. Financial key performance indicators	50.0%	54.5%	+4.5 p.p.
B. Non-financial key performance indicators	50.0%	50.0%	0.0 p.p.
B1. Operational	20.0%	20.0%	0.0 p.p.
B2 of Corporate Governance	25.0%	25.0%	0.0 p.p.
B3. Oriented towards public services	5.0%	5.0%	0.0 p.p.
Total degree of achievement of key performance indicators:	50.0%	54.5%	+4.5 p.p.

Table 34 – Degree of achievement of the performance indicators for the administrators during 01.01.2024-31.12.2024

The total degree of achievement of the key performance indicators has been exceeded by 4.5 p.p., being favorably influenced by the financial indicators.

In **Annex no. 3** to the Report of the Administrators is presented the calculation of the total degree of fulfillment of the financial and non-financial key performance indicators of directors with contract of mandate.

The remunerations and degree of achievement of the key performance indicators of administrators and directors with contract of mandate are presented in the Annual Report of the Nomination and Remuneration Committee.

The statement of salary rights by positions and other rights/benefits of CONPET S.A.

The basic salaries within CONPET S.A. are divided by job functions groups, respectively by job function classes. Job function classes are ranked within the company in relation to the level of professional training, the importance of work, the complexity and diversity of activities, the responsibility and impact of decisions, exposure to risk factors, the difficulty of specific activities, the range of relations.

Crt. No.	Job function classes	Basic gross salary Minimum level - maximum level (Ron)
1	Class 1	3,700- 5,600
2	Class 2	3,840– 5,880
3	Class 3	4,130– 6,170
4	Class 4	4,420– 6,460
5	Class 5	4,730– 6,750
6	Class 6	5,110– 7,120
7	Class 7	5,200– 7,530

Crt. No.	Job function classes	Basic gross salary Minimum level - maximum level (Ron)
8	Class 8	5,110– 7,120
9	Class 9	5,300– 8,680
10	Class 10	5,480– 8,890
11	Class 11	5,770– 9,170
12	Class 12	6,170– 11,610
13	Class 13	11,610– 17,040
14	Class 14	12,380– 17,810
15	Class 15	20,810– 28,580
16	Class 16	25,650– 31,470

Table 35 - Job function classes and gross basic salary level

The above classes include the following job functions:

Class 1 - janitor, cargo handler, pipeline route operator, security guard;

Class 2 - boiler operator for steam and hot water boilers, firefighter servant, telephone operator, car vulcanizer

Class 3 - maneuverer, firefighting formation chief, universal carpenter, tractor driver;

Class 4 - warehouse - keeper, pump operator, chief maneuver, forklift driver;

Class 5 - maintenance electrician, cathodic protection electrician, central heating plumber, technical-sanitary plumber, locksmith energy and transport aggregates, mechanical locksmith, boiler mechanic locksmith, auto mechanic, locomotive mechanic, operator, truck driver, car driver, van driver, bricklayer;

Class 6 - electrical equipment electrician, power plants and power stations operation electrician, laboratory assistant, valves/ LDH mechanical locksmith, earth machine machinist, verifier metrologist, receiver handing-over fluid products - station responsible, crane driver, receiver handing over fluid products, heavy tonnage car driver, special vehicle driver, universal lathe operator, welder;

Class 7 – dispatcher, RSC/LFI locomotive engineer, PSI-RSC/LFI formation leader, shift manager;

Class 8 - archivist, cashier, administrative clerk, householder, car operator, secret document inspector, operator of data entry, data validation and processing, shipping – receiving clerk of materials and tools;

Class 9 - technicians, foremen, administrative secretary, technical reviewer, maintenance responsible, production responsible, junior programmer, accountant, assistant manager, nurse, commercial activities official, administrative, ITP inspector, car drivers);

Class 10 - short-term higher education personnel (engineer, sub-engineer, management reviewer, economist, network administrator, assistant director, assistant manager, communication and image specialist, process improvement specialist, human resources specialist);

Class 11 - formation manager, station manager, warehouse manager, ramp manager;

Class 12 - long-term higher education personnel (engineer, economist, internal auditor, network administrator, information system administrator, assistant manager, chemist, legal adviser, management systems consultant, legal expert, prevention and anti-corruption expert, general medicine doctor, programmer, psychologist, management reviewer, automation responsible, energy responsible, HSEQ responsible, investment responsible, mechanical responsible, maintenance responsible, production responsible, human

resources specialist, communication and image specialist, communication and press relations specialist, process improvement specialist, public relations specialist, events logistics specialist, OHS specialist, translator);

Class 13 – activity coordinator, advisor to the Director General, construction site supervisor;

Class 14 – head of Department, head of specialized formation, head of sector, head of office;

Class 15 - chief engineer, regional head, head of department;

Class 16 - director.

Within the company, bonuses of a permanent nature and temporary bonuses are granted.

Benefits of a permanent nature:

- seniority benefits to be determined on the basis of the total seniority; the seniority benefits are applied to the gross basic salary and can be of 5%, 10%, 15%, 20%, 25% and 30%;
- disability benefits, for employees with a disability degree, apply a percentage of 9.5% to the gross basic salary.

The temporary benefits are:

- night work benefits are granted at a rate of 30% to the gross basic salary, for the time actually worked;
- benefits for work on Saturdays and Sundays, a percentage of 25% is granted to the gross basic salary, for the time actually worked;
- Benefits for working on holidays are granted in a percentage of 100% to the gross basic salary, for the time actually worked.

Based on the Collective Labor Agreement and within the limits of the provisions of the Revenues and Expenditure Budget approved annually, the company may grant the following rights:

- meal vouchers with a nominal value of 40 Ron for each worked day;
- birth aid and/or child adoption aid (in the amount of an average gross earnings per company*);
- employee death grant (in the amount of five gross average earnings per company*), death grant spouse, child death grant, parental death benefit (in the amount of an average gross earnings per company*); death benefit for in-laws (in the amount of 1,200 lei);
- gifts in cash or kind for the children of the employees on the occasion of the Children's day and Christmas holidays, gifts in cash or in kind for the employees on the occasion of March 8th, gifts in cash or in kind, including gift vouchers, for the company's employees on the occasion of Easter and Christmas holidays, as well as on the occasion of other events (limits set annually depending on the provisions of the Fiscal Code);
- aids for serious or incurable diseases and prostheses;
- consideration of the touristic services for treatment and rest carried out in the country and abroad, as well as the transport carried out on the occasion of the annual leave (75% of the invoice, but not more than 2,800 RON);
- retirement aid (in the amount of one gain, two earnings, three earnings or five average gross earnings per company*, depending on the seniority/seniority in the company);
- marriage aid (in the amount of an average gross earnings per company*);
- contribution to the stakeholder pension fund - pillar III (Ro. Pilon III), up to a limit of 400 euro annually;
- voluntary health insurance, up to a limit of 200 annually euro;

- reimbursement of transport from home to the place of work and return based on the regulation, annex to Collective Labor Agreement and in the amount of 75%;
- daily allowance for travels in the country, for business, in the amount of 180 ron/day;
- the equivalent of expenses with nurseries/kindergartens/ "after school" program, not more than 600 Ron;
- other advantages: the employees can rent car and equipment at the same rate as the one practiced by the company in relation to third parties, and the employee bears 50% of the invoice value; the employees receive for seniority in the company (women 30 years old, men 35 years old) a gift consisting of material objects (watches or other personalized objects);
- if the company has positive financial results, prizes may be awarded within the limit of a prize fund of up to 10% of the salary fund realized monthly and cumulatively;
- the employees' share of profit is approved by the GMS and is granted on the basis of criteria approved by the Board of Directors;

* average gross earnings per company - the gain determined on the basis of salary expenses, achieved in the year preceding the granting

The management of conflicts of Interest

To avoid the occurrence of the conflict of interest, the company has set-out a series of deontological rules that need to be observed both by the members of the Board of Directors as well as by the directors of the company, in correlation with the applicable legal provisions.

The members of the Board of Directors keep confidentiality of any facts, data or information they have acquired in the course of exercising their responsibilities and understand that they have no right to use or disclose them during or after termination of the activity. Both in the Rules of Organization and Operation of the Board of Directors of CONPET S.A., as well as the Corporate Governance Rules there are dispositions with regards to the management of the conflicts of interests and trading with involved persons. In practice, the members of the Board of Directors shall inform the Board of any conflicts of interest that have arisen or may arise and shall refrain from attending the discussion and voting for the adoption of a ruling on the matter, giving rise to the conflict of interest concerned.

The Administrator or Director General who has interests in a particular operation, directly or indirectly, contrary to the interests of the company must notify the other administrators and the internal auditor thereof and must not take part in any deliberations concerning this operation. The same is the duty of the Administrator or the Director General if, in a particular operation, knows that the spouse, relatives or affiliates up to the fourth degree inclusively are interested.

The situations in which CONPET S.A. employees may be in conflict of interest, the way of preventing, communicating and solving them are established through an operational procedure, which has been approved and disseminated in 2022, in accordance with the internal regulations. In practice, the employees have the obligation to refrain from resolving the request, making the decision or participating in making a decision and to immediately inform the hierarchical head directly by submitting a statement regarding the potential/real conflict of interest to the designated person within the competent organizational entity within the company. Also, in the event that a CONPET S.A. employee or another person has become aware of violations of the law on conflicts of interest, they may report this in good faith, using several communication channels that are published on the Conpet S.A. website in the "Conpet Public Interest Whistleblower" Section or in the "Notify the Ministry of Energy" Section, available on the company's website.

The company was not notified about integrity incidents related to the conflict-of-interest regime/ incompatibilities whose resolution was made as a result of the final remaining of an act of finding issued by A.N.I. -En. National Integrity Agency

Social and Corporate Responsibility (CSR)

The Social and Corporate Responsibility of Conpet (CSR) is integral part of the CONPET's vision and strategy and the respect towards people, responsibility towards the environment and involvement in the community's life are essential values and major priorities for the company.

The actions that CONPET undertook in 2024 in the field of CSR were manifested both internally, with the aim of aligning employees with the company's values and mission, and externally, in the company's relationship with third parties, through involvement in the life of the community and supporting its development.

Regarding the internal dimension of CSR, which includes strengthening the organizational culture and common values of CONPET employees, in 2024 actions were organized to promote people and the image of the company, among which the award of the senior employees (30 years for women, 35 years for men), congratulating employees who have retired or mentioning employees who represented the company at various internal or external events.

The internal newspaper "Informația CONPET" was another communication channel through which employees received information about the company's main actions and activities in 2024, sponsorships and social responsibility actions.

A relevant action that combines organizational culture and social responsibility is represented by internal communications and posts on the official facebook page, which aim to promote culture, national and international historical milestones and, in general, all the principles we consider valuable to the civilized world we live in.

The health campaign continued by publishing articles about physical and emotional health through the daily Press Magazine. Employees were thus informed and encouraged to develop a healthy lifestyle, in order to maintain the best possible balance between personal and professional life. At the same time, articles on the environment and green energy were selected in the Press Magazine, in order to cultivate a culture oriented towards environmental protection, energy efficiency and sustainability.

Regarding the company's involvement in the life of the community, CONPET has chosen along the years voluntary actions, projects and various causes to cover as wide an area as possible of the community's needs.

In 2024, CONPET organized, in collaboration with the Ploiești Blood Transfusion Center, for the third consecutive year, a blood donation campaign among the company's employees. Understanding that the need for blood is a permanent problem for hospitals in Romania and wanting to help people in vulnerable times, employees at the Ploiești headquarters set out to make a tradition of their good deeds and joined the humanitarian action organized by the company this year, on October 29.

Participating in "Ora Pământului" #EarthHour is another tradition that CONPET respects every year, wishing to reiterate, also symbolically, the commitment that the company has assumed to protect the environment, as well as the consistency describing the pursue of this promise. Thus, on March 23, 2024, CONPET turned off the lights for one hour (20:30 – 21:30) at its headquarters in Ploiești, once again joining the largest voluntary environmental action in history, now in its 18th edition. "Earth Hour" aims to draw attention to the climate problems affecting our planet, while initiating actions that aim to become frequent habits with a positive and significant impact on it.

Every year, CONPET aims to ensure that the social responsibility actions it undertakes have both a positive impact on the community in which it operates, and the purpose of increasing employee alignment with its values and mission.

Sponsorship

The sponsorship activity was performed in compliance with the annual Revenues and Expenditure Budget, falling within the sponsorship expenses broken down by areas of interest.

The sponsorship policy of the company supports both traditional projects, those that have an important and lasting impact on the community, as well as requests for smaller scale, which promote, through ideas and actions, individual performance.

In 2024, the company sponsored the realization of major projects in the medical and health field. Thus, sponsorships were granted for the "dr. Constantin Andreoiu" Ploiești County Emergency Hospital to equip the operating room of the B.M.F. Surgery Department with high-performance equipment and the Florești Pneumophthisiology Hospital to continue equipping the new Physical Medicine and Respiratory Rehabilitation department with medical equipment. At the same time, we supported the implementation of the "Bucuria vindecării" /Joy of healing project dedicated to oncological patients undergoing treatment or in post-therapy monitoring and recording, and we provided support to associations active in the health field, with the aim of implementing individual medical projects (people affected by serious illnesses) to save human lives.

We also continued to support education in Romania, by sponsoring new or traditional projects, such as school performance activities (Lego Academy robotics workshop, participation in the international debate and general culture competition International World Scholar's Cup – global stage), the organization in Bucharest of the fourth edition of the forum "Forumul Studenților Români de Pretutindeni", the cultural-educational competitions (National Storytelling Competition with a Historical Theme, the Inter-school General Culture Competition for Prahova High School Students – The Best).

CONPET company supported sports activity this year as well, providing sponsorships for the preparation and participation of children and young people in domestic and international competitions in various sports (football, cycling, karting, etc.) and maintained the sponsorship of a prestigious Prahova cultural institution, the Ploiești Philharmonic.

The Revenues and Expenditure Budget of CONPET S.A. for 2024 provides for sponsorship expenses in amount of 790,000 RON.

During January - December 2024, within the Board of Directors meetings of CONPET S.A. were approved and concluded sponsorship contracts amounting to 776 thousand RON, as follows:

- 306 thousand Ron - "Education, schooling and sports";

- 320 thousand Ron - "Medical care and health"
- 150 thousand Ron - "Other actions and activities".

The detailed presentation of the projects from each category of sponsorship provided for in the GEO no. 2/2015 can be found in the Report about sponsorships granted by Conpet S.A. in 2024 published on the website

<https://www.conpet.ro/wp-content/uploads/2024/01/Raport-sponsorizari-2023-pentru-site.pdf>

4.4.3. Executive Management

By Resolution no. 6 dated 19.12.2023, the General Meeting of Shareholders approved the Performance Indicators for monitoring the performance of Conpet S.A., resulting from the 2023-2027 Administration Plan.

In structure, the degree of achievement of the performance indicators of the company for 2024 reveals the following:

Crt. no.	Performance indicator	Performance objective	MU	(Period 01.01.-31.12.2024)		Degree of achievement KPIs (%)
				Target values	Achieved values	
1.	Capital expenditure ratio	Increase of the efficiency of the National Transport System of crude oil, rich gas, condensate and ethane	%	≥6.5%	8.3%	127.7%
2.	General solvency (leverage)	Ensuring the capacity to pay the total debts		≤0.25	0.1	100%
3.	Turnover ratio of assets	Ensuring the efficiency of assets management		≥0.5	0.6	100%
4.	Return of assets (ROA)	The achievement of a profitability of assets over the 4% level	%	>4.0%	5.8%	100%
5	Implementation of the actions set out in the Program for the development of the internal control management system	Development of the internal control management system implementation in compliance with the legal requirements in force	%	≥90%	100%	100%
6	Duly reporting of the degree of achievement of the performance indicators of the company	Framing within the reporting due deadlines	%	100%	100%	100%
7	Dividends distribution rate from the net profit of the financial year	Maintaining a sustainable dividend policy	%	≥65%	93.9%	100%
8	The settlement of the risks management policy	Efficient and effective risk management that could affect the achievement of the company's objectives	YES/NO	YES	YES	100%

Table 36 - Objectives and performance indicators for monitoring the performance of Conpet company achieved in the period 01.01.2024 - 31.12.2024

Strategic objectives regarding the management of the company CONPET

Actions carried out in view of achieving the strategic objectives contained in the Administration Plan

The strategic objectives contained in the company's Administration Plan for the period 2023-2027 are derived from the Letter of Expectations of the majority shareholder, the Romanian State, through the Ministry of Energy and aim to identify and implement solutions for:

- Optimizing the activity considering the future prospects from the point of view of customers and transport capacities of the NTS;
- Increasing the performance of the NTS by continuing the investment/modernization/re-engineering works:
 - Modernization of non-modernized active pumping stations;
 - Maintaining smart pigging programs;

- Replacement of pipeline sections that are unsafe in operation, to avoid technical breakdowns;
- Extending the implementation of the pipeline leak detection and location system;
- Continue to upgrade the pipeline network and storage capacities;
- Completing the implementation of the cathodic protection system;
- Modernization of the integrated IT system and the SCADA system;
- Electricity production from renewable resources.
- Ensuring effective management in human resources management:
 - The optimization of the organizational structure and the permanent adaptation of human resources in correlation with the requirements and the technical-economic realities of society, the optimal dimensioning of the need for human resources in relation to the real activity and development needs of society;
 - The development of the specific competencies and basic skills of the human capital.
- Labor productivity growth;
- Continuing efforts to identify new opportunities for growth and diversification:
 - Development of activities related to the core activity (providing storage services of crude oil and petroleum products, etc.) and non-related activities;
 - Continuation of steps to access European funds and other forms of non-reimbursable financing.
- Development and improvement of the internal managerial control system;
- Continuous improvement of the integrated management system (quality-environment-health and safety at work-energy-anti-bribery) and the railway safety management system, implemented and certified in CONPET S.A.;
- Maintaining and improving risk management (identifying risks that may affect the achievement of objectives, establishing and implementing risk control measures);
- Improving the monitoring and operational control of transport processes, to increase energy performance (measurement, monitoring and control through remote management) in order to improve energy efficiency to reduce specific consumption per ton of crude oil transported;
- Compliance with the requirements of environmental authorizations and establishing appropriate measures for significant environmental aspects, limiting environmental impact;
- Maintaining and observing the principles of corporate governance and the values and principles of integrity defined in the Code of Ethics and Integrity of CONPET S.A.;
- Responsible and active involvement in corporate social responsibility actions.

The strategic objectives for the period 2023-2027 are:

- Boost efficiency and improve activity performance;
- Development of new activities, related and non-related to the core business;
- Ensuring effective management in the management of human resources;
- Selection of company directors based on criteria of professionalism and integrity;
- Ensuring modern management by implementing and maintaining risk management, control, ethics, integrity and corporate governance processes;
- Ensuring a balance between the dividend policy and that regarding the provision of the necessary funds for the investment programs undertaken by the company for development and modernization.

To the strategic objectives mentioned above, the general objectives of the organization established according to the requirements of the Order of the Secretary General of the Government no. 600/2018 regarding the approval of the Code of Internal Managerial Control of Public Entities and the National Anti-Corruption Strategy 2021- 2025, as well as according to the requirements of the reference standards for the quality-environment-energy-anti-bribery integrated management system and the regulations applicable to the management system of railway safety.

Strategic Objective- Boosting efficiency and improvement of the activity performance

Measure - Optimization of the operation and administrative costs

Cost optimization is one of the basic management directions for increasing activity efficiency. A first action in this regard is the control of operating and administrative costs. This control was carried out in the two determining stages, respectively at the time of establishing the budget and at the time of its execution. At the stage of planning the activities for the next year, the resources consumed in the current year for carrying out each activity were analyzed and the types of expenses that can be reduced by optimizing processes were established. The result of this analysis in the planning stage was to cover the material price increases by decreasing the consumption. Through the budgeting managers, the execution of expenses on each cost center is monitored monthly, they are responsible for taking measures to ensure that the costs fall within the planned limits. Also, through the monthly presentation of the table of expenses, those responsible for budgeting have the opportunity to carry out periodic analysis and to discuss within the Steering Committee the proposals for cost efficiency measures.

Another line of action to optimize costs was the efficiency of the pumping scenarios on the two transport subsystems, Domestic and Import, with the aim of establishing, as far as possible, for each transport a pumping scenario with the lowest consumption electric power.

Measure - Making investments aimed at reducing technological consumption in the transport process, reducing energy consumption

Another approach to support cost efficiency was to support and stimulate the implementation of investment objectives based on new technologies, with longer life, with lower electricity consumption and reduced maintenance costs.

An important investment project that meets the above requirements is the implementation of a Tele management System for tracking energy consumption.

By carrying out this project several benefits are obtained, among which we list the following:

- ensures the operation and maintenance of the pipeline network in conditions of increased efficiency, with the reduction of operation and maintenance costs;
- making subsequent optimizations in the configuration of own installations, based on the analysis of the information provided by the system.

During 2023, the installation works of the remote management system were completed in 8 locations, and by June 30, 2024, 6 more locations were completed, the last location being commissioned in July 2024.

Other projects with operational efficiency and cost optimization impact are: the modernization of the pipeline network, a project aimed at reducing technological consumption, but also reducing energy consumption and modernizing pumping systems, with a positive effect on energy consumption.

At the end of July 2024, the tele management system was finalized and put into operation in 15 locations.

Measure - Increasing the performance of the NTS by continuing the investment/modernization/re-engineering works

In 2024, investment/modernization/refurbishment works were continued, primarily aimed at increasing the performance of the National Transport System, with the aim of achieving the commitments assumed through the minimum development/revamping programs, annex to the Concession Agreement concluded with NAMR.

The 2024 investment program included investments aimed at improving the performance of the national transport network.

The investment program related to 2024 included rehabilitation works of major transport pipelines and investment works for installations and related equipment to the Crude Oil National Transport System.

The investment projects within CONPET target, mainly, enhancing efficiency of the transport activity as well as the operation, under safe conditions, of the National Transport System.

From the modernization quota, CONPET finances investments provided in the rehabilitation, modernization and development programs, agreed with the National Agency for Mineral Resources, according to the "Petroleum concession agreement for the operation of the national transport system of crude oil, rich gas, condensate and ethane, including the main pipelines and the ancillary installations, endowments and facilities".

In 2024, investments amounting to **70,445** thousand RON were achieved, as compared to **85,000** thousand RON programmed (**82.9%**).

The value of the investment objectives achieved in 2024, by appurtenance of assets, as compared to the approved program, is as follows:

Investments	Budget 2024	Achieved 2024	Achieved/ Budget
Total investments, o/w:	85,000	70,445	82.9%
Public domain	65,000	56,139	86.4%
Operating domain	20,000	14,306	71.5%

Table 37 - 2024 Investments achieved vs program (kRon)

The main investment objectives finalized and commissioned in 2024

- Modernization of Potlogi pumping station;
- Upgrade of Mislea station;
- Modernization of Moreni pumping system;
- Modernization of the Ochiuri Pumping System - Connection to the electrical network and the usage facility;
- New PSI tank Biled
- Upgrade Ciresu ramp;
- System related to the tele-transmission and tele-management of the power consumptions in 7 locations belonging to CONPET S.A;
- Modernization and monitoring of the cathodic protection system related to the NTS domestic and import in 3 locations;

- Replacement of Ø 20" Constanța - C1 pipeline - 8 sections - completed: section 3 (A,B,D,E,F), section 4 (A,B) and section 5 (A);
- Smart pigging, detection of pipeline status Ø10 ¾" L1 Bărbătești– Ploiesti West and Ø 10¾" L2 Orlești– Ploiesti (Petrobrazii);
- Modernization of pumping station Ochiuri;
- Replacement of Ø 20" Constanța - C1 pipeline - 8 sections - completed: section 1 (A,B,D), section 2 (A,B), section 3 (C) and section 7;
- Replacement of Ø 20" Constanța - C1 pipeline - 8 sections - completed: section 2 (D,F,G), section 5 (B,C,D,E,F) , section 6 and section 8;
- Transformation of the LDH 92 53 0850 130 -1;
- Replacement of pipeline section Ø 6½" Warehouse Petrom Orzoaia de Sus – Urlați crude oil station, about 1,600 m in length.

The main ongoing investments on December 31, 2024:

PUBLIC DOMAIN

- Replacement of pipeline Ø 20" Constanța - C1 - 8 sections;
Crude oil storage Berca village;
- Modernization and monitoring of the cathodic protection system related to the domestic and import NTS;
- Modernization of Satchinez pumping station;
- Modernization of Slobozia crude oil station;
- New PSI tank Buffer tank Independenta;
- Installation and initial metrological verification of four measuring skids in Petrobrazii P3, Poiana Lacului, Videle and Otesti locations;
- Modernization of the multiplexor network;
- Rehabilitation of the pump hall C+D+E Călăreți station and Rehabilitation of the building related to connections 6 kV, electrical distributors 6/ 0.4 kV A+B Local Dispatch, electrical distributors C,D,E, Călăreți station.

OPERATOR FIELD

In 2024 have been achieved investments in the operator domain amounting to 14,306 thousand RON, representing 71.5 % of the annual program, as follows:

- Rehabilitation of buildings at Headquarter 2 Workshops - Buildings C4, C5, C10, C11;
- Replacement of Ø 6" Urlați-Ploiești, crude oil pipeline network, in the area of National Road 1A Moara Nouă- Corlătești.

Commissionings achieved in 2024 amounted to 85,426 thousand RON, out of which, per financing sources:

- 69,744 thousand RON out of the modernization quota;
- 15,682 thousand RON out of other own sources;

The main investment projects started in the previous years which continue in 2024 are the following:

Modernization of non-modernized active pumping stations

Modernization of pumping stations is a significant investment project that can take place over a longer period of time. The first stage of pumping station modernization started in 1997 and ended in 2007, when 16 stations were modernized. The second stage included the partial modernization of 5 stations.

The advantages obtained from the modernization of the pumping stations are the following:

- reduced technological costs in the storage and transport process;
- minimized energy, fuel and lubricant consumptions;
- minimized operating costs and reduced operating difficulties;
- improved safety and flexibility of the system;
- reduced environmental impacts.

In 2024, works to modernize the pumping systems of 3 stations (Potlogi, Mislea and Moreni) worth 21.5 million RON were completed and put into operation.

In June 2024, the objective "Modernization of the Cireșu ramp" was completed and put into operation.

In August 2024, the objective "Pumping system at the Ochiuri station" was completed and put into operation.

At the same time, work was started on the pumping systems at the Sat Chinez, Slobozia, Constanța Sud and Berca work sites.

The performed work aims to automate the installations in order to be included in the SCADA system. These works include the replacement of existing piston pumps with new pumps and pipe connections in pumping stations, as well as energy and automation works at existing installations.

Maintaining smart pigging programs

The purpose of the smart pigging operation is to determine the degree of wear and tear and to estimate when the pipes should be replaced, so that they are safe in transport.

In order to keep the operational risk and the risks related to environmental aspects under control, the policy of reducing these risks - continued through the multi-year programming of internal inspections with intelligent pig in order to diagnose all the pipelines.

In March 2023, the contract was signed for "Inline inspection services (expertise) of main crude oil transport pipelines: L1 Bărbătești - Ploiești West (Bărbătești - Orlești, Orlești - Poiana Lacului, Poiana Lacului Siliște, Siliște - Ploiești West) over a length of 238 km and L2 Orlești - Ploiești - Petrobrazii (Orlești - Poiana Lacului, Poiana Lacului – Siliște, Siliște - Ploiești) over a length of 175 km with a value of approximately 2.11 million RON.

On 31.07.2024 the works were finalized.

Replacement of pipeline sections which do not present safety in operation

Annually, during the development of the Investment Program, investment objectives are analyzed and prioritized for pipe rehabilitation works, respectively for the replacement of sections that are no longer safe to operate.

Prioritization is mainly based on the results obtained from smart pigging operations.

The analysis of pipeline replacement works also takes into account the information regarding the consents and consents of the landowners to determine if there could be difficulties in obtaining them.

Historical data shows that there is a significant risk related to obtaining building permits in a reasonable time, which is generated by the difficulties encountered in obtaining the consent

of the landowners to allow access to the land for the execution of the works. In order to mitigate the impact of this risk, it is necessary that, based on the results obtained from the smart pigging and the level of operational risk established, a medium-term action plan regarding pipeline replacements should be drawn up, which would include: taking into account the potential risks, as well as the risks involved, the measures and actions necessary to mitigate or eliminate the risks and a multi-year planning of these investments.

In 2024, the work to rehabilitate the main crude oil transport pipelines was continued and 9.40 km of pipelines were replaced, for a total amount of 29.41 million RON.

Ongoing execution works:

- Replacement of pipeline 20" Constanța county - C1 - 8 sections (approx. 13,600 linear meters);
- Safe disposal of the Ø 12" and Ø 14" Cartojani-Ploiesti pipelines at the overcrossing of Cricovul Dulce.

Completed works:

- Replacement of pipeline section Ø 6 $\frac{5}{8}$ " Warehouse Petrom Orzoaia de Sus – Urlați crude oil station, about 1,600 m in length.

In October 2024 the reception and commissioning were performed, with total value of 1,783.5 thousand RON.

Design works in progress, in the stage of obtaining the Construction Permit:

- Replacement of Ø 8 $\frac{5}{8}$ " Lucăcești-Vermești crude oil transport pipeline - the section from Deal Măgura (Crucea Roșie) to Vermești (Vermești mine road), approx. 9 km in length;
- Section of the pipeline connection Ø 8" Moreni – Mija (Valea Neagră) in L1, L2 Siliște – Ploiești and pig launcher/receiver stations;
- The safe disposal of the crude oil pipelines L1 and L2 Ø 10 $\frac{3}{4}$ " Siliște-Ploiești, at the undercrossing of Ialomita river;
- Replacement of two sections of the pipeline Ø 24" Barăganu- Brazi refinery, undercrossing of Leaota brook.

Extending the implementation of the pipeline leak detection and location system

The benefits of implementing a system to detect and locate crude oil leaks from pipelines consist of reducing losses in the event of breakdowns, greening costs and reducing the compensation that the company has to pay to the owners of the lands affected by these breakdowns.

The leak detection system is currently being implemented on the Poiana Lacului– Siliște-Ploiesti pipeline subsystem (pilot project) and the benefits obtained post-implementation are being monitored to be compared with those initially estimated by the study, after which a decision will be made on when installing the system on the remaining operational pipelines of the NTS

In order to make the decision to continue implementing the system on the rest of the pipelines, the results obtained will be compared with the expected ones and the cost-benefit analysis will be updated based on the evaluation results. In order to make the decision to

continue the implementation of the system, it is important to take into account the results obtained in the process of intelligent pigging.

An analysis will be conducted to determine whether to expand the implementation of the pipeline leak detection and location system.

Continue to upgrade the pipeline network and storage capacities

In recent years, several crude oil tanks, of different capacities, as well as P.S.I. tanks have been built and rehabilitated. located at different work points.

At the level of the Transport Operations and Development Maintenance departments, an analysis was carried out in order to establish the work points where it is appropriate to build tanks of smaller capacity, adapted to the quantities of crude oil transited through those work sites. On the occasion of the analysis, it was established that the type of reservoir built in the Moreni station should also be built in other working points of the company (Independența Buffer Tank, Poiana Lacului Pumping Station).

In June 2024, the P.S.I. tank at the Biled station was commissioned with a total value of 2.59 million RON.

Also, in 2024, construction works were started on the P.S.I. Tank Independența Buffer Warehouse, with works worth 4.82 million RON and a 1,500 m³ tank within the Videle Crude Oil Pumping Station, which is currently being designed.

In August 2024, the execution works for "Replacement of manifolds and valves at the CONPET S.A. work site - OIL TERMINAL Constanța warehouse" began with a value of 18.34 million RON.

Completion of the implementation of the cathodic protection system

Modernization and monitoring of the cathodic protection system for the crude oil transport system via pipeline aims at slowing down or even stop the corrosion process occurring at the surface of metal pipes underground with effect in:

- reducing the maintenance costs associated with both the metal losses and decommissioning of installations;
- increasing safety in the operation of the pipelines;
- avoiding environmental contamination with corrosion/transported product
- reducing the consumption of electricity.

CONPET is running an extensive program to modernize the cathodic protection system of pipes and tanks, which started in 2017 and continues, being expected to be completed in 2024.

In the first stage, a number of 53 SPCs were created and put into operation by the end of 2019.

In the second stage, a number of 16 SPCs were created and put into operation by the end of 2020.

In the ongoing third stage, out of a total of 31 SPCs (the contract with 2 SPCs was added and one SPC was abandoned) a number of 24 SPCs were made and put into operation.

Of the other 7 SPCs, 3 SPCs have been put into operation, execution works are underway at the Ciorani location, and for 3 locations (Ana Maria Pop, Gura Vitioarei, Movila Vulpilor 2), construction permits are in the process of being obtained. Due to problems in obtaining

construction permits, the completion date for the works has been extended until October 2025.

Modernization of the integrated IT system and the SCADA system

Investments objective **Modernization of SCADA System** includes:

- Expansion of SCADA monitoring in 4 rail ramps and hard and soft upgrade of the data transmission and automation system in 5 locations of the SCADA system

After the implementation of this project, the real-time monitoring through the SCADA system of the process data (pressure, flow, level and pigging crossing sensors) will be expanded in four railway ramps, and by replacing the equipment and updating software in four work points eliminates hardware and software bottlenecks and delays caused by incompatibility between old and new equipment. The benefits obtained by extending the monitoring through SCADA consist in: reducing the time and costs for interventions caused by failures; reducing maintenance costs; increased cyber security in accordance with European Directives; "remote" diagnosis and intervention.

In 2023, the design and execution contract were concluded and the design was completed. In December 2024 the reception and the commissioning were performed, with a total value of 1.94 million RON;

- Design, execution, installation and initial metrological verification of four measuring skids in Petrobrazi P3, Poiana Lacului, Videle and Otești locations

After the implementation of this project, the fiscal and unitary metering of the crude oil pumped to the Petrobrazi refinery will be allowed; increasing the accuracy of fiscal measurement of skids in Poiana Lacului, Videle and Otești; significant reduction of maintenance costs and times; increasing the quality of the sampling process for laboratory determinations; online tracking of pumped quantities.

The project is in progress. In 2023 the design stage was finalized.

From the point of view of the manufacturing process, part of the execution phase, in accordance with the contract and addendum no. 1, the following were completed by 30.06.2024:

- FAT Mechanical (Hydro + NDT) – piping, filters, degasser- 100% for the Videle, Otești and Poiana Lacului locations;
- FAT Instrumentation (Cabinets) - 100% for the Videle, Otești and Poiana Lacului locations;
- Material procurement 100 % Petrobrazi P3, 100% Videle, 100% Otești, 100% Poiana Lacului.

Current status of the work:

- The assemblies related to the Videle and Otești locations are positioned in the locations; work is underway to connect them to the technological pipelines.

The term for completion of the work is October 2025.

- Update of hardware and software related to SCADA workstations inside Central Dispatch and Local Dispatch Centers

From the point of view of cyber security, reliability of existing equipment, as well as compatibility between the operating systems and different software used for the safe operation of the crude oil transportation network through pipelines, it is necessary that these systems be replaced with tested systems of the latest generation. The project on upgrading hardware and software in SCADA workstations in the central dispatch center and in local dispatch centers is proposed in the investment program in the period 2025- 2027.

Objective “Integrated information system modernization”

In order to implement the project **Modernization of the integrated information system**, an analysis was carried out in order to reconfigure the business processes and the ERP system so as to meet the specifics of the activity and the requirements of the users within Conpet. The analysis was carried out by external specialists, who also drew up the Scope of work.

On the date of the report, the procedure for acquiring licenses and developing the ERP software that will allow integrated management of processes and operations is started.

The tender for the award of the contract took place in August 2024, and at the beginning of October 2024, following the evaluation, it was found that the submitted offers were non-compliant, and the tender was canceled.

The tender procedure will be resumed in 2025 after the approval of the Budget by the OGMS.

Objective “Modernization of the telecommunications system”

The implementation of this project aims to modernize the multiplexer system, by replacing the NPT equipment produced by the Ribbon company. The work consists of: replacement of hardware equipment in 72 Conpet work points; software configuration of newly installed equipment and system management platform.

In June 2024, the contract with the company that will carry out the design and execution of the works was concluded.

At the end of September 2024, the design phase was completed and the phase of equipment and materials procurement began.

On 31.12.2024 the degree of achievement was 32%. The equipment in 27 CONPET work points was replaced and software configured.

Objective “Radio relay system modernization”

The implementation of the project involves the modernization of the radio relay system with a microwave IP system consisting of 51 split-type microwave radio relay links in 7GHz, 15GHz and 23GHz, over a distance of approximately 800 km within the own telecommunications system currently operated within CONPET S.A..

The contract for the execution of the system was signed at the end of June.

At the end of December 2024, the design phase was finalized and the procurement phase began.

Strategic objective- Development of new activities, related and non related to the core business

Measure - Electricity production from renewable resources

In the third quarter of 2023, the commissioning of the works for, Realization of an electricity production system (of a photovoltaic plant) with photovoltaic panels within the premises of

the Administrative Headquarters 2 CONPET S.A. was carried out, an objective that is currently working successfully.

Similar to the project already implemented, in June 2024, CONPET S.A. started the actions to contract a company to deal with the following projects:

- site analysis, support studies, design and execution for an electricity production system with photovoltaic panels within the Crude Oil Automated Station Constanta Sud;
- - site analysis, support studies, design and execution for an electricity production system with photovoltaic panels within the Crude Oil Automated Station Calareti - CONPET S.A. Ploiesti;

In August 2024, contracts were signed for the following projects:

1. Site analysis, support studies, design and execution for an electricity production system with photovoltaic panels within the Crude Oil Automated Station Calareti - CONPET S.A. Ploiesti, with a capacity of 60 kWp.;

2. Site analysis, support studies, design and execution for an electricity production system with photovoltaic panels within the premises of the Constanta Sud Oil Plant - CONPET S.A., with a capacity of 60.48 kWp.

The locations were handed over according to the minutes, for the necessary analyses to be carried out. Currently, stage I is being carried out according to the specifications, both for the Țiței Constanța Sud automated station and for Călăreți automated crude oil station.

Measure - Monitoring of the operational programs and priority axis with a view to accessing European Funds and other non-refundable financing instruments

CONPET continued its efforts to identify funding opportunities from European funds, monitoring operational programs and priority axis that may target possible access to structural funds.

In the first quarter of 2024, the project "Elaboration of Opportunity Analysis and Feasibility Studies for the implementation of photovoltaic parks in five locations of CONPET S.A." was approved.

Following the carried out analysis, it was established that there are conditions regarding the possibility of CONPET S.A. to apply for non-reimbursable funds, because CONPET falls into the category of large enterprises and has the core business transport of crude oil, condensate and rich gas via pipelines and by rail - an activity not excluded from notification according to the E.U Regulation No. 651/2014 declaring certain categories of aid compatible with the internal market and the Treaty on the Functioning of the European Union.

In 2024, the financing programs were monitored and analyzed through different mechanisms, which could target the modernization/refurbishment/development of the National Transport System. Also, axes/programs/grant financing schemes were monitored and analyzed in order to identify the possibility of developing the main activity carried out by CONPET S.A.

Strategic Objective - Ensuring effective management in the management of human resources

The measure: The optimization of the organizational structure and the permanent adaptation of human resources in correlation with the requirements and the technical-economic realities of society, the optimum dimensioning of the need for human

resources in relation to the real activity and development needs of the company in view of enhancing work productivity;

The human resources policy had in mind:

- Permanently ensuring a balance between the need for human resources and the technical-economic and administrative needs of the company;
- Anticipation of possible fluctuations in staff deficit or surplus;
- Identifying and removing the possible restrictive limits of the available human resources which, by their nature, could affect the performance of the activity;
- Optimizing employee costs through efficient use of working time;
- Establish staff tasks and responsibilities so that management has all the necessary levers to achieve the assumed objectives and performance indicators;
- The allocation of appropriate human resources for the execution of the operations and the provision of the necessary technical skills in the various stages of these operations;
- The distribution of tasks so that each structure has specific responsibilities and does not perform any of the tasks corresponding to another structure.

Particular attention was paid to the process of continuous dimensioning of the resources necessary to achieve the established objectives, by applying managerial measures in order to reduce expenses, which achieves, in addition to the economic effects, the optimization and adaptation of the functional structures in accordance with the current needs of the company, by permanently ensuring a balance between the number of personnel and the real technical-economic and administrative needs of the company.

Continuous monitoring and analysis are carried out for:

- Identifying positions that can be consolidated or eliminated for the purpose of their design or redesign, by clearly understanding the responsibilities and expectations for each position, the role, position, duties and functional links between them.
- The continuous sizing of the human resources requirement according to the real needs of the activity and development of the company, considering investment/modernization/re-engineering projects, the development of activities related to the basic activity and non-related or other factors such as: the frequency of pumping, the volume of transported quantities, the change in legislation, the seasonality of some activities, etc.
- Optimizing the organizational structure to facilitate workflows, improving communication and maximizing productivity, in accordance with the real activity needs and development projects of the company, as well as updating the Organization and Operation Regulation in accordance with the organizational structure.
- The redistribution of the positions/employees - to ensure the continuity of the work process or to cover a real new need arising because of the increase/decrease in the volume of activity, as well as the most efficient use of staff.

Following this analysis process, 56 positions were identified that are no longer needed.

Therefore, the Board of Directors approved the abolition of 29 positions starting with 01.03.2024, respectively 27 positions starting with 01.08.2024 in order to streamline work and maximize the use of human and financial resources.

The abolition of the 56 positions resulted in the individual dismissal of 56 employees, occupants of those positions, for reasons not related to their person. The executive

management has taken the necessary steps so that the process of individual dismissal of employees is carried out in accordance with the legal regulations in force and in compliance with the provisions of the Collective Labor Agreement of CONPET S.A..

The measure: The ongoing development of the specific competencies and basic skills of the human capital

In order to maintain and/or develop specific skills and basic abilities of the human capital, the training activities are carried out on an ongoing and planned basis, based on the professional training and authorization programs of the company, following the identification and prioritization of the training needs of CONPET S.A. personnel.

Training of company personnel is achieved mainly through participation in external courses, organized in collaboration with certified trainers for all fields of activity within the company. Also, training is conducted internally by trainers and/or experts of the company, with a good knowledge and experience relevant to the activity of the company. They support professional training sessions and training courses with the aim of updating job-specific knowledge and skills, as well as examining or checking the employees participating in the respective sessions.

Through the trainers within the company, both receivers of fluid products and employees with operating duties in the field of micro-SCADA can be trained/retrained/qualified internally.

In 2024, 3,609 participants in the following types of training/professional authorization were registered:

- 111 Various fields authorizations (specific per activity);
- 372 rail permits;
- 371 professional training courses;
- 428 internal authorizations;
- 2,327 Qualifications/internal authorizations.

Strategic Objective- Selection of the company directors based on criteria of professionalism and integrity

The selection procedure of directors with a mandate contract was carried out in accordance with the provisions of GEO no. 109/2011 on the corporate governance of public enterprises based on criteria regarding training and professional experience and those of integrity.

On 19.10.2023, the company CONPET S.A. sent to the Bucharest Stock Exchange and to the Financial Supervisory Authority current report no. 41/2023 regarding the appointment of directors with a mandate contract (director general, deputy director general and economic director).

Following the progress and completion of the recruitment and selection procedure, on 12.01.2024 CONPET S.A. submitted to the Bucharest Stock Exchange and the Financial Supervisory Authority the current report no. 3/2024 on the appointment of the Deputy Director General 3.

At the same time, these reports were also posted on the Conpet website at <https://www.conpet.ro/en/investors-relation/reports/current-reports/>

Directors with mandate contracts have the powers laid down in the Articles of Incorporation and in the contracts of mandate, supplemented by the applicable legal provisions.

Strategic objective - Ensuring modern management by implementing and maintaining risk management, control, ethics, integrity and corporate governance processes

The measure: Maintaining and observing the principles of corporate governance and the values and principles of integrity defined in the Code of Ethics and Integrity of CONPET S.A.

Through the way it conducts its processes, CONPET S.A. complies with all applicable legal requirements and responds to all the requirements of the relevant stakeholders, and through the projects and social responsibility actions carried out, it provides financial support for the community, constantly getting involved in humanitarian actions, education, art and culture, sports and environmental protection.

Taking into account the fact that Conpet S.A. has important responsibilities in a field of national, regional and local interest, being declared of strategic interest, maintaining the company's reputation is a priority for the administrators and management of Conpet S.A.. They must maintain the company's reputation as a trusted partner in all relationships and with all relevant stakeholders with whom they come into contact. The management of privileged information was carried out ensuring equal treatment for all the company's shareholders.

Transactions with related parties represent another important aspect related to ethics, and within CONPET S.A., internal regulations have been adopted regarding both these and the management of conflicts of interest.

The elements of corporate governance that have been permanently monitored are:

- 1) The way in which, at the level of Conpet S.A. the principles and recommendations of the Corporate Governance Code are implemented and respected;
- 2) Compliance with financial and corporate reporting deadlines to authorities and institutions with an impact on the company's activity;
- 3) Efficiency of the risk management system and internal managerial control;
- 4) Respecting the principle of equal treatment towards all stakeholders.

The list of people who have access to privileged information is drawn up in accordance with the legal provisions in force regarding issuers of financial instruments and market operations. This list is updated whenever changes occur in relation to the inside information and the people who have access to it.

Priority is also given to respecting the rights and fair treatment of shareholders, as well as the rights and interests of stakeholders.

In 2024, CONPET S.A. continued the process of implementing good corporate governance practices.

CONPET S.A. Pays particular attention to corporate governance, analyzing the level of compliance with the provisions of the new Corporate Governance Code issued by the Bucharest Stock Exchange that came into force on January 4th, 2016. CONPET S.A. annually prepares a Declaration on compliance with the provisions of the Corporate Governance Code

issued by the Bucharest Stock Exchange, a statement that can be found in the Annual Report of the Directors for 2024.

The Corporate Governance Regulation of Conpet is available on the webpage of the company at <https://www.conpet.ro/en/corporate-governance/corporate-governance-rules/>

As a company listed on the Bucharest Stock Exchange, CONPET fully complies with its reporting obligations, preparing and submitting periodic and current reports in accordance with capital market legislation.

In accordance with the legal provisions, CONPET S.A. has announced the financial communication calendar for 2024. At the same time, taking into account the principles and good practices in corporate governance, CONPET, in 2024, organized conference calls with financial analysts in the capital market, in order to analyze the company's periodic reports. The presentation materials prepared on the events mentioned above have been published on the company's website.

Particular importance has been given to the relationship with shareholders and investors, by showing increased transparency. The company's representatives answered positive to all the participants to the capital market. During the time subject to analysis, CONPET took part in events organized in the capital market sector, showing openness towards both institutional and individual investors.

The company has also provided a contact number and email address (infoinvestitori@conpet.ro), through which investors can clarify certain aspects or ask various questions, thus coming into direct contact with the company's investor relations team.

The evolution of CONPET S.A. share is monitored by the research departments of the major financial investment services companies from the Romanian capital market.

Furthermore, the entity that manages the relationship with the investors maintains a permanent connection with all financial analysts in the capital market.

CONPET S.A. undertook during 2024 a series of actions regarding corporate governance that mainly focused on the following aspects:

- The payment of dividends for the 2023 financial year was carried out in compliance with the legislation in force applicable to issuers, based on the documents published on the company's website;
- In accordance with the provisions of the A.S.F. Regulation no. 5/2018, CONPET S.A. has submitted current, periodic and annual reports to the B.V.B. and A.S.F. The submitted reports are posted bilingually (Romanian and English) on the website of CONPET.
- CONPET S.A. organized 4 conference calls to present the financial results, according to the financial calendar announced at the beginning of the year. They provide the company with a platform to connect with stakeholders, strengthen its brand image, and increase investor confidence by demonstrating their commitment to transparency, accountability, and ethical business practices;
- Within CONPET S.A. there is an entity dedicated to investor relations, which is an essential part of corporate communication and management that deals with maintaining and building strong relationships between a company and its various stakeholders, especially its investors;
- On the CONPET S.A. website there is a corporate governance section, which also includes a subsection on investor relations. There can be found information on the shares

of CONPET S.A. (trading, dividends, regulations on shareholders' rights), market releases, information on the company's financial statements, quarterly presentations of the company from a financial point of view, analysis reports prepared by financial analysts, information on the General Meetings of Shareholders (convening notices and related materials, draft decisions of the General Meeting of Shareholders, forms of special and general powers of attorney, postal ballot papers, both for legal entities and for individuals, as well as the decisions of the General Meeting of Shareholders with the results of the votes). CONPET S.A. ensures the publication of the Resolutions of the General Meetings of Shareholders, within a maximum of 24 hours from the date of the meeting, on the Company's website.

The section dedicated to Corporate Governance on the company's website contains the main corporate regulations existing at the level of the Company: The Articles of Incorporation, the Corporate Governance Regulations, the regulations of the Board of Directors and Consultative Committees, the Code of Ethics.

- The Company ensures the communication of the current reports and the periodic financial reports (quarterly, half-yearly and annual) to the B.V.B. and A.S.F. and their publication on the Company's website, accompanied by the Reports of the related auditor when applicable;
- The presentations made by CONPET S.A. intended for investors when the company's main financial events, in accordance with the financial calendar, are displayed on the Company's website.

The measure: Development and improvement of the internal managerial control system

The company CONPET S.A., defined as a public entity in accordance with the provisions of the Order of the Secretary General of the Government no. 600/2018, applies the Code of Internal Management Control of Public Entities, approved by the aforementioned regulation. CONPET S.A. does annual self-assessments of the degree of implementation of the internal control management standards and reports in accordance with the legal requirements.

The continuous development of the internal management control system is a priority of the management team, through the efficient and effective implementation of all actions in the Development Program of the internal managerial control system, elaborated and updated annually by the Monitoring Commission.

The development program of the internal control management system of CONPET SA for 2023 has been approved by the Director General. The actions included in the program, which had a permanent term or a term due in 2024, were completed.

In 2024, the Commission for monitoring the internal control management system met ten times. The conduct of the meetings of the Monitoring Committee is recorded in the minutes of the meetings.

The measure: Maintaining and improving risk management (identifying risks that may affect the achievement of objectives, establishing and implementing risk control measures)

Efficient and effective risk management is very important to ensure the long-term viability and success of the company.

During 2024, the risk identification and assessment process was implemented, through rigorous documentation and consistent application of the provisions of the "Risk Management" process documents.

The risks that have the potential to affect the achievement of the set objectives have been identified, assessed and prioritized. The significant risks are documented in the risk register of CONPET S.A. for 2024, and the control measures, the responsible persons and the implementation deadlines were included in the Annual Plan for implementing the control measures for the significant risks at the level of CONPET S.A. 2024.

According to the document "Risk Profile and Risk Tolerance Limit" for 2024, the risk tolerance limit at CONPET S.A. level for 2024 is maximum exposure 12.

The risks in the Risk register of CONPET S.A. for 2024 are within the approved tolerance limit.

Risk management is maintained as an essential component in prioritizing actions and investments.

The management of corruption-specific risks and vulnerabilities aims to reduce the likelihood of corruption occurring.

The "Corruption Risk Registry (including bribery)" includes moderate risks (for which prevention/control measures are established) and minor risks (which do not require the establishment of measures). No high risks were identified that required urgent measures.

The "Corruption Risk Registry (including bribery)" is updated annually, as well as in the event of the identification of new corruption/bribery risks, respectively information that may change the level of exposure or affect the effectiveness of the prevention/control activity.

The anti-bribery management system is maintained, operational and effective, providing top-level management and the management body with the assurance that reasonable measures are in place to prevent, prevent and, detection and fight against bribery within CONPET S.A. Establishing the "Risk Management Policy" is one of the company's performance indicators, included in the Management Plan for the period 2023 - 2027.

The executive management developed the "Risk Management Policy", through which the company's top management commits to:

- Develop a risk-based approach in all its processes and decisions and encourage immediate reporting of any new risks identified by any employee;
- Establish, maintain and document appropriate risk assessment methods, plan and monitor significant risk control measures.
- To allocate necessary resources for risk management, namely resources for staff training/instruction/awareness and resources for implementing approved measures to address risks;
- Establish clear responsibilities of personnel involved in risk management;
- To systematically report relevant risk management data to stakeholders.

The document "Risk Management Policy" signed by the Director General and the Deputy Director General was presented to the Board of Directors of CONPET S.A. Ploiești, for approval, with Report no. 38818/ 09.10.2024.

The measure: Continuous improvement of the integrated management system (quality-environment-health and safety at work-energy-anti-bribery) and the railway safety management system, implemented and certified in CONPET S.A.

Continuous improvement of the integrated management system involves a series of actions such as periodic assessment of its compliance and effectiveness through internal and external audits, evaluation of the SMI performance within the annual management review and through feedback from stakeholders.

Following these evaluations, opportunities for improvement were identified and steps were taken to improve the effectiveness of the system.

The internal audit of the integrated quality– environment– occupational health and safety management– energy– anti-bribery system and the railway safety management system shall provide information regarding the compliance with the requirements of the references and applicable legal requirements. Internal audits are also aimed at assessing the effectiveness and continuous improvement of the implemented management systems.

The internal audits were conducted in accordance with the approved program for the year 2024 and the audit criteria established in the audit plans. The results were communicated to the auditees by distributing Audit Reports, to which were attached the Non-Conformity Reports, observations and opportunities for improvement identified during the audits.

The management of the company provides resources for the proper conduct of internal audit, mandatory requirement of reference standards SR EN ISO 9001:2015, SR EN ISO 14001:2015, SR EN ISO 45001:2023, SR EN ISO 50001:2019 and SR ISO 37001:2017, as well as railway safety regulations.

In May 2024, Management Review meeting No. 32 took place, during which several actions were established to improve the management system.

The status of the actions is monitored according to the provisions of the process flow diagram „Analysis carried out by management” in force.

All actions were implemented by 31.12.2024.

During June 5-7, 2024, the external surveillance audit for the anti-bribery management system, implemented and certified according to the requirements of ISO 37001:2016, was carried out by the certification body SRAC CERT.

Following the external audit, no non-conformities or observations were identified. Two areas for improvement were formulated, namely:

- The organization must determine whether climate change is a relevant issue in its context.
- The organization must determine whether relevant stakeholders may have requirements related to climate change.

On 30.09.2024, the actions related to the two areas of improvement were implemented as follows:

- The Integrated Management System Manual was revised to include reference to climate change aspects relevant to the CONPET S.A. organization. The revised Manual was approved on 29.08.2024.

- The Stakeholder Registry has been revised to include climate change requirements. The document was approved by the Director General and registered with No. 36923/27.09.2024.

Following the external surveillance audit, the SRAC CERT certification body recommended maintaining the compliance certificate no. 28/13.07.2022 for the anti-bribery management system implemented in the CONPET S.A. organization.

In September 16-20, 2024, the external surveillance audit took place for the management systems related to quality, environment, health and safety at work, energy, according to the requirements of ISO 9001:2015, ISO 14001:2015, ISO 45001:2018 and ISO 50001:2018, audit performed by the BUREAU VERITAS certification body.

Following the external audit, no non-conformities or observations were identified.

The audit team of the BUREAU VERITAS body concluded that the organization CONPET S.A. has established and maintained an integrated management system in accordance with the requirements of the reference standards and has demonstrated its ability to meet the requirements according to the policy, objectives and scope of the organization. The certification body BUREAU VERITAS recommended maintaining the certificates for quality, environment, occupational health and safety and energy management systems, issued for the organization CONPET S.A.

The railway safety management system is being implemented and maintained within CONPET S.A. in accordance with the national legal requirements on railway safety, in compliance with the national legal requirements on rail safety and the reference European directives. The field of application of this system includes railway ramps where CONPET carries out railway shunting, for which the company holds the "License for the performance of rail transport services (railway shunting)", granted by the Romanian Railway Authority (A.F.E.R.).

For the railway ramps where CONPET S.A. performs railway maneuvering, the Romanian Railway Safety Authority (ASFR) has issued the Single Safety Certificate which is valid until September 2025.

The measure: Compliance with the requirements of environmental authorizations and establishing appropriate measures for significant environmental aspects, limiting environmental impact;

CONPET activity is regulated according to the provisions of the GEO. no. 195/2005 on environmental protection and according to the provisions of the Water Law no. 107/2005, both with subsequent additions and amendments. They establish the legal framework for the prevention of damage to the geological environment, through accidental pollution, and for the management of natural resources.

Compliance with the requirements of environmental authorizations and establishing appropriate measures for significant environmental aspects are key components for the company's strategy regarding the limitation of environmental impact. As part of the company's commitment to sustainable development, compliance with environmental legislation is not only a legal obligation, but also an ethical responsibility.

Fulfilling the requirements of environmental authorizations implies, first, the implementation of technical measures to prevent damage to the geological environment.

To further strengthen the company's commitment to protecting the environment, action was taken to:

- Improve compliance with best practices for sustainability;
- Strengthen internal pollution prevention policy, including through an employee training program;
- Continuing investments in clean and energy efficient technologies;
- Periodic monitoring and evaluation of environmental performance to identify opportunities for continuous improvement.

The measure: Elements of ethics and integrity

The Code of Ethics and Integrity of CONPET S.A. was developed in 2012 and last revised in April 2024, in accordance with the provisions of the National Anti-corruption Strategy (S.N.A.), with the requirements of the ISO 37001 Standard (implemented and certified within the organization in the summer of 2022) and the provisions of other legislative regulations specific to integrity. The management of CONPET S.A. ensured that the measures below are still maintained or implemented as follows:

- the values, principles and norms of behavior established by the Code should be periodically reminded to the organization so that it is continuously promoted among the employees;
- ensuring the necessary levers regarding compliance with the Code that do not allow violations of the principles of ethics and integrity, at any level in the company, with reference to management, employees, legality, abuses: campaign to promote the ethics and integrity advisor with the aim of strengthening the status and mandate to him; campaign to promote the communication channel regarding the whistle blower in the public interest;
- the presentation in the organization of confirmed cases of violations of ethical behavior to emphasize the importance of respecting ethical behavior;
- periodic monitoring of the application of the provisions of the Code;
- revising and disseminating the Code, with the approval of the internal auditor and within the term stipulated in the specific legislation.

Through the Integrity Plan of CONPET S.A. adopted in the coordinates of S.N.A./National Anti-corruption Strategy 2021 - 2025 in 2022 and revised in February 2024 and by the Declaration on assuming the organizational integrity agenda adopted since 2022, including objectives and measures to act as remedies for the risks and vulnerabilities to corruption identified within society, the management of Conpet S. A. has provided all material, financial and human resources, so that all measures to prevent corruption be implemented.

The Integrity Plan contains a varied set of measures aimed at achieving the following specific objectives:

- implementation of integrity measures in the organization in the coordinates of S.N.A. 2021-2025;
- streamlining preventive anti-corruption measures by remedying legislative gaps and inconsistencies, as well as ensuring their effective implementation;

- improving the ability to manage management failure by correlating the tools that have an impact on the early identification of institutional risks and vulnerabilities by strengthening the own integrity plan, as a managerial tool for promoting integrity in the organization;
- increasing integrity, reducing vulnerabilities and corruption risks by: respecting and applying integrity standards; avoiding the conflict of interests and incompatibilities, as well as for the consideration of the public interest, in accordance with the observance of the principle of transparency of the decision-making process unrestricted to information of public interest; publication in open format of economic indicators, as well as other information of public interest.

In this context and considering the efficiency achieved by implementing the measures up to this point in the Integrity Plan, the quarterly and annual evaluation of the implementation of the measures provided for in the approved Integrity Plan and its adaptation to newly emerging risks and vulnerabilities was a priority management in order to achieve the objectives in the field of anti-corruption.

The registry of corruption risks was developed in 2018 and revised for the last time in December 2024. The identification, evaluation and periodic monitoring of corruption risks, as well as the establishment and implementation of prevention and/or control measures are carried out in accordance with the methodology reflected internally by operational procedure and must be maintained, be a priority in prevention and combat corruption.

In order to strengthen this risk identification system, as well as to promote institutional integrity, Conpet S.A. obtained the ISO 37001 certificate in 2022. In 2023 and 2024, respectively, the certificate attesting compliance with the anti-bribery management system was maintained. Reasonable measures are taken at the company level to also identify bribery risks and to control/prevent their occurrence. The corruption risk assessment is communicated and documented, and any changes that occur lead to a reassessment. The anti-bribery compliance function (as per ISO ISO37001:2017) has accountability and authority to report to the management body Board of Directors and management at the highest level, in respect of the performance of the anti-bribery management system.

Increasing the level of education and awareness of employees achieved through training and professional training actions at the company level is the most accessible way for employees to determine behavioral change, thus limiting deviations from anti-corruption norms, internal conflicts, the use of company resources in purposes other than the interests of the company. The management of the company has created a functional and transparent organizational framework of integrity, which contributes to the employees' sense of security, to their identification with the company's values.

The measure: Communication with shareholders and other stakeholders

The management ensured full compliance with the reporting obligations related to the capital market, drawing up and transmitting the periodic, current and communicated reports in accordance with the legislative provisions in force. The company also published and complied with the annual financial reporting calendar.

For good communication and transparent information to all interested parties, the public information provided by the legislation was published on the website of CONPET S.A.

Strategic Objective - Ensuring a balance between the dividend policy and that regarding the provision of the necessary funds for the investment programs undertaken by the company for development and modernization

The dividend policy of the company CONPET S.A. was approved by the Board of Directors in January 2021.

The net profit distribution decisions concern the company's options between partial or full reinvestment of the net profit and/or distribution in the form of dividends.

The dividends' distribution ratio, set out in the dividend policy, which the Board of Directors will consider in the formulation of the proposal to the General Meeting of Shareholders of CONPET S.A. will be between 85 % and 100 % of the net accounting profit.

The gross dividend per share is the share of the company's net profit that is calculated and paid to shareholders for each share held.

The Ordinary General Meeting of Shareholders dated 25.04.2024 approved the distribution in the form of dividends of the amount of 57,891,137 RON from the net profit and of the amount of 862,397 RON from the reported result, representing surplus from revaluation reserves.

Executive Management

Between 01.01.2024 - 31.12.2024, the executive management had the following composition:

The Directors with mandate contracts:

Position	Name and Surname	Observations
Director General	Eng. TUDORA Dorin	4-year mandate contract, starting from 20.10.2023 until 19.10.2027 (inclusive of), according to BoD Decision no. 31/19.10.2023. (Art.1, Letter a).
Deputy Director General	Jurist DUMITRACHE Mihaela - Anamaria	4-year mandate contract, starting from 20.10.2023 until 19.10.2027 (inclusive of), according to BoD Decision no. 31/19.10.2023. (Art.1, letter b.).
Economic Director	Econ. TOADER Sanda	4-year mandate contract, starting from 20.10.2023 until 19.10.2027 (inclusive of), according to BoD Decision no. 31/19.10.2023. (Art.1, letter c.).
Deputy Director General 3	Eng. NECȘULESCU Radu Florentin	As per Decision of the Director General no. 271/13.05.2022, indefinite period. The Mandate contract starting from 15.01.2024 until 19.10.2027 (inclusive of), according to BoD Decision no. 1/12.01.2024. (Art.1, Letter a).

Directors, Heads of Units, Chief Engineer:

Position	Name and Surname
Deputy Director General 2	Jurist LUPEA Ioana Mădălina As per Decision of Director General no. 619/06.11.2023 has been appointed in the position of Deputy Director

	General 2 for a definite period, starting 07.11.2023, until the termination of the mandate contract of the Director General no. 37110/19.10.2023, but no later than 06.11.2026 (inclusive of).
Head of Transport Operations Unit	Eng. STOICA Narcis Florin
Head of Maintenance Development Unit	Eng. BUZATU Dan
Head of Communication and Corporate Governance Unit	Political science graduate PATRICHI Bianca Maria
Head of the HSE Unit	Eng. MARUSSI Mădălina Mihaela
Head of Commercial Unit	Jurist MANOLACHE Dan
Development-Maintenance Chief Engineer	Eng. CÎRLAN Florentina – Anca

Table 38 - Executive Management

Disputes or administrative proceedings

In the last 5 years there have been no disputes or administrative proceedings involving the management of CONPET.

5. NON-FINANCIAL STATEMENT FOR THE YEAR 2024

5.1 Other non-financial information

The non-financial information through which the company's management wishes to transparently communicate to business partners, employees, investors, the community in general and any other interested parties the actions taken and the progress achieved by CONPET S.A. in terms of ensuring and continuously improving the quality of services provided, environmental protection, occupational health and safety, personnel and social issues, preventing human rights abuses, business ethics and integrity and preventing and combating corruption.

Company's profile

CONPET SA is the operator of crude oil, rich gas, condensate and ethane National Transport System (NTS). As presented largely in the Report of the Administrators, CONPET SA provides transport services to its customers through both the National Transport System, leased based on the Oil Concession Agreement and by rails, from the loading ramps to refineries.

The operation of the system is being performed by the local dispatchers coordinated by the central dispatcher of the company. The National Transport System consists of the following components:

- Import Crude Oil Transport System;
- Domestic Transport System, which in turn includes:
 - The crude oil and condensate transport subsystem;
 - The rich gas transport subsystem;
 - The ethane transport subsystem.

The powers of each entity within the organizational structure are established by the Rules of Organization and Operation of the company.

Quality, Environment, Occupational Health and Safety Policy

In accordance with the strategic development direction of COPET SA, the Quality Environment, Occupational Health and Safety Policy aims at satisfying the requirements of the customers and of other relevant stakeholders, complying with the legal requirements concerning the transport of crude oil, rich gas, ethane and condensate and ensuring a healthy and safe work environment for the entire personnel, targeting the following action lines:

- Ensuring the availability and timeliness of the crude oil, rich gas and condensate transport services;
- Solving operative interventions to transport facilities without affecting the interests of customers and other stakeholders;
- Optimizing technological consumption of transported product;
- Compliance with legal and other requirements relating to occupational safety and health;
- Continuous improvement of performance in environmental protection activities in particular by adopting measures to prevent pollution, technological risks and accidents that can have a negative impact on the environment;
- Awareness of the company's personnel and the one working on behalf of the organization and improvement of communication to ensure active participation in achieving the goals;
- Eliminating hazards and reducing risks related to health and safety;
- Consultation and involvement of workers on any issue related to health and safety at work;
- Ensuring an appropriate organizational framework for setting the objectives of the integrated management system quality - environment - health and safety;
- Permanent assessment of the risks/opportunities arising from the current organization evolution and the risks/opportunities related to processes and establishment of actions to process them, correlated with the actions established at local/national level.

The company's management pursues consistently the performance concerning quality, environment, occupational health and safety, by maintaining and continuously improving the Management Systems in accordance with the reference standards for these areas.

The certification body BUREAU VERITAS issued certificates for management systems implemented in CONPET S.A. according to the requirements of ISO 9001, ISO 14001 and ISO 45001 standards, following the external re-certification audit in September 2022. The certificates are valid 3 years, with annual surveillance. Following the surveillance audit of September 2024, the BUREAU VERITAS certification body recommended maintaining the certificates for the management systems of quality, environment, health and safety at work, issued for the organization CONPET S.A..

The quality of transport services

CONPET aims at fully satisfying customers' requirements and expectations, fulfilling the obligations undertaken under the Oil Concession Agreement and at permanently complying with the regulations and legal provisions.

The main goals pursued by the company to ensure an adequate level of quality of the transport services are:

- The Development of the National Transport System by implementing the best technologies for the rehabilitation and modernization of the oil transport infrastructure, so as to ensure conditions of continuity and quality of the transport services;
- Increased safety in operation and reduced technological consumptions;
- Continuous improvement of the operational processes to ensure the high level of customer satisfaction through prompt, timely and cost-effective execution of the transport services;
- Maintenance of the Integrated Management System certifications according to the reference standards.

The main lines of action relating to service quality are the following:

- Ensuring the availability and timeliness of the transport services;
- Efficient solving of interventions on the transport installations without affecting customers and other stakeholders' interests;
- Optimization of technological consumptions of transported product.

The potential risks identified in this regard are as follows:

- The degradation of the National Transport System, reduced transport capacity, delays in delivery, decreased customer satisfaction, complaints;
- identification of major non-conformities following the certification or surveillance audits and suspension/cancellation of certificates, which could have a negative impact on the image of the organization.

As a result of the measures taken by the company, the aforementioned risks were maintained at a low exposure level. The efficient control of the risks materialized by:

- documentation, implementation and procedure compliance measures;
- reviews and internal audits of the integrated management system;
- planning and execution of investment and repair works to the National Transport System;
- ensuring human resources with appropriate skills for conducting the main processes.

No non-conformities have been identified as a result of the external audits for the surveillance of the integrated management system.

The specific objectives, which refer to increasing customer satisfaction and promptness in providing transport service, are:

- Implementation of the crude oil, rich gas, condensate transportation program with inclusion in the technological consumptions in the contracts;
- Zero complaints from customers;
- Carrying out the transport of crude oil with the specific electricity consumption of max. 3,2 kwh/transported ton;
- Zero railway events during the railway maneuver carried out by CONPET's own personnel, in the rail ramps. ;
- Customer satisfaction with the crude oil and derivatives transport activity, with a target of at least 90% responses of 4 and 5 out of the total number of responses.

In 2024, the indicators have reached the target values laid down as follows:

- the transport program was carried out within the contractual limits of technological consumption for all transported products and for all customers;

- there were no complaints from customers;
- the specific consumption of electricity for crude oil transportation fell within the margin of max. 3.2 kwh/ transported ton, the achieved value being 2.67 kwh/ton;
- no railway events were recorded during the railway maneuver carried out with CONPET's own personnel.
- The value achieved for customer satisfaction was 100% with responses of four and five out of the total number of responses, as follows: 53 responses, of which 49 Very high satisfaction (respectively 5) and 4 High satisfaction responses (respectively 4).

Environment

In the field of environmental protection, CONPET management has adopted an environmental policy integrated with the policy on quality, health and safety at work, specific to the company's activity, size and impact on the environment, which would provide the framework for establishing and analyzing general objectives and specific environmental objectives.

Special emphasis was placed on issues related to the needs and expectations of stakeholders (including the demands of the authority) and local environmental conditions or regional that can affect or be affected by the organization, the way the risks and opportunities are treated related to environmental issues for prevention and limitation of their consequences on human health and the environment.

Being aware that the responsibilities towards the environment and the community in which it operates are inextricably linked to the performance it wants to achieve in its own activity and in accordance with the principles of sustainable development, CONPET has committed, through its environmental policy, to:

- ensuring compliance with legal and other requirements relating to environmental matters.
- the continuous improvement of the performance in environmental protection activity, in particular by adopting prevention measures for pollution, technological risks and accidents which can have negative repercussions on the environment.
- Permanent assessment of the risks/opportunities generated by the context in which the organization evolves and of the risks/opportunities related to the internal processes and the establishment of actions for their treatment.
- Awareness of the company's personnel and of the personnel working on behalf of the organization and improvement of communication in order to ensure active participation in the achievement of the goals and the environmental management program.

In terms of environmental protection and water management, CONPET S.A. activity is authorized in accordance with the provisions of GEO 195/2005 on environmental protection, as supplemented and amended and Water Law no.107/2005, with subsequent amendments and additions.

According to the Ministry of Environment and Sustainable Development Order 1798/2007 approving the procedure for issuance of the environmental permit, the activity carried out by CONPET is an activity with significant environmental impact. The environment permits issued by CONPET remain valid all along the period the company has been issued annual visa permit - amendment brought by Order 1150/2020.

The identification of environmental aspects and the assessment of their associated impact within the company is carried out for:

- all the activities performed, included in the area of application of the environment management system;
- materials, goods and services that can generate environmental impacts that are supplied/manufactured by suppliers/providers;
- new projects and developments/upgrades;
- facilities/equipment from a workstation whose operation has been partially or permanently stopped because of preservation, respectively of dissolution of work site and that have triggered or may trigger impacts on the environment.

Following the identification of environmental aspects for activities, products and services of the company significant environmental aspects have been retained, which are input and environmental management program.

The update of the lists of environmental aspects and the associated impacts thereof, as well as their centralization, is made whenever changes occur, such as:

- Technology changes;
- upgrading or introducing new plant, equipment, use of other raw materials;
- occurrence of new requirements, environmental regulations or amendment of the existing ones;
- decommissioning of installations and equipment;
- preservation/restarting, dismantling of workstations after completion of actions to deal with significant environmental aspects.

During 2024 environmental issues were reviewed at the sites, significant environmental aspects being included in the "List of significant environmental aspects and associated impacts".

Given the significant environmental aspects identified at company level, the measures of inspection reports/minutes - authorities, concerning compliance with legal and other requirements, etc., during 2024 have been reviewed:

- Environmental Management Program and actions to achieve environmental objectives;
- Registry of environmental opportunities;
- Registry of environmental legal requirements - Water;
- Registry of environmental legal requirements - Air
- Registry of environmental legal requirements -Regulations;
- Registry of environmental legal requirements – Wastes;
- Registry of environmental legal requirements -Protected areas.

The status of achieving the established objectives and targets and the status of implementing the actions established to achieve the environmental objectives are analyzed annually by the executive management, as part of the analysis carried out by the management, on which base decisions are made and the Action Plan for the continuous improvement of CONPET S.A. activities in the field of environmental protection is developed.

Occupational Health and Safety

In order to organize the prevention and protection activity within the company, according to art. 14, letter c and in conjunction with art. 19, paragraph 1 of The GD no. 1425/2006 with subsequent amendments and supplements, the internal prevention and protection service is established.

In each sector, there are persons responsible for health and safety at work, appointed by the Director General 's decision.

Safety and health at work is today the joint concerns of technical and engineering disciplines, interested in finding the most appropriate ways and means of optimizing human integration into the professional applications system.

The ultimate goal of work safety and health at work is:

- protecting the life, integrity and health of workers against the risks of accidents and professional diseases that can occur in the workplace;
- creating working conditions to provide them stable physically, mentally and socially comfort;

Specific training programs are run to address specific issues, such as those related to safety risks.

Permanently, through medical checks, a healthy, active lifestyle, first aid courses, body immunization programs are promoted, especially for employees who work in conditions of isolation, work at height and night shift.

The main action lines of the top management concerning health and safety are as follows:

- Prevention and reduction of occupational diseases and accidents at work;
- Consultation and participation of workers on any aspect of health and safety at work. During the checks carried out by the representatives of the service, the "Conpet S.A. employee satisfaction evaluation questionnaire" was filled in by the employees regarding the safety and health at work" and reports were drawn up with reported problems and their remediation.
- Ensuring appropriate organizational framework for setting the objectives of the integrated management system quality- environment- health and safety;
- Permanent assessment of the risks/opportunities posed in the context the organization evolves in and of the risks/opportunities related to the processes and determining the actions for their treatment.

According to the occupational health and safety law and regulations (S.S.M.), every employer with at least 50 employees in an establishment is obliged to establish an occupational health and safety committee, in order to consult and ensure employee participation in the development of all labor protection rules. The occupational health and safety committee is a mixed group, made up of both employer representatives and worker and medical staff representatives.

Beyond our duty to ensure that employees are fully satisfied with their careers and have excellent opportunities for growth and personal development, our priority is to provide them with a safe workplace.

Health and safety matters are discussed in the Occupational Health and Safety Committee meetings held quarterly or whenever necessary.

From the perspective of the obligations and responsibilities arising from the Law no. 319/2006 on safety and health at work and. 1425/2006 approving the Methodological norms for the application of the provisions of the Law on safety and health at work no. 319/2006, the conditions for health and safety at work and occupational accident and diseases prevention are ensured:

- prevention and protection activities are organized internally through the Prevention and Protection Department;
- the duties and responsibilities for safety and health at work are set out incumbent upon the workers, corresponding to the functions exercised, which are specified in the job description;
- the areas requiring occupational safety and health signaling and the necessary signaling type according to GD 971/2006 concerning the minimum requirements for the provision of safety and/or health signaling at work are determined;
- occupational health and safety clauses are established upon the conclusion of the service contracts with other employers, including those concluded with foreign employers;
- authorization is organized for the exercise of trades and professions provided for by the specific Legislation;
- the health of the workers is monitored through in-house medical practices and by contracting occupational medicine services;

In 2024, external inspections were carried out by labor inspectors of the Labor Territorial Unit from Giurgiu, Brăila, Dâmbovița, Călărași, Prahova, Gorj, Olt, Teleorman and Vâlcea without identifying irregularities at the level of the checked worksites. 14 improvement measures have been ordered. During the scheduled internal controls, all the locations established by the approved control schedule were checked, no serious deviations were found, possibly causing injury and/or occupational illness of workers; the non-conformities found were remedied by carrying out the corrective measures ordered at no additional cost.

The starting point in the continuous improvement of the prevention of work accidents and occupational diseases at the workplace is the "Assessment of the Risks of Occupational Accidents and/or Diseases". In 2024, the committee set up within the company for this purpose analyzed and reassessed the risks for each workplace/workstation. By implementing the technical organizational and sanitary measures from the Prevention and Protection Plan, the level of risk within the company is of 2.80, value below the maximum allowed limit of 3.50.

Within the organization CONPET S.A. an occupational health and safety management system is implemented and certified in accordance with the requirements of the ISO 45001 standard.

During 2024, the occupational health and safety management system, part of the Quality - Environment - OSH Integrated Management System, was maintained and improved, a fact confirmed following the external surveillance audit of September 2024.

The employer permanently allocates resources to maintain and improve the working conditions and health of the employees, the effects of these obligations being reflected in the results presented and in the medical reports prepared by occupational medicine doctor.

In the light of the obligations and responsibilities arising from **fire defense and civil protection legislation** with implications for the safety and health at work of workers, prevention and intervention measures have been ensured by meeting/complying with the applicable legal requirements and fire defense activity shall be organized at company level, therefore:

- is established the Emergency Situations Office - structure with responsibilities in emergencies, specialized in risk prevention of occurrence of emergencies through guidance and control activities;
- is organized defense against fire for all work places;
- is organized the intervention of firefighting for all work places;
- is ensured the organization of rescue and evacuation of employees and material goods;
- Private service for Emergency Situations is set, in accordance with the law;
- are identified, monitored and evaluated specific risk factors, generators of hazardous events; are identified types of risks generating natural and technological disasters; is provided assessment and analysis of potential risks on the possibility of their occurrence and consequences on people's lives, the environment and property;
- is established the Cell for Emergency Situations.
- are provided information and training activities on the means of knowledge, compliance and enforcement of the norms, of the technical regulations and provisions concerning fire safety and civil protection for all company personnel;
- is provided the organization of training of employees and emergency teams within SPSU in emergency situations; participation in exercises and applications alarm, evacuation, intervention, limitation and elimination of consequences of fires or other disasters.

From the point of view of the obligations and responsibilities arising from Law no. 59/2016 on the control of major accident hazards involving dangerous substances are provided prevention/action measures by performance/compliance with the applicable legal requirements:

- are established and provided measures to prevent major accidents involving dangerous substances and limit their consequences on human health and the environment;
- "Security Reports" and "Internal Emergency Plans" are developed for each location of the company classified as a "higher level site", respectively "Major Accident Prevention Policy" for the locations classified as a "lower-level site";
- the staff employed in these locations is periodically trained on the relevant parts of that documentation;
- at the site level, a responsible in charge with security management was appointed, by decision of the Director General.

In order to maintain and continuously improve the safety and health of workers in every aspect related to work, CONPET SA has developed and established the following plan on short, medium and long term:

1. Achievement of all necessary lines regarding Safety and Health at Work contained in the Plan for Prevention and Protection and in the Programs of measures resulting from checks/internal and external audits;
2. Permanent compliance with OHS legislation and other requirements/regulations to which the company subscribes, by implementing innovations in the field;
3. Creating an OHS culture through training and raising awareness of employees about the need to respect the rules of safety and health at work by:

- using interactive teaching methods, accompanied by practical demonstrations;
- empowering all staff in identifying, reporting and eliminating/reducing the dangers of accidents and professional diseases;
- supporting and promoting preventive thinking and behavior;
- involving all personnel in adopting measures to continuously improve the working environment.

4. Continuous improvement of occupational health and safety by:

- eliminating/reducing ongoing risks of accidents and occupational diseases;
- conclusion of an occupational medicine contract with a specialized clinic;
- integrating new employees in all the prevention and protection actions specific to the workplace;
- developing programs to educate employees on occupational health, by adopting a healthy lifestyle;
- improving internal communication and consultation on issues of safety and health at work;
- implementation of thematic programs of information on health and safety risks, use of modern methods, efficient and effective training.

In 2024, no work-related accident/incident was registered within CONPET S.A.

During 2024, sanitary materials and personal protective equipment were provided for all employees.

Informative materials were developed and displayed, including the rules and measures that must be observed, regarding wearing the protective mask, washing/disinfecting hands, ventilating and disinfecting the workspace during epidemics.

Energy Policy

The Energy policy of CONPET SA promotes the objectives of continuous improvement of energy performance by maintaining and improving the energy management system, by ensuring compliance with the legal provisions and other applicable requirements in terms of energy consumption and energy efficiency, minimizing the loss of electricity and fuel for the production of heat energy, motor vehicles and rail maneuvering on rail ramps, energy cost reduction, purchase and use of energy-efficient products and services.

The company carries out actions to raise personnel awareness and improve communication in order to ensure active participation in the achievement of the energy goals and targets. In order to achieve the goals of this policy, the management and personnel of the company are fully committed to maintaining and improving the energy management system in accordance with the provisions of the ISO 50001 standard.

The certification body BUREAU VERITAS issued the certificate for the management system implemented in CONPET S.A. according to the requirements of ISO 50001 standards, following the external re-certification audit in September 2022. The certificate is valid 3 years, with annual surveillance. Following the surveillance audit of August 2024, the BUREAU VERITAS certification body recommended maintaining the certificates for the management systems of quality, environment, health and safety at work, issued for the organization CONPET S.A..

Railway Safety Policy

Starting 2010, within CONPET S.A. the Railway safety management system is implemented and maintained. The scope of this system includes ramps where CONPET performs railway shunting operations.

Through the railway safety policy of CONPET S.A. the company declares its will and firm commitment to maintain and improve a railway safety management system according to the requirements established by the national and European Union regulations. The main lines of action are:

- Compliance with existing legal requirements and other relevant stakeholder requirements relating to the development of railway shunting operations;
- Ensuring the appropriate organizational framework for setting objectives and assessing the performance of the safety management system;
- Identification of hazards, assessment and evaluation of risks associated with railway operations, including those arising from external factors;
- Establishing appropriate safety measures to be implemented to mitigate these risks, with a view to preventing accidents/incidents by rail and cooperate with relevant stakeholders on the implementation of appropriate safety measures in case of common risk identification;
- Assuming the coordination of the safety management system activities at the level of the management and delegation of responsibilities within the organization;
- Provision of programs to train the personnel and maintain their competence in performing tasks, both for personnel in charge of management, training and control tasks and for personnel performing railway safety-related activities.

The Romanian Railway Authority (A.F.E.R.) granted the company the License for the performance of railway transport services (railway shunting), and the A.S.F.R. (Romanian Railway Safety Authority) issued the Single Safety Certificate for the railway safety management system implemented in CONPET S.A..

Social and Personnel Policy

The company's management develops and implements internal regulations used to establish the organization of the activity within the company by which the necessary resources are allocated effectively. The risks associated with the social and staff field are identified and their potential adverse effects are kept to an acceptable level through appropriate measures for cancellation or mitigation.

The legal requirements in the HR and OHS areas at the level of the company are also complied with by the implementation and certification of the integrated management system. In addition, certain requirements are included in the Internal Regulations and the Code of Ethics and Integrity.

Competent, motivated and honest employees represent the essential element for the successful completion of the company's goals, being the most important resource for the proper conduct of the business.

The main actions taken with respect to these issues have materialized by:

- the provision of optimum work conditions;

- transparent processes for recruitment based on professional competence and experience;
- promotion of employees that behave ethically and have proved integrity;
- assessment of professional performance based on professional and personal skills criteria;
- allocation of sufficient resources for training and continuous improvement of the personnel;
- health care (regular medical checks and assessments, monitoring the health status of the employees, insurance contracts for medical services for the benefit of the employees);
- providing additional wage benefits in the form of voluntary health insurance, as regulated in art. 221 para.9 of the Collective Labor Agreement, the ultimate goal being to prevent loss of working capacity of employees;
- social facilities provided for in the Collective Labor Agreement (meal vouchers, covering part of the cost of tickets for rest and treatment, financial support to the employees and, in exceptional circumstances, to the members of their families (husband, wife, children supported by them), who have special medical problems, as well as to the employees who suffered significant damage from earthquakes, landslides or floods or other natural phenomena, fires);
- supporting trade union activity, communication and ongoing consultation with the trade union organization.

The main potential risks in the social and personnel field relate to:

- high personnel fluctuation, decreased rate of retention of newly hired personnel or occupying key positions;
- insufficient financial resources allocated for maintaining and improving working conditions or for preventive medical actions and measures;
- constraints and budget limitations that can restrict the initiation/development of projects in the field of human resources;
- improperly managed communication;
- lack of qualified personnel in order to ensure the continuity of certain activities (e.g. personnel with responsibilities in traffic safety) in the case of departures from the system.

The effects of these potential risks may consist in the increase in the medical leave expenses incurred by the company, increased absenteeism, decreased quality of the transport services, decreased efficiency, increased recruitment costs, adverse incentive of the employees or trade union conflicts. The company has managed, through the measures taken, to maintain the social and staff risks at a low level.

To manage the risks in this field, the company has taken the necessary measures to ensure the security and protection of the employees' health, to prevent occupational risks, to inform and train the employees and to ensure the organizational framework and the necessary means for occupational health and safety, including for specific risk-sensitive groups.

Therefore, in-house instructions have been developed for the application of the regulations concerning safety and health at work, taking account of the particularities of the activities and of the jobs in the company. Furthermore, labor protection measures have been taken, specific for certain occupations or activities.

In drawing up the measures for safety and health at work, the company's management shall consult with the Trade Union or, as appropriate, with the representatives of the employees and with the Occupational Health and Safety Committee.

The personnel are informed and trained about the risks to the safety and health of the employees and to the protection and prevention measures specific to the workplace.

In terms of gender equality, each employee of the company is free to develop their own skills and to express their choices without being influenced by the peculiarities of their gender.

The different behaviors, aspirations and needs of women and men enjoy equal appreciation and promotion within CONPET S.A.

The Internal Regulations of the company include provision for the prohibition of all forms of discrimination.

Of the total personnel, 14.9% are women with higher education, who represent 37.6% of the total staff with higher education. At the same time, women account for a percentage of 32% in total personnel with management positions and a percentage of 36% in total personnel with management and coordination positions in the company. These weights represent an indicator of women's participation in the decision-making and management process at all levels and in important areas of business of the company.

Thus, according to the organization chart in force at 31.12.2024, the entities Deputy Director General, Deputy Director General 2, Economic Directorate and Maintenance Development Chief Engineer are led by women. Promoting equality at work is synonymous with significant economic benefits.

By eliminating all forms of discrimination within the company, women are free in the choice of their occupation upon their employment on any vacant job and at all levels of the professional hierarchy. This creates non-discriminatory conditions for career advancement, for work remuneration in relation to the professional skills and the quality of the work carried out and for the participation in professional qualification/re-qualification, improvement and specialization programs.

The company guarantees for all employees, regardless of sex, the application of the principle of equal pay and the right to other benefits paid by the employer to employees, directly or indirectly, in cash or in kind, according to their place of employment.

The Conventions of the International Labor Organization (., considered as fundamental labor principles and rights, relate to trade union freedom and trade union right protection, the effective recognition of the right of collective organization and bargaining, the elimination of all forms of forced or compulsory labor, the abolition of child labor and the elimination of discrimination in respect of employment and occupation, and represent guidelines and useful tools for the preparation of the internal policies of the company concerning employment, work, social dialogue, etc.

The company informs employees consistently and permanently on the provisions of the Collective Labor Agreement, the Code of Ethics and Integrity and the Internal Regulations, a document containing special chapters on the rights they have in connection with the compliance with the equality of opportunities and treatment between men and women in labor relations.

Trade union freedom and collective bargaining ensures a good cooperation and consultation between the workers and the employer, leading to a decrease in the number of labor conflicts and a higher social stability.

The employees of CONPET SA receive adequate protection against any discriminatory acts that might infringe trade union freedom.

The practice of collective bargaining in CONPET SA guarantees that the worker and the employer have an equal share in the negotiations and that the decisions made will be fair and equitable. Starting from the premise that social dialog is an important factor for socio-economic progress, considered as one of the pillars of the European social model, essential for: the promotion of decent working conditions, transparent regulations regarding working rules, respect for employees and performance, productivity and profit for employers, collective bargaining has allowed the social partners to negotiate a fair employment relationship and to prevent labor disputes.

The activities and actions for entertainment and networking for employees have been conducted between the trade union and employees, between the employees and family members, activities in partnership with public educational institutions, culture, various events at which personalities have been invited, etc.

CONPET SA promotes a transparent business climate, communication and cooperation with all the parties involved in the conduct of its business, with respect for the community and the environment. CONPET S.A. supported, through sponsorship actions, projects of tradition or with significant impact on the community, but also request of less amplitude targeting ideas, actions or individual performance.

Ethics and Integrity in Business, fighting corruption

CONPET SA promotes fair business relationships and pursues legal compliance in all commercial transactions and activities carried out, acting for the deterrence, prevention and combating of corruption deeds.

By the Code of Ethics and Integrity the company has established the rules of conduct and integrity, which regulate the values and principles of anti-corruption strategy, corporate values, responsibilities, obligations and business conduct, mandatory rules, applicable to all employees, from all organizational structures of CONPET S.A., directors and administrators with mandate contract.

The Code of Ethics and Integrity defines honest conduct and behavior, prohibits participation of employees in decision-making process in situations where there is a conflict of interest, prevents pantouflage, incompatibilities, imposes restrictions in terms of offering/accepting gifts, favors or services, establishes the obligations of the employees with regard to the

protection of the company's assets and resources, specifies how to relate with the authorities based on the principles of fairness, transparency and good collaboration and mentions the rules of conduct during national and international trips. There are also clear rules for dealing with shareholders regarding equal treatment and privileged information, as well as the use of honest and legal practices in dealing with business partners.

As per GEO no. 109 dated November 30, 2011 on the corporate governance of public enterprises, further amendments and additions and within the Program for the development of the internal control management system, elaborated in compliance with the O.S.G.G. no. 600/2018, considering the necessity of building an integrity culture inside CONPET S.A., the Code of Ethics and Integrity has been revised and approved by the Board of Directors (in the meeting dated 25.04.2024).

The entire personnel of CONPET S.A. have been trained with regards to the company's institutional strategy, related to the expectations in conduct matters as per the Code of Ethics and Integrity, as well as related to the rights and obligations of the personnel in ethics and compliance matters. The Ethics Advisor monitored the compliance, by the organization's staff with the principles and rules of conduct and provided advice and assistance in the field of ethics, on the occasion of meetings organized within certain work sectors, according to the "Regulations on the activity of the Ethics Advisor within CONPET S.A", in force.

In order to implement the National Anti-corruption Strategy 2021– 2025 (NAS) at the level of the company, as early as May 2022 have been adopted the Declaration on assuming the organizational integrity agenda in the NAS 2021 - 2025 coordinates and the Integrity Plan, which was updated in February 2024 by Decision of the Director General of CONPET S.A., and which details, in particular, the measures applicable to CONPET S.A., subsumed to the general and specific objectives set out in the NHS of public undertakings, in order to identify specific risks, vulnerabilities and needs for intervention. All measures to prevent corruption, with a deadline of 2024, have been implemented.

Measures related to the development of programs/training, internal training and awareness in the field of anti-corruption education are carried out annually. Organization of the training program assumes that, if a company provides the efficient functioning of promoting an ethical and upright behavior, causing a change in attitudes among its personnel, then this system may limit internal conflicts, theft of company assets and fraud, use of the company resources in purposes other than those for which they are provided, using its image in the personal benefit of employees or sabotaging the interests of the company by misconduct of employees in relation to customers or business partners or corruption etc. The functioning of such a system contributes to the strengthening of the internal integrity system and the employee's sense of security, to his identification with the company's values, and therefore to the higher performance of the company.

The recurrent staff awareness activity had an amplitude at the level of the entire company in the field of integrity, through the actions undertaken during 2024. Internally, all staff in the activity were trained on the norms of the Code of Ethics and Integrity in force, the norms related to the obligation to declare gifts/goods received free of charge on the occasion of protocol actions in the exercise of the mandate or function, the provisions of the Criminal Code regarding acts of corruption, the provisions related to declarations of assets and

interests, conflict of interest, incompatibilities, and pantouflage. On this occasion, various educational information materials were disseminated and published, which supported the training campaigns, and not only.

Following the training on the provisions on conflicts of interest and incompatibilities, in 2024, a test/verification of the knowledge acquired by the management and TESA staff took place, which took place between November and December 2024, and was completed by obtaining high results from the staff, the degree of knowledge of the aforementioned provisions being 100% (no. of employees who obtained the rating very good and good/no. of employees tested *100).

The company also provides specialized personnel with training for new employees regarding:

- a) the anti-bribery policy and the requirements of the anti-bribery management system implemented in CONPET S.A. for the positions included in the "Inventory of Sensitive Functions at CONPET S.A." in force, as well as for the anti-bribery compliance function (appointed by decision of the Director General);
- b) the rules on conflicts of interest and incompatibility for management and TESA personnel.

Annually, during the first semester, the personnel occupying positions included in the "Inventory of Sensitive Functions at the Conpet SA Level" in force, the anti-bribery compliance function, directors with mandate contracts and administrators of CONPET S.A. fill-in a declaration confirming compliance with the Anti-Bribery Policy and the requirements of the anti-bribery system implemented within the organization.

The Anti-Bribery Policy

For CONPET S.A., doing business and process deployment by the observance of the highest standards of ethics and integrity stands for a constant preoccupation.

Acting as an operator of the crude oil, rich gas, condensate and ethane national transport system, CONPET S.A. acceded to the anti-bribery national strategy and implemented proper integrity plans.

By the anti-bribery policy, CONPET S.A. commits not to tolerate any bribery act, not to manifest any type of sanction or retaliation against any relevant employee or third party for the refuse to be part of a bribery act and to observe the anti-bribery legislation applicable to the organization.

Following the external audit carried out in July 2022, the SRAC CERT certification body certified the anti-bribery management system implemented in CONPET S.A. organization in accordance with the requirements of ISO 37001. The certificate is valid for 3 years, with annual surveillance. Following the external surveillance audit of June 2024, the SRAC CERT certification body recommended maintaining the compliance certificate no. 28/13.07.2022 for the anti-bribery management system implemented in the CONPET S.A. organization.

Aspects related to the Diversity Policy in terms of Administrative and Management Bodies

CONPET S.A. is a company listed on the Bucharest Stock Exchange and, according to the capital market legislation, the decision for the appointment of the members of the Board of Directors belongs to the shareholders. For this reason, the company is not in a position where

it can influence issues of diversity and could not adopt a policy on diversity in terms of administrative and management bodies.

However, the proposals for candidates and the result of the vote in elections have provided each time an appropriate degree of diversity in terms of profile of administrators, coverage of professional expertise areas or age thereof.

The current Board of Directors is composed of five male and two female individuals with professional experience in the fields of engineering, economics and law.

5.2 Annual Sustainability Report 2024

The Sustainability Report prepared for the year 2024 provides a detailed picture of the company's environmental, social and governance (ESG) performance. The report is prepared in accordance with the Corporate Sustainability Reporting Directive (CSRD) and the Order of the Ministry of Finance (O.M.F.) No. 85 of January 12, 2024 for regulating aspects related to sustainability reporting, ensuring compliance with national and European legislative requirements in the field of non-financial reporting.

It is aligned with the European Union regulations on sustainability reporting, complying with the CSRD requirements and **the European Sustainability Reporting Standards (ESRS)**.

The following relevant regulations were taken into account in the preparation of this report:

- Directive 2022/2464 on corporate sustainability reporting (Corporate Sustainability Reporting Directive - CSRD);
- ORDER No. 85 of January 12, 2024 for regulating aspects related to sustainability reporting;
- European Sustainability Reporting Standards (ESRS);
- The (EU) Regulation 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability reporting in the financial services sector (SFDR).
- The (EU) Regulation 2020/852 on the establishment of a framework to facilitate sustainable investment (EU Taxonomy).

The sustainability report for 2024 is presented in **Annex no. 1**.

6. PROPOSAL OF THE BOARD OF DIRECTORS

6.1 Approval of the financial statements concluded on 31.12.2024

6.2 Approval of the allocation of net profit related to the financial year 2024

Proposal to distribute the accounting profit left following the deduction of the corporate tax on December 31, 2024:

Along 2024, there have not been distributed dividends based on the interim financial statements.

The remaining accounting profit after the deduction of the corporate tax, on December 31, 2024 is in amount of 49,323,047 RON.

The proposal to allocate, by legal destinations, the accounting profit left after the deduction of the corporate tax to be distributed, to which was added the provision for the employees' share of profit in amount of 5,057,858 RON, resulting a total amount to be distributed of 54,380,905 RON, is the following:

Crt. No.	Element	Provisions of GD no. 64/2001	Amount -RON-
1	The net profit of the financial year 2024, reported based on the audited annual financial statements	-	49,323,047
2	The employees' share of profit within the limit of 10% of the net profit but not more than the monthly average base salary achieved at the level of the economic operator in 2024 financial year, acknowledged in the provisions account.	-	5,057,858
3	Net profit, reinstated with the provision for employee share of profit (1+2):	-	54,380,905
a	Other allocations stipulated by law - exemption from the payment of the reinvested corporate tax (account 1068), Art 22 of Law no. 227/2015 of the fiscal code	Art. 1, Para (1), Letter b)	2,993,062
b.	Employees' share of profit within the limit of 10% of the net profit but not more than the monthly average base salary achieved at the level of the economic operator reported in the reference financial year	Art. 1, Para (1), Letter e)	5,057,858
c	Dividends due to shareholders	art. 1, para. (1), letter f)	46,329,985

Table 39 - Proposal for the allocation of net profit for the year 2024

6.3 Approval of the distribution, as dividends, of certain amounts from retained earnings and other reserves

The retained earnings which can be allocated, in the amount of 8,814,854 RON, are proposed to be distributed as dividends due to shareholders. The statement of retained earnings distributable and its distribution shall be as follows:

Crt. No.	Destination	Amount -RON-
1.1.	The retained earnings representing surplus achieved out of revaluation reserves	6,298,970
1.2.	The retained earnings representing actuarial loss from the discount of benefits granted upon retirement	1,760,616
1.3.	Retained earnings from the correction of various elements that have affected the profit of the previous years	755,268
1	Total retained earnings, distributed for:	8,814,854
a	Dividends due to shareholders	8,814,854

Table 40 - Proposal for the distribution of retained result

Other reserves in the amount of 3,407,439 Ron, representing prescribed dividends, not collected within three years from the due date (prescribed dividends), are proposed to be distributed as dividends due to shareholders.

- RON -

Crt. no.	Destination	Amount
1	Other reserves represent distributions to owners, unclaimed within three years from the due date (prescribed dividends)	3,407,439
1	Total other reserves, distributed for:	3,407,439
a	Dividends due to shareholders	3,407,439

Table 41 – Other reserves distribution proposal

ANNEXES

The following annexes are an integral part of the 2024 Annual Report of the administrators of Conpet:

- 1) Annex no. 1 - Annual Sustainability Report 2024
- 2) Annex no. 2 - Transactions concluded according to art.52 of GEO no. 109/2011 in the second semester of 2024
- 3) Annex no. 3 – Objectives and financial and non-financial key performance indicators of the directors with mandate contract for the period 01.01.2024-31.12.2024
- 4) Annex no. 4 - Report on the internal/managerial control system as of 31.12.2024
- 5) Annex no. 5 - List of the important contracts concluded by the company in 2024
- 6) Annex no. 6 - List of disputes in which Conpet S.A. is a party, pending in the courts on 14.03.2025
- 7) Annex no. 7 - The Articles of Incorporation in force, updated on 27.04.2023
- 8) Annex no. 8 - CVs of the current administrators

CHAIRMAN OF THE BOARD OF DIRECTORS
Gheorghe Cristian - Florin

Director General
Eng. TUDORA Dorin

Deputy Director General
Jurist DUMITRACHE Mihaela - Anamaria

Deputy Director General 3
Eng. NECȘULESCU Radu – Florentin

Economic Director
Econ. TOADER Sanda

Sustainability Annual Report

[2024]



**More than
120 years of
oil transportation
through pipelines
in Romania**



CONPET S.A. Commitment

to sustainable growth
and corporate
responsibility

Sustainability is at the core of
our vision and commitment to
progress, ensuring harmony
between crude oil
transportation and
environmentally responsible
practices for a secure and
sustainable future.

“Executive Statement

General Director
Dorin TUDORA

Dear colleagues, partners and collaborators,

I am honored to serve as the General Director of a company with a tradition of over 120 years in crude oil transportation through pipelines in Romania — an enterprise of strategic importance that plays a vital role in the country's energy security and economy. CONPET S.A. operates a network classified as critical infrastructure and we fully understand the significance of our activity and its contribution to building a sustainable and high-performing Romanian society.

Our company's management, continuously focused on growth and excellence, is supported by dedicated professionals who are well-prepared to tackle the challenges that constantly arise in an industry that keeps the world in motion.

We recognize and welcome recent legislative advancements, including EU Directive 2022/2464 on Corporate Sustainability Reporting (CSRD) and Order No. 85/2024 issued by the Ministry of Finance, which establish high standards of transparency and corporate responsibility.

CONPET S.A. has aligned itself with these requirements by adopting the European Sustainability Reporting Standards (ESRS), implementing rigorous reporting methods, and ensuring independent validation of data for full credibility. We view these requirements not only as legal obligations but also as opportunities to strengthen our operational sustainability and actively contribute to a cleaner economy.

History, Present and Future

The history of CONPET S.A. has always followed a path of continuous evolution. Survival and progress would not have been possible otherwise. The way we transport crude oil today is vastly different from the methods used over 30 years ago.

Over the years, we have demonstrated strong adaptability and a forward-thinking vision focused on modernization and development, allowing us to meet the demands of a dynamic operational environment. Our continuous investments in modernizing critical transport infrastructure and adopting advanced technological solutions reflect our firm commitment to minimizing environmental impact and supporting social and economic development.

Energy efficiency remains one of our key objectives, alongside our core business operations. Through strategic planning and annual investments, we aim to reduce costs and energy consumption. New technologies and efficient investment projects enable us to enhance service quality, security and operational efficiency.

While our primary activity is transporting crude oil through pipelines, we have also embraced a sustainability strategy, integrating electric and hybrid vehicles, photovoltaic panels and electric locomotives into our operations.

This is yet another testament to our commitment to environmental protection and to ensuring that our business keeps pace with modern advancements. Striking a balance between being a crude oil transporter and promoting eco-friendly practices is essential for the future. We honor our past and recognize our critical role in keeping the world moving, yet we remain forward-looking, prioritizing efficiency, progress and environmental protection.

The present and future of our operations focus on sustainable investments and eco-friendly initiatives, aimed at protecting the environment and ensuring efficient resource utilization. By implementing advanced technologies for optimizing transport and developing innovative projects, we are committed to building an infrastructure that is both efficient and environmentally friendly, further strengthening our position as a reliable and trusted service provider.



Our Tangible Steps Towards Sustainability

This report is more than just a formal obligation – **it is a testament to our commitment to creating lasting value for all stakeholders.**

We invite you to explore the document in detail and join us in our collective effort to build a more sustainable future.

Social Policies and Responsible Governance

An essential development area for CONPET S.A. is its corporate social responsibility (CSR) initiatives. A successful and responsible company must demonstrate care and engagement toward the community and its people. We recognize our role and the influence we can exert and we strive to be both an example and a positive force within the community.

In 2024, CONPET S.A. continued its active participation in various projects across rural and urban communities, covering diverse areas such as sports, education, social support, and cultural initiatives. Internally, our CSR efforts focus on employee development, fostering a corporate culture rooted in the company's values and principles, which we also promote within the broader community.

As part of these efforts, 2024 marked the third consecutive year in which CONPET S.A. organized a blood donation campaign, providing employees with the opportunity to contribute to a noble cause, supporting patients in need through an act of empathy and solidarity.

On a social level, the company is committed to promoting an inclusive work environment based on diversity and equity, enabling employees' continuous growth through dedicated training and development programs. At the same time, our community initiatives focus on supporting regional development through projects that foster social and economic resilience.

Furthermore, our corporate governance principles are guided by transparency in decision-making and adherence to the highest ethical standards, reinforcing trust and collaboration with our partners.

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CONPET S.A. transports essential resources, contributing to a sustainable future through responsible governance and international best practices.

1. REPORT FUNDAMENTALS

This Sustainability Report 2024, prepared for **CONPET S.A.**, provides a clear and detailed picture of the company's environmental, social and governance (ESG) performance. The document is produced in compliance with **the Corporate Sustainability Reporting Directive (CSRD)** and the **Order of the Ministry of Finance (OMF) No. 85 of January 12, 2024 for regulating sustainability reporting aspects**, ensuring compliance with the latest national and European legislative requirements in the field of non-financial reporting.

This sustainability report is an individual report of **CONPET S.A.** and includes operations carried out by **CONPET S.A.** in its crude oil, condensate and ethane transport activities for the period January 01 - December 31, 2024. It is aligned with the latest **European Union** regulations on sustainability reporting, complying with the requirements of the **CSRD** and the **European Sustainability Reporting Standards (ESRS)**. Specific details on the activities included in the report will be presented in the following sections.

In 2024, CONPET S.A. did not encounter any specific circumstances that prevented the full application of the ESRS requirements (ESRS 2 (BP-2)). The report was prepared with validated internal information, without intentional omission of data, and where estimates were used (e.g. in the absence of complete value chain data), they were based on documented methodologies.

This report has taken into account multiple relevant regulatory frameworks:

- ✔ **Directive 2022/2464 on Corporate Sustainability Reporting Directive (CSRD)** - imposes strict standards on sustainability reporting transparency for European companies.
- ✔ **ORDER No. 85 of January 12, 2024 for the regulation of sustainability reporting issues** - establishes national requirements for non-financial reporting and harmonization with European requirements. This Order ensures the alignment of the reporting process with the **European Sustainability Reporting Standards (ESRS)** and introduces clear requirements for transparency, comparability and verifiability of ESG information, thus strengthening the integration of sustainability principles into corporate strategies.
- ✔ **The European Sustainability Reporting Standards (ESRS)** - provide the detailed structure for reporting, including specific aspects on climate impact (**ESRS E1**), social aspects and labor relations (**ESRS S**) and corporate governance (**ESRS G**).
- ✔ **Regulation (EU) 2020/852 on establishing a framework to facilitate sustainable investments (EU Taxonomy)** - defines the criteria by which economic activities can be considered environmentally sustainable.
- ✔ **Regulation (EU) 2019/2088 of the European Parliament and of the Council of November 27, 2019 on Sustainability Disclosures in the Financial Services Sector (SFDR)** - imposes specific transparency requirements on the integration of ESG factors into financial decisions.

The following sections detail the scope and methodology of emissions reporting, explain how compliance with the CSRD and ESRS influences CONPET S.A.'s future sustainability strategy, and describe the role of complementary EU regulations on sustainable finance (such as the EU Taxonomy and the SFDR) in guiding our decisions. We also highlight the improvements in the sustainability disclosure process compared to previous years, underlining CONPET S.A.'s commitment to continuously improve transparency and accountability in reporting.



CONPET S.A. uses a rigorous approach for monitoring greenhouse gas (GHG) emissions, covering all three emission areas defined by the GHG Protocol and required by ESRS E1. In accordance with these standards, the company reports the following emission categories:

- *Scope 1 emissions*
- *Scope 2 emissions*
- *Scope 3 emissions*

Scope and methodology of emission reporting (ESRS)

This classification follows the internationally recognized GHG Protocol (Greenhouse Gas Protocol - GHG) methodology, which has been adopted in the ESRS E1 standard to ensure consistency in reporting emissions.

The collection of emissions data by CONPET S.A. is comprehensive:

- **For scopes 1 and 2**, we rely on internal records (e.g. log sheets for our fleet of vehicles and equipment, meter readings and utility bills for electricity and heat consumption at our facilities, technological consumption).
- **For Scope 3**, we aim to work with suppliers and partners to collect relevant data (such as fuel and energy consumption information) and, where direct data are not available, use estimation techniques and industry baselines to approximate emissions from activities such as procurement, waste disposal and end-use.

All greenhouse gas emissions are calculated in CO₂ equivalent (CO₂e) using recognized emission factors. For example, we apply conversion factors set by national authorities or the IPCC for fuels and electricity, ensuring that all significant greenhouse gas (GHG) emissions are accounted for in CO₂e based on their global warming potential.

By aligning our calculations and reporting to ESRS E1 guidelines, CONPET S.A. ensures that our emission figures for areas 1, 2 and 3 are reported with clarity and credibility. ESRS E1 requirements require absolute emissions to be reported for each scope, and we provide this information in the report, together with explanations of the methodologies used.

Compliance with ESRS E1 also means that we report emissions in a similar way to other companies in the EU, as the standard prescribes the definitions and measurement methods set out in the GHG Protocol. This alignment improves the comparability of our data, allowing stakeholders to assess CONPET S.A.'s carbon footprint relative to other companies in the industry and track our progress in reducing emissions over time.

In short, the emissions data in this report reflect a rigorous, standards-aligned process - from data collection to calculation, designed to ensure the accuracy and transparency of our climate impact reporting.

CSRD AND ESRS COMPLIANCE AT CONPET S.A.

The emergence of the CSRD and its detailed ESRS framework has shaped CONPET S.A.'s idea of sustainability and governance approach. Far from being a mere reporting obligation, these regulations serve as a model for mainstreaming sustainability at all levels of corporate decision-making. CSRD is ushering in a "new era of transparency" for European companies by requiring a **dual** assessment of the **materiality** of sustainability issues - i.e. assessing not only how social and environmental issues influence CONPET S.A.'s financial performance, but also how CONPET S.A.'s activities influence society and the environment. This dual perspective drives CONPET S.A. to communicate/collaborate with its stakeholders.

Compliance with CSRD is an important aspect of CONPET S.A.'s governance structure. The ESRS includes specific governance standards (ESRS G1 to G4) that outline expectations on corporate governance issues, emphasizing aspects such as business ethics, internal control, risk management and stakeholder engagement. In response, CONPET S.A. has strengthened Board and Executive oversight of ESG issues. Sustainability performance and risks are regularly monitored at Board level, ensuring that top management takes full responsibility when it comes to meeting the company's ESG objectives and obligations.

In line with ESRS G4 (Stakeholder Engagement), CONPET S.A. is optimizing its processes for interacting with stakeholders and on sustainability issues. By involving stakeholders, CONPET S.A. aims to ensure that their concerns are taken into account and addressed in the company's decision-making process. This not only fulfills regulatory expectations, but strengthens trust and relationships with those who are affected by or have an impact on our business.

Compliance with the CSRD and ESRS also requires CONPET S.A. to expand the scope its risk management to fully integrate ESG risks. In line with ESRS G3 (Internal Control and Risk Management), companies are expected to describe their systems for identifying and managing sustainability risks, including climate change and social risks. In response, CONPET S.A. will update the enterprise risk management framework to include sustainability risks alongside traditional financial and operational risks. CONPET S.A. assesses human capital, as well as social and environmental risks (such as labor practices, health and safety, and/or environmental impact on the community) as part of this integrated approach to risk management. The results will influence strategic planning; for example, the risks identified have prompted us to invest in the modernization of the Pipeline Transporta System (PTS) and energy efficiency. By transparently reporting on these risks and how we are managing them, CONPET S.A. is committed to CSRD and demonstrates to stakeholders that the company is proactively mitigating sustainability threats. Aligning CONPET S.A. to this principle means having ESG monitoring mechanisms in place, implementing actions to continuously improve our resilience to a changing environmental and regulatory landscape.

In short, compliance with CSRD and ESRS acts as a sustainability catalyst for CONPET S.A. to integrate ESG requirements into governance, stakeholder engagement and risk management. These regulations are driving us to formalize and improve our internal processes - from sustainability oversight by the Board of Directors, to stakeholder engagement in decision-making, to the expansion of our risk assessments - thereby strengthening our overall sustainability performance and accountability.

Table 1.1 Data points deriving from other EU legislation (ESRS IRO2.56)

Submission requirement and related data point	Reference in the Benchmarks Regulation [1]	EU Reference from Climate Law [2]
ESRS 2 GOV-1 Gender diversity in governing bodies point 21(d)	Commission Delegated Regulation (EU) 2020/1816[3], Annex II	-

Submission requirement and related data point	Reference in the Benchmarks Regulation [1]	EU Reference from Climate Law [2]
ESRS 2 GOV-1 Percentage of members of the governing bodies who are independent point 21(e)	Delegated Regulation (EU) 2020/1816, Annex II	-
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Regulation (EC) No 1893/2006	-
ESRS E1-1 Transition plan to achieve climate neutrality by 2050, point 14		Regulation (EU) 2021/1119, Article 2(1)
ESRS E1-4 Greenhouse gas emission reduction targets point 34	Delegated Regulation (EU) 2020/1818, Article 6	-
ESRS E1-6 Gross values of 1, 2, 3 and total GHG emissions point 44	Delegated Regulation (EU) 2020/1818, Articles 5(1), 6 and 8(1)	-
ESRS E1-6 Gross GHG emission intensity Rows (53)-(55)	Delegated Regulation (EU) 2020/1818, Article 8(1)	-
ESRS E1-7 GHG removals and carbon credits point 56	-	Regulation (EU) 2021/1119, Article 2(1)
ESRS E1-9 Benchmark portfolio exposure to climate-related physical risks paragraph 66	Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II	-
ESRS E1-9 Exposure of portfolio to the opportunities climate-related point 69	Delegated Regulation (EU) 2020/1818, Annex II	-

Submission requirement and related data point	Reference in the Benchmarks Regulation [1]	EU Reference from Climate Law [2]
ESRS S1-1 Due diligence policies on the issues addressed by the fundamental Conventions 1-8 of the International Labor Organization paragraph (21)	Delegated Regulation (EU) 2020/1816, Annex II	-
ESRS S1-14 Number of fatalities and number and rate of work-related accidents point 88(b) and (c)	Delegated Regulation (EU) 2020/1816, Annex II	-
ESRS S1-16 Gender pay disparity in unadjusted form point 97(a)	Delegated Regulation (EU) 2020/1816, Annex II	-
ESRS S1-17 Non-compliance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines point 104(a)	Delegated Regulation (EU) 2020/1816, Annex II to Delegated Regulation (EU) 2020/1818, Article 12(1)	-
ESRS S3-1 Failure to respect the UN Guiding Principles on Business and Human Rights, ILO principles and/or OECD guidelines point 17	Delegated Regulation (EU) 2020/1816, Annex II to Delegated Regulation (EU) 2020/1818, Article 12(1)	-
ESRS G1-4 Fines for violation of laws against corruption and bribery point 24(a)	Delegated Regulation (EU) 2020/1816, Annex II	-

[1] Regulation (EU) 2016/1011 of the European Parliament and of the Council of June 8, 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (OJ L 171, 29.6.2016, p. 1).

[2] Regulation (EU) 2021/1119 of the European Parliament and of the Council of June 30, 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Act') (OJ L 243, 9.7.2021, p. 1).

[3] Commission Delegated Regulation (EU) 2020/1816 of July 17, 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards the explanation in the

benchmark statement of how environmental, social and governance factors are reflected in each benchmark provided and published (OJ L 406, 3.12.2020, p. 1).

EU TAXONOMY AND SFDR

In the context of new EU sustainability requirements, the EU Taxonomy and the Sustainable Finance Disclosure Regulation (SFDR) are two key frameworks for increasing transparency and aligning capital flows towards sustainable investments. These regulations provide a clear framework for investors and companies, contributing to a greener and more responsible economy.

The EU Taxonomy is a classification system designed by the European Commission to identify economic activities that make a significant contribution to the European Union's environmental objectives. It sets clear technical criteria for six environmental objectives. To be considered aligned with the Taxonomy, economic activities must make a significant contribution to one of these objectives, do no significant harm to other objectives (DNSH - Do No Significant Harm) and comply with minimum social governance requirements.

The SFDR Regulation sets out strict reporting requirements for financial firms and fund managers on the integration of sustainability risks and the impact of investments on ESG (environmental, social, governance) factors. It requires financial products to be categorized according to their level of sustainability:

- Article 6 - Products without specific ESG objectives
- Article 8 - Products promoting ESG features
- Article 9 - Products with a focus on sustainable investments

The SFDR obliges investors to publish clear and comparable information on how ESG risks are managed and to what extent their funds contribute to sustainability objectives.

CONTINUOUS IMPROVEMENT OF REPORTING PRACTICES AND TRANSPARENCY

CONPET S.A. is committed to improving our reporting on ESG issues, continuously increasing the accuracy and transparency of our information. Each annual report builds on the previous one, incorporating new guidelines and stakeholder feedback to enhance the clarity and detail of the information provided. In the past, under the former EU Non-Financial Reporting Directive (NFRD), our sustainability disclosures covered key aspects of our ESG performance in a more simplistic manner. Now, under the CSRD, we have significantly expanded and refined our reporting practices.

Overall, the *Reporting Basics* section outlines how CONPET S.A. approaches sustainability reporting with diligence and integrity. By detailing our methodologies, aligning with EU regulations (CSRD, ESRS, EU Taxonomy, SFDR) and continuously improving our practices, we strive to clearly present our sustainability performance and how we manage ESG impacts and risks. This approach ensures that readers of the report - be they investors, regulators, partners or members of the public - can confidently understand and assess CONPET S.A.'s sustainability efforts in 2024 and the progress we are making towards our long-term ESG goals.

CONPET S.A. STRATEGIC OPERATOR

of the National Crude Oil
Transport System,
ensuring the efficient
delivery of Romania's
energy resources.

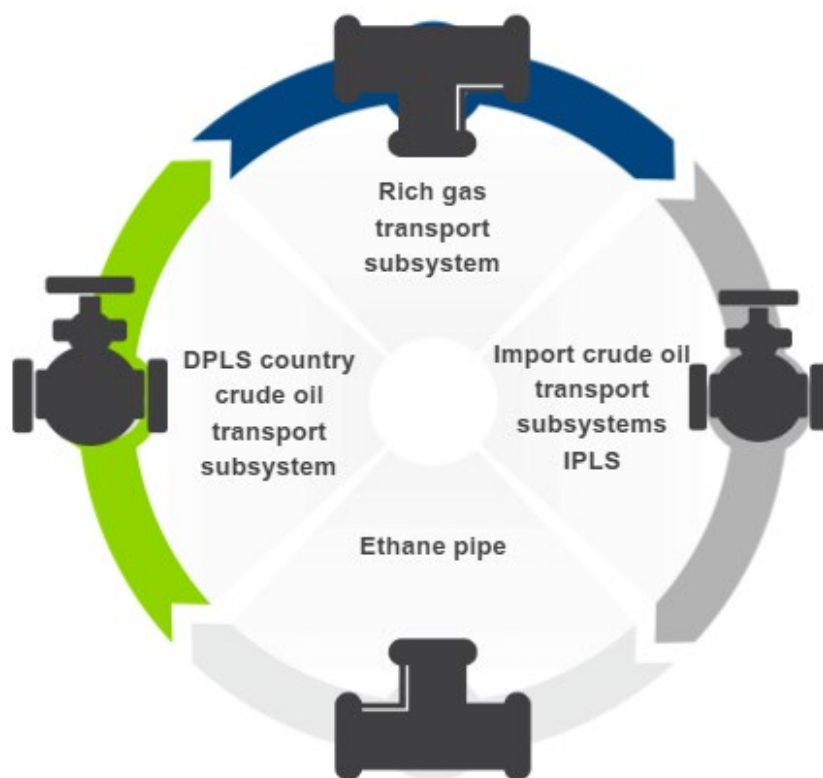


2. COMPANY OVERVIEW

2.1 Business model and market position

CONPET S.A. is the operator of the "National Transport System for Crude Oil, Rich gas, Condensate and Ethane" (SNT), whose activity is the transport through pipelines, in order to supply the refineries in Romania.

Oil transport through the National Transport System is a service of national interest and strategic importance. The National Crude Oil Transport System is the set of interconnected trunk pipelines that collect the oil extracted from the exploitation perimeters, or imported, and route it from the delivery points of the producers/importers to the processing units, through the pumping stations, loading and unloading ramps on the railways, as well as all the installations, equipment and facilities related to them. According to the concession agreement, the company must ensure **open and non-discriminatory access** to its pipelines for all eligible customers on equal terms. This guarantees that any authorized producer or importer of crude oil can use CONPET S.A.'s infrastructure, and transport tariffs are regulated by the National Regulatory Authority for Mining, Petroleum and Geological Storage of Carbon Dioxide (ANRMPSG).



Graph 2.1. Composition of the National Pipeline, Rich gas and Ethane Transport System

The National Pipeline, Rich gas and Ethane Transport System currently has an operational capacity of approximately 18.75 million tons. In regions where there are no main pipelines, CONPET S.A. also manages the rail transport infrastructure, including loading ramps, as well as a fleet of tank wagons and locomotives, thus ensuring efficient and safe delivery of products.

This integrated pipeline and railroad model provides CONPET S.A. with flexibility in its operations and the ability to serve remote locations, strengthening its role in Romania's crude oil supply chain. The National Crude Oil Transport System is a vast network of pipelines, both trunk and local, with a total installed length of approximately 3,800 km, of which 3,200 km are available. The company currently has an operational pipeline network of approx. 2,200 km, which is why the total nominal transport capacity of about 27.5 million tons per year is operationally reduced to about 18.75 million tons per year. This is caused by the closure over time of some production and processing units of crude oil, rich gas, ethane in Romania, which led to the inactivation of some pipelines and related pumping stations.

Table 2.1. Distribution of transport infrastructure by subsystem

Subsystems	Network length	Total transport capacity	Storage capacity
Domestic crude oil	1.540 km of pipeline	6,9 million tons per year	120.000 cubic meters
Imported crude oil	1.348 km of pipeline	20,2 million tons per year	79.500 mc
Rich gas/liquid ethane	921 km pipelines	0,33 million tons per year	250 mc
CF crude oil/ rich gas	13 loading ramps	2 unloading ramps	13 locomotives and 55 wagons

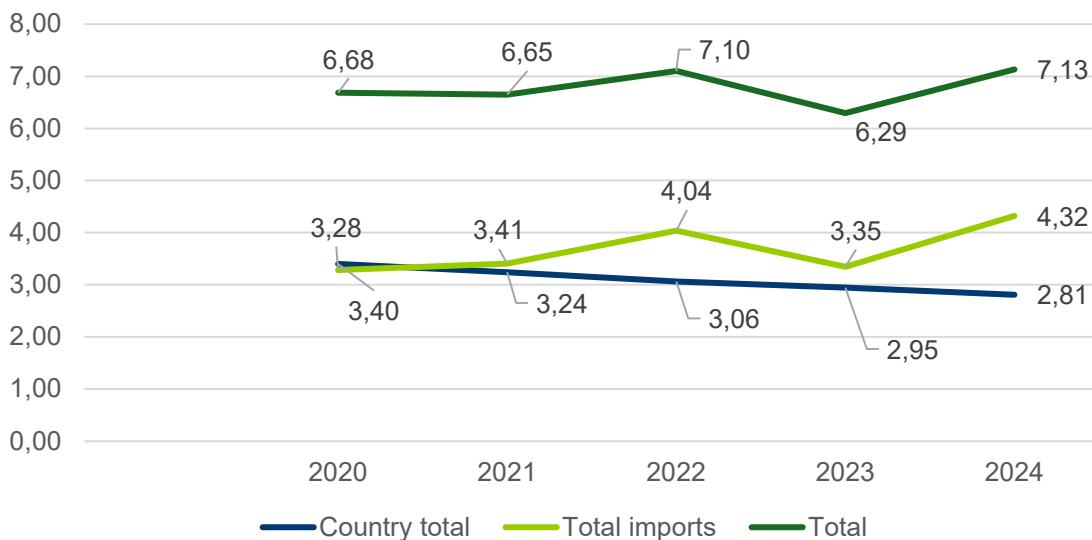
The infrastructure and transport capacity of Conpet S.A. serves its main customers, OMV Petrom and Petrotel Lukoil, key players in the refining and distribution of petroleum products.

Table 2.2. Market position and operational capacity

Metric	Value
Length of operational pipelines	approx. 2.200 km active pipelines
Annual operational transport capacity	18,75 million tons/year
Main customers	OMV Petrom, Petrotel Lukoil
Surveillance regulations	National Regulatory Authority for Mining, Petroleum and Geological Storage of Carbon Dioxide (ANRMPSG)

The evolution of the quantities transported by CONPET S.A. between 2020 and 2024 recorded a gradual decrease in the transport of domestic crude oil, reaching 2,81 million tons in 2024, while the volume of imported crude oil recorded a steady increase, reaching 4,32 million tons in the same year, which contributes to maintaining a stable total of transported quantities, with a peak of 7,13 million tons in 2024.

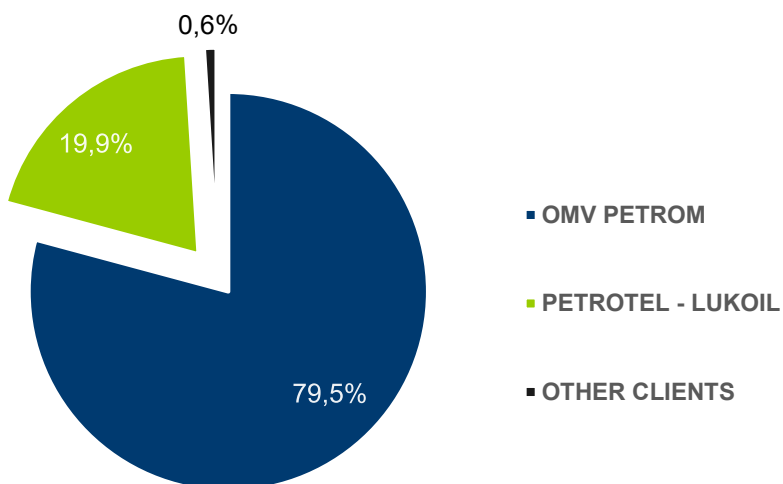
**Evolution of quantities transported during the period
2020 - 2024: Import vs. Domestic (mil. tons)**



Graph 2.2. Evolution of quantities transported from 2020 to 2024

The distribution of CONPET S.A.'s customers according to their share in sales in 2024 shows the dominant position of OMV Petrom (79.5%), the main crude oil producer in Romania, followed by Petrotel Lukoil (19.9%) and other customers (0.6%).

Share of customers in turnover (2024)



Graph 2.3. Share of customers in turnover

Market share and customer base: Due to its unique position, CONPET S.A. manages almost all the crude oil transported through pipelines in Romania, making it an indispensable partner for the oil industry. The company's **main customers** are **OMV Petrom**, the largest and only upstream oil producer in Romania, and **Petrotel Lukoil**. These long-term partnerships underline the strategic importance of CONPET S.A..

BREAKDOWN OF INCOME AND ASSETS BY SIGNIFICANT SECTORS (ACCORDING TO ESRS 2 SBM-1, 40B)

In accordance with the requirements of ESRS 2 - Strategy and Business Model (SBM-1, par. 40b), companies are required to disclose a breakdown of the revenue and equity components, as included in its financial statements, by material ESRS segments in the context of sustainability to enable stakeholders to better understand the structure of the business model, the contributions of each operating segment to economic performance, and exposure to ESG risks and opportunities.

CONPET S.A. is active in the fossil fuels (oil and gas) sector, earning revenues from their transport, and 99.59% of revenues from customer contracts (turnover) are associated with crude oil transport activities. Thus, in accordance with IFRS 8 Operating Segments, the company has only one reportable segment, i.e. the provision of crude oil pipeline transport services. This is disclosed in the annual financial statements, Note 3 "Accounting policies" point (t) Reporting by business segments.

Table 2.3. Total revenue (2024), broken down by accounting category (financial statements - statement of financial position at 31 DECEMBER 2024)

Category	Value (thousand RON)	Percentage (%)
Revenue from turnover (Revenue from contracts with customers - IFRS 15)	533.618	87,10%
Other operating income	72.663	11,86%
Total operating income	606.282	98,96 %
Financial income	6.384	1,04%
Total revenue	612.666	100,00%

By offering a mutually beneficial and secure transport solution, CONPET S.A. enables its customers to ensure a constant supply of raw materials. Alternative modes of transport are more expensive and less efficient compared to pipeline transport.

MAIN INTANGIBLE RESOURCES (INTANGIBLE ASSETS)

The main intangible resources of CONPET S.A., which contribute directly to the company's operational success and competitiveness, are:

- Intellectual capital and employee expertise:** The company has a solid base of technical knowledge and accumulated experience in the transport of crude oil through pipelines. This expertise covers the operation and maintenance of complex transport systems, the application of advanced technologies to optimize operational efficiency and the implementation of effective risk management mechanisms.
- Technical and procedural know-how:** CONPET S.A. applies an integrated management system that ensures high standards of quality, environmental protection, operational safety and energy efficiency. These principles are regularly validated by independent external audits and contribute to maintaining operational performance and compliance.

The company's certification basis within the integrated management system is optimal and ensures the implementation of best practices in the relevant areas, facilitating adaptation to industry-specific legislative and operational requirements.

Competitive advantages: CONPET S.A.'s business model confers several competitive advantages. First, it operates within a **stable regulatory framework** that guarantees predictable revenues - transport tariffs are set and approved by the National Regulatory Authority for Mining, Petroleum and Geological Storage of Carbon Dioxide (ANRMPSG). This regulated tariff system, in accordance with the **Petroleum Law (Law 238/2004)** and the company's concession agreement (Government Decision No. 793/2002), provides a clear legal basis for CONPET S.A.'s operations and rights. Secondly, the company benefits from **economies of scale and network effects** as the sole pipeline operator: its nationwide infrastructure and centralized dispatching allow efficient transport of large volumes, giving it a cost advantage over any potential fragmented competitor. Third, CONPET S.A.'s **extensive experience** - over a century in pipeline transport - has built a reputation for reliability and operational excellence. CONPET S.A. is today recognized as a **strategic company for the national economy** and a major player on the Romanian capital market. This legacy translates into valuable technical know-how, a solid safety culture and strong stakeholder confidence. Finally, the company's strategic importance (with the Romanian state as majority shareholder) means that it operates under close supervision, aligning its goals with national energy security objectives. In short, CONPET S.A. holds a **unique market position**, characterized by an exclusive asset base, captive demand from the Romanian oil industry and a favorable regulatory environment governing the transport of crude oil.

Table 2.4. Economic efficiency and operational costs transport methods

Metric	Pipeline transport (CONPET S.A.)	Transport road	Rail transport	Maritime transport
Cost per tonne-km	Lowest cost thanks to continuous flow and low energy consumption	High cost due to high fuel consumption	Intermediate but high cost for short distances	Low cost over long distances but requires port infrastructure
Transport capacity	High volume, continuous, uninterrupted	Limited by truck capacity	Depends on the availability of tank wagons	High capacity but port-dependent

Metric	Pipeline transport (CONPET S.A.)	Transport road	Rail transport	Maritime transport
Impact on infrastructure	Does not require frequent road or rail maintenance	Affects roads and requires constant maintenance	Requires maintenance of rail lines and terminals	Requires large investments in ports and terminals

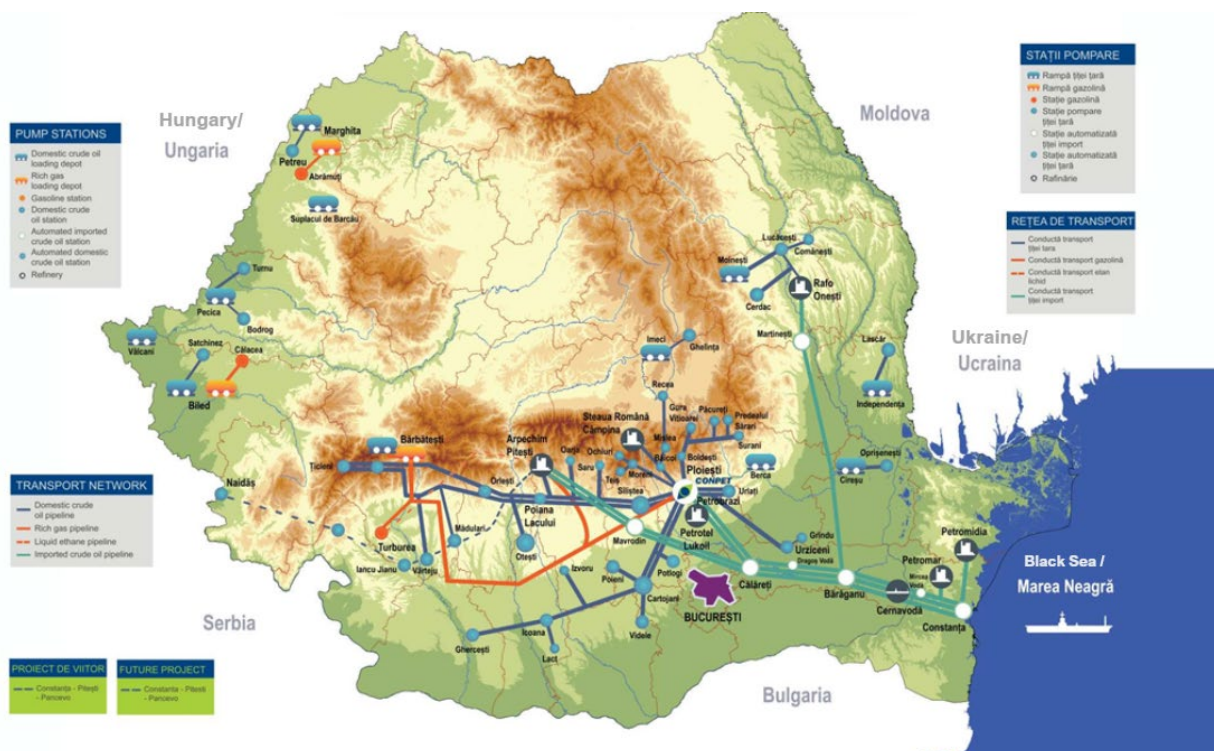
Table 2.5. Operational safety and accidental pollution risk in transport

Indicator	Pipeline transport (CONPET S.A.)	Road transport	Rail transport	Maritime transport
Risk of accidents	Lowest without interaction with road traffic	High - risk of accidents	Environment - risks of derailments and accidents	Raised in case of maritime collisions
Spills and pollution	Minimized thanks to continuous monitoring and control systems	High - risk of spills in case of accident	Environment - risks of soil and water pollution	Picked up in accidents at sea

NATIONAL TRANSPORT SYSTEM OPERATED BY CONPET S.A.

The complete infrastructure of the National Transport System (NTS) operated by CONPET S.A. covers the main production and refining regions in Romania, including all pumping stations, depots and rail ramps that could transport more than 27 million tons of crude oil annually. The dense pipeline structure in the key areas - Constanța (maritime terminal), Prahova Valley (main refining area) and the West of the country (domestic production area) emphasizes the strategic role of CONPET S.A. in ensuring Romania's energy security.

The map below shows the pipeline networks for domestic crude oil (blue), imported crude oil (green), rich gas (orange) and liquid ethane (orange).



2.2 Company profile

CONPET S.A. is a public enterprise and falls within the regulatory scope of G.E.O. no. 109/2011 on the corporate governance of public enterprises (with subsequent amendments and additions), as well as the specific legislation on the capital market.

At the reference date (31.12.2024) the total number of issued shares of CONPET S.A. is 8,657,528, held by 16,251 shareholders. Each share is subscribed and paid at par value 3.3 RON, conferring to the holder the right to one vote in the General Meeting of Shareholders, the right to elect and be elected in the management bodies, the right to participate in the distribution of dividends in accordance with the provisions of the Articles of Incorporation and legal provisions, as well as other rights provided for therein. The shareholder structure, corresponding to the consolidated summary shareholder structure on the same reference date, is as follows:

➤ Romanian State through the Ministry of Energy (1 shareholder)

Number of shares:	5.083.372
Contribution to the share capital (RON)	16.775.127,60
Share in profit and loss (%)	58,7162

➤ **Legal entities (100 shareholders)**

Number of shares:	2.083.424
Contribution to the share capital (RON)	6.875.299,20
Share in profit and loss (%)	24,0649

➤ **Individuals (16,150 shareholders)**

Number of shares:	1.490.732
Contribution to the share capital (RON)	4.919.415,60
Share in profit and loss (%)	17,2189

Shareholders exercise their rights in the General Meeting of Shareholders (G.M.S.), which is the highest decision-making body of the company. The powers of approval of the General Meeting of Shareholders, the conditions for the organization and validity of such meetings are laid down in the Company's Articles of Association, in accordance with the applicable regulations, and are supplemented by the relevant legal provisions. The Company's Articles of Incorporation, the Regulations on the Organization and Conduct of the G.M.S. and Information on Shareholders' Rights are available on the Company's website.

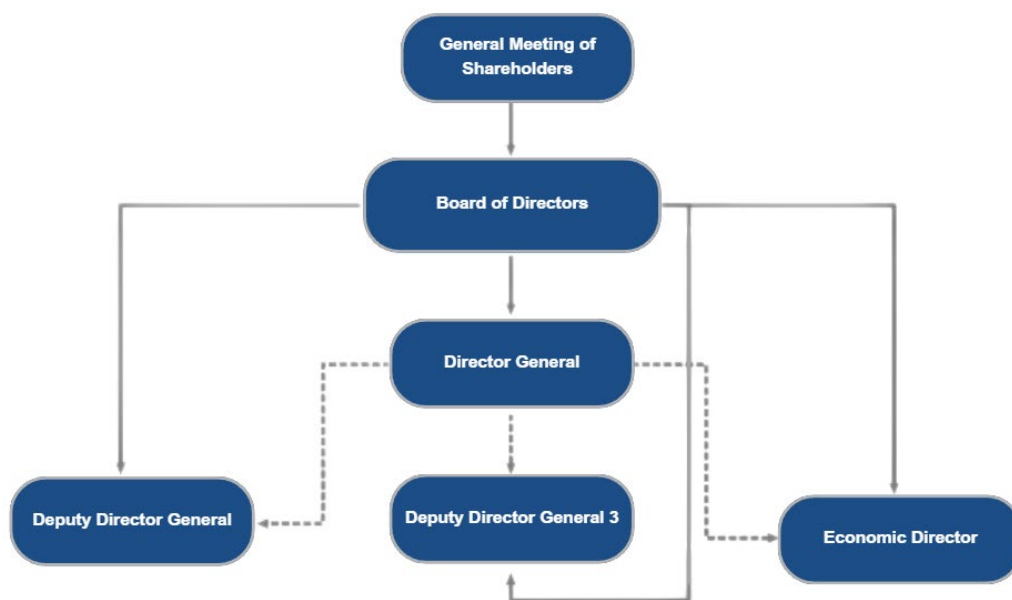
COMPANY MANAGEMENT

➤ **General Meeting of Shareholders**

The General Meeting of Shareholders is the governing body of the company, which decides on the company's activities and policies in accordance with the legal provisions in force.

➤ **Board of Directors**

CONPET S.A. is managed in a unitary system, by a Board of Directors, composed of 7 directors (all non-executive members), appointed by the Ordinary General Meeting of Shareholders for a period of 4 years, starting from 22.08.2023, following the conduct and completion of the recruitment and selection process of directors at the level of the Public Authority of the Ministry of Energy. The Board of Directors is headed by a Chairman, elected by the Board of Directors from among its members. The decision on his appointment or removal shall be taken by a majority vote of the members of the Board of Directors. The Chairman of the Board of Directors of the company may not also be its General Director.



Management structure of CONPET S.A.

➤ Executive Management

The executive management of the company is ensured by a team of 4 directors with a mandate contract (General Director, Deputy Director Generals and Economic Director), appointed by the Board of Directors, with a 4-year mandate (period 2023 - 2027), following the completion and finalization of the recruitment and selection procedures for directors in accordance with the provisions of the G.E.O. no. 109/2011 on the corporate governance of public enterprises.

2.3 Sustainability commitment

CONPET S.A. aligns itself with both European and national strategies in terms of sustainability and makes every effort to have a positive year-on-year evolution in terms of energy efficiency and carbon footprint reduction.

The main sustainability initiatives and objectives of CONPET S.A. are:

🌱 Environmental Management

Protecting the environment is a priority for CONPET S.A. in view of the potential environmental risks associated with the transport of crude oil, rich gas and condensate. The company has implemented an ISO 14001 certified environmental management system, which ensures the identification and continuous control of environmental aspects and associated impacts in all operations. CONPET S.A. is fully committed to complying with environmental legislation - it operates in strict compliance with all applicable laws and permits relating to air emissions, water and soil quality and waste management. In practice, this means monitoring pollutant emissions from its facilities (e.g. pumping stations, storage tanks) and keeping them within regulated limits, as well as treating waste properly and preventing any unauthorized discharges.

Beyond compliance, CONPET S.A. emphasizes pollution prevention and continuous improvement of environmental performance. The company proactively invests in technologies and processes that reduce the risk of spills and environmental incidents. For example, advanced spill detection systems and upgrades to the cathodic protection system of its pipeline network minimize the risk of leaks and corrosion. It also conducts regular maintenance and pipeline integrity inspection programs so that potential problems are identified and resolved before they affect the environment.

A significant part of our environmental protection strategy focuses on **reducing greenhouse gas emissions and energy consumption** in transport operations. Although pipeline transport generates fewer carbon emissions than other modes of transport, CONPET S.A. still consumes electricity (e.g. to power pumping stations) and fuels (for maintenance vehicles and back-up generators), which contribute to its carbon footprint. The company has adopted an **energy efficiency policy** that includes improving energy performance and complying with energy efficiency regulations. CONPET S.A. maintains an ISO 50001 certified **energy management system**, demonstrating its dedication to systematic energy savings. Through this system the company closely monitors energy consumption, sets targets to reduce avoidable losses and invests in efficiency measures. The company's objectives include keeping the consumption of electricity and fuel in the transport process within the set quotas and technological consumption within the limits set for the transport process. In line with these objectives, CONPET S.A. is actively replacing old equipment with energy-efficient alternatives and optimizing processes to reduce energy consumption. Although the company has not yet publicly announced specific greenhouse gas reduction targets, it strives to achieve year-on-year improvements in energy intensity and carbon footprint. This approach is evidenced by the fact that in recent years key performance indicators related to technological consumption in transport operations and energy consumption have been met, indicating progress in efficiency efforts.

Table 2.6. Environmental performance initiatives

Initiative	Impact
Implement and maintain Environmental Management System (ISO 14001)	Ensure compliance with environmental regulations and environmental issues are kept under control
Implement and maintain Energy Management System (ISO 50001)	Ensures regulatory compliance and Improves energy efficiency
Modernization of the NTS	Reduces risks of accidental product loss and soil/water pollution
Investing in renewable energy	Offsets electricity consumption from conventional sources
Leak detection system	Prevents environmental incidents

Renewable energy projects

CONPET S.A. has installed a **photovoltaic panel** system at the **secondary office (administrative office 2)**. By the end of 2022, the first phases of this project (design and procurement) were completed and the actual installation of the solar panels on the office building took place in 2023. This system covers approximately 27% of the site's electricity consumption, directly reducing grid consumption and associated emissions. Through these investments in renewable energy, CONPET S.A. not only reduces its carbon footprint, but also protects itself against volatile energy prices by generating some of its electricity in-house. The company has evaluated the results obtained as a result of the implementation of this project and has extended the use of solar energy to other locations (Constanța Sud and Călăreți), projects implemented in 2024, which will be operational in the first part of 2025.

ESG and innovation-oriented investments

In addition to renewable sources of energy, CONPET S.A. has channeled capital expenditures into projects that support social and environmental outcomes. A prime example is the **modernization of critical pipeline infrastructure** to enhance safety and environmental protection. In 2023, CONPET S.A. completed a critically important project: **the replacement of pipeline segments under the Danube River and the Borcea Arm**. These new underground pipelines were built using modern materials and methods, reducing the risk of leaks in environmentally sensitive areas. The investment significantly improves the protection of water and soil resources as it ensures the continued safe operation of crude oil transport across the Danube, thus **avoiding potential environmental damage** from obsolete pipelines.

Similarly, CONPET S.A. is undertaking a multi-year program of **upgrading storage tanks and pumping systems** - including a large crude oil storage tank recently commissioned at the Călăreți station - incorporating improved safety features and emission controls. These infrastructure upgrades not only reduce environmental risks and emissions (e.g. by minimizing steam losses and preventing accidental spills), but also improve operational efficiency. On the technological side, CONPET S.A. is investing in **digital monitoring and control systems (SCADA)** to optimize pipeline flow and quickly detect any anomalies, which improves both energy efficiency and incident prevention. The company's development strategy explicitly mentions the implementation of a leak detection system and the modernization of the control and data acquisition system as key strategic elements, emphasizing the integration of sustainability with operational excellence.

In addition to environmental investments, ESG components extend to its **and community**. The company also focuses on social issues such as employee well-being, community involvement and ethical governance. Internally, CONPET S.A. promotes **a safe and inclusive workplace**. The company has an ISO 45001 certified occupational health and safety management system and **has a target of "zero accidents"** each year. Health and safety and security (H&S) training and instruction has led to accident prevention, which has been achieved in recent years. In addition, the company invests in the **development of its human capital**: employees benefit from continuous training programs to improve their skills and career development. CONPET S.A. also prioritizes the well-being of its employees, offering health maintenance programs, ensuring fair remuneration and promoting work-life balance. These efforts contribute to maintaining a motivated workforce and low staff turnover.

CONPET S.A.'s human capital strategy emphasizes **continuity, diversity and professional development**, integrating **proactive retention measures** and **improving working conditions**. By **investing in training, promoting gender equity** and **active social dialog**, the company ensures **long-term stability** and **adaptation to the demands of a changing industry**.

SOCIAL RESPONSIBILITY (CSR) AND COMMUNITY INVOLVEMENT

CONPET S.A. has a strong tradition of supporting the communities in which it operates. The company's CSR approach is based on **transparency, stakeholder engagement and respect for the community and the environment**. Through sponsorships and partnerships, CONPET S.A. contributes to various social causes, considering this an integral part of its sustainable development mission. In recent years, the company has **sponsored numerous cultural, educational and health initiatives**. For example, CONPET S.A. has supported prestigious cultural events such as the "Paul Constantinescu" National Music Competition and the "Toma Caragiu" National Theatre Festival, recognizing the importance of cultural heritage. It has also funded national health campaigns (improving public health awareness and services) and supported educational programs, including school competitions and academic olympiads for students. Sport is another area of involvement - the company has sponsored clubs and sports events, promoting healthy lifestyles and youth involvement in its community. The company carefully selects projects that meet the needs of the community and monitors the results, ensuring full transparency of expenditure by publishing an Annual Sponsorship Report on the company website. It emphasizes the effectiveness of sponsorship spending so that financial support generates tangible social benefits and provides real support to citizens. By maintaining an active dialogue with non-profit organizations and local authorities, CONPET S.A. directs its CSR efforts where they are most needed

CONPET S.A. has implemented a **ISO 9001 certified quality management system**, which brings significant benefits in terms of **transparency, process effectiveness and continuous improvement**. This standard supports ESG governance through documented policies and processes, providing a clear framework for the effective management of operational activities. ISO 9001 also contributes to the identification and management of risks, ensuring the implementation of measures to control and improve organizational performance. In addition, ISO 9001 supports the ESRG G1 requirements on control mechanisms, governance structures and business ethics through clear documentation of processes and the implementation of an effective monitoring system.

In addition to this standard, CONPET S.A. has also implemented the requirements **ISO 37001 for anti-bribery management system**, reinforcing its commitment to **transparency, integrity and ethical compliance**. This system provides a **rigorous framework to prevent, detect and combat bribery** through strict internal control mechanisms and compliance measures.

In the context of **ESG Governance**, the ISO 37001 certification ensures the company's credibility in the eyes of its stakeholders, contributing to an organizational climate based on ethics and responsibility. The application of these standards demonstrates CONPET S.A.'s firm commitment to operational excellence and corporate governance, strengthening the trust of investors and business partners.

The company follows **corporate governance** best practices with a structured approach **risk management and ESG compliance**. It also has a well-defined governance framework that balances state ownership interests, capital market requirements and professional management.

CONPET S.A. will publish an annual sustainability report, in compliance with Romanian law and EU regulations, providing a transparent picture of its environmental, social and governance (ESG) impacts. The 2022 sustainability report highlighted the integrated policy on quality, safety, energy efficiency and key projects for pipeline security and community support. The company demonstrates its commitment by responsibly managing environmental impacts, investing in renewable energy, protecting employee health, and implementing sound corporate governance practices, thereby strengthening stakeholder trust.

Through dual materiality analysis

CONPET S.A. turns sustainability challenges into strategic opportunities for the future.



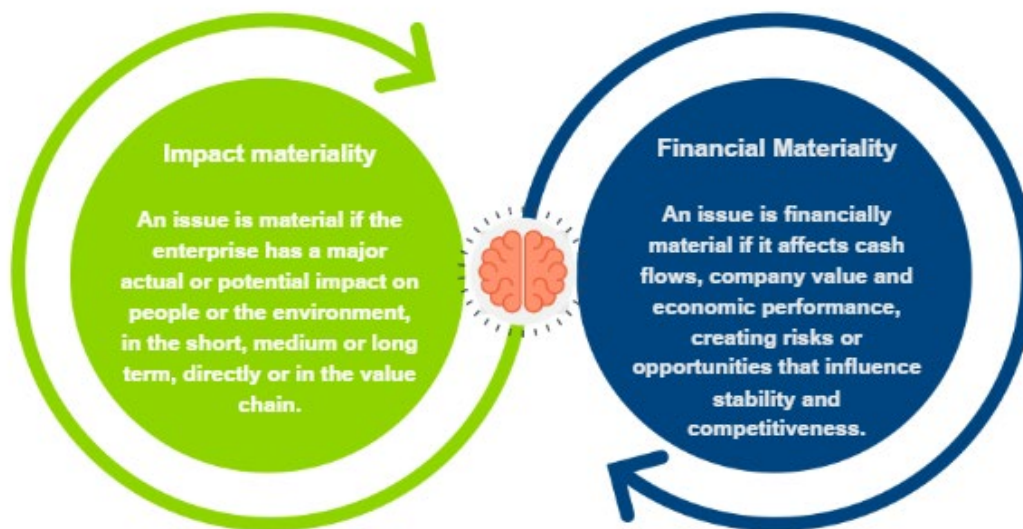
3. DUAL MATERIALITY ANALYSIS

3.1 Legal framework and applied standards (CSRD, ESRS)

The dual materiality analysis methodology applied by CONPET S.A. has been developed in accordance with the requirements of the **European CSRD and ESRS Directives**, with the aim of identifying and prioritizing sustainability impacts, risks and opportunities for the company and its stakeholders. It is based on a modular approach, assessing both **the impacts on the environment and society (impact materiality)** and **the financial implications on the company (financial materiality)**, according to the requirements of ESRS 2 and ESRS 1. The full dual materiality analysis is available to interested parties on request.

The **Corporate Sustainability Reporting Directive (CSRD)** expands the reporting requirements on **ESG (environmental, social and governance) impacts and risks**, with the main objective of providing consistent and comparable data for investors, consumers and other stakeholders, thus contributing to the achievement of the EU's climate and environmental objectives.

FIGURE 3.1 - Dual materiality diagram



GENERAL DESCRIPTION OF THE METHODOLOGY USED

The approach used by CONPET S.A. complies with the Delegated Regulation (EU) 2023/2772, which allows flexibility in the identification of material factors, using impact studies, secondary sources and scientific data, thus ensuring rigorous and transparent reporting.

The methodology is carried out in **four major steps**, which allow collecting, analyzing and validating relevant data for determining significant ESG topics, therefore the materiality assessment process at **CONPET S.A.** was structured in four main steps:

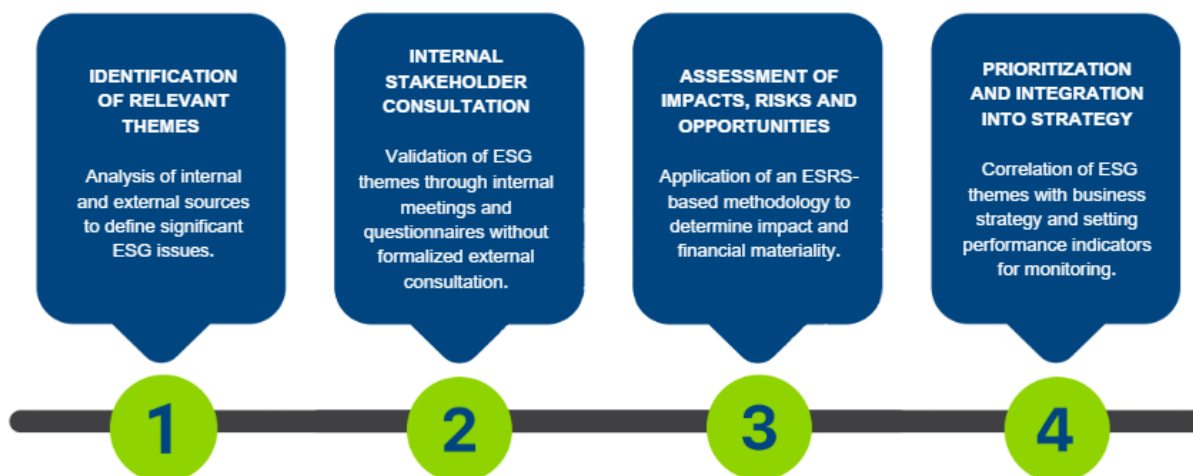


FIGURE 4.2 - Dual materiality diagram

The steps of the dual materiality analysis process are detailed below:

a. Identifying relevant topics for the company and its stakeholders

At this stage, CONPET S.A. analyzed sources, including:

- ✔ International Standards and Regulations (ESRS).
- ✔ Review internal documents (policies, previous sustainability reports, ESG impact and risk assessments).
- ✔ Scientific research and industry reports relevant to energy.

This assessment did not make use of **performance benchmarking with other companies in the fuel transport sector**, as the methodology applied was based on scientific studies, sector analysis and regulations, which provide an objective and comparable framework. Nor was the assessment of feedback from regulators and applicable regulations in the field of crude oil transport used. This has been done because according to IG Materiality 1 (Implementation Guide for Materiality Assessment), materiality analysis can be carried out without formal consultation with external stakeholders as long as credible and valid sources are used, and Delegated Regulation (EU) 2023/2772 confirms that companies can use existing data and secondary sources for materiality assessment without requiring direct involvement of external stakeholders. Thus, the analysis of investor and stakeholder requirements through benchmarking studies (comparative analysis) and the assessment of feedback from regulators and applicable fuel transport regulations were not included in the process, as ESRS 2 - SBM-3, paragraph 45 clarifies that the analysis can be based on alternative sources such as industry reports, scientific studies or internal data, ensuring compliance with ESRS.

b. Stakeholder consultation and validation of material themes

The stakeholder consultation was **mainly** conducted **internally**, with the aim of validating the identified ESG themes and ensuring their alignment with the company's vision.

Methods used for consultation:

- ✔ Working meetings with internal entities (HSE, Human Resources, Transport Operations, Management).
- ✔ Questionnaires and semi-structured interviews with employees of different internal entities.

In line with the methodology applied, no formalized external consultation was carried out in this reporting cycle. Analysis of investor and financial stakeholder requirements through benchmarking studies and assessment of feedback from regulators were not included in this process.

c. Assessing impacts, risks and opportunities

After identifying and validating the ESG themes, each material topic was assessed from a dual materiality perspective:

- Impact on environment and society (materiality of impact).
- Financial impact on the company (financial materiality).

The impact assessment methodology has been developed based on the ESRS 2 SBM 3 framework, applying the following criteria:

- Scoring by impact size: each ESG theme was assessed according to the size, duration, reversibility and severity of impact.
- Assessment of risks and opportunities: risks identified include regulatory costs, reputational risks and direct financial impact, while opportunities are related to operational efficiency and attracting green finance.
- Determination of financial significance: for each ESG theme, CONPET S.A. used a quantification system based on financial materiality thresholds established by analyzing the impact on operating income and expenses.
- The assessment led to a final list of material themes, presented in the List of Material Themes, which ranks each ESG theme according to its importance for stakeholders and the company.

d. Prioritizing and integrating material themes into the strategy

The final step in the process was to integrate the findings of the materiality analysis into the company's ESG reporting framework. This is accomplished by:

- Set specific ESG objectives and targets for each material theme.
- Link ESG themes to the company's business strategy and current risks/operations.
- Identify ESG performance indicators (KPIs) to monitor progress towards the objectives.

As a result of this process, CONPET S.A. defines a clear ESG reporting framework, ensuring the correlation with the ESRS and other relevant international standards that will result in a sustainable development strategy.

RESULTS OF THE METHODOLOGY

As a result of applying the dual materiality methodology, CONPET S.A. has identified material themes grouped into the following categories:

TABLE 3.1 Material themes according to ESRS

Categories	Material themes
Medium (ESRS E1-E5)	Climate change, Pollution, Water resources management, Biodiversity, Circular economy
Social (ESRS S1-S4)	Working conditions, Social dialogue, Protection of human rights, Impact on local communities, Customer data privacy
Governance (ESRS G1)	Corporate culture, Anti-corruption and bribery, Whistleblower protection, Supplier relationship management

These themes were assessed and ranked based on the criteria of **impact and financial materiality**, resulting in a clear prioritization of ESG priorities for the company.

Improvement actions taken in the cacul for the next time horizon:

- 
Extend stakeholder consultation process - Although the report mentions the involvement of internal stakeholders, **a broader external consultation process** (e.g. supplier surveys, meetings with local communities) would increase the credibility of the methodology and align CONPET S.A. with ESRS best practice standards.
- 
Assessment of financial scenarios for ESG themes - Quantitative modeling of the financial impact of ESG risks (e.g. impact of climate regulation on operational costs) would allow for **more efficient allocation of resources** and **better strategic integration of sustainability**.
- 
Continuous monitoring and regular updating of materiality - It is recommended that the materiality assessment be **reviewed annually** to take into account regulatory changes and global ESG developments.

3.2 Assessment of dual materiality

A comprehensive dual materiality assessment was conducted to identify the main ESG risks and opportunities affecting CONPET S.A. and its stakeholders.

TABLE 3.2 Main material aspects of climate change

Material aspect	Impact on environment and society	Impact on the company (financial impact)
Greenhouse gas emissions (GHG emissions and climate change mitigation)	- CONPET S.A.'s direct and indirect emissions contribute to global warming, having a negative effect on climate and ecosystems. - Air pollution from CO₂ and other GHGs affects the quality of the environment in the long term, intensifying extreme weather events that can harm communities.	- Increased costs of compliance with climate regulations (e.g. carbon taxes, emission limits). - Pressure from investors and authorities to reduce carbon footprint, with potential consequences for market value and access to finance. - The need to invest in green technologies (renewable energy, energy efficiency) to avoid penalties and maintain competitiveness.

Material aspect	Impact on environment and society	Impact on the company (financial impact)
Physical climate risks (effects of extreme weather events)	- Climate change is increasing the frequency and intensity of extreme weather events (floods, droughts, heat waves) that can affect the environment and local communities. - Extreme events can cause environmental accidents: for example, severe flooding can erode soil and cause oil spills, polluting the water and surrounding land. - Communities in the areas of operation are exposed to hazards (e.g. pollution, fires) if the infrastructure does not withstand the changed climatic conditions.	- Infrastructure damage: extreme weather events threaten pipelines and pumping stations, potentially causing operational disruptions and high repair costs. - Significant financial losses can result from natural disasters (in Romania, climate damage already amounts to billions of euros and is growing). - Higher insurance costs and the need for emergency provisions. <i>Note:</i> A major incident (e.g. a pipeline burst due to a landslide) would generate environmental and financial costs that may exceed the internal financial materiality threshold established (as set out in Annex I).
Energy transition and climate regulation (transition risk and opportunity)	- Climate benefits: The transition to low-emission energy (e.g. renewables) contributes to global climate goals by reducing air pollution and public health impacts. - Society as a whole benefits from climate change mitigation: a more stable climate, fewer natural disasters, improved long-term quality of life. - Local social impact: In areas where CONPET S.A. operates, adapting to the energy transition (e.g. cleaner technologies) can bring green jobs and sustainable development; conversely, an unexpected transition without preparation can affect employees and communities dependent on traditional activities.	- Market risk: Declining demand for fossil fuels in the long term (as the economy decarbonizes) may reduce the volumes of crude oil transported by CONPET S.A., affecting revenues. - Regulatory risk: European climate policies (Green Deal, Fit for 55) require emissions to be reduced by 55% by 2030 and climate neutral by 2050. For CONPET S.A., this means stricter environmental standards and possible additional capital costs for plant modernization. - Opportunities: Adapting the business model can open new directions - for example, using existing infrastructure to transport biofuels. Early investments in green energy can also provide a competitive advantage (lower long-term operational costs, access to green finance and funds for sustainable projects).

Material aspect	Impact on environment and society	Impact on the company (financial impact)
Pollution	- Pipeline failures and exceedances of hydrocarbon indicators resulting from CONPET S.A.'s activity can have an impact on the environment and society if not kept within normal limits. - These forms of pollution can have long-term ecological effects, requiring decontamination and soil remediation works. - The responsible management of hazardous waste by CONPET S.A. contributes to reducing risks to public health and protecting the surrounding communities.	- Possible environmental penalties or fines, especially for exceeding contamination limits or late reporting. - Damage to company reputation if incidents are publicized. - Costs with monitoring, assessment and intervention (e.g. excavation works, neutralization, relocation of contaminated soil).

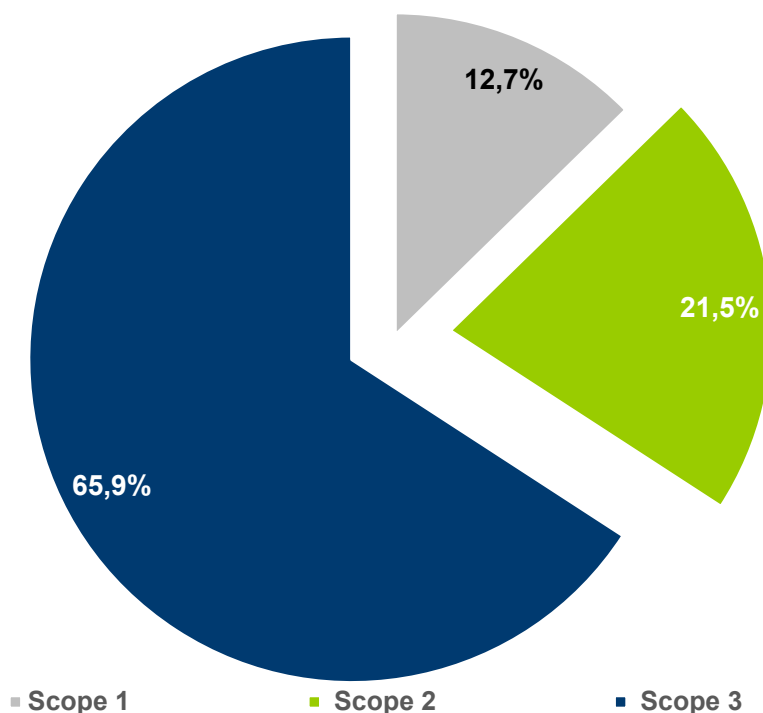
The emissions are structured into the following three areas of application:

Table 3.3 Greenhouse gas emissions by area of application

Scope 1 emissions	Scope 2 emissions	Scope 3 emissions
2.630,41 tons CO₂e	4.451,10 tons CO₂e	11.825,08 tons CO₂e
mainly from the combustion of fuels for the company's own vehicles and facilities.	generated by the electricity consumption required to operate the pumping stations and ancillary facilities of the pipeline system.	representing other indirect emissions in the value chain (third-party logistics, business travel, goods and services purchased, waste management).

These significant emissions underline the climate responsibility of CONPET S.A., highlighting the impact of its operations on the carbon footprint and the need to reduce it in order to minimize environmental impacts.

Graph 3.1. - Percentage distribution of emissions by areas of application



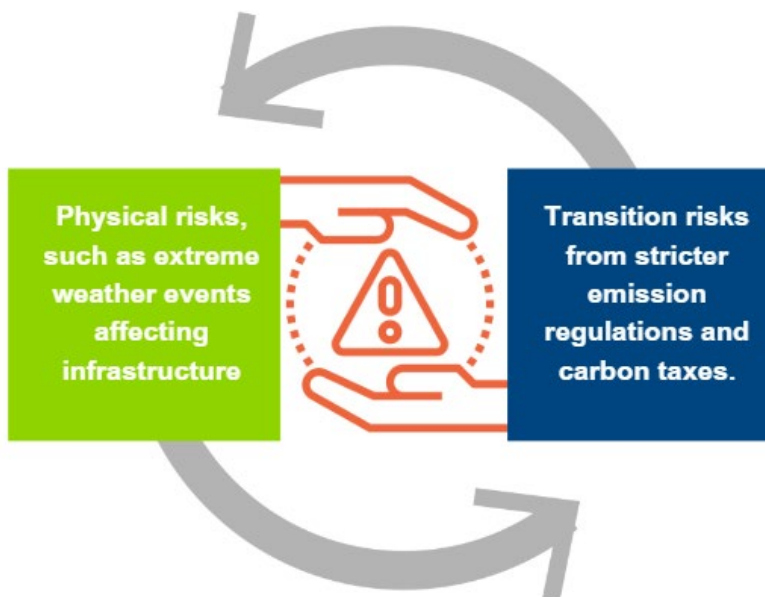
From a broader social perspective, every ton of CO₂e reduced contributes to avoiding the adverse effects of climate change (droughts, floods, extreme heat) that affect people and the environment. Local communities and the public expect energy operators to reduce their pollution and support efforts to combat global warming. Therefore, mitigating climate change (by lowering GHG emissions) is a central objective for the company, with direct benefits for the environment and society. CONPET S.A. has already started to implement important sustainable initiatives, such as energy efficiency projects and investments in renewable energy, such as the installation of photovoltaic panels at the administrative headquarters and other operational locations. Such measures contribute directly to reducing emissions, support the region's energy transition and set a positive example of engaging in responsible climate action . In addition, the company educates and engages its employees in sustainability actions (such as green skills training or participation in green volunteering activities), thus reinforcing an organizational culture oriented towards environmental and social responsibility.

Table 3.4 Financial risks and opportunities of climate change

Outlook	Main climate risks with financial impact	Main financial opportunities
Academic literature	- Physical risks: Studies show that climate change jeopardizes the long-term reliability of oil infrastructure. Pipelines and facilities with decades of life are facing more severe events (extreme temperatures, hurricanes, floods, fires), increasing the risk of failures, leaks and unplanned shutdowns. - Transition risks: To reach climate targets, a substantial share of fossil fuels will be unusable - For example, ~1/3 of global oil reserves are expected to remain untapped by 2050 according to a Nature study. This implies the risk that oil-related assets (fields, pipelines) will lose their value (<i>stranded assets</i>) as demand for oil falls. Oil companies also face market uncertainties (oil price volatility in the context of decarbonization) and possible legal costs related to climate responsibility.	- Adaptation and resilience: The Academy highlights the need to adapt infrastructure to new climatic conditions. Measures such as strengthening vulnerable pipelines, redesigning exposed routes, and operational continuity plans can mitigate disaster losses and are essential for long-term financial sustainability. - Strategic transition: Opportunity to reuse existing infrastructure in the low-emissions economy - for example, technical research suggests that much of the gas pipeline networks can be retrofitted for hydrogen transport at only ~10-35% of the cost of building new ones. Such innovations can expand the business model of fuel transport companies, allowing them to remain relevant in the future energy mix.

Outlook	Main climate risks with financial impact	Main financial opportunities
Consultancy (PwC, EY, McKinsey etc.)	- Financial and market risks: Advisory firms emphasize that failure to adapt to the climate transition erodes the value of companies. In recent years, under pressure from investors and lower demand forecasts, oil companies have seen massive write-downs on fossil assets Investors are redirecting capital to climate-resilient firms and governments are announcing policies to phase out fossil fuels (e.g. targets to phase out rich gas/diesel cars, ban new oil exploration) - all of which threatens the long-term sustainability of oil-focused companies. - Regulatory and reputational risks: Consultants draw attention to the avalanche of new ESG regulations (e.g. CSRD, EU Taxonomy) that may impose costly compliance on oil companies. The reputation of these companies is also suffering as the public and NGOs demand swift climate action - a risk that is difficult to quantify financially, but real (loss of social license, lawsuits, funding restrictions).	- Efficiency and future-proofing: Adopting sustainable practices is seen as an opportunity to increase efficiency and future-proof the business. EY notes that implementing strategies to reduce emissions and "greener" operations contribute to future-proofing operations, i.e. maintaining long-term competitiveness in the context of the energy transition. - Diversification and new markets: Consultants advise oil companies to diversify their portfolio by investing in renewable energy, biofuels, carbon capture, etc. to capitalize on the growth of these segments. For example, McKinsey points out that many O&G companies have committed to net-zero targets and are investing in technologies such as direct carbon capture from the air and low-emission solutions. A pipeline operator can explore new services - from transporting hydrogen or captured CO₂ to green infrastructure management expertise - creating alternative revenue streams as the economy decarbonizes.

In conclusion, the company faces significant climate risks:



GRAPH 3.2. - Types of risks faced by CONPET S.A..

⚠️ PHYSICAL RISKS (IMPACT ON CONPET S.A. INFRASTRUCTURE)

Climate change is intensifying extreme weather events that can directly affect the physical infrastructure of CONPET S.A. (the operator of the Romanian crude oil pipeline network). Globally, the frequency and severity of storms and floods are expected to increase, events that can damage oil extraction, production and transport infrastructure and disrupt the operation of crude oil pipelines. A report by [Deloitte](#) shows that 79% of global business leaders believe that the planet is at a tipping point and requires solutions to combat the effects of climate change, which is already negatively affecting businesses. For CONPET S.A., whose pipelines cross major watercourses and flood-prone areas, this risk is highly relevant. Adaptation measures are already being observed: for example, the company has completed a ~€26m project to replace and bury pipeline segments under the Borcea arm of the Danube (using horizontal directional drilling), **significantly** reducing the likelihood of leaks or damage caused by extreme floods. This modernization increases the resilience of the infrastructure to increased flows and protects continuity of supply.

Other relevant physical risks include **extreme temperatures** and drought. Warmer climates can bring heat waves that stress infrastructure (expansion of pipelines, overloading of pumping equipment) and jeopardize the health of operating employees, possibly requiring temporary shutdowns. Changes in rainfall patterns - dry spells followed by heavy downpours - can cause subsidence or landslides that threaten pipeline stability. The literature emphasizes that these phenomena (heat waves, severe droughts, vegetation fires, permafrost melting in northern regions, etc.) pose major challenges throughout the oil supply chain, from downstream to

transport and refining. A relevant example for Romania is the impact of extreme weather events on energy infrastructure. Major floods in the Danube basin can affect transport and storage of petroleum products, while vegetation fires in the Bărăgan can endanger pipelines and pumping stations. Such events can significantly disrupt CONPET S.A.'s operations, highlighting the vulnerability of critical infrastructure to climate change and associated risks. Physical risk management requires **strategic adaptation**.

In international practice, energy companies are investing in the consolidation of vulnerable assets and business continuity plans. Through such measures, the risk of outages and property damage is minimized, thereby also protecting financial performance (avoiding repair costs or environmental penalties following an incident). It is worth noting that cost-benefit analysis at sector level supports these investments: **investments in climate resilience bring net benefits in the long term**, avoiding much higher losses in the event of a disaster.

TRANSITION RISKS

The global transition to a low-carbon economy poses substantial risks to the business model of fossil fuel-based companies such as CONPET S.A. A first set of risks is **legislative and regulatory**: increasingly ambitious climate policies may impose direct and indirect costs. For example, increasing the price of carbon (through CO₂ taxes or cap-and-trade systems) will penalize high-emitting activities. The oil sector, being a major contributor to emissions, will be significantly affected - carbon taxes increase operational costs and can erode companies' margins, affecting both profitability and the price of final oil products. CONPET S.A., although it would not directly pay a carbon tax on transported crude oil, may feel the indirect impact: higher electricity costs (if producers pay CO₂), higher auxiliary rail transport prices, or taxes on its own emissions from fossil fuel consumption in operations. In addition, new European regulations (e.g. *ReFuelEU*, stricter emission standards for fuels) may reduce the demand for petroleum products, thus reducing the volume of crude oil transiting the CONPET S.A. network.

A second transition risk is the **decline in demand for crude oil in the medium to long term**, amid market and technological change. As electric vehicles displace traditional fuels (International Energy Agency (IEA) scenarios show the market share of electric vehicles (EVs) rising to over 60% of car sales by 2030), and alternative energies (solar, wind) replace fossil fuels in the power sector, oil demand could peak and then fall. Academic research supports this outlook: a study published in *Nature* estimates that to keep global warming below 2°C, about **a third of global oil reserves, half of global natural gas reserves and more than 80% of coal reserves would have to remain unused** by 2050. This implies that many planned extraction projects will not materialize and the related infrastructure (including transport pipelines) risks becoming *loss-making* (financially unrecoverable) assets. With previous refining and petrochemicals closures, transport capacities are already under-utilized. In this context, a further fall or stagnation in crude oil demand could exacerbate this situation, reducing CONPET S.A.'s revenues and putting additional pressure on tariffs.

Signs of these transition risks are already visible in the market, where investors and financiers are turning to companies with clear adaptation plans, reducing their exposure to climate risk. A [McKinsey report](#) notes that in the first three quarters of 2020, amid the pandemic and accelerating energy transition, oil majors in North America and Europe saw asset write-downs of around \$145 billion - about 10% of their market value - reflecting the expectation that some of their oil and gas reserves will no longer be exploitable profitably. At the same time, governments are taking unprecedented measures: for example, Denmark has announced the cessation of all North Sea oil operations by 2050. For CONPET S.A., whose business depends entirely on transporting crude oil to refineries, such developments signal the **strategic risk** of a gradual decline in long-term volumes and the potential *erosion of its business model* unless diversification takes place. In addition, **technological innovation** is a transition risk: advances in batteries, energy efficiency and alternative fuels may reduce oil's competitiveness. For example, if green hydrogen or next-generation biofuels become economically viable on a large scale, the transport requirement for crude oil could fall accordingly.

Last but not least, there are **legal and reputational risks**. As public awareness of the climate emergency grows, oil companies face increasing scrutiny. Environmental organizations and civil society are pushing for accountability for the fossil industry - including through lawsuits against companies for climate damage or for failing to meet emission reduction targets. A relevant example is the Climate Action 100+ initiative, which brings together investors managing more than \$50 trillion and calls for clear strategies from major emitters to align with the Paris Agreement targets. In this context, ignoring the energy transition is no longer an option, becoming a **risk of losing social license**: companies perceived as reluctant to change may lose public support, be excluded from certain sources of finance and incur higher capital costs. CONPET S.A. is aware of these risks and integrates them into its internal assessments, analyzing both **compliance risks** (such as new emission requirements, EU Taxonomy and ESG standards) and **technological and market risks**, including shifting consumer preferences towards low-emission alternatives.

Opportunities (transition to a sustainable business model)

While climate change poses serious risks, it also creates strategic opportunities for companies that adapt early. For CONPET S.A., the opportunities stem from its role as an intermediary in the energy chain - a role that can be expanded and reinvented in a decarbonized economy. A first opportunity lies in the **transition to alternative and efficient sources**, which can bring both cost reductions and new revenues. For example, reducing your own emissions by making pumping stations more efficient and using renewable energy not only reduces the risk of future carbon taxes but also lowers your operational energy costs. Experts emphasize that implementing sustainable strategies and reducing emissions can ensure the long-term sustainability and competitiveness of operations, making them more resilient in a context of increasingly stringent climate regulations.

In the case of **CONPET S.A.**, the company has already started energy diversification by installing a photovoltaic system at the secondary administrative headquarters, which was implemented and operated throughout 2024. This initiative makes it possible to partially supply its own consumption with green energy, thus reducing dependence on conventional sources. In addition, the system

contributes to lower electricity bills and reduced emissions, providing protection against fluctuations in energy prices and the cost of carbon in the electricity sector.

A second major opportunity is to **extend the business model** to the new needs of the energy transition. CONPET S.A.'s pipeline infrastructure and technical expertise can be leveraged in emerging areas, from green hydrogen transport to biofuels distribution or carbon capture and storage. CONPET S.A. is already exploring such directions - assessing the long-term potential of adapting certain pipelines or facilities for the transport of biofuels or other low-carbon liquids. While crude oil transport remains the core business for now, these forward-looking investments signal the company's commitment to evolve with the new energy landscape and reduce its reliance on carbon-intensive activities. Moreover, early involvement in hydrogen projects may position CONPET S.A. as a key partner in Romania's future green value chains.

Last but not least, **building resilience** should also be seen as an investment opportunity. Capital spending to adapt infrastructure to climate change - for example, installing modern pipeline monitoring systems, replacing critical segments with next-generation ones - can prevent costly environmental incidents and unplanned outages, thereby protecting company value. In addition, insurance and reinsurance companies are starting to prioritize firms that have implemented robust climate risk management plans, which can lead to lower insurance premiums or more favorable coverage for those that have adapted their operations to climate change. IEA emphasizes that investing in resilience brings net benefits and strengthens overall energy security, so companies that act early can gain an advantage. CONPET S.A., through its program to modernize and integrate climate risks into its governance, is already building this resilience, which gives it a competitive advantage in the medium term.

In conclusion, the impact of climate change on CONPET S.A. presents both opportunities and challenges, outlining a landscape of favorable and unfavorable aspects. On the one hand, physical risks threaten the integrity of the pipeline infrastructure and continuity of operations, while transition risks - from carbon policies to declining demand for crude oil - call into question the long-term viability of the fossil fuel-only model. On the other hand, there are real opportunities for business to redesign its future: **the transition to alternative energy sources, increased resilience and innovation** can become drivers for growth and adaptation. A balanced perspective, based on international data and analysis, suggests that oil companies that invest in sustainability and diversification today will be better positioned tomorrow - both to cope with intensifying climate risks and to thrive in a global economy on a decarbonization path. Through the steps already taken and planned, CONPET S.A. is demonstrating that it can leverage its experience and infrastructure to adapt to these changes, ensuring its relevance and financial stability in a changing climate.

Relevant sources were consulted in the above analysis, including international organizations, academic studies and consultancy reports. International organizations provide key guidance for climate policy and sustainability, such as [UNEP FI](#), [Climate Action Network](#), [Carbon Disclosure Project \(CDP\)](#) and the [International Energy Agency \(IEA\)](#). Academic literature includes the [Katopodis et al. \(2019\)](#) (*Infrastructures*) and [McGlade & Ekins \(2015\)](#) (*Nature*) studies, which examine the sustainability of infrastructures and the viability of fossil fuels. Advisory

reports come from [McKinsey](#), [Ernst & Young \(EY\)](#) and [DNV](#), providing insights on decarbonization, ESG regulation and climate risks.

These reports provide detailed analysis and applied scenarios on the energy transition and the risks and opportunities associated with implementing sustainable policies. They contribute to understanding market trends and to developing effective strategies for integrating Environmental, Social, and Governance (ESG) principles. Each of these sources has been used to ensure an informed and balanced approach to the topic covered in this section, and detailed references are available through the hyperlinks included.

RESULTS OF THE MATERIALITY ANALYSIS

As a result of the analysis, CONPET S.A. has identified a number of **material themes** on which this report focuses. The list below summarizes these themes, grouped by ESRS standard domains, together with an indication of the materiality perspective:

TABLE 3.5 Main material themes (2024)

ESRS domain	Material theme	Materiality perspectives
E1 - Climate change	<i>Climate change</i> (mitigation and adaptation, transition plan, energy and GHG emissions)	Impact and financial risk
E2 - Pollution	<i>Pollution</i> (air, water, soil; pollution prevention and control)	Impact and financial risk
E3 - Water resources	<i>Water and marine resources</i> (water consumption, discharges)	Impact
E4 - Biodiversity and ecosystems	<i>Biodiversity and ecosystems</i> (impact on ecosystems, land degradation)	Impact
E5 - Circular Economy	<i>Circular economy</i> (waste management, circularity targets)	Impact and financial risk (opportunity)
S1 - Own workforce	<i>Working conditions</i> (safe workplaces, health and safety, social dialog, collective bargaining, internal reporting mechanisms)	Impact and financial risk
S1 - Own workforce	<i>Employee development and equal opportunities</i> (training, equal opportunities)	Impact and financial risk (opportunity)
S3 - Affected communities	<i>Impact on local communities</i> (community rights, community safety)	Impact and financial risk (opportunity)
S4 - Consumers and end-users	<i>Data protection and consumer information</i> (data privacy, access to information)	Impact (and potential risk)
G1 - Professional conduct	<i>Corporate culture and organizational ethics</i>	Impact and financial risk
G1 - Professional conduct	<i>Protection of public interest warnings</i>	Impact
G1 - Professional conduct	<i>Fight against corruption and bribery</i> (prevention, detection, anti-bribery training)	Impact

ESRS domain	Material theme	Materiality perspectives
G1 - Professional conduct	<i>Supply chain responsibility</i> (supplier relations, payment practices)	Impact

Table 3.6. ESRS topics and subtopics that were not considered material and the reasons for their exclusion (according to ESRS 1 IRO-2:54-59)

Domain	Subjects	Topics	Sub-topics	Sub-sub-topics	Reasons on lack of materiality
Environment	ESRS E4 – Biodiversity and ecosystems	Impacts on biodiversity	Ecosystem development and condition	Protected areas, vulnerable species, relations with NGOs	The company does not operate in areas with sensitive biodiversity or near protected areas. There have been no direct interactions with vulnerable ecosystems and the assessments carried out do not indicate any relevant actual or potential impacts.
Environment	ESRS E3 – Water and marine resources	Marine resources	Marine extractions	Marine water for operations	CONPET S.A. does not utilise or extract marine resources; all activity takes place on land, in continental areas. Therefore, there is no impact associated with the topic.
Environment	ESRS E3 – Water and marine resources	Marine resources	Spills in marine environments	Accidental or controlled marine pollution	There are no spills or operations in marine ecosystems. The infrastructure is not located in coastal or marine areas.
Social	ESRS S2 – Value chain workforce	Working conditions	Workers' rights in the value chain	Secure jobs, forced labour, freedom of association	The company's suppliers and partners are exclusively local or EU-based, with similar compliance obligations. No relevant exposure or value chain labour risks have been identified.

Domain	Subjects	Topics	Sub-topics	Sub-sub-topics	Reasons on lack of materiality
Social	ESRS S3 – Affected communities	Civil and political rights	Discrimination, access to justice, fundamental freedoms	-	No incidents, risks or concerns expressed by local communities regarding these rights have been identified. The company operates in industrial zones with minimal exposure to fundamental rights risks.
Social	ESRS S4 – Consumers and end-users	Health and safety	Products and services	User safety	The company does not deliver products or services directly to end consumers. The business is B2B, with no direct interaction with end-users that creates health or safety risks.
Governance	ESRS G1 – Professional conduct	Business practices	Tax strategies	Tax structure, tax avoidance, transparency	The company is state-controlled and operates under the national tax reporting framework. There are no tax-avoidance schemes or cross-border activities giving rise to tax risks.
Governance	ESRS G1 – Professional conduct	Political influence	Lobbying, donations, public interactions	-	There is no political lobbying and the donation policy does not include contributions to political parties or affiliates. There were no activities with significant political influence.

Below, we present a detailed analysis of each material theme, highlighting their implications and impact in the context assessed.

MEDIUM (ESRS E1 - E5):

🌱 *Climate change (ESRS E1)*

Impact on the company: Climate change is a major issue with dual materiality for the company. From a financial perspective, CONPET S.A. faces significant **climate risks**: both physical risks (e.g. extreme weather events affecting infrastructure) and transition risks (stricter emission regulations, carbon taxes, etc.). The internal analysis highlights the absence of a climate transition plan aligned to the Paris Agreement and the lack of clear emission reduction targets, which is a strategic risk for the future. In 2024, the company reported no direct losses from climate change, but these risks may affect both operating costs (e.g. through increased environmental taxes) and revenues in the medium term if not proactively managed.

Impact on the environment and society: The company's activity (transport of crude oil through pipelines and CF) contributes to the emission of greenhouse gases (GHG) through the consumption of fossil fuels for transport and natural gas for heating. These air pollutants have a direct effect on the global climate. The analysis to 2024 revealed a **current negative impact** related to GHG emissions generation, exacerbated by the lack of an integrated strategy to reduce emissions across all application areas (1, 2 and 3). On the other hand, incipient **positive impacts** were also noted: the company has initiated actions to use renewable energy sources and increase energy efficiency, which indicate steps towards reducing the carbon footprint.

Risks: The main climate **risks** for CONPET S.A. are regulatory and reputational - for example, stricter environmental regulations may impose additional costs or production limits. Also, the lack of a transition plan increases the risk that investors or partners may consider the company unprepared for the low-emission economy. **Opportunities:** Investments in climate change mitigation (e.g. retrofitting equipment to reduce emissions, alternative energy sources) represent opportunities for efficiency and accessing green transition funds. Early adoption of green technologies can also improve a company's image as a sustainable operator. A **relevant example** in the industry is the trend for major oil companies to set climate neutrality targets - showing the importance of integrating climate change into business strategy (CONPET S.A. can follow a similar path, adapted to the crude oil transport sector).

Pollution (ESRS E2)

Impact on the company: Environmental pollution, in the form of accidental hydrocarbon spills, is an operational and compliance risk for CONPET S.A.. In 2024, **financial risks** associated with land, air and water pollution have been identified - for example, pipeline leaks can incur significant penalties and remediation costs. The company has implemented strict pollution prevention and monitoring policies and procedures precisely to reduce the incidence of such events and comply with environmental regulations. The effectiveness of these measures is reflected in the fact that **no major incidents of uncontrolled pollution were reported in 2024**, a sign that prevention systems are working as expected. However, the risk remains as long as the transport infrastructure involves old pipelines and hazardous substances.

Impact on the environment and society: CONPET S.A.'s **current negative impact** on the environment comes mainly from crude oil **pollution of the soil**, caused by possible underground pipeline failures. Such events contaminate land, affecting soil and groundwater quality, with consequences on local ecosystems and potentially on rural communities (degraded agricultural land, drinking water pollution). The operation of pumping stations also involves air emissions (generator exhaust gases, volatile compounds), but the company actively monitors these emissions and wastewater discharges to maintain legal compliance. On the positive side, CONPET S.A. has developed an **effective environmental management system** with pollution prevention and control procedures and continuous monitoring, which significantly reduces the frequency and severity of pollution incidents.

Risks: A major pollution incident (e.g. a major pipeline failure) would result in substantial greening costs, possible legal penalties and damage to the company's reputation as a responsible operator.

Strict pollutant regulations may also require additional investment in emission control technology.

Opportunities: Good performance in pollution prevention provides an opportunity for the company to demonstrate its commitment to the environment - for example, maintaining ISO 14001 environmental certification and promoting a **clean operating record** can strengthen relationships with customers (refineries) and authorities. Innovations in early leak detection technologies (IoT sensors on pipelines) can be an opportunity to minimize risks and reduce costs in the long term if implemented.

Water and marine resources (ESRS E3)

Impact on the company: The management of water resources is a material issue mainly from an impact perspective and less as a direct financial risk. The operation of the pipeline network does not consume large volumes of water directly, but CONPET S.A. uses water for certain processes. There **was a negative impact** related to the **extraction of water from its own boreholes in areas with high water stress (Videle, Cartojani, Constanța C2)** - i.e. in some regions where water resources are limited, the company withdraws groundwater for operational use, potentially affecting local availability. This may create future restrictions or costs (e.g. if the authorities impose extraction limits or higher tariffs). On the other hand, the immediate financial risks for CONPET S.A. are low, as the cost of water is not significant in the cost structure, and no outages due to water shortages have been reported in 2024.

Impact on the environment and society: The impact of CONPET S.A.'s operations on water is manifested through potential **accidental pollution of surface or groundwater** (from oil spills) and **consumption of water** from local resources. The materiality analysis shows that the company has internal procedures in place for **responsible water management**, including measures to prevent accidental pollution and constant monitoring of water consumption and quality. These actions are having a **positive impact**: in 2024 there were no significant water pollutions due to CONPET S.A., a sign that prevention is working. At the same time, water consumption is monitored to avoid waste. However, **water withdrawals in vulnerable areas** remain a concern as they can impact local communities (wells, irrigation) if not well managed.

Risks: Accidental water pollution (e.g. contamination of a river due to a burst pipe) would cause environmental damage and possible penalties. Also, in the context of climate change, water resources are becoming more precious - there is a risk that future access to water for operations will be limited or more expensive. **Opportunities:** By reducing its own water consumption and using water recycling technologies (e.g. for washing equipment), CONPET S.A. can achieve savings and improve its environmental performance. Also, by maintaining a clean (pollution-free) water record, the company strengthens its relations with local communities and compliance with stakeholder expectations.

Biodiversity and ecosystems (ESRS E4)

Impact on the company: Biodiversity is a material issue through the **environmental impact of** CONPET S.A.'s activities, rather than through immediate direct financial risks. The operation of crude oil pipelines crosses different terrestrial ecosystems; an incident (such as a major crude oil

spill) may entail environmental remediation costs and legal obligations to restore habitats. In 2024, the company did not incur any biodiversity-related penalties, a sign that no serious events affecting ecosystems occurred. However, awareness of these risks is important: protected areas or sensitive species in the vicinity of infrastructure could lead to operational restrictions if not properly managed (e.g. restrictions on maintenance works during certain wildlife breeding periods).

Impact on the environment and society: The main **potential negative impact** on biodiversity comes from **soil and water pollution** from oil spills. The analysis shows that oil spills can cause **land degradation** and damage to soil and water organisms, disrupting local ecosystems. In practice, soil contaminated with hydrocarbons loses its fertility, affecting vegetation and small life forms, which can have knock-on effects on the local ecosystem. If remediation work is not carried out, such incidents can have long-term environmental consequences. In order to prevent these effects, CONPET S.A. intervenes through authorized companies, carrying out greening works that ensure the restoration of the affected land and its reintegration into the natural circuit.

Risks: A pollution event affecting biodiversity (agricultural land, forests or water) may result in loss of community trust and intervention by environmental authorities, with potential temporary shutdowns until remediation. **Opportunities:** Active involvement in protecting biodiversity (e.g. partnering with NGOs to plant trees along pipeline corridors) could bring significant reputational benefits. Such actions would demonstrate environmental responsibility and could reduce public opposition to future infrastructure expansion.

Circular Economy - Waste (ESRS E5)

Impact on the company: The management of waste, especially hazardous waste resulting from the operation of the pipeline system, is material both in terms of environmental impact and potential operational efficiency. CONPET S.A. generates hazardous waste (waste oil, oil sludge, contaminated soil) from the maintenance and operation of facilities. The associated **negative impact** is the quantity of these wastes and the risk of pollution if not properly managed. Throughout 2024, the company has maintained rigorous waste management according to the "waste hierarchy" - prevention, reuse, recycle, recover before disposal. This proper management reduces the risks of penalties and long-term costs (e.g. landfill or decontamination costs). Furthermore, treating hazardous waste correctly is essential to maintain operating licenses and avoid legal problems.

Impact on environment and society: The **positive impact** noted in 2024 is that the waste generated by CONPET S.A. is treated according to legal requirements and good practices, most of it being **recovered or recycled** rather than disposed of as such. The company keeps transparent records on the quantities and types of waste, demonstrating accountability and traceability. This contributes to the circular economy by putting some materials back into the loop (e.g. oil recovery, recovery of scrap metal from pipe replacement). However, **the generation of hazardous waste remains an unavoidable negative impact of oil activities**. Any incident of improper disposal could lead to soil or water pollution. No such incidents were recorded in 2024, indicating effective control.

Risks: Increases in hazardous waste could increase management costs and environmental liabilities. Future regulations could impose tougher recycling targets or ban certain practices (e.g. disposal of sludge in landfills). **Opportunities:** Waste management can bring financial and operational benefits if properly optimized. For example, waste can be processed by third parties into usable products, helping to reduce costs. However, in the case of oil sludge, processing in a fiscal warehouse under the Fiscal Code can involve significant costs, without generating direct revenues for CONPET S.A., but only operational expenses. In this context, the company can explore waste-reducing technologies, such as more efficient filters and sustainable materials, thus contributing to both optimizing costs and improving its ESG score, an important aspect for investors.

SOCIAL (ESRS S1 - S4)

Detailed social impact analysis according to ESRS S1 - S4:

Working Conditions - Health, Safety and Industrial Relations (ESRS S1)

Impact on the company: CONPET S.A.'s own workforce is an important asset and good working conditions lead to productivity and organizational stability. In 2024, a **positive impact** has been observed by providing a stable and fair working environment with a competitive wage policy and extensive employee benefits. The company offers **secure and stable** jobs, protecting employees from economic risks by paying social contributions (pension, health, unemployment) and respecting their rights. This has resulted in high staff satisfaction and retention in 2024. Social dialog is also well reinforced, which provides employees with representation and structured communication channels. Collective bargaining through the Collective Bargaining Agreement (CBA) ensures transparency and fair resolution of labor issues, contributing to a stable organizational climate. All this strengthens the culture of employee protection and reduces labor conflicts.

Impact on the environment and society: High-standard working conditions have a positive social impact beyond the company's gates, as they promote the well-being of 1,398 employees and their families. CONPET S.A., through its personnel policies, contributes to the **development of the local community** (employees have financial stability, purchasing power, access to health services through insurance, etc.) In addition, a safe and healthy working environment is also reflected in the company's reputation as a responsible employer. In 2024, there **were no occupational accidents at CONPET S.A.**, which indicates the effectiveness of the implemented Occupational Health and Safety (OHS) measures. However, the risk of accidents is not completely eliminated, given the nature of operations (flammable substances, heavy industrial equipment). The potential impact of a major accident would be significant, affecting not only the employee, but also the community (through loss of trust) and the company's business.

Risks: The main risks in the area of working conditions relate to the safety and health of employees. A serious incident (explosion, technical accident) could have major human and financial consequences, including interruption of operations. Ineffective management of **working time** and schedule can also lead to fatigue, human error and work tensions - this has been

highlighted as a potential financial risk (low efficiency, paid overtime). **Opportunities:** A safe and satisfying work environment leads to increased productivity and employee loyalty. CONPET S.A. has the opportunity to **strengthen** its **prevention culture** through regular SSM training, emergency drills and continuous improvement of working conditions (ergonomic equipment, modern technology to take over dangerous tasks). Harmonious labor relations can also serve as an example in the industry, increasing the company's attractiveness on the labor market.

Employee development and equal opportunities (ESRS S1)

Impact on the company: Investing in employee training and skills development has a **direct positive impact** on CONPET S.A.'s long-term performance and sustainability. In 2024, the company continued to organize employee training programs tailored to specific needs (technical, SSM, management, etc.). These initiatives improve the skills of the workforce, increase productivity and the quality of transport system operation. Training programs are also accessible to all categories of staff, promoting **equal opportunities** for career development and advancement. In 2024 an inclusive, non-discriminatory working climate was maintained, with the company having policies against any form of unequal treatment. This reinforces organizational stability and reduces staff turnover as employees feel valued and have prospects for advancement.

Impact on the environment and society: Through continuous employee training, CONPET S.A. contributes to the **growth of human capital** in the region. Better qualified employees also benefit communities - they become specialists who can share knowledge, have higher job satisfaction and improved living standards. Internally promoted equal opportunities reflect a positive social impact, ensuring fair treatment regardless of gender, age or other criteria. Although these effects are harder to quantify at macro level, at micro (company) level they translate into better social cohesion and an example of good practice in labor relations. In 2024 no cases of discrimination or complaints of unequal opportunities were reported, suggesting the effectiveness of existing policies.

Risks: If skills development were neglected, there would be a risk of a shortage of critical skills in the company in the medium term (particularly as experienced staff retire). This could affect operational performance and safety. Lack of development prospects may also lead to talent leaving for other companies. **Opportunities:** Employee training is seen as a **financial opportunity** in itself - by increasing efficiency and reducing incidents/errors, the company saves money and improves its services. Materiality analysis included skills development as an opportunity to create value. Moreover, by promoting diversity and equality (e.g. equal promotion opportunities for all employees), CONPET S.A. can innovate and make better decisions, benefiting from varied perspectives.

Impact on local communities (ESRS S3)

Impact on the company: The safety of the communities in the areas crossed by the pipelines is a major material concern, intrinsically linked to the safety of CONPET S.A. operations. A serious incident (e.g. an explosion, fire or widespread pollution) would affect local communities and, by

extension, the company's relationship with those communities and authorities. In 2024, no major incidents affecting communities were reported due to the strict prevention measures implemented. CONPET S.A. operates an extensive network of pipelines crossing many localities; therefore, the company maintains emergency response plans and collaborates with the authorities (ISU, local authorities) to ensure a rapid response. From a financial perspective, good relations with communities represent **intangible capital**: they ensure continuity of operations (without protests or local opposition) and reduce the risk of litigation. The materiality analysis indicated that managing community impacts well can be seen as an **opportunity** to strengthen the company's "license to operate".

Impact on environment and society: Local communities may be affected by CONPET S.A. activity in several ways: risks of accidents with physical impact (fires, explosions, water/soil pollution affecting public health and the local environment) or operational inconveniences (noise, maintenance works). **The potential negative impact** on communities is mainly related to **operational incidents** - accidental oil spills, fires or explosions may endanger the population and property. CONPET S.A. has shown that it addresses these risks seriously: advanced pipeline monitoring technologies, rigorous maintenance and staff training significantly reduce the likelihood of incidents. Thus, in recent years (including 2024), there have been no emergencies with serious impacts on communities, which highlights a **contained impact**. However, communities remain vigilant and the company is constantly monitoring this issue as infrastructure expansion increases the potentially affected area.

Risks: Any major accident would have immediate effects on communities (evacuations, water pollution, potential casualties), generating an image crisis for CONPET S.A. and possible legal action. Tensions with communities may also arise if they feel that they are not sufficiently informed or compensated for the risks they assume by hosting the infrastructure. **Opportunities:** Open and accountable conduct with communities presents an opportunity to build public trust. The analysis showed that involving communities and respecting their rights can be seen as opportunities (e.g. community dialogue, social projects). CONPET S.A. can initiate community programs (pipeline safety education, local social investments) to compensate for inconveniences and improve relations. A community that perceives the company as a **reliable partner** will more easily support future projects (rehabilitations, new pipeline routes).

Data Protection and Consumer Information (ESRS S4)

Impact on the company: although CONPET S.A. does not directly serve individual "consumers" (being a B2B operator, with customers such as refineries), the S4 theme is relevant in terms of **personal data protection** and transparent communication with service users. In 2024, the company has prioritized GDPR compliance and cybersecurity, with rigorous measures in place to protect the personal data of employees, customers and partners. **The potential negative impact** identified is the risk of personal data being lost or compromised in the event of a security breach, which would harm customers and/or employees by exposing their information. Such an incident would also have repercussions for the company - loss of trust, possible fines and reputational damage. In 2024, there **were no major** cybersecurity **incidents** or data leaks at CONPET S.A., but threats of this type are on the rise globally. The company recognized that while risk cannot be

completely eliminated, it is proactively managed through advanced IT security systems, strict data access policies and incident response plans.

Impact on the environment and society: For society as a whole, respect for the right to privacy and accurate consumer information are essential aspects of sustainability. In the case of CONPET S.A., ensuring **data privacy** helps to protect individuals (employees, partners) from potential abuses or frauds that could result from leaked information. Although the company does not sell a product directly to the public, it does provide information to customers and the public (crude oil transport reports, safety-related communications) - maintaining the **transparency** and accuracy of this information is a trust factor. A positive impact in 2024 was the continuity of transparent reporting and responsible corporate communications, with no incidents of misinformation or complaints from customers about lack of information.

Risks: A cybersecurity incident remains a latent risk - the compromise of personal data can attract significant GDPR fines and damage relationships with business partners. Likewise, any miscommunication or opaqueness to customers about transport services could undermine their trust. **Opportunities:** Continued investment in information security (technology and staff training) and obtaining cybersecurity certifications can become a competitive advantage - customers will prefer an operator that they know is protecting their data and operating to high IT standards. At the same time, CONPET S.A. can capitalize on its **transparency**: publishing environmental and safety performance data to stakeholders shows accountability and can prevent misinformation. By being proactive in communicating, the company can avoid rumors or unfounded public fears.

GOVERNANCE (ESRS G1)

Detailed social impact analysis according to ESRS G1:

Corporate culture and organizational ethics (ESRS G1)

Impact on the company: the corporate culture of CONPET S.A. - defined by values, ethical principles and organizational practices - has a **positive material impact** on employee morale and implicitly on the company's performance. In 2024, the work environment at CONPET S.A. is described as positive and motivating, based on fair and transparent policies towards employees. This leads to high productivity and retention of valuable staff. A culture that promotes integrity, meritocracy and mutual respect contributes to workforce **commitment** to the company. From a financial perspective, corporate culture relates directly to risks such as corruption, fraud or non-compliance - a strong ethical culture reduces the likelihood of non-compliant behavior. Dual materiality is present: '**corporate culture**' and **business conduct** have been identified as a risk factor (if deficient) for the company. The absence of major deviations in 2024 suggests the maintenance of a stable and balanced climate.

Impact on environment and society: A strong organizational culture, centered on ethics and professionalism, has positive effects beyond the company. CONPET S.A., as an important economic entity, influences the local business community - by setting an example in **corporate governance**. If employees are treated fairly and encouraged to adhere to high standards, this is

also reflected in the way they interact with customers, suppliers and authorities. An ethical culture helps to prevent malpractices (intentional pollution, bribery, favoritism), thus having an indirect positive impact on society (the environment is better protected, local communities are respected, the economy runs cleaner). In 2024, CONPET S.A. maintained its reputation as a company with **integrity**, which is also evidenced by the absence of public scandals or criminal investigations.

Risks: Any weakening of the corporate culture and ethical standards could expose the company to risks such as decreased trust from employees, partners and authorities, increased vulnerability to corruption and fraud, as well as possible financial and reputational consequences, affecting long-term stability and sustainability. **Opportunities:** A strong corporate culture aligned with rigorous ethical principles represents an opportunity to attract and retain valuable talent, strengthen relationships with partners and authorities, and improve access to sustainable financing, positioning the company as a model of responsible governance in the energy sector.

Protection of whistleblowers (ESRS G1)

Impact on the company: The existence of an effective mechanism for the protection of whistleblowers demonstrates CONPET S.A.'s commitment to transparency and compliance with ethical principles. The company has in place an operational procedure dedicated to whistleblowers, updated in 2023, in relation to the specific legislation in force on the protection of persons reporting violations of the law. Also, on Conpet S.A.'s own website, whistleblowers have the possibility to report violations of the law using the external reporting channel to the Ministry of Energy. This **positive impact** is to create a safe framework for employees and other parties to report violations of the law or code of conduct without fear of retaliation. As a result, the risks of corruption and fraud are better prevented, as potential problems can be identified early. In 2024, there were no notable cases of whistleblowing at CONPET S.A., which may indicate either the absence of major integrity incidents or their discreet internal resolution. Importantly, the mechanisms are in place and reinforce employee and stakeholder confidence in the company's governance.

Environmental and social impact: Whistleblower protection has a positive impact on society by **discouraging illegal or immoral practices**. If CONPET S.A. employees can report irregularities (e.g. non-compliance with safety rules, hidden pollution, corruption) knowing that they are protected, the company becomes more responsible towards the environment and the community. In this way, the warning mechanism serves the public interest by ensuring that potential problems that could affect society are not covered up. CONPET S.A.'s initiative to align its policy with the Whistleblower Protection Act contributes to a culture of integrity that goes beyond the boundaries of the organization, setting an example for other entities.

Risks: Without adequate whistleblower protection, the company would be at risk of employees failing to report critical issues in a timely manner, which could worsen the consequences (e.g. undetected fraud can result in large losses, a non-compliant environmental practice can lead to a disaster). **Opportunities:** By strengthening the early warning system, CONPET S.A. can discover and internally remedy malfunctions before they escalate or become public. This saves costs and reputation. Also, being a **whistleblower-protective company** can improve governance ratings

and attractiveness to ethically concerned investors. In the context of the new EU legislative requirements on whistleblowers, CONPET S.A. is positioned ahead of the curve, which is an opportunity to easily comply and avoid sanctions.

Fighting corruption and bribery (ESRS G1)

Impact on the company: Preventing and combating corruption is essential for CONPET S.A., given its nature as a state-owned/listed company and exposure to public contracts. The materiality analysis shows a **major positive impact** of the implemented anti-corruption measures: in 2024 there were no incidents of bribery or corruption within the company. CONPET S.A. has an effective compliance framework aligned with the National Anti-Corruption Strategy 2021-2025, which includes clear reporting mechanisms, regular staff trainings and continuous monitoring. This framework significantly reduces the risks associated with corruption and ensures an ethical and transparent business environment. The benefits for the company are multiple: avoiding financial losses through fraud, maintaining access to finance (many investors impose anti-corruption criteria) and protecting corporate reputation. In addition, the integrity of the supply chain is strengthened by imposing these standards on suppliers.

Impact on environment and society: Fighting corruption also has beneficial effects on society. A corruption-free company delivers services more efficiently and at fair cost, contributing to the national economy in an honest way. In the case of CONPET S.A., avoiding bribery and fraud means that the company's financial resources (including those derived from tariffs paid by customers, and thus indirectly by the company) are used for their intended purpose, not diverted. Also, through the integrity of its operations, CONPET S.A. contributes to the **wellbeing of the business community** - contractors know that they have to play by the rules, so competition for contracts is fair. The fact that there were no corruption cases in 2024 means that the associated negative impacts (loss of public trust, local economic damage) were avoided. We can say that it is a **significant positive impact**: the company's reputation and business relations have been protected from corruption attempts.

Risks: Corruption is a severe risk - a single incident (e.g. a case of bribery) could lead to loss of shareholder and public trust, a decrease in market value and legal consequences (fines, criminal cases). It would also jeopardize **good internal governance**, creating a toxic organizational climate. **Opportunities:** Being proactive in preventing corruption, CONPET S.A. benefits from the **opportunity of** a clean business environment around it - trustworthy business partners will be attracted and those seeking illicit gains will stay away. The company can pursue regular anti-corruption training as an opportunity to educate and sensitize employees and partners, creating a local business community that shares the same ethical standards. Fair anti-corruption performance can be highlighted in reports and communications, enhancing **the value of the** responsible company **brand**.

Supply Chain Responsibility (ESRS G1)

Business Impact: Working with local suppliers and ensuring responsible sourcing practices has been identified as a material theme in 2024, with a **major positive impact** for both CONPET S.A. and the local economy. The company depends on a variety of suppliers (equipment, maintenance services, rail transport, etc.), and through rigorous selection and monitoring procedures, ensures that the supply chain is efficient and integral. For the company, a reliable supply chain means fewer operational disruptions and greater flexibility. Transparent business relationships (no unfair payment practices or favoritism) also ensure timely delivery of the resources needed to operate.

Impact on the environment and society: by focusing on local and fair suppliers, CONPET S.A. has a **positive impact on society**: it stimulates regional economic development and creates value in the communities where it operates (suppliers can grow their businesses, hire staff). The on-time payment practices and predictable contracts offered by CONPET S.A. contribute to the financial stability of these smaller firms, with a multiplier effect in the local economy. Also, by imposing ethical and quality standards in the supply chain, the company extends the culture of compliance and responsibility to its partners. On the environmental side, working closely with suppliers can lead to more **sustainable** solutions - for example, purchasing less polluting equipment from suppliers or recycling materials used in pipeline maintenance in partnership with them. In this way, positive impacts are transmitted vertically up the value chain.

Risks: Dependence on certain sole suppliers can be a risk (if one has financial or integrity issues, it can affect CONPET S.A. projects). Also, if a supplier does not comply with environmental or labor standards, it may entail chain liability for CONPET S.A. (reputational and compliance risk).

Opportunities: By maintaining and expanding its network of reliable local suppliers, CONPET S.A. has the opportunity to **optimize** its **costs** (by shortening logistic chains) and to innovate (by working with partners that can offer customized solutions). Developing **supplier sustainability assessment** programs (including ESG criteria in procurement) could be the next step, ensuring that the entire supply base meets the standards of future CSRD reporting. Through a responsible supply chain, the company increases its overall resilience and contribution to sustainability horizontally.

CONCLUSIONS

In reviewing the results of the 2024 dual materiality analysis, CONPET S.A. has identified a clear set of material themes according to ESRS standards, reflecting both **the environmental and social impacts of its operations** and **the financial risks and opportunities** arising from the sustainability context. The year 2024 was characterized by **operational stability** and the absence of major incidents in critical areas (workplace accidents, catastrophic pollution, incidents of corruption), indicating the effectiveness of the company's current management. The analysis highlighted areas for improvement based on existing data and practices.

TABLE 3.7. Key findings dual materiality analysis

Strong social and governance performance

Environmental impact under control, but long-term vision needed

Double materiality confirmed for some of the themes

CONPET S.A. enjoys a **positive internal climate**, with protected, well-trained and involved employees (intensive social dialog, training programs). The organizational culture promotes integrity and safety, as evidenced by the absence of SSM incidents in 2024 and any cases of corruption or fraud. These strengths provide a solid foundation for long-term sustainability and significantly reduce operational and reputational risks.

In 2024, the environmental impacts (GHG emissions, pollution, waste) were managed according to legal requirements and did not produce any critical events. However, **climate** and environmental **challenges** require the company to take a more proactive strategic approach. The lack of a climate transition plan and decarbonization targets is an identified pain point. Also, issues such as **biodiversity** and **water supply** require continuous monitoring, even if they have not currently generated problems (prevention remains essential to avoid potential future incidents).

Double materiality confirmed for 9 out of the 23 themes identified with both an impact and a financial dimension. For example, climate change affects the global community through the company's emissions, but also entails financial risks for CONPET S.A. (regulations, transition costs). Similarly, safe management of operations prevents impacts on communities and the environment, but also protects the company from loss and damage. This interdependence (impact ↔ financial risk) emphasizes the importance of **integrating sustainability into strategic decisions**: what is good for the environment and society ends up being good for the health of the business.

Initiatives being considered for the period ahead, based solely on 2024 findings:

- a) **Elaboration and implementation of a Climate Transition Plan:** In view of the identification of climate change as a priority material issue, CONPET S.A. aims to develop a concrete plan for GHG emission reduction and adaptation to climate effects, aligned with European and national objectives. The absence of such a plan was highlighted as a gap in 2024, and addressing it would turn a risk into an opportunity (access to green financing, increased energy efficiency, long-term competitive advantages).
- b) **Maintain and expand pollution prevention and ecosystem protection measures:** Although 2024 performance was good (no major pollution incidents), the company should continue to invest in pipeline monitoring technologies, preventive maintenance programs, and environmental training for employees. In addition, exploring voluntary environmental initiatives, such as conservation actions in areas where the company operates, can demonstrate commitment to biodiversity and help mitigate any potential negative impacts.

These measures, based on identified risks, fall within the known scope of operations and are natural extensions of existing initiatives.

- c) **Continued focus on staff and community health and safety:** 2024 results confirm the value of a strong focus on **safety** - zero workplace injuries and zero major community incidents. It is imperative that this vigilance continues. The company aims to maintain SSM procedures and emergency response plans up-to-date, conducting regular drills and internal audits. Dialogue with local communities should also be maintained and strengthened, communicating safety measures to them and involving them in any decisions that concern them (transparency engenders trust, decreasing reputational risk in case of an incident). In essence, the aspects that worked well in 2024 should be formalized and subject to a constant process of improvement.
- d) **Strengthening governance and ethical practices:** In light of new legislative requirements (including the EU Sustainability Reporting Directive - CSRD), CONPET S.A. aims to capitalise on its identified governance strengths. The whistleblower protection mechanisms, anti-corruption policies and ethical culture in 2024 are at a high level - the company intends to maintain and communicate them transparently in future reporting. At the same time, extending ESG criteria to the supply chain (assessing suppliers on environmental and social, not just economic, aspects) would formalize the positive impact already existing in supplier relationships. Thus, the company is preparing for value chain **due diligence** requirements, building on current positive experience.

In 2024, CONPET S.A. has demonstrated that sustainability and economic performance are mutually supportive, avoiding major incidents and proving resilience. However, the future requires proactive action. The recommendations based on the materiality analysis outline the direction: consolidating successes and addressing vulnerabilities, ensuring a sustainable, responsible and ESRS-aligned path forward.

3.3 Key stakeholders and the process of involvement

In order to ensure transparency and sustainable development, CONPET S.A. actively cooperates with multiple stakeholders that influence or are influenced by the company's activities.

TABLE 3.7. Stakeholders with direct impact

Category	Stakeholder (examples)	Type of collaboration
Industrial customers	OMV Petrom, Petrotel Lukoil, NIS	Use of crude oil transport services
Service providers (ESG consultants, financial audit and other financial services, certification bodies, other service providers)	TDP Partners, Carbon Tool, PKF FinAccount	Compliance and sustainability strategies
	Bureau Veritas, SRAC CERT	Inspection, conformity checking and certification services
	Romanian Railway Group, Talpac, Eye Mall	Rail transport, logistics and infrastructure Execution of replacement/ repair works of pipelines and installations related to NTS Electricity supply

Category	Stakeholder (examples)	Type of collaboration
	Central Depository	Managing the distribution of dividends to shareholders
Local communities	Local communities in the areas of operation	Sustainable development projects and public consultations
Employees and trade unions	Free Trade Union CONPET S.A.	They are consulted in the development and implementation of annual training programs, in the discussion of all occupational safety and health issues, as well as in the development and implementation of decisions in this area, while being constantly concerned about training, occupational safety and enhancing staff well-being.
Public authorities	Ministry of Energy, National Energy Regulatory Authority, Ministry of Environment	Regulating and monitoring environmental compliance
	Emergency Inspectorates	Prevent accidental pollution
	National Regulatory Authority for Mining, Petroleum and Geological Storage of Carbon Dioxide (ANRMPSG)	Regulation, supervision, sustainable and efficient management of mineral resources, oil reserves and geological storage of carbon dioxide, in line with Romania's obligations, strategies in the field and reducing environmental impact.
Academic institutions and research centers	Petrol-Gas University of Ploiești (UPG)	Research, technological innovation, training
NGOs	Prahova Chamber of Commerce and Industry	Involvement in the Governing Board, support for sustainable regional economic development
	Employers' Organization "PETROGAZ"	Participation in economic and legislative debates, working groups, legislative monitoring
	Romanian Standards Association (ASRO)	Member in TC 320 - standardization for fuels, combustibles, lubricants and petroleum products. Participation in the definition of product measurement, classification and labeling methods. Access to working documents and influence in the development of national standards relevant to CONPET S.A. activity.
	Romanian National Committee of the World Energy Council (CNR-WEC)	Collective member. Participation in FOREN, Board meetings and dialog with over 100 energy companies. Deputy Managing Director, member with decision-making role. Promotion in the Energy Messenger.
	Romanian National Committee for the World Petroleum Council (CNR-WPC)	Founding member. Access to strategic oil industry information, legislative support, promotion of Romanian investments and specialists. Participation in international events. Deputy Director General, member with decision-making role.

The company collaborates with stakeholders with direct impact in different forms (service contracts, supply contracts, Collective Labour Contracts, contributions, etc).

CONPET S.A. emphasizes dialogue with stakeholders and capitalizes on their feedback in order to integrate relevant perspectives into the company's strategies, thus ensuring sustainable and responsible management.

Methods of consultation and dialogue

CONPET S.A. maintains an active dialogue with stakeholders through various methods, including:

- Regular meetings with authorities, investors, local communities and employees to discuss relevant issues concerning the impact of the company's activities.
- Questionnaires to employees and partners to collect opinions on working conditions, safety and environmental impact.
- Open communication channels for stakeholder feedback.

Actions and measures taken

Following dialogue with stakeholders, CONPET S.A. has implemented concrete measures to address the concerns expressed, including:

- Modernisation of oil transport infrastructure to reduce pollution risks and increase operational efficiency.
- Improve safety and environmental protection measures by updating emergency response procedures and investing in monitoring technologies (LICs).

Integrating views into strategic decisions

The feedback received from stakeholders is used to improve and adapt the company's strategies, as follows:

- Improve environmental and safety policies in response to concerns expressed by communities and authorities.
- Optimise working conditions and training programmes for employees, based on feedback received through surveys and internal meetings.
- Implement transparency measures in sustainability reporting in line with shareholder and regulatory requirements.

Through these measures, CONPET S.A. reaffirms its commitment to responsible and sustainable management, ensuring a balance between operational efficiency and compliance with stakeholder requirements.

Stakeholders with indirect impact on the activity of CONPET S.A.

Although **CONPET S.A.** has not had direct collaboration with all relevant entities in the energy ecosystem, they play a significant role in the context of sustainability, influencing regulations,

environmental policies, technological innovation and market trends. This chapter highlights how these stakeholders indirectly contribute to the formulation of the company's sustainability strategy.

✚ Energy companies (customers and end-users)

Major players in the energy industry, such as **OMV Petrom, Lukoil, Romgaz, Rompetrol, Transgaz, Hidroelectrica, Nuclearelectrica, Engie, E.ON, Enel and MOL Romania**, determine the strategic directions of the energy market and set standards of efficiency and sustainability.

Energy transition and decarbonization influence the demand for crude oil transport and the potential adaptation of CONPET S.A. infrastructure. Investments in renewable energy and clean technologies may lead to changes in transport flows and the need to optimize the current system. In addition, the ESG requirements imposed on these companies create a knock-on effect on the entire energy ecosystem, including transport service providers.

✚ Consulting Agencies & Big4

Consulting firms, including PwC, Deloitte, EY, EY, KPMG, McKinsey & Company, Boston Consulting Group (BCG), Roland Berger, Accenture, Oliver Wyman and Bain & Company, offer expertise in implementing and promoting international standards for corporate governance, financial transparency and sustainability strategies

These companies indirectly influence CONPET S.A.'s strategy by guiding major energy players in aligning with the **European Sustainability Reporting Standards (ESRS)** and **Corporate Sustainability Reporting Directive (CSRD)** requirements. Reporting standards for emissions, energy efficiency and climate risks are thus becoming essential factors for infrastructure operators as well. At the same time, the trends in digitalization and operational efficiency promoted by these agencies are shaping the innovations needed to modernize the oil transport network.

✚ NGOs

Environmental organizations, such as **Bankwatch, ClientEarth, CDP, Climate Action Network Europe, E3G, Transport & Environment (T&E), Romanian Environmental Partnership Foundation, Terra Millennium III Foundation**, have an indirect impact on the sustainability of the industry by monitoring environmental policies and promoting stricter rules for reducing emissions.

Public campaigns on carbon footprint reduction and the energy transition are influencing environmental regulations and standards, including in the oil transport sector. Organizations such as **CDP and Climate Action Network Europe** are monitoring companies' transparency in emissions reporting, leading to a growing need to align with international sustainability requirements.

Stringent energy efficiency and emissions standards are driving operational adjustments, and the financing mechanisms available for the energy transition can provide opportunities for infrastructure modernization. New European directives such as the **Green Deal and Fit for 55** require structural changes across the whole energy sector, with an impact on fossil fuel transport and its infrastructure.

Even if these stakeholders did not have a direct relationship with **CONPET S.A.** in 2024, they influence the company's operating environment, driving **compliance, sustainability and operational efficiency** requirements. By closely monitoring industry trends and dialoguing with relevant stakeholders, CONPET S.A. can anticipate changes and adapt its sustainability strategy to remain competitive and compliant with new ESG standards.

In 2024, the Board of Directors and the Executive Directors were informed through monthly progress reports on ESG issues, including on stakeholders' interests and expectations (e.g. Environmental Authorities, Labour Inspectorate, BVB, etc.), by the specialised departments (e.g. HSE, Communication and Corporate Governance).

4. ENVIRONMENTAL IMPACT AND CLIMATE STRATEGY

Environmental impact and climate strategy covers how the activities of a company, sector or country affect ecosystems and natural resources, and the measures taken to minimize these negative impacts and combat climate change.

Environmental impacts include all the effects of economic or industrial activities on nature, while the climate strategy is the set of policies and actions designed to reduce these impacts and support efforts to mitigate climate change.

Global warming, caused by greenhouse gas emissions from human activities, is causing global temperatures to rise. The carbon footprint measures the total emissions of CO₂ and other GHGs over the life cycle of products, services or economic activities. Managing it brings strategic, economic and reputational benefits by helping organizations to reduce emissions, improve energy efficiency and comply with environmental regulations, demonstrating a real commitment to sustainability.

RELEVANT ENVIRONMENTAL POLICIES AND OBJECTIVES

CONPET S.A. has a number of clearly defined [policies and procedures](#) for environmental protection and responsible management of the impacts generated by its operations, complying with national legal requirements and European standards, including the [Quality, Environment, Occupational Health and Safety Policy](#), the [Energy Policy](#) and specific procedures for energy and waste management, monitoring of environmental factors (air, water, soil), and biodiversity protection.

CONPET S.A. implements risk management policies and policies oriented towards energy efficiency and environmental management, which are reflected in the activities carried out by the company.

The company's energy policy emphasizes continuous improvement and optimization of operations to reduce energy consumption and related costs. It aims at minimizing energy losses, in particular through the efficient use of electricity and fuels, improving performance in thermal power generation, vehicle operation and rail shunting. Energy efficiency is also integrated into new projects, investments and modernizations of equipment, facilities and processes, thus supporting long-term sustainability. CONPET S.A. pays attention to the procurement of energy efficient products and services, ensuring their optimal use and maintenance, and aligns with international standards such as ISO 50001:2019 for energy management and ISO 14001 for environmental management.

However, although there is an extensive risk and impact assessment procedure in place, the significant issues identified at company level are mainly focused on environmental protection issues such as contamination and waste management. Key topics such as the energy transition and reducing the impacts of climate change are not thoroughly addressed by existing policies, so CONPET S.A. proposes that in the medium term it will expand the strategic framework to explicitly include these priorities.

By implementing them, CONPET S.A. aims to contribute to reducing its carbon footprint and contributing to achieving climate neutrality by 2050. The company also commits to a reduction of greenhouse gas (GHG) emissions (Scope 1 and Scope 2) by 8% by 2030 compared to the reference year 2024, indirectly aligned with EU climate targets ([European Climate Act.](#))

4.1 Carbon footprint and emission reduction targets

GHG emission calculation methodology and reporting limit

The inventory of greenhouse gas emissions at CONPET S.A. was carried out in accordance with international standards and methodologies, ensuring **the accuracy, transparency and comparability** of the reported data. The company has simultaneously aligned itself with the requirements of the **GHG Protocol** in line with the provisions of ESRS E1-6. The full report is available to interested parties on request.

Delimitation of reporting boundaries

The organizational and operational boundaries for the GHG inventory were defined based on CONPET S.A.'s **operational control**. All significant sources of emissions associated with our crude oil pipeline and tanker transport activities and supporting operations were included. Through this delineation, we ensure that **the entire value chain relevant to** the company's business is covered, in line with the requirements of the CSRD and [OMF no. 85/2024](#) to include sustainability information along the value chain, but also avoid double counting or inclusion of negligible irrelevant emissions.

Data collection processes and tools used

CONPET S.A. used the digital platform **CarbonTool** (specialized SaaS solution) to collect, centralize and calculate GHG emissions. Activity data, such as the amounts of fuel consumed, electricity consumption, kilometers traveled by employees on business or the tonnage of waste generated, were collected systematically, following internal reporting procedures. Both direct measurement methods were applied (where tools/metrics were available, e.g. for energy consumption from invoices, fuel quantities from management records) and estimation methods where direct measurement was not possible (e.g. estimating emissions from employee **telecommuting** based on average household energy consumption and national energy mix). All calculations were performed using **recognized and updated emission factors** from reliable national and international databases: e.g. conversion factors from official inventories (ANRE for electricity in Romania, [national emission inventory for fossil fuels](#)), factors from the [IPCC, DESNZ – Department for Energy Security and Net Zero](#) and [EPA](#) database (for standard fuel combustion), as well as specific factors recommended by **ADEME France** ([Bilan Carbone database](#)) were used where detailed estimates were needed (e.g. for the footprint of capital goods or purchased services).

Methodological principles applied

The entire accounting process followed the principles of **relevance, completeness, consistency, accuracy and transparency**. It has ensured that all significant (relevant) emission sources are included, that there are no major omissions (the inventory is complete per defined perimeter), that calculation methodologies are consistently applied for all categories, that data are accurate and verifiable, and that the calculation method and assumptions are transparent and documented. This allows stakeholders - both internally (management, shareholders) and externally (authorities, investors) - to **have confidence in the information reported** and to compare CONPET S.A.'s performance with that of other companies.

For **Scope 1 and Scope 2 emissions**, the calculation methodology was straightforward: activity data (e.g. thousand liters of diesel consumed, MWh of electricity consumed) were multiplied by the emission factors corresponding to each fuel/energy type. CH₄ and N₂O emissions were converted to CO₂ equivalents using 100-year [global warming potentials \(GWP\)](#) according to the IPCC 5th Assessment Report, ensuring uniformity of metrics. For **Scope 2 emissions** under the GHG Protocol, both *location-based* (based on national grid-averaged emissions) and *market-*

based (based on the contractual mix of purchased energy) approaches were applied. The main reporting was done using the *location-based* methodology and the difference was transparently disclosed.

For **Scope 3 emissions**, the GHG Protocol Corporate Value Chain (Scope 3) standard and the guidelines associated with each category were followed. The complete list of indirect emission categories in the value chain (15 possible categories according to the GHG Protocol) was identified and, based on significance to CONPET S.A.'s activity, emissions have been quantified for the applicable categories: *purchased goods and services*, *capital goods*, *fuels and energy related to downstream activities* (emissions from the production of fuels and energy used by the company), *upstream transport and distribution* (in our case, emissions from the transport of crude oil by third parties, but this component is small as transport is mostly provided by CONPET S.A.), *waste generated in operations*, *business travel*, *employee commuting*. The categories of *downstream transport and distribution*, *processing and use of products sold* are not relevant, as the company does not sell a finished product for use by the customer, but provides a transport service for industrial customers. The company also has no emissions from *franchises* or *financial investments* of the type covered by the GHG Protocol in other entities, as these are not part of our business model. Through this filter, **Scope 3 reporting has included all significant sources** and excluded non-applicable sources, ensuring compliance with the **materiality principle** - we focus on the most relevant emissions.

For each sub-category of Scope 3 included, **the calculation methodology** was tailored to the specifics: for example, emissions from *capital goods* were estimated based on the value of capital investments in 2024 and average emission factors (tCO₂e per million euro invested, broken down by project type, according to ADEME database) calibrated with information on the main projects (station modernization, new pipelines - which have larger footprint - vs. standard equipment purchases). Emissions from *purchased goods and services* were calculated using emission factors per monetary unit for different expenditure categories (e.g. metallic materials, chemicals, IT services, etc.), according to extended input-output methodologies in terms of environmental impact. Emissions from *waste* were calculated according to the type and treatment of each waste (e.g. incineration vs. recycling, each with its own emission factor). For *business travel*, transport documents (km traveled) and mode-specific emission factors (flight by average distance per passenger-km, car transport per km, etc.) were used. *Employee commuting* was estimated by an internal survey on modes of transport and average distances, then applying emission factors per km for each mode (private car, public transport). *Upstream fuel and energy* emissions were calculated as a percentage of direct consumption emissions (using standard factors that add the footprint from exploration, refining and transport for each fuel or kWh consumed).

Ensuring data quality

The data collected from the different working points have been cross-checked with primary sources (invoices, consumption registers, technical reports) to detect any omissions or anomalies. The platform used has automatic validation mechanisms that signal if certain intensities (e.g. liters of fuel per km traveled) fall outside the expected ranges, allowing input errors to be quickly corrected. At the end of the calculation process, the inventory has been reviewed by an internal

multidisciplinary team (environment, energy, operations) to ensure consistency and accuracy of the data. This approach ensures a high level of confidence in the 2024 GHG emissions inventory, thus establishing the base year for setting future targets and measuring progress.

Results of the calculation footprint report (emission calculation scopes 1, 2 and 3)

In **2024**, the **total GHG emissions of CONPET S.A.** were **18,906.59 tons of CO2 equivalent (tCO2e)**, distributed as follows by categories of scopes:

- **Scope 1 Emissions:** The main sources of Scope 1 emissions cover all direct emissions from sources owned or controlled by CONPET S.A., including, but not limited to, company vehicles and on-site fuel combustion. Emissions from this scope accounting for approximately 12.7% of total emissions, or **2,630.41 tCO2e**, are mainly from company-operated vehicles and on-site fuel combustion. Therefore, **the emission reduction priorities for Scope 1** are mainly aimed at decreasing fuel consumption in stationary processes and internal road/rail transport.
- **Scope 2 Emissions:** This scope includes greenhouse gas (GHG) emissions from the production of electricity, heat and steam purchased and consumed by CONPET S.A. These indirect emissions are a consequence of the company's energy consumption, but occur in sources owned or controlled by another entity. Their value is approximately 21.4% of the total, namely **4,451.10 tCO2e** are **mainly generated from electricity consumption at CONPET SA's pipeline pumping stations and operational facilities**. They highlight **the operational dependence on electricity** and justify the company's focus on increasing energy efficiency and increasing the contribution of renewable sources in its own electricity consumption.
- **Scope 3 emissions:** These are indirect emissions from value chain activities such as goods purchased, business travel and product use. This category includes GHG emissions from CONPET S.A.'s extended value chain and constitutes the largest part of its carbon footprint. Their total value is **11,825.08 tCO2e which represents** approximately 65.9% of the total attributed to **third party logistics, business travel, upstream procurement and waste management activities**. These emissions - representing almost **two thirds of the total** - emphasize the importance of climate impacts beyond the direct operations of CONPET S.A. Certain sub-categories have been assessed as **not applicable** to CONPET S.A.'s business model and are not included in the inventory, respecting the materiality principle (e.g. the company has no emissions from franchises or from the use of products sold to end customers, as CONPET S.A. provides transport services and does not commercialize a final product with own emissions). With this approach, the reporting covers the entire relevant value chain, focusing on material sources of emissions and aligning with the requirements of OMF 85/2024 on the inclusion of sustainability information along the value chain.

TABLE 4.1. Categories and quantities of greenhouse gas emissions

Emissions category	Amount of greenhouse gas emissions (tCO ₂ e)
Related emissions Scope 1	2.630,41
Fuel burned on site	1.394,46
Mobile emission sources	1.235,95
Fire-fighting equipment	N/A - No use of fire-fighting equipment recorded
Refrigeration and air cooling equipment	N/A - There were no completions for coolant
Related emissions Scope 2	4.451,10
Purchased electricity	4.451,10
Heating purchased	N/A - No centralized heat energy was supplied to CONPET S.A.
Purchased cooling	N/A - No centralized cooling energy was supplied to CONPET S.A.
Related emissions Scope 3	11.825,08
Goods and services purchased	1.674,95
Capital goods	8.220,41
Waste	376,19
Business travelers	34,15
Employee commute	78,76
Upstream transport and distribution	Issues already included in Goods and services purchased
Downstream transport and distribution	N/A - CONPET S.A. does not sell products
Upstream leased assets	Emissions already covered in Scope 1 and 2
Downstream leased assets	Emissions already covered in Scope 1 and 2
Processing of products sold	N/A - CONPET S.A. does not sell products
Treating products sold at the end of their life cycle	N/A - CONPET S.A. does not sell products
Francize	N/A - No franchises available
Investments	N/A - No investments available
Fuel and energy-related activities	1.440,62
Total emissions (tCO₂e)	18.906,59
Domestic water purchased (out of scope)	8,12

According to the table above, **Scope 3 emissions dominate the company's carbon profile (~66%)**, while **the contribution from Scope 1 is relatively small (~13%)** and **Scope 2 is ~21%**. This distribution indicates that **CONPET S.A.'s own operations (scopes 1 and 2)** generate only a fraction of the total climate impact, while **upstream and downstream activities (scope 3)** have a major share. This underlines the need to extend decarbonization efforts **beyond the company's immediate operational boundaries** - for example, by working with suppliers to reduce emissions in the supply chain and by integrating environmental criteria into procurement and investment design (eco-design) - while optimizing own emissions.

Compliance with ESRS E1 (E1-5, E1-6, E1-7, E1-8)

Energy intensity is a key indicator in assessing the sustainable performance of an energy company. In the case of CONPET S.A., the 2024 sustainability report presents in Section 8.1 a precise indicator in line with ESRS requirements: 13.21 kWh/1,000 RON net revenues. This result reflects the energy efficiency of the company's operations and is in direct correlation with the energy modernization and optimization initiatives mentioned in Chapter 4.3. To strengthen future performance, CONPET S.A. proposes an annual energy intensity improvement target (e.g. - 2%/year), which allows for tracking progress and comparability over time.

Greenhouse gas (GHG) emissions intensity is also reported in line with GHG Protocol and ESRS standards. CONPET S.A. indicates a value of 13.26 kg CO₂e/1,000 RON net revenue, a result obtained by aggregating emissions from all three scopes (Scope 1, 2 and 3), as detailed in Chap. 3.3 and Chap. 8.1 of the report. This reporting provides a complete picture of the company's climate impact. In order to support transparency and to encourage performance improvement, the company aims in the medium term to contextualize this indicator through sector benchmarking - a comparison with other European energy transport operators.

Regarding the use of offset mechanisms such as carbon credits, it appears from all the compliance tables (including the integrated ESRS) that CONPET S.A. did not use offset mechanisms such as afforestation, carbon capture and storage (CCS) or other voluntary methods of greenhouse gas (GHG) emissions absorption in 2024. This absence is justifiable and does not affect compliance with the ESRS, but for the post-2025 period the company proposes to develop a feasibility analysis on the integration of voluntary offsetting instruments in the context of the progressive decarbonization of the energy sector.

Concerning the internal carbon price, the report does not present in 2024 a calculation model or any applied simulation. However, the ESRS Integrated Table mentions the intention to model such a tool for the next reporting cycle. The implementation of an internal carbon price (e.g. 85 €/t CO₂e) would allow the integration of climate risks into investment appraisals and strengthen ESG governance. This would allow the company to report in the next report the estimated impact of decisions on the carbon footprint and cost associated with emissions, aligning with European best practice in climate risk accounting.

Climate change mitigation and adaptation targets (ESRS E1-4)

The company allocates resources to climate change mitigation and adaptation, focusing mainly on optimizing energy consumption and transition to renewable energy sources. Well-grounded measures to reduce energy consumption are included in the Action Plan to Achieve 2024 Energy Goals and Targets, and are geared towards maintaining and continuously improving energy efficiency within the organization.

In the absence of previous quantification of greenhouse gas (GHG) emissions, no concrete targets have been set. There has also been no formal assessment of assets exposed to climate risk and this is reflected in the absence of specific measures to address this issue.

IMPLEMENTATION OF THE CLIMATE STRATEGY FOR CARBON FOOTPRINT REDUCTION AT CONPET S.A.

In 2024, CONPET S.A. has implemented a series of **concrete measures to reduce its carbon footprint**, which have proven their effectiveness and underpin the achievement of its long-term climate goals. **Key achievements in 2024** include:

- ✔ **Procurement of electricity from renewable sources:** The company has a contract with a supplier that provides 90% of its total electricity consumption with an energy label with a high share of renewable energy. This has directly contributed to the reduction of Scope 2 emissions by reducing the dependence on energy from conventional sources with higher emission factors.
- ✔ **Improved operational energy efficiency:** Investments were made in upgrading pumping stations and optimizing pipeline transport processes. The implementation of consumption monitoring systems and upgrading of equipment resulted in **to maintain electricity consumption kwh/tonne transported within the limits approved by the AGM**, improving the energy performance of the national crude oil transport system. Thus, emissions associated with energy consumption (Scope 2) were mitigated compared to a lower efficiency scenario.
- ✔ **Installation of solar energy systems at work points:** In 2024, CONPET S.A. initiated the installation of photovoltaic panels at two automated stations (Constanța Sud and Călăreți) to generate clean energy on-site. Each installation has a capacity of ~60 kWp, with an estimated annual production of ~70-80 MWh green electricity per location. This energy will offset part of the grid consumption of the respective stations. The photovoltaic projects - implemented in 2024 and operational in the first part of 2025 - will give CONPET S.A. **prosumer status at the respective locations**, allowing any surplus solar energy to be injected into the local grid. Harnessing on-site renewable energy helps lower operating costs and **increases the company's resilience** to possible future increases in electricity prices or carbon costs.

These actions realized in 2024 demonstrate CONPET S.A.'s desire to align with European climate objectives (European Ecological Pact) and chart a trajectory towards **net zero operational emissions**. At the same time, the **2024 operational context** also included factors that

temporarily increased the carbon footprint: the expansion of sourcing activities and the deployment of major investments led to increased Scope 3 emissions (especially those associated with **capital goods** and **third-party logistics**). For example, strategic infrastructure modernization projects have involved increased purchases of equipment and materials, generating additional emissions in the supply chain. Scope 3 emissions are the most difficult to reduce as they depend on supply chain practices and processes, but CONPET S.A. aims to work with sustainable suppliers in the future, in line with the principles of public procurement in place, to reduce its overall indirect emissions.

Having already substantiated decarbonization actions, CONPET S.A. is in a favorable position to continue its emission reduction trajectory in the coming years. The company will continue to implement measures to reduce greenhouse gas emissions by optimizing operational processes and increasing the use of sustainable energy sources. The company will also develop sustainable strategies to reduce its carbon footprint and identify alternative energy solutions. By combining these efforts with a clear strategic vision on sustainability, CONPET S.A. is integrating the requirements of ESRS E1 (Climate Change) into its day-to-day business, increasing transparency and stakeholder engagement. In the future, progress will be reported regularly and the strategy will be updated as necessary so that the emissions reduction trajectory remains aligned with the latest science, aiming to limit global warming to 1.5°C. In the long term, the company is pursuing a **vision of climate neutrality by 2050**, in line with EU targets and the Paris Agreement, ensuring stakeholders that the decarbonization path is firmly set and pursued step by step.

4.2 Climate change risks and adaptation measures

Pollution-related policies (ESRS E2-1)

CONPET S.A. has implemented an Environmental Management Program in order to achieve environmental objectives and manage the risks associated with pollution. This program includes specific actions to monitor and prevent pollution in various environments.

The company constantly monitors environmental factors such as water, air and soil to ensure compliance with the quality standards set by the regulations in force. This monitoring allows early identification of possible deviations and implementation of necessary corrective measures.

In order to prevent accidental pollution and technological risks, specific measures have been established, including the reduction of the number of failures with significant environmental impact and the identification of major hazards for lower-tier objectives. These measures are an integral part of the annual environmental management program and are regularly reviewed to ensure their effectiveness.

During 2024, a total of 13 environmental incidents occurred. All identified environmental incidents were remediated in accordance with the requirements of the regulatory acts.

Air, water and soil pollution (ESRS E2-4)

CONPET S.A. has implemented an advanced pollution prevention and remediation system in compliance with the requirements of environmental regulations and environmental authorizations. This system includes technical and operational measures designed to minimize pollution risks, prevent environmental accidents and ensure rapid responses in case of adverse events. The whole system is built to protect the environment and ensure compliance with water, air and soil quality standards.

To prevent accidental pollution, the crude oil tanks are equipped with automated measurement and control facilities and the storage areas are equipped with retention dikes and spillways, which are essential to capture and redirect any spills of hazardous substances. In addition, all tanks are built on concrete platforms and pumps are installed in enclosed spaces with safety systems to prevent any risk of accidental spills. For emergency situations, the pumping stations are equipped with absorbent materials and fire-fighting means, including water tanks and foam generators.

The company monitors all air pollutants covered in the environmental permits, following specific procedures. In this context, the impact is positive and current, but minimal, as it is mainly related to compliance with the legislation in force, without involving additional measures going beyond the regulated requirements.

The company monitors water pollutants in accordance with the Environmental Authorization (MA) and the Annual Program for Monitoring and Measurement of Environmental Factors Characteristics, complying with the frequencies established for each category. Until the reporting year, the results of this monitoring were reported exclusively through the Environmental Report to the competent authorities. This information was not made public until this year. Continuous monitoring and reporting is essential to identify and reduce any negative environmental impacts so that the impact is positive, current but negligible.

Substances of high concern and substances of very high concern (ESRS E2-5)

There is a comprehensive inventory of hazardous substances, managed through the ITM Lists, with clearly assigned hazard classes for each substance and mixture. The impact is positive but not negligible since this is a legal compliance criterion. The quantity of hazardous substances is monitored under the Environmental Authorization. Being a legal requirement, the impact, although positive, is negligible. CONPET S.A. does not use groups of hazardous substances from lists I and II and priority/priority hazardous substances for which phase-out measures are to be implemented.

All chemical substances are declared to ATPMs and included in environmental authorizations. Internally, the management of hazardous chemical substances and chemical mixtures is detailed in the operational procedure "Management of hazardous chemical substances and chemical mixtures" (COD PO-20-07). CONPET S.A. uses a substance included in the SHVC authorization list - potassium chromate - for laboratory analysis. The following substances are used in the SHOC process: crude oil, rich gas, condensate (and mixtures), dyes (including primers) and

chloroform (for analysis). The reduction of the use of SHOC/SHVC substances, without a change in the business model or core activity, aims at optimizing the reactants and liquids used for maintenance. For SHVCs (mercury and potassium chromate), a minimum stock, kept under maximum security conditions, has been confirmed. This standard is included in the crude oil transport contracts with partners OMV and Lukoil. In 2024, the quantity of 10% potassium chromate solution used was 100 ml (0.1 L). As the company does not produce this substance, it was not necessary to submit a REACH declaration. Currently, the laboratory has a stock of 200 ml of 10% potassium chromate solution. Mercury is present at the site because it has been previously used in laboratory analysis. As a precursor of banned substances, it is kept under maximum security and the local authorities are informed of this situation.

Products such as crude oil, rich gas (methanol, toluene, benzene) and condensate are classified as hazardous substances and cannot be substituted. However, depending on the type of crude oil (e.g. if it has a high sulfur content), the company implements appropriate protective measures for employees, such as the use of gas semi-masks with filter cartridges, when the situation requires it. In 2024, no such measures were necessary.

The associated risks are carefully analyzed and protective measures are adapted according to the exposure time of the employees. In the process of analyzing the composition of crude oil, the substances used cannot be substituted with less hazardous alternatives, as no such substitutions exist; however, the handling of these substances is carried out under the niche to minimize exposure.

As regards paints, where possible, the company has replaced traditional paints with less toxic water-based variants, thereby helping to reduce environmental and health risks to employees. For workers who handle hazardous substances as part of the work process, the employer provides protective nutrition as an additional safety measure and to support their health.

For all these reasons, it can be stated very clearly that there is no negative impact related to CONPET S.A.'s ShOC/SHVC. All measures that can be taken for safe replacement/maintenance of these substances are being followed. The impact is postic but minor (related to paint replacement).

CONPET S.A.'s main activity is the transport of crude oil and petroleum products, without being involved in upstream activities (such as extraction or exploration) or downstream activities (such as processing and refining), which are usually associated with the use of hazardous or REACH-regulated substances. The company does not process or chemically modify the transported crude oil, but purchases it strictly for onward delivery. Thus the dimension related to the reduction of the use of hazardous substances is not relevant to the specific activity of the company, as it only operates as a transporter, without influencing the value chain beyond the actual delivery.

Pollution targets (ESRS E2-3)

The company has set targets for compliance with pollutant limits in accordance with the requirements of each environmental permit issued. Thus, the negative environmental impact is effectively limited. However, the efforts made by the company are in line with the legal provisions, and no additional measures beyond those already regulated by the legislation in force are considered necessary to achieve these targets. The impact is positive but minor.

The regular assessment of these risks is integrated into CONPET S.A.'s risk management strategy, allowing the company to take appropriate adaptation and mitigation measures. The main categories of climate risks identified include:

- 🔧 **Physical risks:** The increase in the frequency and severity of extreme weather events as an effect of climate change poses a direct threat to oil transport infrastructure. According to the ["State of the Climate - Romania 2024"](#) report and other climate analyses, Romania is already facing an increase in the frequency and intensity of extreme weather events - major floods, severe droughts, heat waves and severe frost episodes - projected to worsen by 2050, affecting agriculture, public health and infrastructure. Such events can affect pipeline routes (landslides caused by heavy rainfall), flood pumping stations or cause **thermal stress on equipment**, increasing the risk of operational disruptions or failures.
- 🔧 **Regulatory risks:** Evolving climate policies and regulations at EU and national level may lead to **stricter compliance requirements and increased costs** for companies in the hydrocarbon transport sector. The European Climate Act stipulates to reduce GHG emissions by 55% by 2030 (compared to 1990 levels) and achieve climate neutrality by 2050. These objectives are translated into policies such as carbon pricing mechanisms (ETS and CO₂ emission taxes), increasingly stringent emission standards and stricter environmental permits for climate-risk infrastructures, as well as by reducing the amount transported. For CONPET S.A., such changes may mean **higher operational costs** - e.g. carbon taxes on fuel and electricity consumption - as well as **additional capital expenditure** to modernize facilities to comply with new safety and environmental standards. Adapting to regulations such as the forthcoming requirements of the "Fit for 55" package requires investments and forward planning so that the company avoids penalties and takes advantage of opportunities created by green transition policies (retrofit funds, sustainable financing, etc.).
- 🔧 **Market transition risks:** The global transition to low-carbon energy and the decarbonization of the economy present long-term challenges for the oil industry and, by extension, for crude oil transport operators. EU policies - such as the *Green Deal* and the *Fit for 55* package - are promoting **the electrification of economic sectors and the development of alternative fuels**, with the aim of drastically reducing fossil fuel consumption. In this context, the demand for transported crude oil could gradually decrease: for example, the accelerated transition to electric vehicles and green technologies in transport may reduce the volumes of petroleum products needed, and thus also the volume of crude oil that needs to be transported by pipeline or rail. For CONPET S.A., a structural decrease in demand for crude oil transport (as the national energy mix

changes) could lead to **underutilization of existing infrastructure** and pressure on revenues if the company does not adapt its business model. This transition risk requires the company **to diversify its long-term use of infrastructure** and identify new opportunities in the decarbonized economy in order to maintain its relevance and profitability.

ADAPTATION AND RESILIENCE STRATEGIES IMPLEMENTED

In order to manage the above climate risks, CONPET S.A. is acting proactively through a series of measures aimed at increasing operational resilience and mitigating vulnerabilities. Thus, the company is carrying out an ongoing program of **modernization and strengthening of the transport infrastructure**, aimed at increasing the network's ability to withstand the impact of extreme weather events. A notable example is the project completed in 2023 **to cross under the bed of the Danube River and the Borcea Arm** through horizontal directional drilling (investment ~€26 million), which replaced a vulnerable section of pipeline. This modernization significantly reduces the risk of crude oil spills or major flood damage, while ensuring the continuity of a critical transport link. CONPET S.A. also has programmes to **gradually replace obsolete pipelines**, upgrade pumping stations and **improve the integrity of the National Transport System (NTS)**, anticipating the possible effects of increasing rainfall, temperature variations and other climatic stress factors. Such preventative measures improve operational safety and **reduce the likelihood of environmental incidents**, protecting both the company and the ecosystems it crosses.

In 2024, CONPET S.A., with the support of an external service provider, conducted its first full ESG reporting exercise. To ensure compliance with the specific requirements, the company implemented a set of integrated measures aimed at improving the accuracy, transparency and reliability of reported data.

Key measures implemented in 2024:

- **Collecting ESG data from CONPET S.A.'s operational reports, consolidating a centralized system for tracking them.**
- **Continuous external validation of the ESG indicators** by specialized consultants, by linking directly to the explicit requirements of the ESRS (E1-E5, S1-S4, G1), ensuring accuracy and compliance of the reported information
- **Independent external audit** performed on ESG data to ensure reliable reporting and alignment with European and international standards (ISO 14064-1, GHG Protocol).
- **Improve the data management process**, reducing human error and improving the efficiency of the collection and analysis process.

2024 RESULTS

- **ESG data** was collected and integrated according to the ESRS methodology.
- **External audit** by independent firm to validate ESG compliance.

a. Integrating ESG requirements into corporate strategy

ESG compliance is not only a reporting obligation but also a strategic tool for improving corporate competitiveness and transparency. In this regard, CONPET S.A. has already started to actively integrate ESRS requirements into its business strategy by creating a dedicated sustainability responsibility structure with specific ESG data management tasks.

🟢 Proposed measures:

- **Continuous assessment of the company's activities** against the **EU Taxonomy Regulation 2020/852**, ensuring that eligible activities are identified and aligned with the technical criteria of DNSH (Do No Significant Harm).
- **Formation of a Sustainable Development Working Group.**
- **Identify strategic ESG indicators**, linking them to the **financial materiality** assessment to anticipate sustainability risks and opportunities.

🟢 The impact of these measures:

- **Employees** involved in the collection and reporting process will be trained in ESRS and CSRD methodologies.
- **New sustainable projects will be** integrated into the corporate development strategy, including investments in renewable energy and reduction of resource consumption, with the potential for concessional financing through sustainability clauses.

b. Audit and certification of ESG management systems

To guarantee the quality and reliability of the reported data, CONPET S.A. will strengthen the ESG management systems by maintaining the relevant international certifications:

- **ISO 9001** quality management system **certification**
- **ISO 14001** environmental management system **certification**
- **ISO 37001** anti-bribery management system **certification**
- **ISO 45001 certification** for occupational health and safety management system
- **ISO 50001** energy management system **certification**

Objectives for verifying compliance in sustainable development:

- **100% compliance with** ESRS and CSRD requirements for the first reporting cycle.
- **Zero major non-conformities** identified in the ISO audits performed.
- **Optimization recommendations** to improve the ESG collection and reporting process, to be integrated into the 2025-2026 strategy.

c. Evaluated initiatives for continuous improvement of ESG reporting

To ensure continued compliance with ESRS requirements and to improve the transparency of ESG reporting, CONPET S.A. proposes to implement the following improvements:

- **Standardize the reporting format**, using structured tables and quantifiable indicators for each ESG aspect.
- **Linking ESG performance to financial impact**, directly highlighting the link between sustainability and the company's financial results.

These improvements will contribute to increasing the accessibility and comparability of ESG data for investors and stakeholders, enhancing the transparency and credibility of ESG reporting at national and international level, as well as reducing ESG risks and anticipating future legislative requirements through a proactive approach.

Investment in alternative energy sources and diversification of activities

As part of its strategy to mitigate transition risks, CONPET S.A. is investigating opportunities in the field of green energy and reuse of existing infrastructure. In the medium term, the company is investing in renewable energy generation and energy efficiency, both to reduce operational emissions and to gain expertise in the new energy landscape.

At the same time, CONPET S.A. is assessing possibilities for adapting its infrastructure to transport low-emission products - for example, it is investigating whether certain pipelines or facilities could be reused in the future for the transport of biofuels or other low-carbon liquids. While the transport of crude oil remains the core business today, these forward-looking investments signal CONPET S.A.'s commitment to evolve with the energy transition and reduce dependence on high-emitting activities. By progressively aligning its asset base and competencies with Romania's national decarbonization strategy, the company aims to mitigate the risk associated with the transition and capitalize on new opportunities in an increasingly *green* economy.

Overall, CONPET S.A.'s approach to climate change combines measures to reduce its own climate impact (decreasing GHG emissions) with adaptation to the already felt or anticipated effects of climate change. The company approaches climate change both as a **business risk to be managed** and as a **corporate responsibility**, integrating these concerns into strategic planning, investments and daily operations. Adaptation measures described above increase the resilience of critical infrastructure, while mitigation initiatives reduce the carbon footprint and prepare the company for future regulations and market conditions. CONPET S.A. is committed to continue regular climate risk assessment and to expand the portfolio of response actions, ensuring **long-term sustainable development** in harmony with global climate goals and stakeholder expectations.

ANALYSIS OF CLIMATE SCENARIOS AND IMPACT ON CONPET S.A.

As part of the climate risk management process, CONPET S.A. analyzes the potential impact of climate change on its infrastructure and operations by identifying physical and transition risks. In line with **TCFD ([Task Force on Climate-related Financial Disclosures](#)) recommendations**, climate scenarios are essential for **anticipating future challenges** and adapting the company's strategy to a changing operating environment.

Currently, the material deals with two main climate scenarios:

TABLE 4.2 Main climate scenarios

Scenario 1: Moderate global temperature increase (+2°C by 2050)
Impact: Increased frequency of extreme weather events (heat waves, floods)
Adaptation measures: Investments to maintain an advanced degree of operational safety and to monitor the condition of pipelines.
Scenario 2: Severe global temperature increase (+4°C by 2050)
Impact: Increased risk of major floods, increased frequency of landslide events
Adaptation measures: Implement an advanced monitoring system to prevent damage to pipelines in risk areas.

In the future, **CONPET S.A.** aims to develop a framework for the assessment of climate scenarios, including specific modeling for the physical and financial risks associated with each scenario. These assessments will enable the alignment of business strategy with climate resilience objectives and help adapt infrastructure to anticipated environmental changes.

4.3. Energy efficiency and renewable energy initiatives

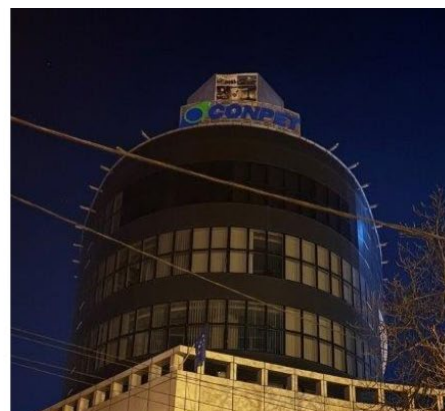
CONPET S.A. focuses its efforts on **reducing its carbon footprint and increasing energy efficiency** in all aspects of its operations, aligning with national and European climate objectives through projects to **harness renewable sources**, modernizing means of transport to make them more environmentally friendly and implementing smart energy management solutions.

Key initiatives undertaken or planned include:

- Solar energy projects in Constanta Sud and Călăreți:** The two photovoltaic projects at the Constanța Sud and Călăreți stations will act as **prosumers** in the CONPET S.A. electricity grid having the possibility to deliver back to the local grid the eventual surplus of renewable energy produced. In addition to reducing emissions, these investments strengthen the **energy security** of the operations (by providing part of the consumption from own sources) and protect the company from volatile energy prices and possible future carbon costs associated with conventional electricity.
- Solar energy projects at the secondary headquarters (Administrative Headquarters No. 2):** This system contributes to reducing grid electricity consumption and related emissions. This initiative is part of CONPET S.A.'s wider strategy to transition to green energy, alongside the photovoltaic projects at the Constanța Sud and Călăreți stations. The project provides the company with a reduction in CO₂ emissions associated with the consumption of electricity from conventional sources, increased energy efficiency and lower electricity costs, increased energy security through diversification of power supply sources and alignment with the company's sustainability direction and national and European climate goals.
- Optimizing energy consumption in the pipeline system and intelligent automation:** the SCADA system implemented at CONPET S.A. supports the company to **monitor in**

real time the flow rates, pressures and energy consumption at the pumping stations on the route and can adjust the operating parameters for optimal efficiency. Operators, with permanent monitoring of the network, can adjust the pumping schedule, redistribute loads between stations and prevent equipment from running inefficiently. The company's energy objectives explicitly include **maintaining energy, fuel and lubricant consumption** in transport processes. Concrete measures implemented or planned include: installation of **frequency converters** on pump motors (to fine-tune power to pumping requirements and avoid excessive consumption), improving pipeline flow (e.g. by adding friction-reducing additives and periodic cleaning of pipelines) and reducing technological product losses. In addition, the company integrates **automation and smart grid** technologies into the stations' energy system so that electricity consumption is optimized and correlated with local renewable energy production. In major stations such as Constanța Sud and Călăreți, the new photovoltaic plants will be managed by smart inverters and controllers, allowing the company to **maximize the use of available solar energy** and supplement from the grid only the amount needed. These efficiency measures, while primarily aimed at reducing emissions and costs, also have the effect of **increasing operational reliability** by reducing the chances of equipment overload and reducing thermal stress on system components. Overall, investments in energy optimization and automation contribute both to **lower carbon emissions** associated with the operations and to **strengthen the financial sustainability of CONPET S.A.** through the savings achieved.

Among the initiatives carried out in 2024 is CONPET S.A.'s participation in the largest voluntary environmental action in history, #EarthHour, now in its 18th edition. In March, between the company turned off the lights for an hour at its headquarters in Ploiești, reaffirming its commitment to environmental protection.



Through the implementation of the above initiatives, CONPET S.A. demonstrates its commitment to **harmonize operational growth with environmental protection**, leveraging technological innovation to achieve efficiency and decarbonization goals. The energy efficiency and renewable energy projects not only reduce the company's carbon footprint, but also serve as examples of best practices in the energy transport industry.

4.4 Water resources management (ESRS E3)

Water and marine policies (E3-1)

Within the Action Plan for Achieving the 2024 Energy Goals and Targets, there is a section that focuses on optimizing and maintaining water consumption in accordance with the requirements of the Water Management Permit. However, there are no specific actions other than those necessary to comply with legal requirements.

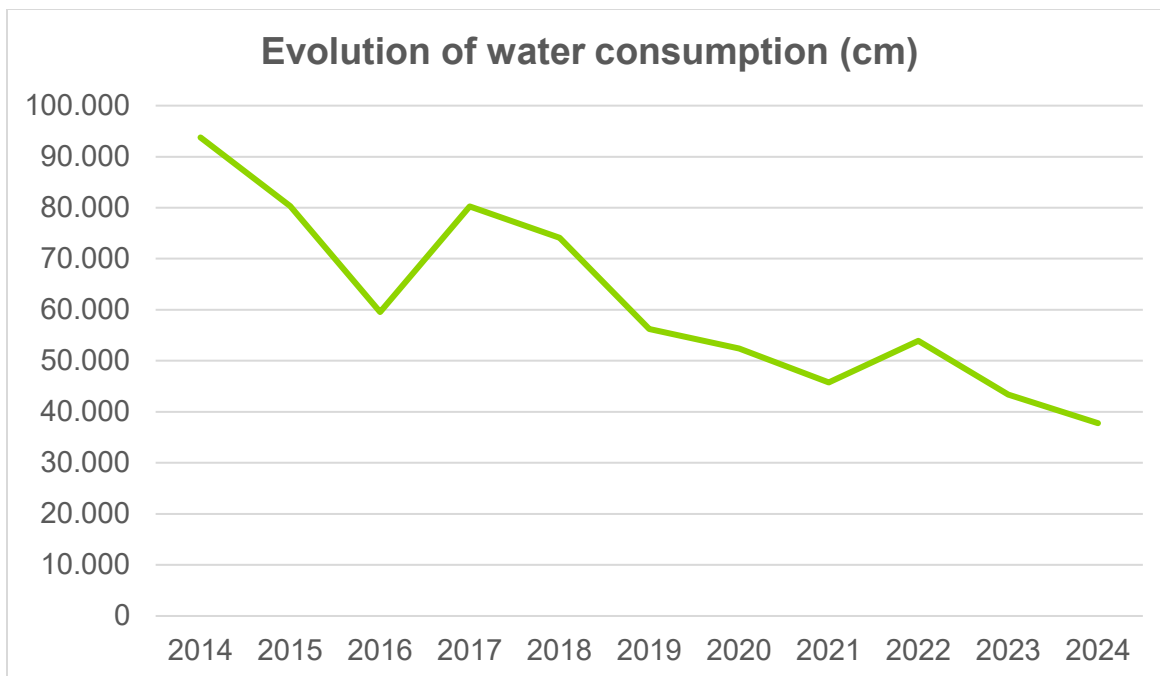
The company has implemented specific measures for the responsible management of water resources through the operational procedure "Water Management" (OP code 20-05). This sets out the modus operandi and responsibilities for water supply, collection, treatment and discharge of domestic, technological and stormwater wastewater, ensuring control over significant environmental aspects related to water use and wastewater discharge. It also regulates the management of water resources for consumptive and non-consumptive water uses.

In the case of water pollution, the greening works are carried out by a specialized company and the company has the obligation to monitor. Monitoring of watercourses is also carried out by the territorial water management authorities.

In order to prevent accidental pollution, the company has set up, by decision of the Managing Director, a dedicated team, made up of representatives from each area of activity, with defined responsibilities. In accordance with Order 278/1997, accidental pollution prevention and control plans are drawn up and endorsed, which include intervention measures and periodic simulations to ensure their effectiveness. On the prevention side, the crossings of watercourses with transport pipelines are equipped with shut-off valves on both banks, accidental spills collection sumps and protection tubes. Pipelines are also regularly inspected for corrosion losses and the results are used to prioritize capital repairs. The company holds stocks of rapid response materials, including skimmers, check dams, check dams, sorbent dams and biodegradable absorbent, helping to improve the quality and control of water discharged to the natural environment. The impact of these activities is positive but minor as they are limited to compliance with legal requirements. The implementation of these measures ensures compliance with the regulations in force, but does not bring significant additional benefits in terms of sustainability, only on the side of prevention and treatment of a potential negative impact related to water pollution. As the standard emphasizes, prevention/mitigation of a negative impact itself does not constitute a positive impact.

Water consumption (ESRS E3-4)

The company quantifies its water consumption, including locations in water-risk areas. The company has made significant progress in reducing water consumption, with a decrease of up to 60% since the start of monitoring. This reduction reflects the effectiveness of the policies and procedures in place. The impact is relevant, especially in the context of the risk of water stress, as optimizing water use contributes both to protecting natural resources and to ensuring greater availability for other essential uses.



Graph 4.1- Evolution of water consumption (cm)

Although the operation of the pipeline system does not involve significant water consumption, CONPET S.A. recognizes the importance of **responsible water management** and protection of water resources. Water is used by the company in certain supporting processes and operations - for example, in hydraulic strength testing of pipelines, for firefighting and for some maintenance works. The absolute volume of water used is not high compared to other industries; however, the **local context of water sources** is a factor to be taken into account. In some regions (**Videle, Cartojani, Constanța C2**) where the company has its own boreholes or extracts groundwater for operational use, water resources may be **under stress (water stressed areas)**. Water abstraction in such areas could, if not well managed, affect local availability for communities (wells, irrigation) and ecosystems, generating potential conflicts of use or future restrictions.

In terms of **the impact on the company**, water is not a significant cost (water expenses are minor in the total structure), and in 2024 there were no business interruptions due to lack of water. However, the **management of water resources is considered a material issue** especially in terms of the impact that operations may have on the environment and communities, even if the immediate financial risks for CONPET S.A. are low.

In terms of environmental and social impacts, the main water-related issues are: the possibility of **accidental pollution of surface or groundwater** in case of oil spills and the **consumption of water from local sources**. The company has implemented strict internal procedures to minimize these risks. Pollution prevention plans include specific water protection - for example, booms and weirs prepared to prevent crude oil from polluting rivers or streams in the event of a breakdown. In 2024, due to these preventive efforts, **there was no significant water pollution** caused by CONPET S.A.'s activities, which indicates the effectiveness of the protection systems. Water

consumption is also constantly monitored to detect possible losses and prevent wastage. **However, water abstractions in vulnerable areas remain an environmental concern:** even if the volumes are small, the long-term cumulative impact on local aquifers needs to be carefully assessed and managed so as not to negatively influence human users or habitats that depend on those water resources.

The risk analysis reveals several specific **risks and opportunities** in the water sector: A major **risk** is the scenario of accidental water pollution - for example, contamination of a river or groundwater following a pipeline burst - which would cause environmental damage, potential legal penalties, and substantial cleanup costs. Another risk, in the context of climate change, is that **water resources are becoming more precious** and there may be tougher restrictions on industrial water use (or higher costs of accessing it) in the future. On the other hand, there are **opportunities** for efficiency: by **reducing own water consumption** (e.g. optimizing testing processes and reusing water used in hydro-treating plants) and by applying **water recycling technologies** (such as filtering and recirculation systems for water used to wash equipment), the company can achieve operational savings and improve its environmental performance. By maintaining a track record of no significant water protection incidents (e.g. pollution incidents), the company also strengthens its relationships with local communities and authorities, demonstrating social responsibility and compliance with stakeholder expectations.

Water and marine resources targets (ESRS E3-3)

The Company complies with the limits imposed on the maximum flow rates for water supply from wells as required by law. However, there are no additional initiatives or measures that go beyond the compliance requirements required by law. The current impact of this practice is positive but negligible, as compliance with the limits contributes to the management of water resources without overexploiting them. Given that water is not a critical factor in CONPET S.A.'s operations - not being used directly in a production process - the influence of this progress on the company's overall sustainability remains moderate. The lack of proactive actions or extensive policies to conserve underground resources significantly reduces the potential to generate a more significant impact in the longer term. In this regard, CONPET S.A. proposes to formulate medium-term targets related to risk/opportunity management in water scarce locations/ reduction of water consumption, especially in water scarce locations.

In conclusion, while water management is not a major financial risk for CONPET S.A. in the short term, the company is taking this issue seriously, integrating sustainable water management principles into its operations and preparing for a future in which water will be an increasingly valuable resource.

4.5 Biodiversity and environmental protection (ESRS E4)

Protecting the environment and biodiversity are key components of CONPET S.A.'s sustainability strategy. Taking into account that the crude oil transport infrastructure crosses diverse ecosystems and communities, the company applies **good practices to prevent**

ecological impacts and has rigorous plans in place for incident management, ensuring a positive contribution to the conservation of local biodiversity.

Biodiversity and ecosystem policies (ESRS E4-2)

The company has environmental risk assessment procedures in place and has risk registers and control mechanisms in place for activities that may impact biodiversity. Although there is currently no dedicated biodiversity conservation policy, relevant assessments are integrated in the context of the risks associated with depollution works, accidental spills and maintenance activities. These assessments include preventive elements through monitoring of sensitive areas and corrective action in case of events. Although the biodiversity policy is not yet structured as a separate document, its principles are already implemented within the environmental risk management system. CONPET S.A. aims to translate them into a biodiversity policy.

Biodiversity targets (ESRS E4-4)

At present, there are no quantitative targets or dedicated strategies defined for the restoration of affected habitats, but there is a commitment that all greening works will comply with legal limits on land restoration and prevent the accumulation of petroleum substances. The internal assessment process recognizes that the lack of post-depollution biodiversity studies is a limitation and that this needs to be strengthened in the future. However, the current approach is based on the principle of "minimal impact and rapid remediation", which can be considered an operational form of targeting, even if not formally stated. Although CONPET S.A. has not implemented this policy at the date of the report, it is part of the strategy for the coming period.

Impacts on biodiversity (ESRS E4-5)

The impact on biodiversity is recognized as moderate and potentially negative, given that the infrastructure crosses natural areas where vulnerable species may occur. Both direct effects (such as accidental mortality, contamination or reduction in diversity) and indirect effects (alteration of food chains or habitat degradation) are recognized within the company, even if the degree of quantification is limited. In the absence of a clear dose-effect function, impact assessment is difficult, but the precautionary approach and integrated risk management provide an acceptable framework for compliance with ESRS requirements.

CONPET's main efforts in this direction cover:

Monitoring pipeline integrity and preventing leaks

CONPET S.A. uses advanced technologies for continuous monitoring of the pipeline network and early detection of any product leakage, among which we mention: the modern system of **detection and localization of crude oil leaks**, capable of quickly identifying abnormal variations in pressure or flow rate that may signal a rupture in the pipeline, the **cathodic protection** system

(which prevents corrosion of underground pipelines), the SCADA system, which provides centralized monitoring of operational parameters.

The company also applies **preventive and predictive maintenance** methods: pipelines are regularly inspected, including internal inspections with *smart dilwells* (devices that walk inside the pipeline and detect any corroded or defective areas), so that weakened sections can be remedied before damage occurs. Data analytics and risk modeling are used to identify segments more likely to fail, directing maintenance resources to critical areas. In addition, the company has also begun using **remote sensing techniques** to monitor pipeline corridors - for example, aerial drone surveys and satellite monitoring - aimed at detecting unauthorized activities near pipelines (construction, digging) or sudden changes in the landscape (landslides, flooding) that could indicate a problem. By integrating these technologies, the company improves its **early warning** and incident prevention capabilities. **Early detection of a leak** is crucial to enable a rapid response and limit the extent of the impact: immediate intervention can prevent a major environmental disaster while reducing remediation costs. Overall, the monitoring systems and proactive maintenance programs implemented by CONPET S.A. enhance the safety of transport operations and **protect the environment from accidental pollution**.

Oil spill prevention and response measures

The prevention of oil spills into the environment is an absolute priority for CONPET S.A., given that some pipelines cross sensitive areas (watercourses, fertile agricultural areas, protected natural habitats). At the watercourse crossings, the pipelines are equipped with sectioning valves on both banks and collection bays for any accidental spills. In addition to prevention, the company has strengthened its **rapid response** capacity in the event of an incident. **Automatic shut-off valves** have been installed on strategic segments of the pipelines, which can immediately isolate the affected portion in the event of a sudden drop in pressure, limiting the volume of crude oil that could leak. At pumping and storage stations, **retention basins and additional emergency barriers** have been installed. For example, at the Constanța Sud station, the company has installed a buried spill collection tank equipped with a pump for liquid evacuation, equipped with an automatic pumping system that can **capture any accidental crude oil spill** before it contaminates the soil or water. Even in unfavorable scenarios, these facilities ensure that spilled fluids are quickly contained, preventing their dispersion into the environment. In terms of operational preparedness, CONPET S.A. maintains **plans to prevent and combat accidental pollution**, in accordance with legal requirements, and has specialized, adequately equipped intervention teams. In collaboration with the local authorities (Emergency Situations Inspectorates, environmental authorities), the company organizes **regular simulations and drills** for crude oil pollution scenarios in order to train staff and optimize response times. CONPET S.A. has also invested in modern spill response equipment: **skimmers, booms, absorbent and protective booms**, strategically stored along pipeline routes (especially near water) to be deployed quickly if the situation requires it. Sustained efforts towards preventive maintenance and early detection have yielded notable results - recent years have seen a **decrease in the number of pollution incidents and the volume of oil spills**, reflecting the effectiveness of the measures put in place. At the same time, key projects such as the replacement of the Borcea sub-crossing pipeline section (mentioned above) have substantially reduced the risk of spills in environmentally

sensitive areas. In the unlikely event of a major spill, the company cooperates closely with the relevant environmental authorities to **remediate the affected sites**, aiming to restore the environment to its original state. Each incident is analyzed in detail, with a focus on continuous improvement of response time and intervention techniques so that the likelihood of similar events is minimized.

Conserving biodiversity and restoring ecosystems

CONPET S.A. pays particular attention to **the restoration of the environment** following any construction or maintenance works on its infrastructure. Internal procedures require that, after the completion of pipeline works, the affected land must at least be restored to its original condition. This involves, for example, **replanting of local vegetation and trees** in areas where soil has been excavated for pipeline replacement/inspection, as well as **rehabilitation of the soil structure** (compaction, restoration of topsoil) to allow habitat to be restored. In regions where pipelines cross valuable ecosystems - forests, wetlands, protected natural areas - CONPET S.A. works closely with environmental authorities to minimize the impact. A common practice is to use technologies **without open trenching** (e.g. horizontal directional drilling) when working under sensitive areas, as was the case for the Danube river undercrossing, precisely to avoid disturbing the riverbed and aquatic habitats. All of its operations strictly comply with applicable environmental regulations and standards; the company has a **certified Environmental Management System (ISO 14001)** that ensures continuous monitoring of environmental performance and compliance with legal requirements. Through these practices and standards, CONPET S.A. contributes to the **protection of local flora and fauna** and strives to leave a **positive environmental legacy** in the areas where it operates. Every approach - from proactive pipeline monitoring, to prompt spill response and land restoration - reflects CONPET S.A.'s commitment to sustainability and is aligned with ESRS guidelines on climate and environmental protection. The company will continue to enhance these programs, recognizing that **protecting the environment is essential to creating long-term value** and maintaining the trust of communities and partners.

4.6 Circular Economy - Waste Management (ESRS E5)

CONPET S.A. recognizes the importance of the circular economy and the reduction of waste generated by its activities, both for environmental protection and operational efficiency. The pipeline system operation and equipment maintenance activities generate various types of waste, including some hazardous ones, which require proper management. Waste generated includes: waste oils (from greasing of equipment and vehicles), oil sludge (residues collected from pumping stations or retention pans), contaminated soils and oil-soiled absorbent materials (from cleaning up minor incidents or maintenance work), and general industrial and household waste from the company's facilities.

Policies on circularity and resource utilisation (ESRS E5-1)

The company already applies a well-functioning waste collection, sorting and management system, implemented in all relevant workplaces. Collection is done selectively, with authorized partners and permanent take-back contracts, for controlled recovery or disposal. This process complies with current legislative requirements and its operation is integrated into the environmental compliance management system. Although there is no separate formal policy for circularity, the operational framework already demonstrates the consistent application of circular economy principles, in particular through actions aimed at preventing accidental pollution and maintaining a sustainable resource traceability regime. CONPET S.A. aims to adopt a policy on circularity and resource utilization in the coming period.

As part of its waste prevention and reduction program, CONPET S.A. invests in innovative technological solutions, such as advanced equipment for cleaning paraffin pipes and reducing the amount of sludge in tanks. The company also purchases solutions for the **efficient** and selective **storage of** recyclable waste (paper, metal, plastic, glass), thus optimizing the waste management process.

These measures contribute to **reducing waste quantities, improving waste management**, minimizing environmental impact through the use of state-of-the-art technologies and **increasing the efficiency and safety of internal operations**.

From a **business impact** perspective, waste management is a material issue, as large amounts of waste or improper waste management can lead to environmental risks (pollution, odor, health problems) and additional costs (disposal fees, legal obligations for fines). At the same time, good waste management can bring operational efficiencies by recovering some reusable materials and reducing the volume requiring final disposal.

In 2024, CONPET continued to apply a rigorous waste management system, following the principles of waste hierarchy. This approach has resulted in **minimizing the volume of waste sent to landfill**, reducing the risk of long-term pollution and possible future remediation costs. At the same time, the correct management of hazardous waste is essential for maintaining environmental permits and operating licenses, as any non-compliance can result in significant penalties.

To support these principles, CONPET has implemented internal measures to prevent and reduce hazardous and non-hazardous waste, which include:

- 🌱 **Allocation of competent human resources:** dedicated waste management and monitoring teams are present at each working point, ensuring constant monitoring.
- 🌱 **Sorting at source:** Waste is separated by type (paper, metal, plastic, glass), facilitating efficient recycling and reuse.
- 🌱 **Monitoring and reporting:** waste is monitored by type and location, and reports are submitted to the authorities as required by law, guaranteeing transparency and compliance, while ensuring waste traceability
- 🌱 **Waste trend analysis:** Waste quantities are monitored to identify any significant increase so that causes can be identified and corrected.

- 🌱 **Resource planning:** Emphasis is placed on the efficient use of materials that can generate waste, thereby reducing waste quantities.
- 🌱 **Preventive maintenance:** Continued investment in technical equipment and processes helps to reduce breakdowns that could generate specific waste, such as oil-contaminated soils.
- 🌱 **Rapid response to damage:** Rapid response measures limit the spread of pollution and prevent the generation of hazardous waste such as contaminated oil.
- 🌱 **Waste Management Contracts:** All CONPET sites are equipped with compliant waste management contracts, respecting the principles of waste prioritization.

Thus, these measures contribute to **reducing the amount of waste generated**, protecting the environment and complying with legal regulations, strengthening the efficiency of internal processes and maintaining the company's responsible environmental status.

Re-use and recovery targets (ESRS E5-3)

The company's approach includes clear measures to valorize waste and reduce the amount disposed of, in particular by avoiding the accumulation and efficient treatment of hazardous categories. Waste is identified, recorded and treated according to legal standards and is tracked through internal monitoring procedures. This practice continues to support recovery by authorized operators, and the implicit objective is to maintain a high level of re-use. Even if not expressed in a fixed annual percentage, there is an active strategic direction to minimize the quantity disposed of and maximize the recoverable components.

In terms of **environmental and social impact**, it is noted that in 2024 CONPET S.A. managed the waste generated **in accordance with legal requirements and good industry practice**. Most of the waste collected was **recovered or recycled**, avoiding direct disposal. The company keeps **transparent records** of the amounts and types of waste generated and how it is treated, allowing full traceability - from the point of generation to the final destination (recycler, incinerator or landfill). This transparency demonstrates accountability and facilitates reporting to authorities and stakeholders. Through its recovery efforts, the company makes a practical contribution to the circular economy by **reintroducing useful materials back into the economic cycle**: for example, waste oils are taken back by specialized companies for re-refining or use as alternative fuels, metal from pipe section replacement is largely sent for recycling, and oil sludge is treated so that the hydrocarbon fraction can be recovered.

However, it is important to note that the generation of hazardous waste is an unavoidable negative impact of CONPET S.A.'s activities, and regardless of process optimization, the maintenance of the crude oil infrastructure will continue to produce certain amounts of contaminated sludge and other residues. In 2024, there were no incidents of improper waste storage or disposal, which demonstrates the effectiveness of the waste management system. All hazardous waste was transferred to authorized operators and CONPET S.A. sites were not affected by pollution related to uncontrolled waste disposal

On waste **risks and opportunities**: A potential **risk** is that as operations grow or become more complex, the volume of hazardous waste could increase, putting pressure on temporary storage capacities and increasing disposal costs. Environmental regulations also tend to become more stringent - more ambitious recycling targets or even **bans on practices** such as the landfilling of hydrocarbon-containing sludges could be imposed in the future, which may require new technological solutions. On the **opportunities** side, innovative waste management can bring financial benefits by generating revenues or savings for the company. CONPET S.A. can explore partnerships or emerging waste reduction technologies - for example, the use of more efficient filters and separators to reduce the amount of sludge produced, or the implementation of on-site **bioremediation** solutions for lightly contaminated soils, converting them to a safe state without the need for off-site transport. Also, engaging employees in *Reduce-Reuse-Recycle* initiatives (such as reducing the consumption of disposables in the office, donating used equipment that can be reused by other entities, etc.) contributes to a **circular economy culture** in the organization.

Resource inputs - materials used (ESRS E5-4)

In operations, compliant materials and technological substances are used, but no centralized input table is currently published. However, as part of the environmental management system, the company tracks and documents the amounts of resources consumed, especially those related to critical processes. It recognizes the importance of integrating this data into a dedicated inventory in the future, with clear indications of the percentage of recycled or sustainably sourced materials. The company's strategic direction is already moving in the direction of supply chain efficiency and optimization of resource consumption.

Resource outputs - waste and recovery (ESRS E5-5)

Waste generated is identified by category - hazardous and non-hazardous - and is managed according to the treatment hierarchy. Recovery and disposal operations are carried out exclusively through authorized partners and monitoring is constant. The company keeps detailed records of waste types and treatment methods. Full traceability is followed and operational transparency is ensured including regular reporting to the authorities. The approach is a mature one, where ESG performance is reinforced by the internal control system and practical experience in circularity.

Waste generated in 2024

Generat	Recovery		Elimination		Other operation
	Recycle	Co incineration	Incineration	Storage	
2.336,58	171,81	89,60	1,03	193,45	1.840,89

Table 4.3. Waste generated in 2024

In conclusion, CONPET S.A. treats both the **consumption of water resources** and **waste management** with the utmost responsibility as integral parts of its environmental performance. By carefully monitoring water consumption, preventing water pollution and reducing reliance on

vulnerable sources, the company is minimizing its water footprint and potential adverse impacts on communities. At the same time, through effective waste management in line with the principles of the circular economy, the company reduces the risks of soil and water pollution, valorizes secondary resources and aligns with the EU's objectives of transition to a sustainable economy with **minimized waste and reused resources**. These practices contribute to **increasing the company's environmental resilience** and strengthen stakeholder confidence that operations are run in a long-term sustainable way.

According to ESRS E1-3, companies must clearly demonstrate that **their climate strategy** is backed up by concrete actions and resource allocation - not just declarations of intent. CONPET S.A. has integrated its climate commitment into its operational and investment plans, mobilizing both financial and human resources to implement decarbonization and adaptation policies.

CONCRETE ACTION TO MITIGATE CLIMATE CHANGE

In recent years, CONPET has initiated projects and measures that are part of its **Low Emission Business Plan**:

- ✔ **Programs to increase energy efficiency**, such as modernization of equipment and facilities (e.g. replacement of pumps and motors with more efficient ones, automation) have been carried out to reduce fuel and energy consumption per unit of activity.
- ✔ **Waste reduction** and logistics optimization **programs** have been implemented (e.g. reuse of metal drums and other materials, circular economy projects, newly built tanks are equipped with mixers that, during operation, considerably reduce the amount of sludge (sludge-type waste) on the bottom of the tank) in order to decrease indirect emissions associated with waste transport and disposal.
- ✔ **Renewable energy pilot projects** have been launched (photovoltaic panels at stations, with plans to expand) marking the transition towards the use of zero emission sources in CONPET S.A.'s energy mix.

Resources allocated and capacities developed

In order to support the above actions, CONPET S.A. is considering the allocation of **dedicated financial resources** in its multi-year investment budgets. The company has also set up an **internal sustainability/environmental structure** that coordinates the reporting, monitoring and implementation of climate policies, and training programs have been carried out for staff on good practices in energy saving, waste management, environmental emergency response, etc.

CONPET maintains **transparent communication** with investors and authorities on climate issues: it regularly reports on environmental indicators, responds to shareholder requests for information on ESG components and participates in corporate social responsibility initiatives that include environmental components. Thus, CONPET S.A. creates a **collaborative environment** around it, where customers, partners and communities can support and multiply the effects of its climate actions.

Monitoring and evaluating the effectiveness of actions (as per E1-3)

A key element required by the ESRS E1-3 is the demonstration that the measures taken effectively lead to **emission reductions**. **CONPET S.A. is committed to monitor greenhouse gas emissions annually** and to continuously implement reduction measures so that in future years clear **progress** can be reported - i.e. a decrease in absolute emissions and improvement in intensity indicators compared to baseline.

Another aspect highlighted by ESRS E1-3 is the **alignment of resources with climate transition plans**. In this respect, CONPET S.A. wants to integrate climate objectives into its future plan (including financial projections), ensuring dedicated budgets for emission reduction projects.

CONPET S.A. does not operate in isolation, but can extend its climate initiatives throughout the value chain. Collaboration with external partners is a key resource: for example, selecting suppliers with high climate performance and integrating environmental criteria into the procurement process (as mentioned above) can amplify the impact beyond the limits of the company's direct operations. If suppliers also reduce emissions, the overall effect becomes significantly greater than what they could achieve on their own. Such initiatives, which involve time, effective communication and sometimes technical support for partners, reflect a concerted effort and strategic use of CONPET S.A.'s relationship capital in achieving climate goals.

In conclusion, there are tangible actions underway, dedicated financial and human resources and the company is prepared to measure and communicate the results of these actions. Through consistent implementation of its plans and stakeholder engagement, the company demonstrates a **planned and managed transition** to a low-emission economy, fulfilling the ESRS E1-3 requirements for disclosure of climate policy actions and resources.

A photograph of a male worker wearing a blue hard hat and a purple work jacket. He is looking upwards and to the right, focused on his work. He is standing next to a large, horizontal industrial pipe or vessel with several bolted flanges. The background shows more industrial structures and equipment under a clear sky.

CONPET S.A. invests in people, supporting workforce development and contributing to a sustainable future.

5. SOCIAL RESPONSIBILITY AND WORKFORCE DEVELOPMENT

5.1 Workforce composition and inclusion

Employee structure of CONPET S.A. in 2024:

The employee structure can be organized and presented according to various classification criteria, depending on the specifics and needs identified. This can be done on the basis of hierarchical level, internal functional entities, type of employment contract or field of activity. Employees may also be grouped according to education, specialization, qualifications, skills or specific responsibilities

Strictly from a workforce composition and inclusion perspective, data will be presented according to the following criteria:

- ✚ **The demographic criterion based on age** - considered relevant in this case, as it allows the analysis of the age structure of the workforce, thus facilitating the implementation of fair employment and professional development policies.
- ✚ **The inclusion criterion** - considered relevant in this case as it is essential to ensure representativeness and equal access to opportunities for all categories of employees, including people with disabilities.
- ✚ **The qualification criterion** - considered relevant in this case because of its importance in assessing the educational level of employees, contributing to the development of effective training and career mobility strategies.

On 31 December 2024, **the actual number of employees is 1,398** and **the average number of employees is 1,387**. The analysis in this chapter has been based on the actual number of employees, as this gives a more accurate picture of the structure of the workforce at a given point in time. At the same time, in line with ESG standards, the reporting of employment data is based on the actual number of employees to ensure comparability between companies and industries.

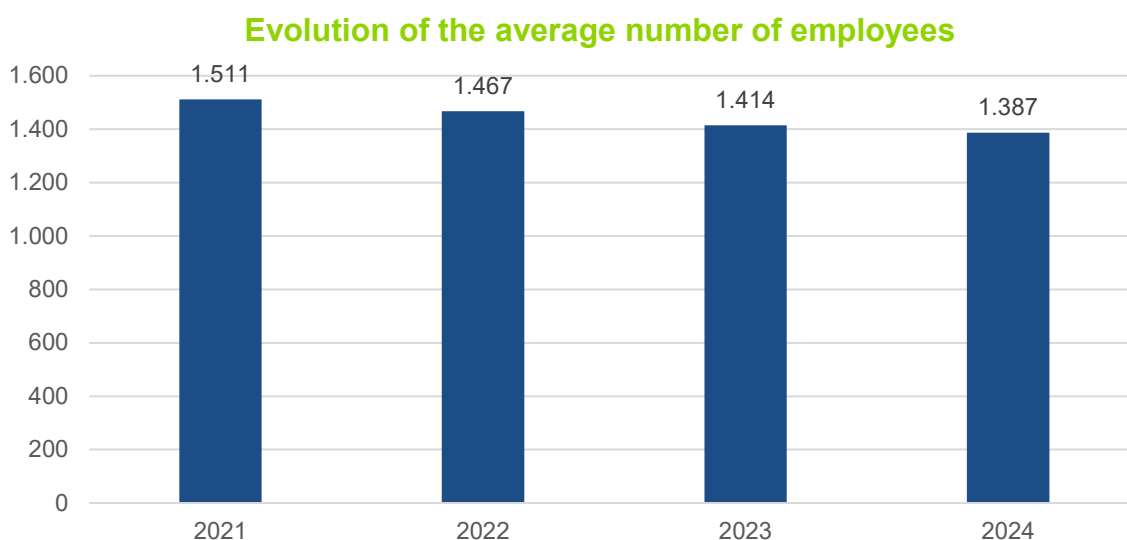


CHART 5.1. Evolution of the average number of employees at CONPET S.A. level.

Out of the total number of employees, 16 of them have fixed-term employment contracts and the rest are employed on permanent contracts.

Within the company, the breakdown by gender is as follows: 287 female employees, representing 21% of the total, and 1,111 male employees, which constitutes 79% of the total number of employees.

Table 5.1. Actual number of employees by gender

Country	Total number of employees	Number of male employees	Number of female employees
România	1.398	1.111	287

In terms of the distribution of employees by geographical area (according to SBM1-40.a.iii), the largest share is held by employees from the Municipality of Ploiești, representing 43.71% of the total workforce.

Table 5.2. Distribution of employees by geographical area

County	Region/ Geographical area	Total number of employees	Percentage of total employees	Types of activities carried out
Prahova	Băicoi	23	1,65%	Operational
	Boldești	2	0,14%	Operational
	Brazi	15	1,07%	Operational
	Ploiești	611	43,71%	Operational Economic Administrative
	Scorțeni	4	0,29%	Operational
	Urlați	44	3,15%	Operational
Ialomița	Fetești	8	0,57%	Operational
	Grindu	2	0,14%	Operational
	Urziceni	5	0,36%	Operational
Buzău	Berca	15	1,07%	Operational
Brăila	Cireșu	23	1,65%	Operational
	Ianca	2	0,14%	Operational
Bacău	Comănești	4	0,29%	Operational
	Moinești	32	2,29%	Operational
Covasna	Cătălina	12	0,86%	Operational
Galați	Independența	24	1,72%	Operational
Dâmbovița	Moreni	27	1,93%	Operational
	Răcari	9	0,64%	Operational
	Raciu	29	2,07%	Operational
Argeș	Pitești	5	0,36%	Operational
	Poiana Lacului	49	3,51%	Operational
Giurgiu	Marșa	13	0,93%	Operational
	Roata de Jos	38	2,72%	Operational
Arad	Pecica	16	1,14%	Operational
Timiș	Biled	30	2,15%	Operational
	Vâlcani	4	0,29%	Operational
Bihor	Marghita	29	2,07%	Operational
	Salonta	7	0,50%	Operational
	Suplacu de Barcău	18	1,29%	Operational

County	Region/ Geographical area	Total number of employees	Percentage of total employees	Types of activities carried out
Gorj	Bărbătești	62	4,43%	Operațional
	Țicleni	6	0,43%	Operațional
Vâlcea	Orlești	49	3,51%	Operațional
Dolj	Fărcaș	6	0,43%	Operațional
	Ghercești	14	1,00%	Operațional
Olt	Cungrea	9	0,64%	Operațional
	Icoana	16	1,14%	Operațional
Constanța	Cernavodă	10	0,72%	Operațional
	Constanța	47	3,36%	Operațional
	Mircea Voda	5	0,36%	Operațional
Călărași	Borcea	20	1,43%	Operațional
	Dragoș Voda	2	0,14%	Operațional
	Tămădău Mare	47	3,36%	Operațional
Vrancea	Tătăranu	5	0,36%	Operațional

Another key aspect of sustainability is diversity and equal opportunities. CONPET S.A. promotes an inclusive work environment where all employees have access to equal opportunities for professional growth:

- 32% of employees in management positions are women;
- 37.6% of employees with a higher education are women, showing balanced access to expert roles.

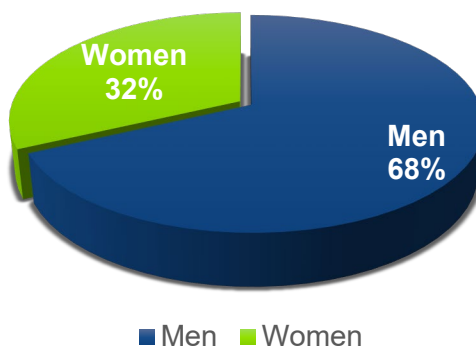


CHART 5.2. Management structure by gender in 2024 (without senior managers with mandate)

The evolution of the staff structure by education and gender reveals that the company promotes a non-discriminatory behavior by hiring female specialists with higher education and professional skills that contribute to the growth of the company's business results. These data confirm

CONPET S.A.'s commitment to creating a fair and inclusive environment, an essential element of sustainable performance.

Demographic structure

The age structure of CONPET S.A.'s staff reflects the fact that 59% of the employees are over 50 years of age, which suggests an experienced team, but also a need to train a new generation of specialists. The average age of staff is 50.2 years, reflecting the experience and stability of the organization. New hires in the last two years have an average age of 40.41, indicating a gradual transition to a younger team.

The age structure of employees at company level is reflected in 3 broad categories as follows:

- Under 30 - 56 out of the total number of employees;
- 30-50 years - 511 employees;
- Over 50 - 831 employees.

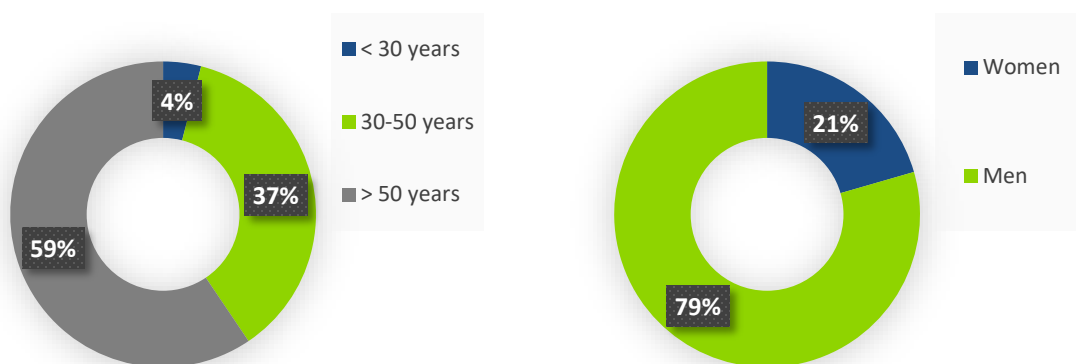


CHART 5.3. Staff structure by age groups and gender in 2024

Inclusive structure

From the perspective of the inclusive structure, the analysis of CONPET S.A.'s workforce focuses on two key aspects: the degree of unionization and the employment of people with disabilities.

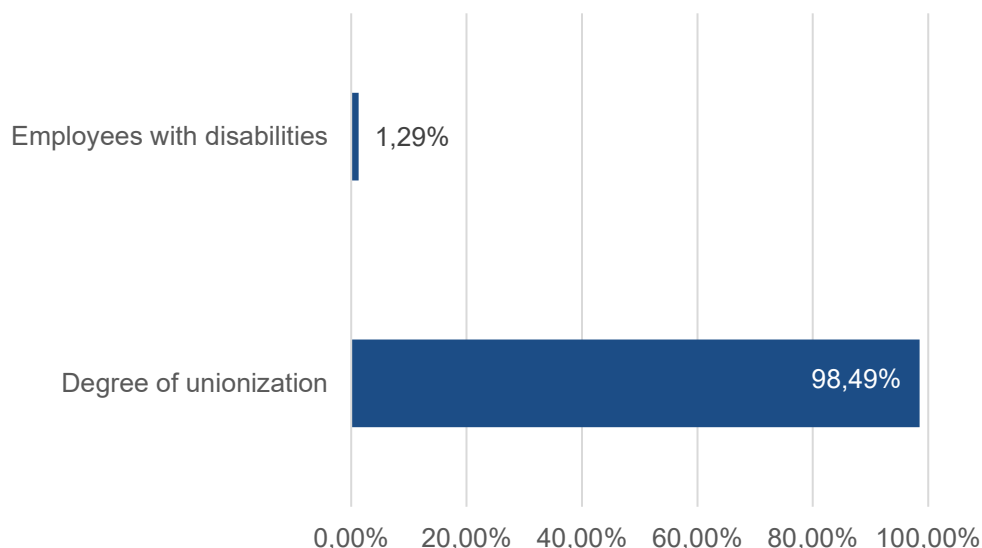


CHART 5.4. Employee inclusion in 2024

The degree of unionization refers to the membership of employees in the LIBER CONPET Trade Union, an organization that represents the interests of employees and supports their rights in their relationship with the employer. According to the data collected 98.50% of the company's employees are members of the trade union Liber Conpet S.A. This reflects a **high level of cohesion and solidarity** among CONPET S.A. employees, demonstrating that they are actively involved in protecting their rights and supporting a fair working environment. Membership in the **LIBER CONPET Trade Union** not only provides representation in the relationship with the employer, but also strengthens a framework of effective social dialog, where the voice of the employees is heard and respected. This collective involvement underlines a strong commitment to **stability, fairness and job security** within the company.

In terms of **employment of people with disabilities**, 1.29% of CONPET S.A.'s workforce is in the category of employees with disabilities, this indicator reflects the company's commitment to inclusion and equal opportunities. The concern for the integration of people with disabilities in the work environment contributes to the diversity of the workforce and demonstrates an active policy of social responsibility.

The nature of the company's activity imposes strict requirements on the aptitudes of employees, which limits the possibility of employing a larger number of people with physical and/or cognitive disabilities, since in most workplaces within the production sectors, risks have been identified that may generate accidents or occupational diseases with serious, irreversible consequences, namely death or disability (*art.2, point 4 of HG 1425/2006 for the approval of the Methodological Norms for the application of the provisions of the Law on occupational safety and health no. 319/2006*).

If the percentage of 1.29% can be considered a low value, compared to the total number of employees of the company, it should be noted that at national level (according to INSSE.RO) - about 2.7% of the national population is included in this category, but over 60% of these people

cannot be employed in the labor force for reasons of age + 65 or - 18 years. Thus - at national level, about 1.08% of the existing workforce has disabilities while at societal level, 1.29% of the workforce has disabilities.

According to art.78 para. 2 of Law 448 /2006 with subsequent amendments and additions, employers with more than 50 employees have the obligation to employ disabled persons in a percentage of at least 4% of the total number of employees. Since CONPET S.A. does not cover this percentage, in order to comply with the legal provisions, it has opted, in accordance with art.78 paragraph 3 of the same normative act, for:

- a) the monthly payment to the state budget of an amount equal to the guaranteed gross minimum basic national wage multiplied by the number of jobs in which they have not employed persons with disabilities, or*
- b) monthly payment to the state budget of an amount representing the equivalent of at least 50% of the minimum gross basic salary guaranteed in payment multiplied by the number of jobs in which they have not employed persons with disabilities, and with the amount representing the difference up to the amount provided for in letter a) to purchase, on a partnership basis, products and/or services made by their own activity of persons with disabilities employed in authorized protected units.*

Thus, the **employment of people with disabilities** is an important indicator of inclusion and diversity policy. The concern for their integration into the workforce demonstrates the company's commitment to the principles of equal opportunities and professional accessibility.

Educational structure

The analysis of **CONPET's** workforce structure in terms of **educational attainment** provides a clear picture of **diversity and professional balance**, highlighting how employee education contributes to the inclusion and stability of the organization.

Educational attainment is a key criterion in the **composition of the workforce**, as it influences the distribution of responsibilities, opportunities for professional development and access to management positions. It is also a relevant factor for **occupational inclusion**, having a direct impact on access to jobs and career advancement opportunities.

In terms of educational level, the majority of CONPET S.A. employees have medium and higher education, with a predominance of age groups between 41 and 60 years. The age distribution shows that 53.65% of the employees fall in the 51-60 age group, while 24.89% are in the 41-50 age group. Younger employees in the 20-40 age group represent approximately 15.67% of all staff, emphasizing the need for sustainable recruitment and retention strategies to gradually replace experienced staff.



CHART 5.5. Percentage of staff with tertiary education 2020- 2024

In this context, the company carefully monitors the needs to fill vacancies, taking into account the demands of organizational structures, the complexity and diversity of activities, the professional skills required and the responsibilities of each position. This strategic approach ensures continuity of operations and the company's adaptability to labor market challenges.

To ensure the sustainability of the workforce, the company has stepped up mentoring, continuous training and intergenerational knowledge transfer programs.

TABLE 5.3. Distribution of CONPET S.A. employees by educational level and gender

Educational level	Total employees	Share total	in	Women	Men
General studies	83	5,94%		7 (0,50%)	76 (5,44%)
Medium education	760	54,36%		71 (5,08%)	689 (49,28%)
Higher education	555	39,70%		209 (14,95%)	346 (24,75%)

Distribution of employees by educational level

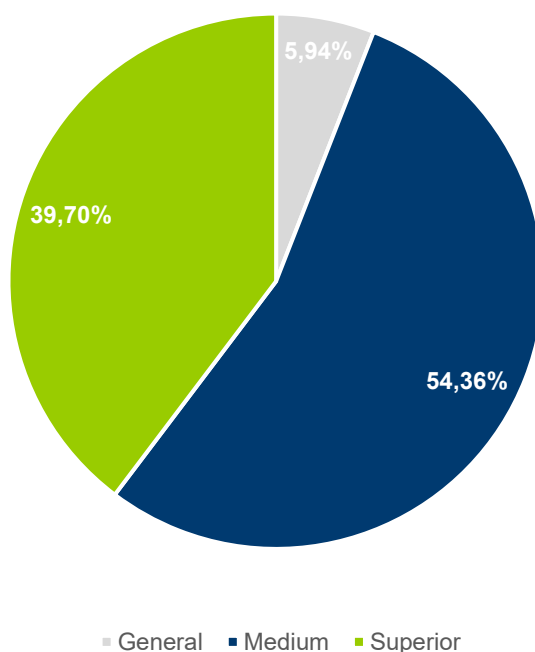


CHART 5.6. Distribution of employees by educational level

- **Staff with general education (83 employees)** - This is a smaller category with predominantly operational roles. Even if these employees do not have advanced education, the experience and practical expertise they have acquired are important factors contributing to the smooth running of the company's business. **The inclusion of this segment** is essential to maintain a diverse workforce accessible to all social groups.
- **Staff with secondary education (760 employees)** - This is the dominant segment within the company, demonstrating that **technical and operational specializations are fundamental to CONPET S.A.'s activity**. This category of employees benefits from continuous training, contributing to increasing professional skills and maintaining a high level of performance. In addition, the presence of a large number of employees with an average education emphasizes the **company's openness to the integration of a wide range of professional qualifications**, ensuring diversity and flexibility within the team.
- **Staff with higher education (555 employees)** - The significant percentage of employees with graduate or post-graduate degrees emphasizes a **strategic orientation towards expertise, innovation and informed decision-making**. This category includes **leaders, specialists and advanced technical staff** with a direct impact on the organization's development. In terms of inclusion, it is important that this category is accessible to all through fair promotion and career development policies.

COMPARATIVE STAKEHOLDER ANALYSIS IN THE SOCIAL CONTEXT

Comparative conclusions - CONPET S.A. vs. other regional operators. The present analysis, based on academic literature and 2023-2024 reports, confirms that the **main social aspects (ESRS S1-S4)** - working conditions (including employee safety and well-being), diversity and inclusion, impact on communities and social due diligence along the value chain - are key in assessing the sustainable performance of Eastern European companies. **Companies in the region are broadly aligning in direction with international practices, but there are still differences in degree and maturity.** CONPET S.A. illustrates well both progress and remaining challenges:

- **Own Workforce (S1):** CONPET S.A. places a strong emphasis on **operational safety and employee well-being**, similar to large energy companies for which safety at work is "priority zero" ([ipieca.org](https://www.ipieca.org)). The extra-wage benefits, health and training programs implemented at CONPET S.A. reflect stakeholder expectations for **decent working conditions**. The differentiation from Western companies is in the **resources allocated** rather than in the commitment, while CONPET S.A. focuses on the basics (safety, competitive wages, training). However, the current level of CONPET S.A. is not to be neglected; salary increases and work-life balance initiatives are mentioned, indicating an effort to **align to modern HR standards**. Furthermore, it integrates environmental and health and safety policies, highlighting an integrated approach to operational sustainability.
- **Diversity and Inclusion (S1):** CONPET S.A. stands out for the fact that more than 30% of management positions are occupied by female employees.
- **Supply chain (S2):** In terms of social due diligence towards suppliers and contractors, CONPET S.A. is probably at a level comparable to local companies of similar size: it has procedures in place for selecting and evaluating contractors, enforces compliance with labor laws and safety standards, but **has not publicly reported the existence of an extensive due diligence framework** (e.g. human rights audits or remediation plans). CONPET S.A. is considering developing a **due diligence policy** aligned to EU standards, covering supplier social risk assessment, third party complaint mechanisms and improvement targets (this is also the direction indicated by 97% of oil and gas companies, which already report setting ESG targets that include the value chain ([ipieca.org](https://www.ipieca.org))). An indication that the focus is shifting to the supply chain is also the fact that *human rights (communities, own workforce and supply chain)* are emerging as one of the most important ESG themes of the future for companies ([ipieca.org](https://www.ipieca.org)). CONPET S.A. applies a clear set of rules and procedures regarding the selection and evaluation of suppliers and contractors, in accordance with the Procurement Procedural Rules - revision 6 and procedure PO-60-13 - Contracting transport of products through SNT and monitoring the fulfillment of contractual requirements. According to these provisions: 'The selection of suppliers shall be carried out on the basis of objective criteria that ensure accessibility and fairness, without restricting the participation of any supplier. Participation guarantee and performance bond shall be required for all contracts, ensuring transparency and contractual compliance.' In addition, the company applies specific procedures for

evaluating the performance of suppliers of products, services and materials (PO-50-02 and PO-50-07), and evaluation criteria include legal compliance, technical performance, ethics, integrity and adherence to contractual deadlines. Although there is no formalized supplier code of conduct, ethical and integrity requirements are built into the contracts and partners are obliged to comply with labour legislation, SSM requirements and environmental protection rules.

- 
Local communities (S3): CONPET S.A. stands out in terms of **traditional community involvement**, characteristic of companies with majority state capital and a historical presence in oil-industrial areas. Compared to other younger private companies or multinational corporations, CONPET maintains an institutional link with local communities, supporting them through sponsorships and partnerships tailored to specific needs. The company's activities are centered around the communities in the oil industrial zones, especially around the pumping stations, crude oil pick-up and transport points (locations such as Ploiești, Băicoi, Moreni, Independența, Cireșu, Moinești, Marghita, Biled, Orlești and Constanța-Bărăganu) where the company carries out its activities and has a direct impact on the community. These towns and municipalities, with a history in the oil industry, have developed an economic and social dependence on CONPET's infrastructure and employment. In the event of a reduction in the company's activity, accelerated energy transition without local support measures or operational risks (such as spills, pollution or major damage), these communities may be directly affected, which underlines the importance of protecting them through appropriate measures. In addition to operational impact, CONPET is actively involved in supporting local communities by supporting education and social causes.
- 
Data privacy and accountability to users (S4): CONPET S.A. does not have activities with direct exposure to individual consumers, having a B2B (business-to-business) operating model, but the ESRS S4 theme is considered material from the perspective of protecting personal data, correctly informing business partners and maintaining a high level of transparency. In this respect, the company has implemented a robust procedural framework for compliance with Regulation (EU) 2016/679 (GDPR), ensuring: protection of employee, customer and business partner data; limiting access to personal data through internal security controls; IT systems protected by cybersecurity policies; regular staff training on data processing and protection. In 2024, there were no incidents of data leaks or complaints of poor information. However, CONPET S.A. is aware that global information protection risks are increasing and will therefore: consider the opportunity to obtain information security certifications (e.g. ISO/IEC 27001); will expand its audit and control systems for data protection; will consider including in the next reporting cycle a feedback or complaints mechanism from industrial customers or partners on access to information, in line with ESRS S4.5 and S4.7 requirements. By this approach, the company ensures alignment with ESRS requirements on consumer rights, transparency and data protection, adapted to its specificity as a strategic infrastructure operator.

In conclusion, the social impact according to ESRS S1-S4 provides a comprehensive framework through which we can compare the performance of companies in Eastern Europe. The energy and fuel transport industry, by its nature, has a significant social impact, and companies in the

East are increasingly adapting their practices to stakeholder expectations. CONPET S.A. is aligned with regional trends in many respects: it has a strong track record on safety and community involvement, and is taking steps towards modernization in human resources management. The differences from similar companies in the region are subtle - some may have access to global expertise, so may be more advanced in diversity or supply chain due diligence, while others are at a comparable or even lower level.

In the ESRS S1-S4 benchmarking of social impacts, the priority issues are safe and fair working conditions, protecting and engaging employees and workers in the supply chain, promoting diversity, maintaining a responsible relationship with communities and ensuring diligence in the supply chain. Differences between CONPET S.A. and other similar companies in the region tend to be nuanced, relating to the maturity and transparency of approaches rather than their direction. By implementing good practices highlighted in the literature and rigorously reporting on progress, companies such as CONPET S.A. can not only meet ESRS requirements, but also gain a competitive advantage and build trust and confidence from stakeholders.

5.2 Employee welfare, training and safety

In this section, two essential aspects for the development and protection of **CONPET S.A.** employees will be analyzed:

- Professional training and attending courses;
- Occupational health and safety (OHS) indicators;

Vocational training - course participations in 2024

Investing in the **professional development** of employees is an essential element in **maintaining a high level of competence**, adapting to market demands and increasing organizational efficiency. By participating in training and specialization courses, employees improve their professional skills and competences, which contributes to **increased productivity** and **the creation of a knowledge-based and innovative working environment**.

TABLE 5.4. Structure of professional training and licensing courses 2021-2024

Type of training	Number of participations			
	2024	2023	2022	2021
Various authorizations	111	106	119	73
Authorizations C.F.	372	376	251	245
Training courses	371	464	413	302
Internal authorizations	428	407	450	439
Internal qualifications/training	2.327	1.345	1.167	15
Total training/authorizations	3.609	2.698	2.400	1.074

The highest share of participations is in **internal trainings and qualifications (2,327 participations)**, which demonstrates a constant concern for the continuous development of staff and their adaptation to the company's requirements.

Employee participation in training plays a key role in developing skills, maintaining workplace stability and preventing operational risks. Through continuous training, employees improve the skills they need to carry out their work in optimal conditions, meeting the safety and efficiency standards required by the company. These training programs contribute not only to increasing the level of qualification, but also to providing opportunities for professional development, strengthening the expertise needed to fulfill the specific responsibilities of each area of activity. The high number of participants in these courses demonstrates the company's commitment to continuous staff training, supporting a safe, high-performance working environment adapted to changing requirements.

Another essential component of social sustainability is ensuring employee well-being through fair benefits and working conditions, measures that contribute to staff retention and the creation of a motivating work environment, which CONPET S.A. actively supported in 2024 by:

- Increased per diem for domestic travel compared to the deductibility limit provided for in the Tax Code
- Paid day off on your birthday.
- Payment for tourist services.
- Contribution to the optional pension fund (Pillar III).
- Voluntary health insurance.
- Meal vouchers.

In addition, to ensure the sustainability of human resources, CONPET S.A. monitors and manages risk factors such as:

- ✔ Retirement of experienced employees, which requires mentoring and knowledge transfer strategies.
- ✔ Difficulties in recruiting technical specialists, especially in operational and engineering areas.

Through this approach, the company ensures that its workforce remains a factor of stability and progress in implementing ESG strategies.

Occupational Health and Safety (OHS) Indicators

In this section, **occupational health and safety (OHS)** issues are not represented graphically, but are analyzed on the basis of relevant indicators reflecting the measures put in place to protect employees and prevent occupational risks.

A key element of this analysis is the **total number of workplace accidents**, which in 2024 was **zero**. This result confirms the effectiveness of the prevention strategies implemented by the company and demonstrates that the implemented safety measures are effective in protecting employees.

Another key aspect is the **ISO 45001** certification, which has been obtained and maintained by the company. This certification attests that the occupational health and safety management system complies with international standards, thus ensuring a safe and controlled working environment for employees.

Another relevant indicator is the **frequency of SSM trainings**, conducted regularly according to the minimum mandatory topics approved at management level, as continuous safety training contributes to the awareness and prevention of occupational risks. Through these training sessions, employees are informed and prepared to manage risk situations, reducing the likelihood of occupational accidents.

In addition, **occupational risk assessment** is carried out whenever the situation requires it, which allows the identification and minimization of potential hazards in the work performed. This proactive approach is essential for maintaining a safe and compliant working environment and keeping the company's Global Risk Level below the target of 3.5.

In conclusion, by constantly monitoring these indicators and implementing effective preventive measures, **CONPET** ensures a safe and well-regulated working environment, minimizing risks for employees and strengthening the organizational culture focused on safety and responsibility.

Indicator	Value (2024)
Total number of accidents at work	0
ISO 45001 certification	Yes (certificate)
Frequency of SSM training	Periodical
Occupational risk assessment	Yes

5.3 Community engagement and CSR initiatives

Corporate Social Responsibility (CSR) is the voluntary commitment of a company to contribute to the sustainable development of the company, beyond its economic and legal obligations. In this sense, CSR goes beyond financial performance and includes actions to support employees, the community and the environment by promoting ethical and sustainable practices.

The CSR directions that will be considered to showcase the company's commitment to the community are:

- ✔ **Employee well-being** through social benefits, development opportunities and a safe working climate.
- ✔ **Supporting the community** through sponsorships and initiatives with educational, cultural and social impact.
- ✔ **Ethical governance and social responsibility** through transparency, equal opportunities and promoting diversity.

In this context, **CONPET S.A.'s commitment to the community and CSR initiatives** are reflected in a series of **concrete actions**, which are perfectly aligned with CSR principles:

a) Supporting employees and their families through social benefits

CONPET S.A. offers an extensive benefits package that supports both employees and their families, contributing to the economic and social stability of the community. These include:

- Payment of tourist and treatment services for employees.
- Financial support for the upbringing and education of employees' children, including after-school program.
- Aid for serious illness, prostheses, financial support for important life events (marriage, childbirth, death).
- Voluntary health insurance and contributions to the voluntary pension fund (Pillar III).

b) Social dialogue and relations with trade unions

One of the pillars of social responsibility is the relationship between employees and employer, and CONPET S.A. demonstrates a strong commitment to this issue. With a unionization rate of 98.50%, the company ensures an open and constructive dialogue with employee representatives, which is reflected in the protocols concluded and collective bargaining aimed at improving working conditions. This practice contributes to organizational stability and a professional climate based on respect and fairness.

c) Community involvement through sponsorships and partnerships

CONPET S.A. is actively involved in supporting the community, supporting educational, cultural and health projects through sponsorship and strategic partnerships. These actions contribute to the social and economic development of the regions where the company operates, thus strengthening its role as a responsible actor in the community.

In 2024 the third edition of the Blood Donation Campaign organized by CONPET S.A. took place. In October, with the support of the Ploiesti Blood Transfusion Center, 60 employees of the company donated blood at the Ploiesti Central Dispatch Headquarters.



EQUAL OPPORTUNITIES AND INCLUSION

In the spirit of responsible governance, CONPET S.A. promotes an inclusive and fair work environment, ensuring equal opportunities for all employees, regardless of gender or social status. The fact that 32% of managerial positions are held by women reflects the company's commitment to the principles of diversity and fairness in recruitment and promotion.

Through its employee support initiatives, active social dialogue, community involvement and promotion of diversity, CONPET S.A. not only respects CSR principles, but also actively integrates them into its organizational culture.



6. CORPORATE GOVERNANCE AND ETHICAL CONDUCT

Corporate governance: requirements and impact of ESRS G1

Corporate governance is Pillar **G (Governance)** of ESG approaches, and is codified in the new European Sustainable Sustainability Reporting Framework (**ESRF**) through **ESRS G1 - Business Conduct**. This standard requires companies to report on how the organization's management and control structures establish the ethical culture, manage risks and ensure compliance with integrity principles (getsunhat.com). ESRS G1 covers a number of key sub-topics related to business conduct, such as *corporate culture*, *protection of public interest whistleblowers*, *political involvement and lobbying*, *managing supplier relationships (including payment practices)*, and *preventing corruption and bribery (including mechanisms for detecting, training and reporting incidents)* (getsunhat.com). These issues are particularly relevant for companies in the energy and fuel transport sectors, where transparency, ethics and effective operational and compliance risk management are essential.

Corporate governance in Eastern Europe has improved in recent years, but challenges specific to the post-transition context remain. Many large energy and utility companies are still state-owned, which has in the past led to problems of political interference and non-transparent practices (sgi-network.org.) International organizations and European institutions have stressed the need to strengthen governance in these companies.

Integrating ESG responsibilities into the governance structure

In order to align the company's governance structure with the requirements of OMF No 85/2024, the report proposes to strengthen ESG integration through clear and legally compliant measures:

- Clarification of the Board's responsibilities for sustainability oversight (48⁶ lit. c): introduction of regular reporting on ESG performance to the Board and establishment of clear monitoring mechanisms.
- Ensure ESG competencies for the Board and BoD (48⁶ lit. c): develop a framework for mandatory ESG training for Board members and the management team, ensuring access to the necessary expertise as required by the legislation.
- Assess the opportunity of integrating ESG KPIs into the variable remuneration system (48⁶ lit. e): analyze the possibility of linking ESG indicators (emission reduction, energy efficiency, workplace safety) with the management incentive system.

These measures support transparency, alignment with the ESRS and strengthen accountability in corporate decision-making.

Declaration on due diligence - CONPET S.A. (GOV-4)

CONPET S.A. places particular emphasis on due diligence as part of corporate governance, with the aim of identifying, preventing and managing the risks associated with its activities. In this regard, the company will implement in the medium term a formalized system to ensure transparency and accountability in all decision-making and operational processes.

1. Risk identification

CONPET S.A.'s due diligence process will include the assessment of environmental, social and governance (ESG) risks associated with all of its activities, with a particular focus on their impact on stakeholders. This process will involve identifying risks at each stage of the value chain, from transport of crude oil to interaction with local communities and other stakeholders.

2. Risk prevention and mitigation

For each identified risk, the company shall adopt preventive and mitigating measures, integrating these measures into operational and decision-making strategies. These measures will include implementation of internal policies, safety protocols, and employee training programs.

3. Monitoring and reporting

CONPET S.A. will monitor risks and their impacts, taking into account local and international regulations. Progress in ESG risk management will be regularly reported to the Board of Directors and the results made available to stakeholders through transparent communication channels.

4. Integration into decision-making

The findings of the due diligence process will be integrated into the company's decision-making process to ensure alignment with CONPET S.A.'s sustainability and corporate responsibility objectives.

6.1 Board structure and ESG governance

Corporate Governance continues to be in a process of adaptation to the requirements of a modern economy, to the increasingly evident globalization of social life and at the same time to the needs of informing investors and third parties interested in the activities of companies.

CONPET's corporate governance system is constantly being improved in order to ensure compliance with the rules and recommendations applicable to a company listed on the Bucharest Stock Exchange. CONPET S.A. is a company whose shares are traded on the regulated market administered by the Bucharest Stock Exchange, on the Main segment, in the Equity Securities sector - PREMIUM category, under the symbol COTE, with the globally unique identifier for entities LEI Code 254900P00DXXOYOYGGAQ77.

CONPET's corporate governance is organized and carried out in accordance with the legal framework in Romania, namely the Companies Law no. 31/1990 and the Government Emergency Ordinance no. 109/2011 on the corporate governance of public enterprises.

Also, CONPET being a company listed on the Bucharest Stock Exchange, the capital market legislation is applicable to it and it has adhered to the provisions of the Corporate Governance Code of the Bucharest Stock Exchange, applying the provisions of this code regarding the responsibilities of the Board of Directors, the risk management and internal control system, fair reward and motivation, added value through investor relations.

As an issuer listed on the Bucharest Stock Exchange, CONPET has promoted and approved by Decision of the Board of Directors no. 7 of March 27, 2014 its own Corporate Governance Regulation. This document represents the voluntary assumption by the Company of the principles of corporate governance, taking into account its specific characteristics and activity in accordance with the principles set out in the Corporate Governance Code of the Bucharest Stock Exchange. The Regulation is a public document and can be viewed on the Company's website in the *Corporate Governance/ Corporate Governance Regulation* section.

CONPET presents detailed information on governance in its annual report, which includes a corporate governance chapter reporting how the company complied with the corporate governance code during the year by completing a corporate governance statement containing a self-assessment of how the company has complied with the corporate governance provisions.

This chapter also usually covers the activities of the board of directors, changes to governance policies, the work of board committees and any governance events during the year. The company also has policies on related party transactions and has an entity in place to ensure transparent communication with investors and regulators.

In applying the general regulatory framework, CONPET has adopted documents through which corporate governance is put into practice:

- The Constitution of CONPET, which contains provisions relating to the governing bodies (general assembly, board of directors, executive management), as well as their powers and operating procedures;
- The Rules of Organization and Functioning of the Administrative Board, which detail and operationalize how this body meets, how it reviews, debates and takes decisions, how it interacts with the executive management and other parties;
- CONPET's Rules of Organization and Functioning, Code of Ethics, Internal Rules, which take over, detail and operationalize some incidental aspects of the company's governance framework

The implementation of transparency and governance measures within CONPET S.A. takes into account aspects such as:

- adoption of the Corporate Governance Code;
- publication of annual/ preliminary annual/ quarterly/ half-yearly reports;
- AGM publication: notices, materials/documents related to the items on the agenda of the meetings, AGM resolutions (AGOA, AGEA), other documents considered to be relevant;
- adopting and publishing the social responsibility policy;
- adoption and publication of the Code of Ethics and Integrity;
- publishing declarations of assets and interests;
- publication of the Society's organizational chart;
- appoint members of the Board of Directors and executive management on professional criteria;
- adoption and publication of the Internal Rules of the Administrative Board and Advisory Committees;
- developing policies applicable at company level: Remuneration policy for directors and directors with a mandate, Policy on the evaluation of the Board of Directors, Policy on related party transactions;
- publication of the composition of the Board of Directors, including name, surname, position on the Board and CV;
- publishing the framework form of the management contract

The Board of Directors of CONPET S.A. contributes to the definition and implementation of the company's ESG strategy, thus ensuring the integration of sustainability principles in its strategic decisions.

Given that the requirements for transparency and social responsibility are increasingly high at the international level, the Board of Directors contributes to promoting an organizational culture based

on sustainability and responsible governance. The company-wide activities on ESG initiatives not only ensure compliance with international regulations, but also contribute to increasing the value of CONPET's shares in the long term for all investors.

Main mechanisms underlying ESG implementation:

- **Align the strategy with the principles of sustainable development**, so that every major decision is assessed in terms of its impact on the environment and society. This alignment is based on a clear set of ESG policies and objectives that are regularly monitored and adjusted in line with legislative changes and investor expectations.
- **Implement an integrated management system** based on international certifications that provides a rigorous framework for identifying, monitoring and managing ESG risks. This system is supported by independent audits and internal evaluations that measure the effectiveness of implemented ESG programs.
- **Establish clear targets and ESG KPIs** to measure performance and identify areas for improvement. For example, implementing initiatives to reduce carbon footprint or increase energy efficiency are included in the company's long-term strategy.

The Risk Management Committee set up at the level of the Board of Directors, aims to include concrete ESG aspects in its tasks, in the medium term, in order to monitor the progress of the implementation of ESG strategies at company level by the responsible structures and to ensure compliance with new European standards, such as CSRD and ESRS G1. To this end, in the medium term, clear policies on diversity and inclusion at the level of CONPET will be defined at the organizational structure, adapted to Romanian legislation, but also to the local culture and mentality.

By applying corporate best practices, the Board aims to guide the company in a dynamic environment, optimize financial performance and effectively manage risks, thereby contributing to sustainable growth and adapting to emerging economic and social challenges. All Board members operate under a **mandate contract** that sets performance criteria and fiduciary duties, aligning their responsibilities with shareholders' interests. The Board of Directors meets regularly to review the company's performance, approve major investments, and ensure compliance with the legal framework for conducting business and implementing internal policies and regulations in accordance with the law.

The Board of Directors delegates the management of the company to one or more Directors and appoints one of them as Managing Director. The Managing Director may be appointed from among the Directors, who thus becomes an Executive Director or from outside the Board of Directors. In accordance with the law, a Director is a person to whom the powers of management of the Company have been delegated by a decision of the Board of Directors and who enters into a contract of office with the Company in accordance with the applicable legal provisions. The General Director of CONPET S.A. represents the Company in relations with third parties and in court. The Board of Directors represents the Company in relations with the Directors with a mandate contract.

Powers of the Administrative Board:

- Delegates to the Managing Director(s) the powers of management of the company by areas of competence and sets out their rights and obligations, powers, duties, responsibilities, through the mandate contract; in the event that the Managing Director(s) are unable to exercise their duties (vacation, sick leave, travel, etc.), they may delegate their duties according to the provisions of the mandate contract and/or decisions of the Board of Directors;
- It supervises the work of the directors with a mandate in the management of the company, including its management, and approves the quarterly, half-yearly and annual activity reports drawn up by the directors, as well as any other activity reports submitted for approval;

Table 6.1 Composition of the Administrative Board

Name	Quality C.A.	Date Appointments	Status	Political affiliation	Professional experience
Cristian - Florin GHEORGHE	Non-executive non-independent member President C.A.	C.A. decision No 22/ 2023 Start of mandate: 22.08.2023 Mandate ends: 21.08.2027	Permanent	No political affiliation	Director General - Directorate General for Electricity, Oil and Natural Gas, Ministry of Energy
Nicușor - Marian BUICĂ	Independent non-executive member	Start of mandate: 22.08.2023 Mandate ends: 21.08.2027	Permanent	No political affiliation	Investment Consultant
Luminița - Doina KOHALMI - SZABO	Independent non-executive member	Start of mandate: 22.08.2023 Mandate ends: 21.08.2027	Permanent	No political affiliation	PhD, "Dimitrie Cantemir" Christian University
Oana - Cristina TĂNĂSICĂ	Independent non-executive member	Start of mandate: 22.08.2023 Mandate ends: 21.08.2027	Permanent	Affiliate - PNL	Lawyer, Law Office Tănăsica Oana
Florin - Daniel GAVRILĂ	Independent non-executive member	Start of mandate: 22.08.2023 Mandate ends: 21.08.2027	Permanent	No political affiliation	Director, Lion Capital S.A.
Andrei - Mihai ZAMAN	Independent non-executive member	Start of mandate: 22.08.2023 Mandate ends: 21.08.2027	Permanent	No political affiliation	General Manager, AFFICHAGE ROMANIA SRL
Alin - Mihael DĂNILĂ	Independent non-executive member	Start of mandate: 22.08.2023 Mandate ends: 21.08.2027	Permanent	Affiliate - PSD	Deputy General Director, Urban Management Services SRL, Ploiești

Diverse professional experience:

- **Board** members come from diverse backgrounds, including **energy, investment, legal, education and business administration**.
- The Chairman of the **Board of Directors, Cristian-Florin Gheorghe**, has significant experience in the Ministry of Energy, which can provide an advantage in linking the company's strategies with national policies in the energy sector.
- The presence of experts **in investment, law and academia** can bring beneficial strategic insights for the company's development.

Within CONPET S.A., the Board of Directors is composed of seven members, two of whom are women, representing approximately 29% of the total. This proportion is higher than the national average for the energy sector, where women occupy 26% of board positions, according to a study by Boston Consulting Group (BCG).

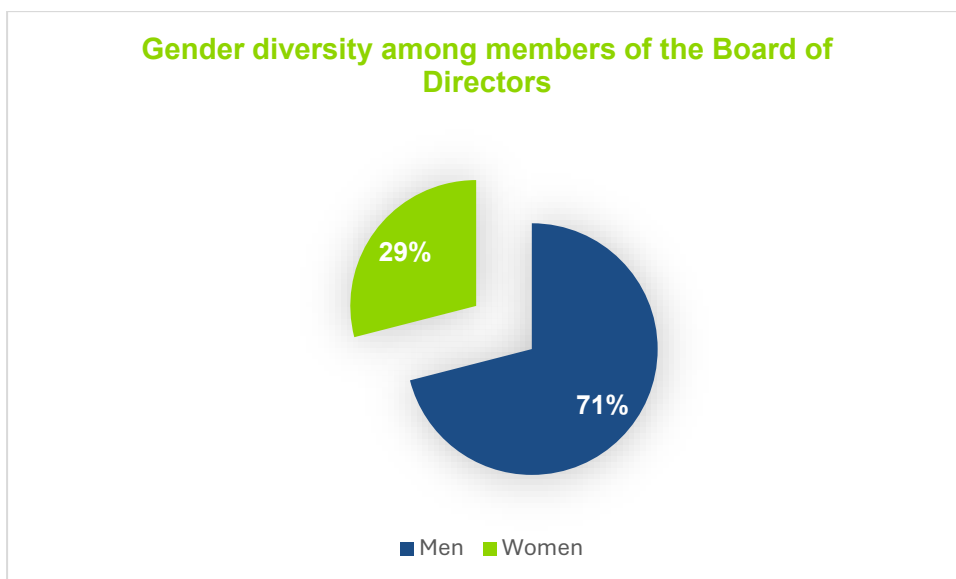
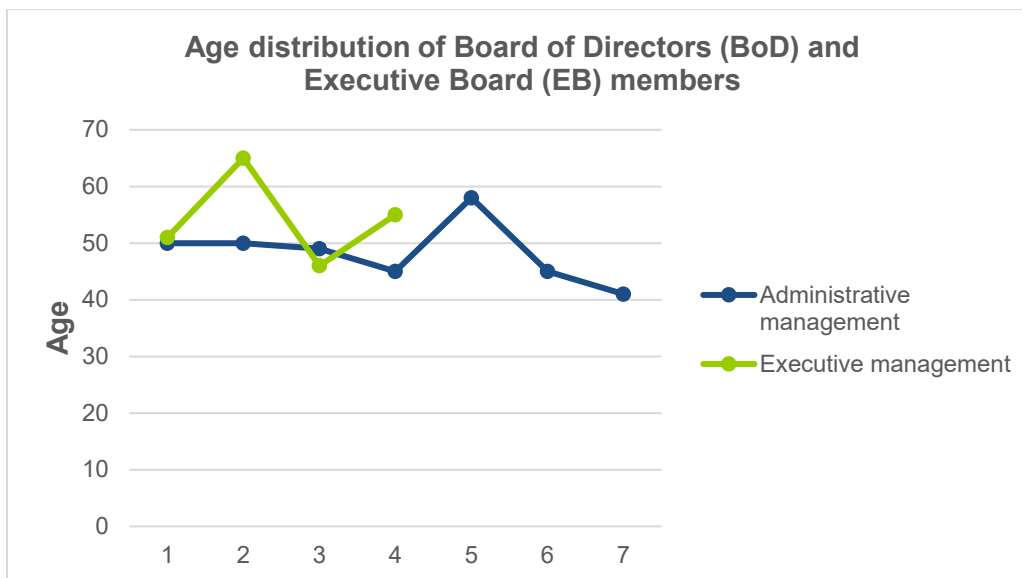


Chart 6.1. Gender diversity among members of the Board of Directors

The age structure of the 7 members of the administrative management (41-58 years old) and the 4 members of the executive management (46-65 years old) reflects a balance between experience and fresh perspectives, suggesting a strategic mix between stability and dynamism.

The chart shows, in linear format, the age of each member of the respective Boards of Directors and Executive Management. The vertical side shows the age and the horizontal side, numbered from 1 to 7, are the members of the two structures (7 members of the BoD and 4 members of the executive management):



Graph 6.2 Age distribution of members of the BoD and the EC

For more information, [the CVs of the members of the Board of Directors of CONPET S.A.](#) are available on the company's website.

CONPET S.A.'s Board of Directors has four Advisory Committees, each with an important role in the management and development of the company, specialized in the company's fields of activity. They exercise powers of analysis, verification, monitoring of financial reporting, internal control, monitoring the performance of the managerial internal control system and risk management and the appointment of executive management (directors with a contract of office), in accordance with best corporate governance practices. [The executive management](#) can be found on the company's website.

- **Advisory Committees**

The following Advisory Committees are set up at the level of the Administrative Board:

- Nomination and Remuneration Committee;
- Audit Committee;
- Risk Management Committee;
- Development and Investor Relations Committee.

[The terms of reference and the powers of the Board of Directors](#) and the [Advisory Committees](#) set up at the level of the Board of Directors can be found on the company's website.

Looking at the composition of these committees, some important aspects related to the specialization of members and the balance of decision-making can be observed:

➤ Audit Committee

The committee is headed by Florin - Daniel Gavrilă, a specialist in the financial-investment field, which is essential for monitoring financial reporting and financial transparency. The participation of Cristian - Florin Gheorghe, who also holds the position of Chairman of the Board of Directors, ensures the correlation between the audit policy and the company's overall strategy. Nicușor - Marian Buică, investment consultant, brings additional expertise in financial risk analysis. The structure is well balanced with a mix of financial and governance skills.

➤ Risk Management Committee

The structure of this committee reflects a multidisciplinary approach to risk management, combining academic, administrative and financial expertise. Luminița - Doina Kohalmi - Szabo, academic, as chair, proposes an analytical and research-based perspective on risk. Alin - Mihael Dănilă, with experience in urban administration, can provide an operational risk and local regulatory perspective. Nicușor - Marian Buică, investment consultant, contributes to financial risk analysis and management.

➤ Nomination and Remuneration Committee

Andrei - Mihai Zaman, with managerial experience in the private sector, is the chairman of this committee and can ensure a balanced selection in terms of appointing directors and promoting effective remuneration policies. Cristian - Florin Gheorghe has experience in similar energy companies. Luminița - Doina Kohalmi - Szabo brings expertise in human resources management. Oana - Cristina Tănăsică, a lawyer, contributes legal expertise essential for compliance policies, and Alain - Mihael Dănilă completes the team with his administrative background. The composition of the committee is diverse, with a mix of managerial, legal and administrative expertise, which is beneficial for the objectivity of the recruitment and remuneration process.

➤ Development and Investor Relations Committee

Oana - Cristina Tănăsică, lawyer, is the chair of this committee, and her legal expertise recommends her for managing relations with investors and authorities. Florin - Daniel Gavrilă, with investment experience, can contribute to attracting capital and maintaining an effective relationship with shareholders. Andrei - Mihai Zaman, presents an operational and strategic development perspective. The structure of this committee seems well chosen to ensure effective communication and sustainable development of the company.

Table 6.2 Composition of the Advisory Committees at 31.12.2024

Audit Committee	Risk Management Committee	Committee of Nomination and Remuneration	Development and Investor Relations Committee
Florin - Daniel Gavrilă - President	Luminița - Doina Kohalmi - Szabo - President	Zaman Andrei - Mihai - President	Oana - Cristina Tănăsică - President
Nicușor - Marian Buică - member	Alin - Mihael Dănilă - member	Cristian - Florin Gheorghe - member	Florin - Daniel Gavrilă - member
Cristian - Florin Gheorghe - member	Nicușor - Marian Buică - member	Oana - Cristina Tănăsică - Member	Andrei - Mihai Zaman - member
		Alin - Mihael Dănilă - member Luminița - Doina Kohalmi - Szabo - member	

Table 6.3 Key Governance Characteristics

Independence	All 7 directors are non-executive members, i.e. 1 non-independent and 6 independent members, thus managing the company.
Expertise	The Board of Directors brings together diversified experience in energy, engineering, economics, law and public administration, providing a strong strategic vision for the company's development.
Diversity gender	Female representation on the Board of Directors is approximately 29%, reflecting a commitment to inclusiveness and balance in decision-making.
Evaluation	Directors' performance is assessed annually by the Annual General Meeting of Shareholders (AGM), taking into account both the execution of the mandate contract and the implementation of the Management Plan, ensuring transparency and accountability in corporate governance.
Training	Board members benefit from continuous professional development in corporate governance best practices, thus contributing to the continuous improvement of the decision-making process and aligning the company to international standards.

In the year 2024, the members of the Board of Directors/ Risk Management Committee of the BoD received and reviewed the Annual Report on performance monitoring and risk management within CONPET SA, finding that the control measures for the significant risks identified were implemented and effective.

The members of the Board of Directors/ Risk Management Committee of the BoD also received and reviewed the report on the anti-bribery management system, finding that this system is maintained and operating effectively in the company.

On a quarterly basis, the Board of Directors was informed on the status of the achievement of the company's performance indicators.

The CONPET SA organization complies with national and international regulations on business ethics and ensures, right from the procurement process, that the suppliers of products, services and works comply with these regulations. Furthermore, business relationships are continuously assessed during the course of business relations, including in terms of compliance with the requirements of good conduct and anti-bribery criteria stipulated in contracts.

For compliance with the requirements of OMF 85/2024 on sustainability reporting, the company aims to formally integrate sustainable development responsibilities into the duties of CONPET S.A.'s management functions in the medium term. This will strengthen responsible corporate governance and ensure effective monitoring of the environmental, social and economic impacts of the company's activities.

Executive Management of CONPET S.A.

The executive management of CONPET S.A. ensures the implementation of the development strategy and the integration of ESG principles in the company's activity. Under the leadership of the Managing Director, the executive management optimizes resources, increases operational efficiency and aligns the company with corporate governance standards.

In a dynamic economic environment, the management levels support increased competitiveness and the strengthening of CONPET S.A.'s position, aiming at reducing environmental impact, operational safety and reporting transparency. In collaboration with the Board of Directors, they transform strategic directions into concrete actions to increase the company's value and benefit investors.

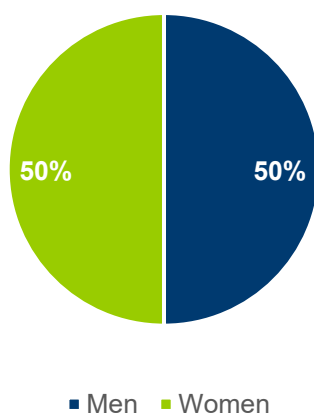
Executive management operates under performance-based mandate contracts and is responsible for risk management, optimizing financial performance and regulatory compliance. By applying best practices, the executive team contributes to modernizing processes, streamlining operations and adapting the company to economic and environmental challenges.

Table 6.3. CONPET S.A. executive management structure

Name	Function	Political affiliation	Professional Experience
Dorin Tudora	Director General	Affiliated	Director General CONPET S.A. (2010-2012, 2021-present). Experience in safety, occupational health and critical infrastructure management in the energy sector.
Mihaela-Anamaria Dumitrache	Deputy Director General	Unaffiliated	Deputy Director General on contract (2018-present). Over 15 years in senior management positions, expertise in legal, human resources, corporate governance, commercial, HSEQ, internal managerial control, information security and strategic project coordination within CONPET S.A.
Sanda Toader	Economic Director	Unaffiliated	Management positions in the economic and financial field at CONPET S.A., (Economic/Financial Director from 2012-present) with focus on financial strategies and accounting processes.
Radu-Florentin Necşulescu	Deputy Director-General 3	Affiliated	Leadership roles in the areas of energy sector critical infrastructure and security, integrity, information security and transport operations. 3rd Deputy Director General from 2022-present.

Chart 6.3. Gender diversity in the executive team

Gender diversity among members of the executive team



The executive team of CONPET S.A. is composed of four members, two of which are women, representing 50% of the total, which significantly exceeds the average of the Romanian energy industry, where women occupy 29% of all jobs in the energy sector according to the results presented by [Econmedia](#) of a study conducted by Boston Consulting Group (BCG). This balance can bring benefits in strategic decision-making and in strengthening the organizational culture.

Members of the management have extensive experience in the energy and financial sectors, which ensures operational stability. The Managing Director, Dorin Tudora, has held the same position for several terms, which indicates continuity in leadership and strategic stability for CONPET S.A. His long experience in managing critical infrastructure in the field of crude oil transport is essential, given the complexity and importance of this sector for national energy security.

In a highly regulated industry, where operational safety and logistical efficiency are priorities, his expertise contributes to managing operational risks, optimizing transport networks and maintaining a reliable and efficient infrastructure. His experience also gives him a solid perspective on market challenges, allowing him to adapt the company's strategy to industry changes and new regulatory requirements.

The executive team is predominantly made up of professionals with long experience, which provides stability and in-depth knowledge of the sector. However, a more balanced representation across generations could bring innovation and agility in decision-making, especially in a sector where digitalization and sustainable technologies are becoming strategic priorities.

All members of the executive team operate on the basis of mandate contracts with clear performance criteria, which ensures alignment with corporate governance standards.

Table 6.4. Integrating ESG principles in the organization

FUNCTION	AREA OF RESPONSIBILITIES	ESG INTEGRATION
Director General	Directs, organizes, coordinates, coordinates and controls the company's activity and is responsible for the conduct of its business, both for direct tasks and those entrusted to the executive directors with a mandate. Directs, organizes, coordinates and controls the work of DGA2 in the areas of Occupational Health and Safety, Environmental Protection, Emergency Situations, Sustainability, as well as the work of the Maintenance Development Department	Through his areas of competence, management duties and area of responsibilities, the CEO ensures the alignment of the company's activities with all three ESG components.

FUNCTION	AREA OF RESPONSIBILITIES	ESG INTEGRATION
Deputy Director General	Organizes, coordinates, manages and is responsible for the work of the subordinate: Legal, Human Resources, Management Systems and Internal Management Control, Integrity, Communication, Corporate Governance and Information Security	Through his areas of competence, management tasks and area of responsibilities, the Deputy Director General ensures the alignment of the Directorate's work with all three ESG components.
Economic Director	Organizes, coordinates, manages and is responsible for the work of the subordinate: Finance/Accounting, Controlling/Budgeting, Assets, Procurement and Contract Tracking, Administrative, Procurement	Through his areas of competence, management duties and area of responsibilities, the Chief Economic Officer ensures the alignment of the Directorate's work with all three ESG components.
Deputy Director-General 3	Organizes, coordinates, manages and is responsible for the work of the subordinate: Operations Transport /Production, Strategic Projects, Security, Critical Infrastructures, Classified Information, IT	Through his areas of competence, management tasks and area of responsibilities, the Deputy Director General 3 ensures the alignment of the Directorate's work with all three ESG components.

This approach reflects the **company's clear commitment to sustainable development**, integrating ESG principles into all areas of governance and operations.

In order to ensure compliance with sustainability requirements, CONPET S.A. aims, in the medium term, to:

- Revise the Rules of Organization and Functioning (ROF) and the Internal Rules of Organization and Functioning (RIOF) of the Advisory Committees set up at the level of the Board of Directors to include specific tasks related to sustainable development and environmental and social impact.
- Finalize non-financial impact monitoring mechanisms by establishing KPIs on resource use, environmental protection and operational safety.
- Establish a clear framework for sustainable development data reporting, ensuring transparency and accountability to all stakeholders.
- Integrate sustainability reporting requirements into decision-making processes, facilitating the link between economic performance and social and environmental impacts.

STRENGTHS OF CORPORATE GOVERNANCE AT CONPET S.A. (ESRS G1)

CONPET S.A. has a number of **good corporate governance practices** aligned with ESRS G1 requirements, which place it favorably compared to many similar companies in Eastern Europe. CONPET S.A. has a **Code of Ethics and Integrity**, an **Anti-Bribery Policy** and a **Corporate Governance Regulation**, as well as clear rules on shareholders' rights and the organization of General Meetings, all promoting *integrity, transparency and accountability* in its day-to-day business. The fact that the company is listed on the stock exchange has required adherence to high standards of transparency and reporting, aligned with the BVB's Corporate Governance Code, which provides a formal framework for the protection of minority shareholders' rights and public reporting of relevant information.

A **distinct strength of CONPET S.A.** is its **pro-ethical organizational culture and implemented anti-corruption system**. The company declares *zero tolerance* towards corruption and bribery, this attitude is supported by concrete measures of prevention, internal control and employee training. CONPET S.A. has adopted an *Integrity Plan* in line with the National Anti-Corruption Strategy 2021-2025. This plan is regularly updated, a sign of a commitment to **continuous improvement of** ethics and compliance policies. In addition, the company systematically invests in **ethics and compliance training for employees**: in 2024, for example, training programs such as *"Auditing the Corruption Prevention System"* or *"Management of the Prevention and Fight against Corruption"* were conducted with the participation of staff in relevant positions. Such sessions raise awareness of the ethical rules and legal responsibilities of staff, strengthening the culture of integrity. Through these efforts, CONPET S.A. is aligning itself with the practices of Western companies in the industry and even going beyond the regional average, given that in Eastern Europe the issue of corruption in state-owned companies has often been a **sore point**. CONPET S.A.'s initiatives to strengthen the ethical culture have a major positive impact, contributing to increased organizational transparency and integrity and responding directly to regional calls to reduce corruption risks in the public energy sector (cepa.org.)

Another strength of CONPET S.A.'s governance is the existence of **strong mechanisms for the protection of whistleblowers**. The company has implemented an operational procedure dedicated to public interest whistleblower protection, providing a clear framework and safeguards for confidential reporting of violations of the law or the code of ethics. CONPET S.A. provides employees with **dedicated reporting channels** - including its own platform as well as a platform of the supervisory authority, both accessible on the official website - guaranteeing confidentiality, impartiality of investigations and protection against retaliation. This whistleblowing system, which goes beyond the minimum requirements of the EU Whistleblowers Directive, is a notable element of good practice. Many similar companies in the region are just beginning to implement such mechanisms, some facing cultural barriers in encouraging internal reporting. In contrast, CONPET S.A. **constantly monitors** compliance with ethical standards through a dedicated ethics counselor and conducts regular assessments of employees' awareness of anti-corruption rules.

CONPET S.A. also emphasizes **transparency and rigor in corporate governance** through its management and risk control structure. The company has constituted advisory committees (audit, nomination/remuneration, etc.) as required by law and is developing an *internal managerial control system* aligned with national regulations (e.g. OSGG 600/2018 on internal control in public entities).

We can conclude that **CONPET S.A.'s strengths** - institutionalized ethical culture, rigorous anti-corruption policies, whistleblowing mechanisms and transparency - align both with ESRS G1 requirements and international good governance trends, positioning the company above the regional average in ESG **Governance** chapter.

IMPROVEMENT OPPORTUNITIES FOR THE GOVERNANCE OF CONPET S.A. COMPARED TO SIMILAR COMPANIES

CONPET S.A. has a solid corporate governance foundation. We aim to identify opportunities for improvement, particularly in formalizing standards of conduct for suppliers. Although the company imposes strict ethical, environmental and safety requirements, it does not yet have a dedicated Code of Conduct for suppliers, which may limit the uniform application of ethical principles and transparency on compliance. Compared with other multinational energy companies that have implemented codes of conduct and audit programs for suppliers, the adoption of such a code would improve control over value chain risks and align CONPET S.A. with ESRS G1 requirements, increasing transparency and investor confidence.

A second area for improvement is the **further integration of sustainability into the company's strategic governance**. CONPET S.A., as a medium-sized company, aims to adapt and develop its own digital system for ESG reporting, which would streamline the process and increase stakeholder confidence in the information published.

Last but not least, corporate governance within CONPET S.A. could benefit from continued alignment with the G20/OECD Principles of Corporate Governance (2023) - which emphasize sustainability risk management and stakeholder engagement as these principles become a benchmark for emerging markets as well.

The **corporate governance of CONPET S.A. could benefit from the continued diversification and professionalization of the management structure**. European governance practices emphasize the *competence, independence and diversity of* boards of directors to ensure effective oversight. In the case of CONPET, which is majority state-owned, the continued application of the legislation on the governance of public enterprises (GEO 109/2011) and the attraction of independent experts to the board could provide fresh perspectives and strengthen market confidence. Already, as required by the BVB, CONPET has independent directors and audit/risk committees, but maintaining the highest standards is a direction of evolution.

In conclusion, the comparative analysis indicates that **CONPET S.A. enjoys a well-founded corporate governance**, with numerous **strengths** in the area of ethics, transparency and risk control - essential elements of ESRS G1 - where its performance is at least at the level of similar

companies in Eastern Europe, if not superior in some respects (anti-corruption, warning mechanisms). There are also opportunities for improvement that can help bring CONPET's governance up to European best practice: formalizing a code of conduct in the value chain, strengthening ESG governance at the strategic level, digitizing reporting and optimizing the governance structure. By proactively addressing these issues, CONPET S.A. could not only ensure full compliance with the new sustainable reporting requirements, but also strengthen its resilience and corporate reputation in a sector subject to rapid transformation and public attention on ESG performance.

Bibliography section:

- CONPET internal documents (according to the dual materiality and ESG governance analysis).
- European Sustainability Reporting Standard **ESRS G1 - Business Conduct** (2022/2023) - sub-themes and reporting requirements.
- EY (2024). *Europe Long-Term Value and Corporate Governance Survey* - findings on the role of the board in sustainability.
- CEPA (2023). *Top European Energy Security Priorities* - recommendations for the governance of state-owned energy companies in CEE.
- OECD (2023/2024). *Updated Governance Guidelines for Public Enterprises* - Focus on Sustainability and Bribery Prevention.
- WBCSD (2023). *The Oil & Gas Transparency Initiative* - best practices in climate and sustainability reporting.
- Academic study (2024). *ESG Integration in Corporate Governance: Emerging Markets* - Regional comparison (Eastern Europe vs. Asia) on ESG practices.
- Other industry and regulatory sources (BVB, Transparency International, etc.) on corporate governance and ESG trends in Eastern Europe.

6.2 Ethics, compliance and anti-corruption

Ethics and compliance are fundamental pillars of corporate governance at CONPET S.A., ensuring the integrity of internal processes and strengthening stakeholder trust. To prevent corruption risks and promote ethical behavior at all levels, the company has implemented a number of specific policies and measures:

- 🌱 **ISO 37001:2017 certification** on anti-bribery management, which confirms the existence of a robust system to prevent bribery based on clear ethics and compliance policies. This certification provides a clear framework for incident reporting and prompt corrective action.
- 🌱 The regularly reviewed **Code of Ethics and Integrity**, which sets standards of behavior for all company employees and business partners. The Code covers issues such as conflict of interest, protection of confidential information and employees' responsibilities to the community.
- 🌱 **The Multi-Annual Integrity Plan**, which is part of CONPET S.A.'s commitment to the National Anti-Corruption Strategy and includes specific actions to combat unethical

practices. Its implementation involves regular trainings and awareness sessions for all employees.

- 🌱 **Whistleblowing mechanisms**, which allow employees and other stakeholders to confidentially report any breach of ethics and compliance principles. The company's whistleblowing system provides whistleblower protection and facilitates prompt action on reported cases.

For the future, the company plans to **extend ethics and compliance assessments throughout the supply chain** by introducing a Supplier Code of Conduct. This code would require adherence to high standards of integrity and social responsibility, ensuring transparent and ethical collaboration with all business partners. Monitoring of this code could be done through regular audits and feedback mechanisms from suppliers.

Anti-Corruption

In order to implement the **National Anticorruption Strategy 2021-2025 (N.A.S.)** at the company level, in May 2022 **the Declaration on the assumption of the organizational integrity agenda in the coordinates of the N.A.S. 2021-2025** and the **Integrity Plan** were adopted. The latter was updated in February 2024 by decision of the General Director of **CONPET S.A.** and details the specific corruption prevention measures applicable to the company, in line with the general and specific objectives set out in the S.N.A. for public enterprises. The plan is intended to identify risks, vulnerabilities and specific intervention needs/measures.

All corruption prevention measures with a deadline of 2024 have already been implemented. In addition, the company conducts annual training, internal training and awareness programs in the field of anti-corruption education. It is based on the premise that the promotion of ethical and upright behavior contributes to the reduction of anti-corruption misconduct, reduction of internal conflicts, prevention of fraud and proper use of company resources. This training system also limits the risks of misuse of the company's image for personal gain or behavior that could affect relations with customers and business partners. The effective functioning of such a mechanism strengthens organizational integrity, increases employees' sense of security and boosts overall company performance.

In 2024, training sessions were organized for both TESA staff and members of executive management, addressing key topics on transparency, ethics and compliance within the company.

Tabel 6.5. Training level situation in 2024

Type of training	Number of employees / training program	Number of trained employees	Training level	Target group of staff
Provisions on conflict of interest and incompatibilities	606	590	97,36%*	TESA Personell
Provisions for corruption offences	1.423	1.408	98,95%*	All staff (Executive Management and employees)

Ethics and integrity rules	1.424	1.411	99,09%*	All staff (Executive Management and employees)
Rules on the obligation to declare gifts	87	87	100,00%	Executive management staff (including directors under contract)
Provisions for declarations of assets and interests	88	88	100,00%	Executive management staff (including directors under contract)

* The difference results from labour contracts suspended at the time of training.

Following training on the legal provisions relating to conflicts of interest and incompatibilities, TESA management staff and employees were tested on their acquired knowledge. This took place between November and December 2024 and demonstrated a high level of compliance, with knowledge of the relevant provisions reaching **100%**.

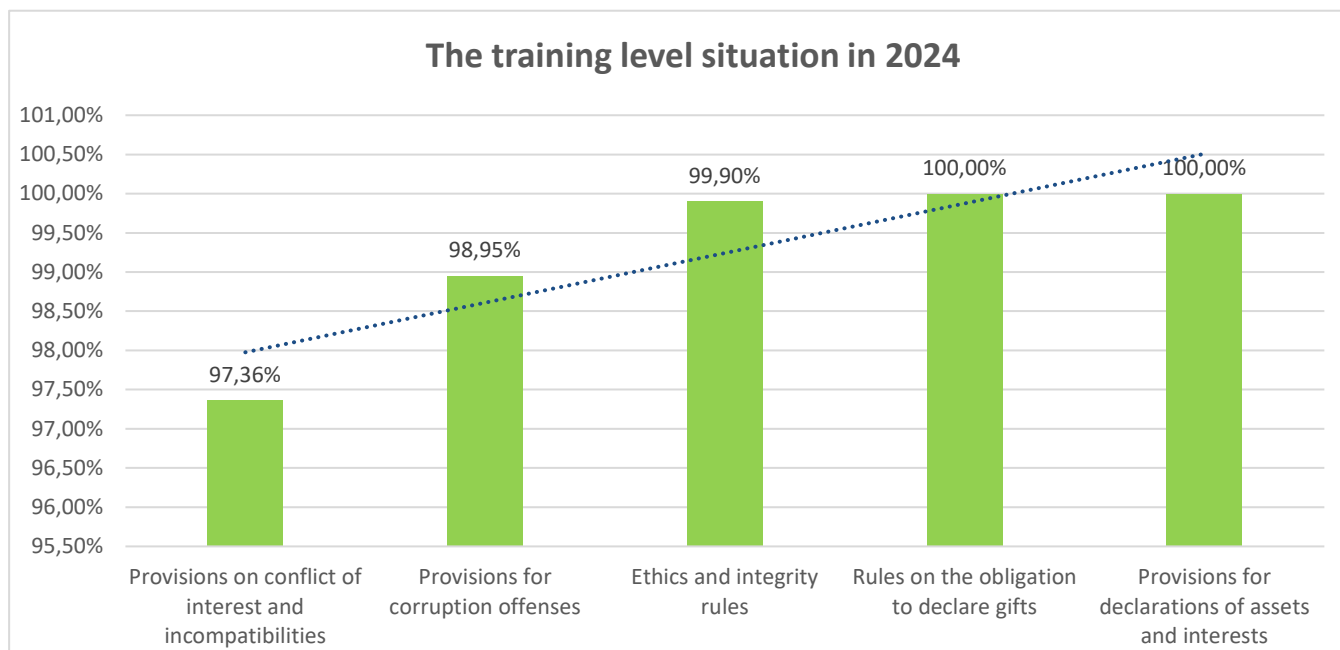


CHART 6.4. The training level situation in the year 2024

Training of new employees is provided by specialized staff and includes:

-  **The anti-bribery policy** and the requirements of the anti-bribery management system implemented in CONPET S.A., applicable to the positions included in the *Inventory of Sensitive Functions* and to the anti-bribery compliance function designated by decision of the General Director;
-  **The rules on conflicts of interest and incompatibilities**, addressed in particular to management and TESA staff.

Annually, in the first semester of each year, employees in sensitive positions, directors with a mandate contract and **CONPET S.A.** administrators fill in a **declaration of compliance** with the **Anti-Bribery Policy** and the requirements of the anti-bribery management system.

PROTECTION OF WHISTLEBLOWERS

CONPET S.A. has implemented a robust whistleblower protection system, providing internal and external channels for reporting irregularities. These were made known to all employees and stakeholders through:

- *Institutional Integrity* section on the company website;
- Internal Network *Info CONPET-Integrity*;
- Dissemination of information leaflets in the work sectors;
- Sending quarterly informative materials by e-mail to encourage reporting.

CODE OF ETHICS AND INTEGRITY

Updated in 2024, the **Code of Ethics and Integrity** sets out core values such as **transparency, honesty, integrity, respect for employees, accountability, non-discrimination and freedom of expression**. It governs the ethical conduct of administrators, directors, employees, as well as delegated or seconded staff, interns and collaborators.

- The Code also includes aspects on the specific measures foreseen by the National Anti-Corruption Strategy 2021-2025 for: Declaration of assets, gifts, protection of whistleblowers in public interest and conflicts of interest;
- Identifying sensitive functions and assessing Integrity incidents and corruption risks;

Role of the ethics and integrity counselor

The Ethics and Integrity Advisor is responsible for **advising management and employees**, organizing training sessions and monitoring the application of ethical rules. In 2024, he has:

- Organized trainings on the **Code of Ethics and Integrity** and the **Rules of the Ethics Adviser**;
- Disseminated information materials via e-mail and printed brochures;
- Organized information sessions for various internal entities, reporting practices that could lead to ethical violations;
- Assessed compliance through employee **questionnaires**, the results of which are included in an **annual report** with measures to improve the ethical climate.

On a quarterly basis, the Ethics Counselor shall report to the management relevant information about the counseling, training and compliance activities, as well as the administrative measures necessary to correct any misconduct.

COMPLIANCE AND INTERNAL AUDIT

Compliance with regulations is an essential component of **CONPET S.A.'s** activity, given the company's highly regulated field (crude oil transport, environmental protection, occupational health and safety, stock exchange rules, etc.).

To ensure compliance, the company has:

- 🕒 **Compliance Officer**, appointed by decision of the Director General, in accordance with the **National Anti-Corruption Strategy 2021-2025** and **GEO 109/2011**;
- 🕒 **Anti-bribery compliance function**, designated under **ISO 37001**, the international standard for anti-bribery management systems;
- 🕒 **Internal audit of the integrated management system**, focused on checking compliance with quality, environmental, occupational health and safety, energy and anti-bribery standards.
- 🕒 **Public internal audit**, as an independent, objective assurance and advisory activity, is designed to add value and lead to improvements in the company's activities.

The assessment of compliance with legal requirements is systematically ensured by specialized internal entities according to internal procedures. Regular auditing of the **integrated management system** contributes to the continuous improvement of the company's activities and to maintaining a high level of transparency and organizational ethics.

For the future, it is recommended to **extend ethics and compliance assessments throughout the supply chain** by introducing a Supplier Code of Conduct. This code would require high standards of integrity and social responsibility, ensuring transparent and ethical collaboration with all business partners.

The main mechanisms through which ESG governance is implemented include:

- 🔧 **Align the strategy with the principles of sustainable development**, so that every major decision is assessed in terms of its impact on the environment and society. This alignment is based on a clear set of ESG policies and objectives that are regularly monitored and adjusted in line with legislative changes and investor expectations.
- 🔧 **Implementation of an integrated management system**, recognized through certifications by accredited bodies, which provides a rigorous framework for identifying, monitoring and managing ESG risks. This system is evaluated internally and externally and regularly reviewed by top management, which monitors the effectiveness of the ESG programs implemented.
- 🔧 **Establish clear targets and KPIs** that allow performance to be measured and areas for improvement to be identified. For example, energy and environmental performance improvements are included in the company's management programs, with clear actions, deadlines and accountabilities

- **Adoption of a Corporate Social Responsibility Policy**, which includes the implementation of principles on: accountability for the impact of activities on society, economy and environment, transparency, ethical behavior, respect for stakeholder interests, respect for the rule of law and human rights, respect for international norms of behavior

RECOGNITION FOR ESG ETHICS, PERFORMANCE AND ACCOUNTABILITY

Conpet S.A. has consolidated its reputation as a reliable operator in the crude oil transport sector by respecting **the principles of corporate governance, ethics and social responsibility**. Its performance in terms of **transparency, sustainable investments and community impact** has been recognized by several relevant awards:

- ◇ **1st place in the category "Services - Very Large Enterprises"** - confirms financial stability and business ethics, reflecting Conpet's commitment to operational excellence and integrity.
- ◇ **Top Investor Award** - highlights the implementation of responsible investment practices, including **infrastructure modernization, digitalization and energy efficiency**, thus contributing to sustainable development.
- ◇ **Corporate Social Responsibility Trophy** - highlights positive impact on the community and environment through **sustainability** programs, **employee support and social initiatives**.

These awards confirm that **CONPET S.A.** respects **the highest ethical and governance standards**, ensuring transparency and accountability in all its activities. By integrating **ESG principles into its business strategy**, the company actively contributes to sustainable economic growth and to the consolidation of a responsible business model in the long term.

6.3 Risk management and transparency

The management of ESG risk factors is essential to ensure the operational and financial sustainability of CONPET S.A. In this regard, the company has developed a structured risk assessment and management framework, which includes:

- **Establishment and implementation of the Risk Management Policy** and a documented risk management process that develops a culture of risk-based approach in all company processes and decisions.
- **Identification of ESG risks** at all operational levels, including environmental, social and governance risks. These risks are identified and assessed to ensure that the company's strategy remains aligned with current market and international regulatory requirements.
- **Integration of ESG risks into the Internal Management Control System (IMCS)**, implemented in accordance with the requirements of OSGG 600/2018. This system provides a framework for continuous monitoring and enables proactive measures to be taken to reduce the negative impact on the company's business.

- **Regular internal audits** that assess compliance with international regulations and standards, ensuring transparency and accountability in risk management. Independent auditing contributes to building confidence in the company's ability to manage ESG risks.
- **Transparent reporting of ESG performance** through annual publication of sustainability indicators and measures taken to improve ESG performance. This reporting is essential to maintain an open dialog with investors and business partners.

Appropriate risk assessment methods are established, documented and maintained within the organization, and the effectiveness of control measures implemented to manage significant risks is constantly monitored. Risk management benefits from the allocation of the necessary resources, both for staff training, education and awareness, and for the implementation of approved measures to deal with identified risks.

To ensure effective risk management, the responsibilities of the staff involved are clearly defined and relevant risk data are systematically reported to stakeholders. The risk identification and assessment process covers several key categories:

- ⚠ **Operational risks**, such as pipeline integrity, technical or induced damage;
- ⚠ **Financial risks**, including market and liquidity risks;
- ⚠ **Compliance risks** such as legislative and regulatory changes, litigation risks or environmental impacts.

In order to better manage long-term risks, CONPET intends, in the medium, to develop advanced risk scenarios, including projections of the impact of climate change on the company's infrastructure and business model. This approach would enable the company to adapt its development strategy in a sustainable and resilient way. In addition, the development of strategic partnerships to identify and implement ESG best practices would contribute to the continuous improvement of internal processes.

Through these measures, CONPET S.A. strengthens its managerial strategy in terms of corporate governance and sustainability, ensuring transparency, integrity and accountability at all levels of the organization.



CONPET S.A.

aligns investments with the EU Taxonomy, ensuring sustainability and compliance with environmental and social standards.

7. TAXONOMY AND ESG INVESTMENT STRATEGY

EU Taxonomy - Classification of sustainable activities

The EU Taxonomy is a classification system that defines which economic activities can be considered environmentally sustainable according to EU criteria. It establishes a set of six environmental objectives. These objectives are: (1) climate change mitigation, (2) adaptation to climate change, (3) sustainable use and protection of water and marine resources, (4) transition to a circular economy, (5) pollution prevention and control, and (6) protection and restoration of biodiversity and ecosystems.

It also establishes technical selection criteria that activities must fulfill in order to be considered sustainable. CONPET S.A. evaluates its operations and capital projects against these criteria to determine eligibility and alignment with the Taxonomy. In practice, for each major investment or project (e.g., upgrading pipeline technology or installing renewable energy at our facilities), we assess whether it contributes substantially to an environmental objective, does not significantly harm any other objective, and meets the minimum social safeguards as set out in the Taxonomy Regulation.

SFDR - Improved ESG performance tracking and reporting

The Regulation on Sustainability Reporting in the Financial Services Sector ([SFDR](#)) complements the taxonomy by focusing on transparency and disclosure in the financial sector.

Although the SFDR directly targets investors, not CONPET S.A., it affects us indirectly, as investors seek high quality ESG data to fulfill their reporting obligations. CONPET S.A. understands that, in order to remain an attractive investment and facilitate capital flows for sustainable initiatives, it must provide the ESG information required by the SFDR to investors. Thus, we are working to improve our ESG performance monitoring systems and report relevant indicators, aligning with investor expectations, to enable them to identify our sustainability profile and correctly categorize funding under the SFDR.

Essentially, the **SFDR is driving us to be more transparent and data-driven in our sustainability reporting**, thereby aiming to prevent greenwashing and ensure that any sustainability claims are backed up by consistent data. By applying the taxonomy, companies can transparently assess and report the environmental impact of their activities, facilitating access to sustainable finance.

The ESG (Environmental, Social, and Governance) investment strategy focuses on integrating environmental, social responsibility and governance criteria into the company's decision-making process.

This chapter is structured in two parts:

Alignment with the EU Taxonomy and sustainable financing

This section details how CONPET S.A. is aligning with the requirements of the EU Taxonomy, thereby contributing to the transition to a sustainable economy and facilitating access to green finance.

ESG financial performance and future investments

This section analyzes the company's ESG performance and strategies for attracting sustainable financing, ensuring sustainable and transparent growth.

7.1 Alignment with EU taxonomy and sustainable financing

INTRODUCTION ON EU TAXONOMY REQUIREMENTS (REGULATION (EU) 2020/852)

Regulation (EU) 2020/852, known as the Taxonomy Regulation, sets clear criteria for identifying sustainable economic activities in the European Union. Its main aim is to promote sustainable investments and align financial flows with EU climate objectives.

CONPET S.A. assesses its operations and capital projects against EU Taxonomy criteria to determine eligibility and alignment with sustainability standards. In this regard, the company reviews each major investment to assess:

- **Contribution to environmental objectives;**
- **Respect the principle of DNSH (Do No Significant Harm);**
- **Compliance with minimum social guarantees.**

This assessment guides our decision making: projects that align with the Taxonomy's sustainability criteria are prioritized in our strategy, as they are more likely to support EU climate and environmental objectives and potentially attract green finance. By identifying activities that are **Taxonomy-eligible** (covered by the Taxonomy framework) and **Taxonomy-aligned** (meeting all sustainability criteria), CONPET S.A. can transparently report the proportion of its activities that are sustainable in EU terms. This includes reporting the proportion of our turnover, capital expenditure (CapEx) and operating expenditure (OpEx) associated with taxonomy aligned activities, as required by Article 8 of the Taxonomy Regulation.

For example, in our Sustainability Report in 2022 (the first year in which we assessed alignment with the EU taxonomy), we reported that no economic activities of CONPET S.A. were identified as aligned with the taxonomy at that time. This result provided a baseline and highlighted opportunities for improvement. Since then, we have explored investments in technologies such as renewable energy for our operations and efficiency improvements in pipeline transport that could qualify under the Taxonomy's criteria for climate change mitigation. The EU Taxonomy thus serves as a guide for CONPET S.A. in **aligning financial flows with sustainability goals** - it encourages us to channel investments into areas recognized as sustainable, thereby gradually increasing the portion of our business that contributes to environmental objectives. By following the Taxonomy's guidance, we not only support EU-wide climate goals, but also position the company to benefit from incentives and financing associated with sustainable economic activities (e.g. green bonds or loans can favor Taxonomy-aligned projects).

Although the main activity does not fit the Taxonomy criteria, CONPET has identified **secondary activities/investments with partial alignment**:

- The installation of photovoltaic systems at own facilities has been recognized as an activity with a substantial contribution to the objective "climate change mitigation". These projects were classified as enabling activities according to the Taxonomy.
- Part of the capital expenditure (CapEx) related to these investments is reported as aligned with EU criteria.
- Other investments, such as renovating buildings or installing energy efficiency equipment, did not fully meet the technical criteria and were not included.

As an infrastructure operator with majority state capital, CONPET S.A. carries out public procurement according to its own rules, but in drafting the tender documentation, it will take into account the introduction of environmental criteria, thus complying with the regulations established by Law no. 69/2016 on green public procurement, as well as sectoral legislation (Law no. 98/2016 and Law no. 99/2016).

INTEGRATING ENVIRONMENTAL AND SUSTAINABILITY REQUIREMENTS INTO PROCUREMENT POLICY

The National Green Procurement Plan 2025-2030 (PNAE) sets **mandatory annual targets** for green procurement in public entities and covers categories such as:

- IT and electronic equipment;
- Paper and sustainable products;
- Vehicles and infrastructure for green mobility;
- Renewable energy and energy-efficient construction works.

The PNAE targets are progressively increasing, so that, for example, green purchases for road vehicles and IT equipment have to reach the following targets:

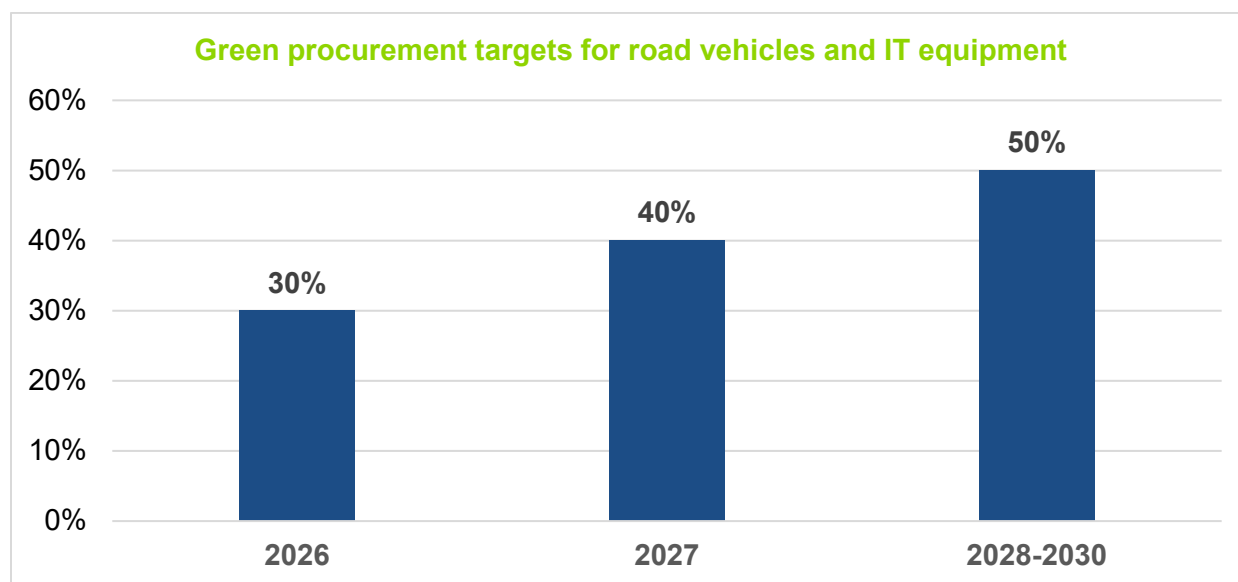


CHART 7.1 - Green procurement targets for road vehicles and IT equipment

CONPET S.A. has already started the alignment with the PNAE by:

- **Renewing the fleet** with hybrid and electric vehicles, reducing emissions and meeting sustainable mobility requirements. Currently, the company has 5 plug-in hybrid cars and 2 electric cars.
- **Introducing electric locomotives** for technological rail transport, reducing the use of fossil fuels. CONPET S.A. owns a total of 13 locomotives of which 3 hybrid locomotives and 2 electric locomotives.

These measures demonstrate CONPET S.A.'s commitment to sustainability and compliance with national and European policies such as the EU Taxonomy and PNAE. Furthermore, alignment with these requirements facilitates the company's access to **green financing** (e.g. green bonds or loans) and positions CONPET S.A. as a responsible actor in the transition towards a sustainable economy.

The EU Taxonomy is an essential guide for CONPET S.A. in integrating sustainability into its operations. Although the company's core business is not aligned with the Taxonomy, efforts to develop sustainable projects, such as renewable energy and energy efficiency, demonstrate continuous progress.

In addition, by implementing the **green public procurement** strategy and aligning with the PNAE 2025-2030, CONPET S.A. can actively contribute to national and European sustainability objectives. This approach not only reduces environmental impact, but also positions the company to benefit from the opportunities offered by the green economy of the future.

The Regulation (EU) 2019/2088 of the European Parliament and of the Council of November 27, 2019 on Sustainability Disclosures in the Financial Services Sector (SFDR) requires asset managers, banks and other financial market participants to report on the sustainability of their products and portfolios by classifying funds according to their ESG characteristics (e.g. 'open green' funds under Article 8, which promote ESG characteristics, and 'closed green' funds under Article 9, with explicit sustainable investment objectives).

Key improvements in our recent reporting include:

- **Wider reporting scope:** Previous sustainability reporting focused mainly on CONPET S.A.'s direct operations and traditional CSR topics such as environmental compliance, employee welfare and anti-corruption measures. In contrast, the CSRD-aligned 2024 report covers a broader range of topics and impacts. We now report on climate risks and opportunities, supply chain sustainability, diversity and inclusion, energy efficiency innovation and other important topics identified through our dual materiality assessment. This broader scope provides stakeholders with a comprehensive picture of CONPET S.A.'s ESG performance and how we are creating long-term value in a sustainable way.
- **Improving data quality and methodologies:** With each reporting cycle, CONPET S.A. improves its data collection and calculation methods. For example, the 2022 Sustainability Report was the first to include an analysis of the eligibility and alignment of our activities to the EU Taxonomy, and did not identify any aligned activities at that time. In 2024, we developed more detailed tracking of environmental data (such as detailed greenhouse gas emissions tracking for Scopes 1, 2 and 3) and social metrics (such as training hours and employee turnover).
- **Increased transparency and quantitative reporting:** CONPET S.A. has moved to a quantitative and target-oriented reporting style in response to legislative requirements. This reporting style aims to present concrete performance indicators and progress. For example, instead of simply stating that we aim to reduce emissions, we want to publish our specific emission reduction targets and our annual performance (in tons of CO₂e) against these targets. Key metrics for recent years will be presented to show trends and any failures or challenges are openly discussed. By revealing both successes and areas for improvement, we provide stakeholders with a clear and honest account of our sustainability journey. There has been a slight improvement in CONPET S.A.'s ESG performance and transparency in our public reporting from 2021 to 2024. We aim to continue this trajectory of increased transparency.

- **Strong reporting and assurance governance:** CONPET S.A. currently has a cross-functional team collecting the ESG information required for reporting, and the Audit Committee and Risk Management Committee of the Board of Directors will review all issues presented as part of the overall reporting process. The 2024 Sustainability Report is subject to assurance by the external financial auditor and we are putting in place the necessary systems and documentation for formal third-party assurance in future reporting cycles. The adoption of assurance will further enhance stakeholder confidence in the information we provide by having an independent verifier attest that our sustainability data is accurate and our processes are robust.

Through these improvements, CONPET S.A. demonstrates its commitment not only to meet regulatory requirements, but also to go beyond them where possible in order to provide stakeholders with a high level of transparency. Each enhancement to our reporting practices - whether expanding content, improving data accuracy or clarifying presentation - is intended to make the information more useful and trustworthy for our readers. Stakeholders can see a clear evolution in our sustainability reporting, from a baseline of compliance a few years ago to the current comprehensive, CSRD-compliant report, which is our most detailed and transparent communication to date. CONPET S.A. will continue to refine its sustainability reporting in line with emerging best practices and stakeholder expectations as part of our wider commitment to corporate responsibility and sustainable development.

We are better positioned to attract ESG-focused investors because we can demonstrate through verified data that our strategies and projects contribute to recognized sustainability goals.

ASSESSMENT OF ELIGIBILITY AND ALIGNMENT OF CONPET S.A. ACTIVITIES UNDER THE EU TAXONOMY FOR 2024:

In the following we present an assessment of the eligibility of the economic activities of CONPET S.A. for the year 2024 in accordance with the EU Taxonomy. The assessment of the activities carried out by CONPET S.A. was carried out for each of the three financial indicators (Turnover, CapEx and OpEx), based on financial statements provided by the company's representatives. The analysis was conducted with the purpose of identifying the eligible economic activities and their eligibility proportions, in accordance with the provisions of Delegated Act No. 2021/2178 and subsequent communications of the European Commission on the interpretation and implementation of certain requirements of the EU Taxonomy Regulation and related Delegated Acts.

From a methodological point of view, the following aspects were analyzed:

- ✔ For CapEx, an analysis of the investments that CONPET S.A. has made in the year 2024 has been performed to determine the proportion of capital expenditure, reported in the financial statements, related to assets or processes associated with economic activities that qualify as environmentally sustainable. CapEx includes additions related to property, plant and equipment and intangible assets (including right-of-use assets in accordance with IFRS 16, paragraph 53(h)). These investments are reported in the 2024 annual financial statements in notes 5 (Property, plant and equipment) and 6 (Intangible assets), lines 'Additions to property, plant and equipment' 2024 and 'Additions to intangible assets' respectively.
- ✔ For Turnover, the assessment was performed to identify the percentage of contract revenue related to eligible and EU Taxonomy aligned activities in the contract revenue included by the company in the Statement of Profit and Loss and Other Comprehensive Income for 2024, in the line "Contract revenue".
- ✔ For OpEx, an analysis of the revenue that CONPET S.A. has earned in 2024 has been performed.

For more details on our accounting policies, see Annual Financial Statements, Note 3. Accounting Policies.

As the company's main activity does not correspond to the activities listed in Annex I of Delegated Act 2021/2139 and is not eligible under the EU Taxonomy, the eligible turnover is zero.

In the following paragraphs will be presented the assessment of the eligibility and alignment of CONPET S.A. activities according to the EU Taxonomy - for OpEx.

TABLE 7.1. Eligibility and alignment of CONPET S.A. activities for the year 2024 according to the EU taxonomy - OpEx

Economic activity	NACE Code	Eligibility Taxonomy	Turnover (%)*	OpEx (%)
Pipeline transport of crude oil	4.950	No (fossil fuel transport)	99,59%	0%
Rental of movable and immovable property	6.820	No	0,38%	0%
Other activities	-	No	0,03%	0%

- ✔ **Pipeline transport of crude oil:** activity not eligible for taxonomy.
- ✔ **Rental of movable and immovable property:** We currently consider that the rental of movable and immovable property is not aligned with the EU Taxonomy, taking a prudent approach given the stringent energy efficiency and sustainability requirements. We believe that the investments made in 2024 (reflected in CapEx) have the potential to change this situation, which is why the activity will be reassessed in the following year, particularly if it

moves beyond its current status as a marginal activity, given its suboptimal weighting in the company's operating structure.

- **Other activities** : Currently considered not aligned with the EU Taxonomy, being directly related to the main activity. This classification will be reassessed if these activities go beyond their residual status or if a dominant niche emerges that can be specifically analyzed.

In conclusion - the percentage of the company's OpEx eligible under the EU Taxonomy is 0%.

The following paragraphs will present the assessment of the eligibility and alignment of CONPET S.A.'s activities according to the EU Taxonomy - for CapEx.

TABLE 7.2. Eligibility and alignment of CONPET S.A. investments for the year 2024 according to the EU taxonomy - CapEx

Type of investment	Value RON)	(thousand	CapEx (%)
Total investments realized in 2024	72.840		100,0%
Misaligned investments	72.370		99,4%
Aligned investments	470		0,6%

Additional analysis and explanations:

- The company's core activity, the transport of crude oil, is the dominant field, which reasonably implies that most of the investments are aimed at modernizing, streamlining and optimizing it. As this activity is not eligible under the EU Taxonomy, the related investments will be largely associated with this activity and therefore considered as non-aligned.
- Investments have been identified that can be dissociated from the core business and subject to individual analysis to determine their compliance with the EU Taxonomy. This approach allows for a targeted assessment to highlight investments that meet the criteria for alignment with sustainability standards.
 - Investing in photovoltaic power generation;
 - Investments in building rehabilitation;
 - Investments in modernizing water supply systems.

TABLE 7.3. Breakdown of the aligned investments of CONPET S.A. for the year 2024 according to the EU taxonomy - CapEx

Aligned investments	Value (thousand RON)	CapEx (%) - in aligned investments	CapEx(%) - in total investments
Investing in photovoltaic power generation	30,00	6,38%	0,043%
Investment in building renovation	138,77	29,51%	0,197%

Aligned investments	Value (thousand RON)	CapEx (%) - in aligned investments	CapEx(%) - in total investments

Investments in modernization of water supply systems	301,52	64,11%	0,428%

- Investment in photovoltaic energy production sources** - The investment is aligned with the EU Taxonomy as it contributes directly to climate change mitigation by producing energy from renewable sources, reducing greenhouse gas emissions and reducing dependence on conventional energy sources.
- Investments in building renovation** - The investment is aligned with the EU Taxonomy, as it leads to a reduction in primary energy consumption, either compared to the previous situation or compared to the baseline values estimated for the last three years, thus fulfilling the energy efficiency criteria.
- Investments in modernization of water supply systems** - The investment is aligned with the EU Taxonomy, as it generates significant reductions in electricity consumption by upgrading pumping systems and decreases water losses by optimizing sewerage infrastructure and connections, thus contributing to resource efficiency.

In summary - the percentage of the company's CapEx that is aligned under the EU Taxonomy is 0.6%.

INITIATIVES AND INVESTMENTS IN LINE WITH THE EU TAXONOMY

CONPET S.A. has initiated a series of investments aimed at improving operational sustainability and ensuring compatibility with the EU Taxonomy criteria, a relevant example of which is the installation of photovoltaic systems, which fall into the category of renewable energy production - an activity considered 100% sustainable, directly contributing to climate change mitigation.

The company has also invested in the rehabilitation of buildings, implementing measures that lead to a reduction in primary energy consumption, thus improving energy efficiency and ensuring alignment with the EU Taxonomy. Another significant project is the modernization of water supply systems, with a direct impact on reducing electricity consumption by making pumping systems more efficient, as well as on reducing water losses, thus optimizing the use of resources.

With these investments, CONPET is reinforcing its transition towards a more sustainable economy, with the possibility to expand its green initiatives and diversify its core activities in line with European climate objectives.

TABLE 7.4. Taxonomy key performance indicators - turnover

Economic activities	Code	Absolute turnover	Proportion of turnover	Criteria for substantial contribution						DNSH criteria						Minimum (social) guarantees
				1	2	3	4	5	6	1	2	3	4	5	6	
		thousand RON	%	%	%	%	%	%	%	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No
A. TAXONOMY - ELIGIBLE ACTIVITIES																
A.1 Environmentally eligible activities (aligned to taxonomy)	-	-	-													
Turnover of environmentally sustainable activities (aligned to taxonomy) (A.1)	-	-	-	-	-	-	-	-	-							
A.2 Activities eligible under the taxonomy but which are not environmentally sustainable (non-taxonomy activities)																
Turnover of activities eligible under the taxonomy but which are not environmentally sustainable (non-taxonomy activities) (A.2)		-	0.00													
Total (A.1 + A.2)		-	0.00													
B. TAXONOMY - INELIGIBLE ACTIVITIES																
Turnover of activities not eligible under taxonomy (B)		533.618	100,00													
Total (A + B)		533.618	100,00													

ENVIRONMENTAL OBJECTIVES:

-  Climate change mitigation
-  Adjusting to climate change
-  Water and marine resources
-  Circular economy
-  Pollution
-  Biodiversity and ecosystems

TABLE 7.5. Taxonomy key performance indicators - CapEx

Economic activities	Code	Absolute CapEx	Proportion of CapEx	Criteria for substantial contribution						DNSH criteria						Minimum (social) guarantee
				1	2	3	4	5	6	1	2	3	4	5	6	
		thousand RON	%	%	%	%	%	%	%	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No
A. TAXONOMY-ELIGIBLE ACTIVITIES																
A.1 Environmentally eligible activities (aligned to taxonomy)																
Investing in photovoltaic power generation		30	0,04	100							Yes	Yes	Yes	Yes	Yes	Yes
Investment in building renovation		139	0,19	100							Yes	Yes	Yes	Yes	Yes	Yes
Investments in modernization of water supply systems		302	0,42	100							Yes	Yes	Yes	Yes	Yes	Yes
CapEx for environmentally sustainable activities (aligned to taxonomy) (A.1)		470	0,65	100	-	-	-	-	-							
A.2 Activities eligible under the taxonomy but which are not environmentally sustainable (non-taxonomy activities)																
CAPEX related to activities that are taxonomy eligible but not environmentally sustainable (non-taxonomy activities) (A.2)		0	0,00													
Total (A.1 + A.2)		470	0,65													
B. TAXONOMY - INELIGIBLE ACTIVITIES																
CapEx for activities not eligible under taxonomy (B)		72.370	99,35													
Total (A + B)		72.840	100,00													

ENVIRONMENTAL OBJECTIVES:

- ✔ Climate change mitigation
- ✔ Adjusting to climate change
- ✔ Water and marine resources
- ✔ Circular economy
- ✔ Pollution
- ✔ Biodiversity and ecosystems

TABLE 7.6. Taxonomy key performance indicators - OpEx

Economic activities	Code	Absolute OpEx	Proportion of OpEx	Criteria for substantial contribution						DNSH criteria						Minimum (social) guarantees
				1	2	3	4	5	6	1	2	3	4	5	6	
		thousand RON	%	%	%	%	%	%	%	Yes /No	Yes/ No	Yes/ No	Yes /No	Yes/ No	Yes /No	Yes/No
A. TAXONOMY-ELIGIBLE ACTIVITIES																
A.1 Environmentally eligible activities (aligned to taxonomy)	-	-	-	-												
OpEx related to environmentally sustainable activities (aligned to taxonomy) (A.1)		-	-		-	-	-	-	-							
A.2 Activities eligible under the taxonomy but which are not environmentally sustainable (non-taxonomy activities)																
OpEx for activities that are taxonomy eligible but not environmentally sustainable (non-taxonomy activities) (A.2)		-	0.00													
Total (A.1 + A.2)		-	0.00													
B. TAXONOMY - INELIGIBLE ACTIVITIES																
OpEx for activities not eligible under taxonomy (B)		556,796	100.00													
Total (A + B)		556,796	100.00													

ENVIRONMENTAL OBJECTIVES:

- ✓ Climate change mitigation
- ✓ Adjusting to climate change
- ✓ Water and marine resources
- ✓ Circular economy
- ✓ Pollution
- ✓ Biodiversity and ecosystems

7.2 ESG financial performance and future investments

ESG INVESTMENT STRATEGY AT CONPET S.A.

In recent years, CONPET S.A. has made efforts to align itself with sustainability standards, preliminary steps that can be concretized in the future through a firm Strategy for integrating ESG criteria in investment planning and capital expenditure, recognizing that environmental, social and governance performance is closely linked to sustainable financial performance.

The company's management has closely followed the implementation of the planned investments, with the well-defined aim of optimizing the operational activity, increasing the performance of the National Transport System (NTS) and **improving operational safety**. An eloquent example of a successfully completed ESG investment (and at the same time one of the most important investments of the last decade for CONPET S.A.) is the **replacement of the crude oil transport**

pipelines under the Danube River and the Borcea Arm. The project, finalized in the second quarter of 2023, involved the installation of new, underground pipelines, made of modern materials and technologies, in place of the old pipelines crossing the Danube. With an investment value of ~€22 million (excluding VAT) , this large-scale project was a **first** for CONPET S.A. and demonstrated the company's commitment to environmental protection. The new pipelines, put into operation under maximum safety conditions, significantly reduce the risk of crude oil spills in sensitive natural areas, thus protecting the surrounding water and soil resources. The investment ensures the continued safe transport of crude oil across the Danube, avoiding potential environmental incidents caused by outdated infrastructure. In parallel, through subsequent investments visibly oriented towards sustainability, CONPET S.A. is carrying out a **"multi-year program" of modernization of crude oil storage and pumping facilities**. In 2020, the company commissioned a high-capacity storage tank at the Călăreți station, equipped with modern safety and emission control systems

According to the information available on the company's website, the company has carried out a [multi-year program of](#) modernization of crude oil storage and pumping facilities. Under this program, in 2020, the construction of a new crude oil tank (R3) in the Călăreți Automated Transport Station (A.T.S.) with a capacity of 31,500 cubic meters was completed, with a value of 15,933 thousand RON. This project was part of the company's [investment strategy](#) for 2020-2025, which includes the modernization and expansion of the crude oil transport and storage infrastructure.

Also, in 2021, the replacement of the 14-inch crude oil pipeline between Bărgăanu and Călăreți, with a length of 15,972 meters, was carried out with a value of 16,047 thousand RON. These investments reflect CONPET S.A.'s commitment to improve the efficiency and safety of its operations, as well as to reduce the environmental impact.

Such upgrades to the existing infrastructure reduce pollution risks (by preventing accidental spills and minimizing hydrocarbon evaporation) and simultaneously **improve the operational efficiency** of the NTS. On the technological component, CONPET S.A. invests in digital SCADA pipeline monitoring and control systems, which allow the optimization of transport flows and the rapid detection of any anomalies. This increases energy efficiency and prevents incidents, combining environmental and operational safety objectives. The company's development strategy explicitly mentions the implementation of an **advanced leak detection system** and the modernization of the data acquisition system as key strategic directions, emphasizing the integration of sustainability principles into CONPET S.A.'s operational excellence. Overall, CONPET S.A.'s current portfolio of ESG investments reflects a balanced approach: **environmental** projects (reducing emissions and pollution, increasing energy efficiency), investments in **occupational health and safety** (e.g. maintaining the zero accidents goal through ISO 45001 certification and continuous SSM training), as well as initiatives with **positive social impact** (developing employee skills and community involvement through sponsorships and partnerships). This improved ESG performance is also reflected in stable financial results: for example, in 2023 CONPET S.A. achieved an operating profit of RON 66.4 million, above the previous year's level, demonstrating that investments in sustainability can go hand in hand with increased shareholder value. By optimizing operational costs and reducing environmental risks (which could otherwise turn into costs or penalties), the ESG approach contributes to the

company's **financial resilience**. At the same time, by maintaining a high standard of corporate governance and transparency, CONPET S.A. continues to strengthen investor confidence and access to capital markets.

PLANNING NEW SUSTAINABLE FINANCING OPPORTUNITIES

Recognizing the accelerated dynamics of *green* funding, CONPET S.A. has established internal mechanisms for **continuous monitoring of** funding opportunities and **proactive planning of** future projects. Dedicated teams closely follow the launch of European and national calls for projects and funding guidelines, evaluating *the eligibility of* the company's project ideas against the criteria of these programs. At the same time, CONPET S.A. coordinates with relevant authorities (e.g. the Ministry of Energy) and industry partners to identify **co-financing** opportunities or consortia to access funds (an example would be working with other energy companies on regional green infrastructure projects). Through this integrated planning, the company ensures **optimal alignment** between its sustainability strategy and the timing of funding opportunities, minimizing the risk of missed funding opportunities and maximizing the impact of equity constrained investments.

Although CONPET S.A. does not have a well-defined sustainability strategy, but as a national operator for pipeline transport it appears in national analyses for possible participation in the national decarbonization strategy. Thus in the PNIESC (National Integrated Energy and Climate Change Integrated National Plan) CONPET S.A. was nominated as a company that can provide CO₂ transport through pipelines. In the framework of the PNIESC an estimation of the possibility of CO₂ transport through pipelines of approx. 16mil t/year.

POLICY RECOMMENDATIONS - ESG FUNDING AND TRANSPARENCY

In order to **increase access to ESG funding** and to continuously improve the transparency of reporting, CONPET S.A. will focus its efforts on several clear strategic directions:

- **Increasing the share of Taxonomy-eligible investments:** the company will continue to develop projects aligned with climate goals (e.g. renewable energy, energy efficiency) so that an increasing share of annual CapEx is eligible and subsequently *aligned* with the EU Taxonomy. This will increase the company's **financial resilience** and attractiveness to financiers, as Taxonomy-compliant projects can benefit from lower capital costs and preference from institutional investors. The medium-term objective is for investments with climate and environmental benefits to represent a segment in the investment plan, enabling the company to report annually on the increase in the percentage of sustainable activities in accordance with Art. 8 of the Taxonomy Regulation.
- **Full alignment with ESRS and OMF 85/2024 reporting standards:** CONPET S.A. is fully committed to the **European Sustainability Reporting Framework**. In line with the new ESRS standards and OMF 85/2024 (which transposes the CSRD requirements at national level), the company treats climate, environmental and social reporting with the same degree of importance and rigor as traditional financial indicators. Sustainability reporting is thus integrated into the corporate reporting system, ensuring **transparency, comparability and accuracy**. The organisation is partially prepared for the collection and management of data to be audited and compliant with ESRS requirements. In doing so,

the company **continuously improves transparency** and the ability to demonstrate ESG progress.

- **Proactive communication with investors and stakeholders on ESG:** Given the requirements of the Sustainable Financial Transparency Regulation (EU) 2019/2088 (SFDR), CONPET S.A. recognizes the importance of providing relevant information that allows investors to correctly *classify* their investment in the company from an ESG perspective. In this regard, the company will continue to publish **ESG key performance indicators** and link its sustainability objectives to financial market expectations. The dialog with investors will include a clear presentation of how CONPET S.A. contributes to environmental objectives (e.g. emission reduction, green energy generated) and how it manages climate or transition risks. Such proactive communication, backed by solid data (aligned with the Taxonomy and ESRS), will increase **investor confidence** and highlight the company's positioning as an attractive opportunity for ESG-oriented investment funds. In addition, CONPET S.A. aims to strengthen its relationship with institutional financiers and banks by presenting its ESG performance indicators in annual reports and analyst meetings, highlighting annual progress (e.g. increasing percentage of green CapEx, decreasing emissions intensity, achieving safety targets).

Through these strategic directions, CONPET S.A. aims both to facilitate access to sustainable financing and to improve ESG performance in an integrated way. The integrated approach - from targeting investments towards sustainable projects, to the effective use of green financial instruments, to transparent reporting according to international standards - ensures that the company is aligned with corporate sustainability best practices. In this way, CONPET S.A. strengthens its long-term position as a responsible energy operator, ready to face the challenges of the climate transition and to capitalize on the development opportunities arising from it, **for the benefit of shareholders, the environment and society.**



CONPET S.A.

measures and monitors ESG indicators to ensure transparency, compliance and sustainable performance.

8. PERFORMANCE INDICATORS AND COMPLIANCE WITH ESRS

8.1 Key ESG indicators and objectives

Non-financial reporting has become an indispensable element in demonstrating organizations' commitment to sustainability principles. This chapter outlines CONPET S.A.'s approach to measuring, monitoring and reporting environmental, social and corporate governance (ESG) performance indicators in line with the requirements of the European ESRS, the CSRD Directive and national legislation implemented by OMF no. 85/2024. These indicators reflect not only the company's current performance, but also its commitment to a sustainable future in which economic growth, social responsibility and environmental protection are harmoniously integrated into the business strategy.

CONPET S.A.'s approach to sustainability aims to continuously improve its environmental, social and governance performance. In the current context of the transition to a green economy, the company aims to implement a comprehensive monitoring framework of ESG indicators, aiming to align with international best practices and comply with the requirements of ESRS standards.

These indicators provide a transparent picture of the company's progress towards its sustainability goals and facilitate evidence-based decision-making.

Performance indicators and ESRS compliance (2024)

The year 2024 represents the first full year that CONPET S.A. reports its ESG (Environment, Social and Governance) performance. The ESG data and information used comes from internal sources (energy consumption, water and waste management reports and records) and external sources (compliance audits and standardized reporting according to the GHG Protocol and ISO 14064-1), and is subject to validation by independent external audits.

🌿 ESG Performance - Environment (ESRS E1-E5)

TABLE 9.1. Greenhouse gas (GHG) emissions in 2024

Total Scope 1 emissions	2.630,41 tCO ₂ e (direct emissions from fossil fuels used in own vehicles and installations).
Total Scope 2 emissions	4.451,10 tCO ₂ e (indirect emissions from purchased electricity).
Total Scope 3 emissions	11.825,08 tCO ₂ e (indirect emissions associated with the value chain, estimated by standardized methodologies in the absence of detailed primary data).

Table 9.2. Resource use and waste management in 2024

Water used	124.400 m ³ with a recirculation rate of 65%
Hazardous waste generated	800 tons, 100% treated according to legal requirements
Non-hazardous waste generated	4.200 tons, 78% recycled
Material consumption	9.856 tons (down on the previous year)

ESG PERFORMANCE - SOCIAL (ESRS S1, S3, S4)

🌿 Working conditions and employee health

CONPET S.A. maintains its commitment to a stable and fair work environment by implementing competitive wage policies and offering extensive social protection to employees. The company has implemented clear and rigorous processes to prevent accidents at work and manage occupational health and safety, obtaining and maintaining ISO 45001 certification.

In parallel, CONPET S.A. promotes an active and constructive social dialogue, with an extremely high unionization rate (98.50%), reflected by the effective negotiation and signing of the Collective Bargaining Agreement (CBA) in 2024. It establishes a transparent framework for addressing employees' rights and obligations, ensuring organizational stability and a favorable climate for all staff.

🌱 Skills development and training opportunities (ESRS S1)

In 2024, CONPET S.A. has intensified its efforts on the professional development and continuous training of its employees, offering them clear and well-structured opportunities to improve their professional skills, adapted to operational requirements and sustainability standards.

CONPET S.A.:

- 📌 Ensure regular training and certification of staff according to specific operational requirements;
- 📌 It offers continuous training programs to develop technical, digital and managerial skills;
- 📌 Monitors training needs and tailors training programs to meet strategic business requirements;
- 📌 Support internal and external training through collaborations with accredited institutions and training providers.

🌱 Investing in training

In 2024, CONPET S.A. continued to prioritize **human resources development**, investing in training and certification courses for its staff. According to internal reporting in 2024, there was a significant increase in the total number of participants in training and certification sessions from 2,698 in 2023 to 3,609 participants in 2024.

These training sessions cover both **technical training** and the skills required to operate the critical infrastructure managed by the company, the breakdown of which is given below:

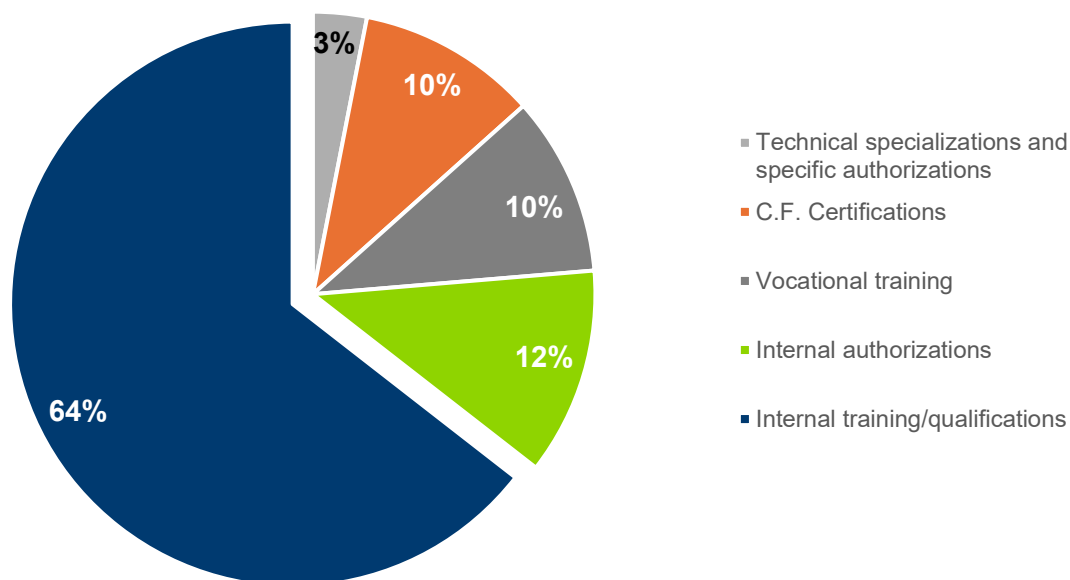


Chart 8.1. Training sessions - 2024

ESRS S1 alignment and impact on the workforce

According to **ESRS S1 - Own Workforce**, CONPET S.A. actively monitors the effects of training programs on employees. Their main benefits include:

- **Increase the safety and quality of operational activities** through better staff training;
- **Improve workforce stability** through access to professional development opportunities;
- **Increase the competitiveness of employees** by developing the technical and managerial skills needed by the industry.

Training impact assessment and future perspectives

In accordance with **ESRS S1**, CONPET S.A. constantly evaluates the effectiveness of its training programs, analyzing their impact on:

- **Employees' individual and collective performance** through the internal competency appraisal system;
- **Degree of compliance with oil and energy regulations.**

For the coming years, CONPET S.A. intends to **increase the number of training programs** oriented towards digitalization, energy efficiency and sustainability, thus contributing to the modernization and optimization of operational processes.

ESG PERFORMANCE - GOVERNANCE (ESRS G1)

Anti-corruption policies and corporate integrity

CONPET S.A. is committed to maintaining an ethical and transparent business environment in accordance with ESRS G1 and national corporate compliance legislation. In this regard, the company has implemented clear mechanisms to prevent corruption and fraud by:

- **Code of Ethics and Business Conduct** - sets out **the principles of integrity**, transparency and compliance in all company activities.
- **Anti-bribery policies** - explicitly prohibit any form of bribery, favoritism or unfair business practices in dealings with partners and authorities.
- **Regular training for employees** - training programs on **anti-corruption and corporate ethics**, risk awareness and regulatory compliance.

CONPET S.A. aims to increase reporting and compliance through internal and external audits and will improve mechanisms monitoring and sanctioning integrity violations.

Effective reporting and protection mechanisms for public interest warnings

In order to ensure transparency and encourage reporting of unethical behavior, CONPET S.A. has strengthened whistleblower protection mechanisms, aligning with EU Directive 2019/1937 on the protection of whistleblowers and ESRS G1:

- **Secure reporting channels** - implementing an internal platform where employees can **anonymously report any irregularities.**

- **Protection mechanism against retaliation** - ensuring legal protection for those who report ethical or corruption violations.
- **Transparent investigation process** - each complaint is analyzed by a committee established according to internal procedures.

CONPET S.A. will take measures to increase the awareness of employees about their rights and the use of reporting mechanisms.

🟢 **Monitoring relationships with suppliers and business partners**

CONPET S.A. operates in a complex business ecosystem and ESG risk management in the supply chain is an important component of corporate governance. CONPET S.A. plans to implement in the medium term the following:

- **Sustainable procurement policies** - integrating **ESG criteria** into the supplier selection and evaluation process. The company will aim to increase the number of partnerships with suppliers that comply with legal environmental and workplace safety requirements (e.g. ISO 14001 and ISO 45001 certifications).
- **ESG contract clauses - compliance** standard in commercial contracts.

ESRS G1-4 (corruption incidents):

During the year 2024, no incidents of corruption, bribery or ethical misconduct were reported or found within CONPET S.A. This information is a result of the affirmative action found in the sustainability report, in the section dedicated to training (Chart 7.3), where it is shown that 100% of employees in sensitive and management positions were trained and signed declarations of compliance, including on the topic of combating corruption and conflicts of interest. Also, the indicator on professional conduct and ethics (ESRS G1), states that there were no allegations of corruption during the reporting period. CONPET S.A. maintains its commitment to publish annually the status of incidents, including when it is nil, in the spirit of transparency as required by ESRS G1-4.

ESRS G1-5

CONPET S.A. did not carry out lobbying or organized political influence activities in 2024, in the sense of participating in legislative initiatives, actively promoting regulations or financing campaigns or organizations with the purpose of influencing.

According to the dual materiality analysis the topic "Political influence and lobbying activities" under ESRS G1-5 was not identified as a material theme because:

- the company does not have organizational practices or structures in place to support such approaches;
- the legislation regulating the activity of CONPET S.A. is imposed by the regulatory authority (ANRMPSG);
- the company is not a member of any EU or national lobbying structures that influence environmental, energy or transport regulations.

Consequently, ESRS theme G1-5 is considered immaterial for the reporting period.

ESRS G1-6 (payment terms to suppliers):

In 2024, the payment terms applied by CONPET S.A. were 30 days from the receipt of the invoice through the e-invoice system. All payments were made on the due date.

ESG CORPORATE GOVERNANCE AND RISK MANAGEMENT

CONPET S.A. has started the process of integrating ESG factors into its governance structure and decision-making processes, aligning with the ESRS G1 requirements:

- ✔ **Monitoring the implementation of ESG components** - The Board of Directors will oversee and assess the progress of sustainability initiatives, ensuring the alignment of the company's future strategy with ESG principles.
- ✔ **ESG risk identification** - As a first step, the company will conduct internal assessments to identify environmental, social impact and governance risks, with the intention to subsequently implement a formalized ongoing reporting system.
- ✔ **Strengthening ESG risk management** - CONPET S.A. aims to integrate ESG risks into its decision-making process and operational strategy, thus strengthening sustainability as an important element of its activities.

To achieve these objectives, the company aims to implement the following measures in the medium term:

- ✔ **Establish specific ESG specific tasks and responsibilities** within advisory committees at Board level.
- ✔ **Integrate ESG risks** into the company's overall risk management system.
- ✔ **Increase transparency** in ESG performance reporting.

Through these initiatives, CONPET S.A. reaffirms its commitment to a responsible and sustainable governance model.

8.2 Alignment with European regulations and standards (ESRS)

REPORTING CONTEXT AND ESRS REQUIREMENTS

The year 2024, marks **CONPET S.A.'s first sustainability reporting** in accordance with the requirements of the Corporate Sustainability Reporting Directive (EU) 2022/2464 (CSRD) and the European Sustainability Reporting Standards (ESRS). This represents an important step in integrating the principles of transparency, corporate responsibility and sustainability into the company's activities.

As the first ESRS reporting, CONPET S.A. has implemented only initial compliance measures, **with the** aim of fully integrating ESG reporting requirements and standards into its operational and decision-making processes in the coming years. This year:

- ✔ **A preliminary analysis of the ESRS requirements** and their impact on the company's activities **has been carried out.**

- ✔ **Sustainability data was collected and structured**, but without ongoing reporting mechanisms or external audit.
- ✔ **No dedicated targets and policies have yet been set in line with the ESRS**, these will be defined in the coming period, based on expert recommendations and stakeholder feedback (e.g. Ministry of Public Finance, Financial Supervisory Authority, etc).

Main issues covered in this report

In line with the ESRS requirements, the current report includes general information on the company's ESG performance, but does not yet reflect specific measures to align with all European standards. However, the following relevant areas for reporting have been identified:

- ✔ **ESRS E1 - Climate Change**
 - Reporting GHG emissions for scopes 1 and 2 according to the GHG Protocol methodology.
 - Overall emission reduction target
 - Initial investments in energy efficiency and use of renewable energy (e.g. photovoltaic panels).
- ✔ **ESRS S1 - Own workforce**
 - Employee structure and training policy.
 - Implementing health and safety measures in the workplace.
- ✔ **ESRS G1 - Corporate Governance**
 - Management structure and internal managerial control mechanisms.
 - Ethics and compliance policies, no ESG system in place.

CHALLENGES AND NEXT STEPS FOR ESRS COMPLIANCE

Given that ESG policies and reporting mechanisms fully aligned with the ESRS have not yet been developed, the main challenges and objectives for the coming years include:

- ✔ **Create a dedicated ESG strategy**, based on ESRS and CSRD requirements.
- ✔ **Improve the ESG data collection process** by implementing an internal system for monitoring and reporting on sustainability indicators.
- ✔ **Set measurable and realistic targets** on climate change, circular economy, workforce diversity and corporate governance.
- ✔ **Increase the integration of ESG principles into strategic decisions**, including by aligning procurement and investment processes with sustainability criteria.

Integrated ESG data collection, monitoring and validation system

In 2024, the first year of reporting under the ESRS, CONPET S.A. began steps to improve the transparency and accuracy of its ESG reporting. In the absence of a dedicated data collection

system, the company adopted a step-by-step approach, relying on internal sources of information and external expertise from consultants specialized in ESG reporting.

Measures implemented in this first reporting year:

- ✔ **Decentralized collection of ESG data** by entities in the relevant business areas (e.g. Environment, Human Resources, Finance, Operations, Transport, Integrity).
- ✔ **Preliminary validation** of information through internal mechanisms with the help of specialized consultants.
- ✔ **Recruitment of ESG experts** for:
 - Assistance in collecting and interpreting data specific to sustainability reporting.
 - GHG emission calculations and compliance with ESRS requirements.
 - Prepare internal staff for future reporting cycles and improve the ESG reporting system.

The company aims over the next years (2025-2027) to gradually develop its ESG reporting system, which would involve:

- ✔ Create a **flow** to ensure **consistency and traceability of ESG information**.
- ✔ Train internal staff to **autonomously manage the ESG reporting process** with the support of consultants.
- ✔ **Establish a regular data verification mechanism** to improve compliance with ESRS and the credibility of future reporting.

Own methodology adapted to the requirements of dual materiality

Being the first ESG reporting of CONPET S.A. under CSRD and ESRS, the company does not yet have a fully standardized methodology for dual materiality, but has initiated the first steps to align with these requirements. In this respect, CONPET S.A. has implemented the following measures:

- ✔ **Preliminary identification of relevant ESG themes** for CONPET S.A., based on **ESRS requirements and ESG risks and opportunities analysis**.
- ✔ **Stakeholder mapping**.
- ✔ **Analysis of the impact of company activities** on the environment and society, without a complete financial quantification of these impacts.
- ✔ **Hiring specialized consultants** for:
 - Defining the materiality analysis methodology.
 - Assistance in assessing ESG risks and opportunities.
 - Training internal teams on the application of the principle of dual materiality in future reporting.

For the coming years, CONPET S.A. aims to strengthen the methodology by:

-  **Elaborate own methodology** based on ESRS and GRI requirements.
-  **Set up a structured stakeholder consultation process** to validate material themes and ESG priorities.
-  **Extending the materiality analysis** to include direct and indirect impacts as required by the ESRS.
-  **Continuous training of staff** to understand and apply the materiality methodology in future reporting.

CERTIFIED MANAGEMENT SYSTEMS TO ENSURE COMPLIANCE

CONPET S.A. continuously maintains and improves its certified management systems to ensure compliance with implemented standard requirements, which include compliance with legal requirements, international regulations and industry best practices. By certifying its management systems, the company demonstrates its commitment to sustainability by aligning with both corporate governance and reporting requirements in accordance with ESRS (European Sustainability Reporting Standards).

Certifications Management systems implemented at CONPET S.A.

To ensure efficient and sustainable management, CONPET S.A. holds the following essential certifications:

1. ISO 9001:2015 - Quality Management System

-  **Ensures high quality standards** for pipeline oil transport services.
-  **It involves continuously monitoring and improving processes**, maintaining tight control of activities and increasing customer satisfaction.
-  **ESG Benefits:** Increased operational efficiency and process optimization to reduce waste and negative environmental impacts.

2. ISO 14001:2015 - Environmental Management System

-  **It supports environmental protection initiatives** and promotes responsible resource management.
-  **Ensures compliance with** national and European environmental **regulations** and the implementation of sustainable practices in the operation of transport infrastructure.
-  **ESG benefits:** Minimizing environmental impacts, reducing greenhouse gas (GHG) emissions and improving energy efficiency.

3. ISO 45001:2018 - Occupational Health and Safety Management System

-  **Provides safe working conditions** for employees, reducing the risks associated with operational activities.
-  **Contribute to improving** occupational health and safety (OHS) **performance** by assessing and controlling OHS risks.
-  **ESG benefits:** Protecting the health and safety of employees, reducing workplace accidents and creating a safe working environment.

4. ISO 50001:2018 - Energy Management System

- **It aims to improve energy performance**, streamline energy consumption and reduce the energy impact of CONPET S.A. operations.
- **Facilitates the monitoring and optimization of energy consumption**, including the integration of renewable energy sources (e.g. photovoltaic panels).
- **ESG benefits:** Alignment with the 10% emission reduction target through more efficient energy management.

5. ISO 37001: 2016 - Anti-Bribery Management System

- **Ensures compliance with anti-bribery legislation** applicable to the organization and zero tolerance of bribery.
- **It contributes to the highest standards of ethics and integrity** in the conduct of business and processes.
- **ESG benefits:** increased confidence in commercial negotiations and improved reputation of CONPET S.A.

Integrating certifications into ESG strategy and ESRS compliance

Certified management systems are not only compliance requirements but also essential tools for implementing and reporting ESG strategy. ESRS alignment is reflected in the following areas:

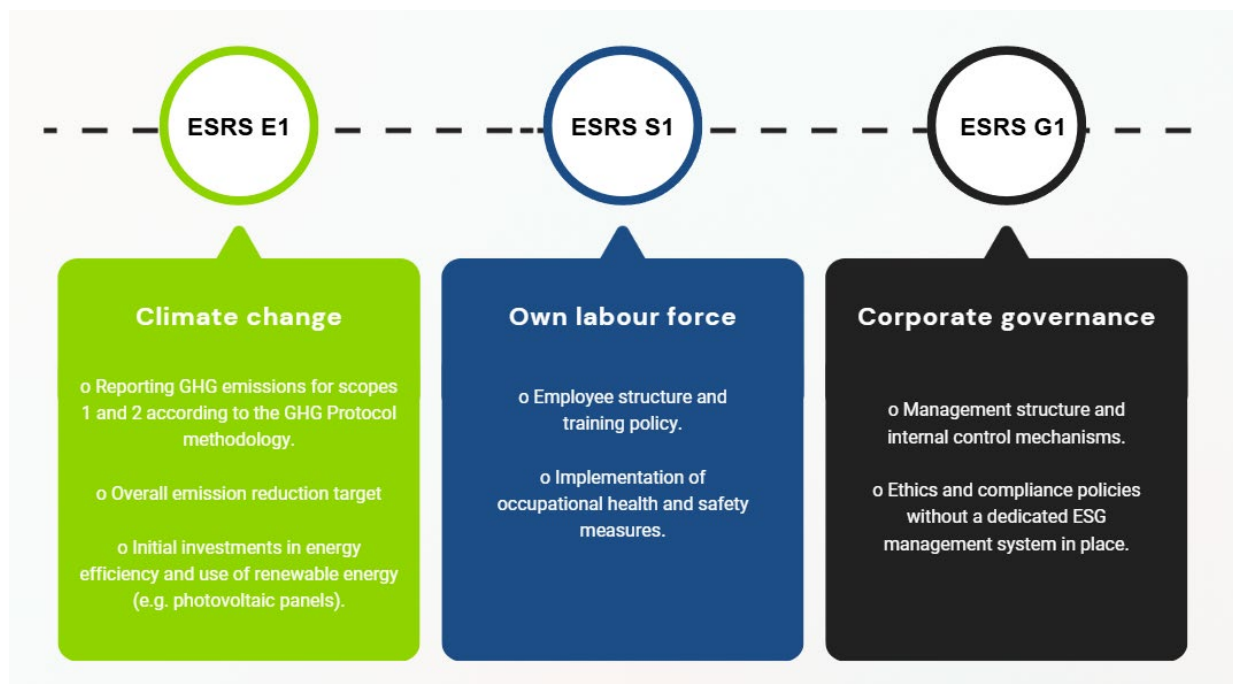


Chart 8.2. ESRS domains

THE BENEFITS OF MANAGEMENT SYSTEM CERTIFICATION FOR STAKEHOLDERS

By maintaining these **international certifications**, CONPET S.A. brings tangible benefits for:

- 📌 **Employees** - Safer working environment, health protection and continuous training.
- 📌 **Investors** - Increase transparency and trust in the company's ESG practices.
- 📌 **Regulators** - Strict compliance with legislative requirements and international standards.
- 📌 **Customers and partners** - High quality services and guaranteed operational sustainability.

Prospects and improvements for the future

For the coming years, our company aims to maintain its ISO certifications and will also analyze the possibility of implementing new integrated management systems, including:

- 📌 **Increased automation and digitization** ESG and environmental processes.
- 📌 **Stricter alignment with the EU Taxonomy** and requirements for sustainable investments.
- 📌 **Develop a sustainable development management system** based on the requirements of the ESRS and the new CSRD regulations

8.3 ESG 2024 risks and opportunities (ESRS E1-E5)

During 2024, CONPET S.A. carried out a detailed analysis of the ESG risks and opportunities associated with its operational activities. This assessment, conducted in accordance with ESRS standards and the principle of dual materiality (financial impact and ESG impact), led to the identification of the following relevant issues with clear implications for the company's business and financial performance.

SIGNIFICANT ESG RISKS IDENTIFIED IN 2024

In the year 2024, the ESG analysis according to the dual materiality methodology highlighted several operational and strategic risks impacting the company's sustainability and resilience:

1. Sustainable management of water resources and exposure to water risks

The company utilizes facilities and has water extraction wells in areas of moderate to high water vulnerability. In the absence of a risk mitigation plan, a possible reduction in the availability of water resources could lead to operational constraints and the need for adaptive measures, such as optimizing consumption, diversifying water sources and investing in alternative technologies.

2. Exposure to environmental risks associated with operational activities

The transport and handling of petroleum products inevitably entails risks related to technical incidents and potential accidental spills, which can affect large areas of land. To prevent environmental impacts, continuous measures are needed to upgrade infrastructure, implement advanced leak detection technologies and optimize rapid response processes.

3. Increased requirements for waste management and the circular economy

The generation and disposal of hazardous and non-hazardous waste is subject to stringent regulations, and legislative trends at the European level indicate an intensification of reporting requirements and minimization of environmental impacts. The company needs to ensure continued compliance with legal requirements for waste management and actively contribute to

the circular economy in the context of frequent legislative changes and compliance cost pressures.

4. Risk of high capitalization cost and limited access to sustainable funding

Increased requirements in green finance and sustainable insurance ratings add additional risk for companies that do not have a robust ESG risk analysis and a concrete plan to mitigate environmental impacts. In the absence of proactive measures, the company could face higher capitalization costs and restricted access to green finance sources or advantageous insurance products. Alignment with EU taxonomy requirements and the implementation of clear climate transition and mitigation strategies are essential to maintain financial and operational competitiveness.

ESG OPPORTUNITIES SEIZED IN 2024

CONPET S.A. acted proactively to transform ESG challenges into strategic and sustainable growth opportunities by implementing specific projects and initiatives, which had measurable results in 2024.

In 2024, CONPET S.A. has implemented several initiatives aimed at transforming sustainability challenges into strategic ESG opportunities, generating value for both the company and its stakeholders. The capitalized ESG opportunities focus on three main pillars: environmental, social and governance. These initiatives are aligned with the European Sustainability Reporting Standards (ESRS) and support the company's policies to reduce environmental impacts, increase operational efficiency and improve corporate governance.

1. Environmental opportunities (ESRS E1, E2, E5)

a) Increased energy efficiency and use of renewable energy

- **Expansion of solar energy capacity** by installing photovoltaic panels at Constanta Sud and Călăreți stations and other operational units.
- **Future objective:** to reduce energy consumption from conventional sources and decrease CO₂ emissions, contributing to the GHG reduction target.
- **ESG Impact:** Alignment with ESRS E1 (Climate Change) and ESRS E5 (Circular Economy).

b) Optimizing resource consumption and waste management

- Implement **advanced waste reduction and recovery measures** in the maintenance of oil transport infrastructure.
- **ESG Impact:** Application of circular economy principles through **reuse of materials and minimization of hazardous waste** generated by operations (**ESRS E5**).

c) Upgrade infrastructure to reduce accidental spills

- **Upgrade the leak detection system** in the oil transport network to **reduce accidental spills**.
- **ESG impact:** Increased operational safety and decreased risk of accidental pollution, alignment with ESRS E2 (Pollution).

2. Social opportunities (ESRS S1, S3, S4)

a) Employee skills development and safety at work

- **Increase in the number of training programs** for technical and administrative staff, with a total of 3,609 participants in training and licensing sessions in 2024, a significant increase from the previous year.
- **ESG Impact:** Providing a safe and motivating work environment as per ESRS S1 (Own workforce).

b) Community involvement and social responsibility initiatives

- **Education and professional development program** for students and young professionals, through which CONPET S.A. offers internships.
- **Participate in blood donation campaigns** and support public health initiatives.
- **ESG Impact:** Strengthening the relationship with the local community and creating a positive social impact (ESRS S3 - Affected Communities).

c) Diversity and inclusion

- **Promoting equal opportunities** in the company by increasing the representation of women in management positions and implementing inclusive and non-discrimination policies.
- **ESG Impact:** Alignment with ESRS S1 - Working Conditions and Inclusion.

8.4 ESG 2024 Performance and Compliance (ESRS & CSRD)

In 2024, CONPET S.A. achieved notable results, reflecting an improvement in ESG performance and compliance:

🌿 Environmental performance

- The company has achieved a share of about 27% of its energy produced from renewable sources at its administrative site 2, thanks to investments in photovoltaic systems.
- It has implemented operational measures to recycle 78% of non-hazardous waste and treat 100% of hazardous waste, confirming its commitment to the circular economy and waste management targets set in the area of waste management.

🌿 Social performance

- In 2024, CONPET S.A. carried out 22,237 hours of professional training, which represented an average of approximately 16 hours/employee, significantly improving technical, operational and managerial skills.
- A positive organizational climate has been maintained, evidenced by a very high degree of unionization (98.50%) and the signing of the Collective Bargaining Agreement, guaranteeing social stability and clear working conditions and competitive benefits.

- No occupational accidents have been reported, confirming the effectiveness of preventive measures and the maintenance of the occupational health and safety management system in compliance with ISO 45001.

● **Performance in corporate governance:**

- CONPET S.A. has implemented a secure and anonymous digital mechanism for warnings/warnings on the rules of ethical conduct leading to the identification and transparent management of 2 minor incidents, promptly resolved through training and internal corrective measures.
- The company achieved ISO 37001:2016 anti-bribery management system certification in 2022, and through annual surveillance demonstrates the organization's strategic commitment to preventing corruption and increasing stakeholder confidence.

THE NEED TO CONTINUE ESG STRATEGIC INVESTMENTS AND DEVELOP A SUSTAINABLE INVESTMENT STRATEGY

The ESG impact assessment confirms the need to accelerate strategic investments to improve sustainable performance and strengthen operational resilience:

- **Reducing greenhouse gas (GHG) emissions:** In line with the GHG Protocol and ESRS reporting standards, an effective plan to reduce direct and indirect emissions and transition to renewable energy sources needs to be developed.
- **Optimize water consumption and reduce exposure to water risks:** Implementing advanced water monitoring and reuse systems, diversifying sources, and integrating alternative solutions will help reduce reliance on vulnerable resources and minimize operational risks.
- **Improving operational safety and preventing environmental incidents:** Investments in advanced prevention technologies, early leak detection systems and optimized response procedures are needed to reduce reputational and compliance risks.
- **Continuous alignment to legal requirements for waste management and contribution to the circular economy:** Frequent legislative changes require a constant adaptation of waste management strategies, the development of partnerships for recycling and the use of sustainable solutions to minimize environmental impacts.
- **Increasing access to sustainable finance and reducing capitalization costs:** Integrating ESG criteria into strategic decisions, running ESG financial stress scenarios and aligning with climate reporting standards (TCFD, ISSB, ESRS) are key to attracting green finance, sustainable insurance and improving sustainability ratings.



9. FUTURE SUSTAINABILITY PERSPECTIVES AND OBJECTIVES

To ensure a sustainable and efficient transition, it is essential to strengthen and optimize the policy framework through concrete measures to reduce emissions, responsible management of water resources and implementation of the circular economy principles.

CONPET S.A. implements a diverse range of sustainability initiatives structured along the three ESG dimensions (environmental, social and governance). In the area of environmental protection, the company focuses on energy efficiency, renewable energy and infrastructure modernization to prevent technical failures. Social priorities include employee safety, professional development and support for local communities. The governance dimension is strengthened through ethical practices and transparency in dealing with all stakeholders.

Table 9.3. Achievements for sustainability and environmental protection

Initiative	Description	Impact
 Energy efficiency	Maintain the energy management system (ISO 50001) and upgrade equipment to reduce energy consumption Modernizing equipment to reduce energy consumption	Reducing energy consumption and carbon emissions
 Improving environmental performance	Maintenance of environmental management system (ISO 14001) Ensuring compliance with environmental protection requirements and monitoring the impact of company activities	Keeping environmental aspects and associated impacts under control
 Photovoltaic panels	Installation of photovoltaic systems at the secondary building (Administrative Building no. 2)	27% of the premises' electricity consumption covered by renewable sources
 Modernization of NTS infrastructure	Replacement of pipeline segments under the Danube and Borcea arm using advanced technologies	Reducing the risk of spills and protecting aquatic ecosystems
 Monitoring and preventing oil spills	Implementing advanced leak detection systems and upgrading the cathodic protection system	Prevent environmental incidents and protect soil and water
 Monitoring technology consumption	Compliance with specific consumption limits for crude oil transport	Active contribution to maintaining the technological consumption within the maximum limits allowed for crude oil at CONPET S.A. level.
 Monitoring specific annual average specific consumption of electricity for technological purposes	Compliance with the maximum allowable specific annual electricity consumption	Maintain energy efficiency by optimizing consumption and preventing overshooting limits

Initiative	Description	Impact
 Sorting waste at source	The constant realization of selective collection and the permanent existence of valid contracts for the waste generated in CONPET S.A. locations, for the purpose of recovery/disposal.	Operate in compliance with legal and other requirements applicable to own identified environmental issues. Ensuring selective collection at CONPET S.A. locations.
 Preventing and combating accidental pollution	To reduce the number of incidents with significant environmental impact so that the number of incidents is $\leq$ the number recorded in the previous year.	Constantly improving environmental performance and reducing incidents with significant impact each year.

Table 9.4. Achievements for sustainability and social responsibility initiatives

Initiative	Description	Impact
 Health and safety at work	Maintaining the occupational health and safety management system (ISO 45001)	Zero accidents at work in recent years
 Professional development	Ongoing training programs to develop employee skills	Increasing skills and motivation workforce
 Community sponsorships	Support for cultural, educational and health events in local communities	Active contribution to the social and cultural development of communities

Table 9.5. Achievements for sustainability and corporate governance

Initiative	Description	Impact
 Transparency and ethics	Maintaining anti-bribery standards (ISO 37001) and transparent reporting of activities	Building stakeholder trust and enhancing reputation
 Improving performance	Maintaining the quality management system (ISO 9001)	Increase operational efficiency and optimize internal processes

Roadmap for sustainability

CONPET S.A.'s Sustainability Roadmap 2025-2030 sets out the company's vision for the coming years, with ambitious targets covering all three ESG dimensions. On the environmental dimension, the company aims to reduce GHG emissions. Social initiatives focus on developing employees' green skills and community-based green regeneration programs. In the area of governance, CONPET S.A. aims to be a benchmark in the application of ESG standards, integrating sustainability into all strategic decisions. This reflects the company's commitment to a responsible and sustainable future.

Table 9.6. Sustainability initiatives 2025-2030

Initiative	Description
 Training staff in sustainability	Launch a regular sustainability awareness and training program for employees, aiming not only to inform but also to create an internal sustainability culture to guide company decisions and actions.
 Developing an ESG strategy and transition plan	Elaborate an integrated ESG strategy and transition plan to align corporate governance with sustainability best practices.
 Increasing renewable energy capacity	Progressively increasing the installed renewable energy capacity, reaching 180 kWp by 2026 and expanding to 360 kWp by 2030.
 Community program for environmental and economic regeneration	Support a programme to regenerate ecosystems and support local communities through sustainable development initiatives.

Initiative	Description
 Developing and implementing a strategic framework for reducing the carbon footprint	Elaborate a sustainable strategy to reduce carbon footprint and identify alternative energy solutions.
 Reducing emissions GES	Implementation of measures to reduce greenhouse gas emissions by at about 8% (Scopes 1 and 2), by optimizing operational processes, increasing the use of sustainable energy sources and increasing the percentage of energy consumed from renewable energy suppliers.
 Developing an ongoing ESG awareness program	Raising ESG awareness by implementing a training program and educational initiatives within the company and in the communities.
 Strengthening your role leadership in ESG practices	Leadership in ESG practices at the national level and integration of sustainability into the company's decision-making and strategic processes.
 Education and training of own staff	Providing a minimum of 10 hours of training and education per employee to train and develop professional skills and knowledge.
 Implement integrity as required by law	Preparation, training, evaluation and periodic internal testing of CONPET S.A. staff, carried out within the framework of anti-corruption awareness and education programs.
 Respecting gender equality	Ensuring women's access to management positions, with the objective of maintaining a minimum of 30% of female managers out of the total number of management positions at CONPET S.A..

These initiatives can be translated into specific investment projects as follows:

Reducing greenhouse gas emissions

An indicative reduction target for Scope 1 and Scope 2 emissions by 2030 is being considered, benchmarked to 2024 and in line with the general directions of the European Ecological Pact. In this context, energy efficiency initiatives are being analysed to reduce these emissions by around 8% through a series of projects such as:

- Selection of electricity suppliers so that, on average, at least 50% of energy purchased comes from renewable energy suppliers;
- Installation of renewable electricity generation systems contributing to this initiative

These measures aim to contribute to the process of reducing greenhouse gas emissions by at about 8%.

Circular economy and waste management

It is envisaged to continue the selective collection of waste to enable its continuous collection for recovery or disposal.

Strengthening compliance mechanisms

Increased attention will be given to the achievement of the proposed sustainability targets, including by integrating these issues into operational meetings, where dedicated time will be allocated to review progress and identify solutions to improve sustainability performance. The aim is to integrate the company among the top performing organizations in terms of sustainability practices.

Improved reporting and transparency

Digital mechanisms for collecting and analyzing sustainability data will be adopted, facilitating the generation of detailed and accessible stakeholder reports. These measures will contribute to building stakeholder trust and improve the company's ranking among ESG best practice organizations.

In addition, the following initiatives could be considered:

Adapting to climate change

A carbon footprint reduction framework can be implemented, which will include energy efficiency measures and transition to renewables. In this regard, the company can continue to invest in infrastructure modernization to reduce climate change risks such as accidental spills and excessive energy consumption. At the same time, environmental regeneration initiatives and the protection of vulnerable ecosystems can be pursued, contributing to the resilience of operations. These measures would support the company's alignment with the objectives of the European Ecological Pact and international sustainability standards.

Digitizing operations

The current remote management system can be developed to optimise operational processes with significant impact and monitor energy consumption, ensuring compliance with energy efficiency and sustainability objectives. Automating workflows and digitizing reporting processes would help reduce time spent on administrative tasks and increase transparency. A centralized system for monitoring technology consumption can also be introduced, facilitating real-time data-based decision-making. These measures would support the integration of ESG into corporate strategy and improve operational efficiency.

By implementing these initiatives, CONPET S.A. strengthens its commitment to sustainability and demonstrates a strategic vision oriented towards adaptation, innovation and long-term responsibility.

CONCLUSIONS

CONPET is a company with a notable activity in the oil and gas industry in Romania, which in over 30 years of activity, through modernization projects and large-scale investments, has responded to all the challenges posed by the dynamics of an industry essential for the energy sector.

We responsibly carry out an activity that contributes to keeping the world on the move, being a forward-looking and environmentally friendly company that understands how to maintain the right balance between past and future, between tradition and progress. CONPET's investment projects are aimed at increasing the efficiency of the transport activity, the safe operation of the National Transport System and minimizing the impact on the environment, **in the context of the energy transition process and the company's policy of aligning with the new European environmental standards.**

With this first sustainability report, CONPET S.A. reaffirms its strong commitment to transparency, corporate responsibility and long-term sustainable development. The detailed and in-depth analysis of ESG indicators reflects a broad understanding and integrated approach to the operational impact on the environment, society and the economy. In the face of climate challenges and the increasingly stringent requirements of ESG standards, CONPET S.A. adopts a proactive and forward-looking approach, constantly identifying responsible investment opportunities. The company is committed to reducing greenhouse gas emissions, managing natural resources efficiently and supporting the energy transition. At the same time, CONPET S.A. aligns its strategies with national and European objectives, actively contributing to the implementation of environmental and sustainable development policies.

CONPET S.A. will integrate ESG criteria into its decision-making and operational processes, promoting transparency and integrity. The active involvement of stakeholders - employees, communities, suppliers and partners - remains essential, and the company will continue to improve dialog and feedback mechanisms for responsible development. We would like to express our deep appreciation to all stakeholders for their continued support, active engagement and valuable collaboration to date. We strongly reaffirm our commitment to continuous progress in an ethical, transparent and accountable manner, ensuring a positive and lasting contribution for present and future generations.

Finally, all our lines of action are aimed at the sustainable development of the company, in harmony with the European energy strategy and with the responsibility imposed by the management of a strategic activity for Romania's energy security.

Annexes

ESRS compliance table

ESRS Standard	ESRS requirement	Status in 2024	Detailed explanations and sources
E1-1	Climate policies	Fully met	The report details climate policies in Chap. 4.1, documented through the implementation of ISO 14001 and ISO 50001 management systems. The policies cover pollution prevention, energy efficiency and climate compliance. Reference is also made to climate impact management in the section on dual materiality (Chap. 3).
E1-2	Mitigation and adaptation actions	Fully met	Chaps. 4.2 and 4.3 of the Report clearly document concrete actions: installation of photovoltaic panels (27% of consumption covered at the secondary site), modernization of pipelines under the Danube, upgrading of pumping stations. Investments in renewable energy and energy efficient technologies are indicated.
E1-3	Financial and technical resources allocated	Partially met	Although significant investments are mentioned (e.g. €26m for the Borcea pipelines), the report does not present a consolidated ESG budget or a budget chapter dedicated to climate action. There is no breakdown by type of resources. For the next report it is intended to introduce ESG resources with an estimated budget structure.
E1-4	Climate targets (GHG reductions)	Fully met	Chap. 4.3 and Chart 2.5: the company aims to reduce GHG emissions by ~8% by increasing the share of renewables in the purchased mix (from 52% to 85.4% in 2025). A strategic direction to reduce emissions intensity is also mentioned.
E1-5	Energy intensity (kWh / income)	Fully met	Section 8.1 of the Report provides the indicator: 13.21 kWh/1,000 RON net revenue , calculated according to ESRS requirements. It correlates with the energy efficiency initiatives presented in Chapter 4.3.
E1-6	GHG intensity (kg CO ₂ e / income)	Fully met	The indicator is calculated: 13.26 kg CO₂e / 1,000 RON income , according to the GHG Protocol, based on total emissions domains 1-3 (Chap. 3.3 + 8.1). The methodology is transparent and aligned with ESRS.
E1-7	GHG removals and carbon credits	Not applicable	In all the tables (including the integrated ESRS), it is mentioned that no carbon credits or GHG offset measures (e.g. afforestation, CCS) were used .
E1-8	Internal carbon price	Not yet addressed	The report contains no model calculation or simulation of an internal carbon price. The ESRS Table only mentions the modeling intent for 2025

ESRS Standard	ESRS requirement	Status in 2024	Detailed explanations and sources
E2-1	Pollution policies	Fully met	Chapter 4.4 of the report details the policy for prevention and monitoring of soil, water and air pollution. It mentions: ISO 14001 certification, the existence of leak detection systems, inspection plans and environmental interventions. There are responsible allocations and response structures for each site.
E2-3	Pollution prevention targets	Fully met	Table 9.4 of the report (sustainability initiatives) explicitly formulates an annual target: "Reduce the number of incidents with significant environmental impact to less than or equal to the previous year." This is an operational and quantifiable ESG target applicable to accidental pollution risks. Also confirmed in the dual materiality analysis.
E2-4	Air, soil and water pollution	Fully met	The existence of a rigorous monitoring system for air, water and soil pollutants is confirmed in Chap. 4.4. No significant incidents are recorded for 2024. Measures include regular inspections, automatic leak detection, greening by authorized firms.
E2-5	Dangerous Substances (SVHC/REACH)	Fully met	This is covered in the supporting technical documents. The WFD analysis includes safety data sheet tables (SVHC) and documentation submitted to ITM and the Ministry of Environment. The WFD mentions neutralization and traceability procedures for hazardous substances. The materiality methodology confirms the inclusion of these topics in the ESG assessment.
E3-1	Water and marine policies	Fully met	Chap. 4.4 of the report deals with sustainable water use policies. It mentions continuous monitoring of consumption, the use of own sources (boreholes), pollution prevention and compliance with environmental legislation. No incidents are reported.
E3-3	Water consumption targets	Fully met	The company complies with the limits imposed on the maximum flow rates for water supply from wells as required by law.
E3-4	Reporting total water consumption	Fully met	Chap. 8.1 presents the total annual water consumption by location in m ³ /year. The sources (own boreholes and network supply) and monitoring shall be indicated.
E4-2	Biodiversity and ecosystems policies	Fully met	Chap. 4.4 mentions measures to prevent impacts on biodiversity, including monitoring and greening after works. It is clearly stated that activities do not take place in protected areas or vulnerable ecosystems.

ESRS Standard	ESRS requirement	Status in 2024	Detailed explanations and sources
E4-4	Biodiversity targets	Not addressed	There is no formal or voluntary biodiversity protection target. It is mentioned that no protected areas are affected, but no "0 incidents" or "X% habitat restoration" target is set. Also confirmed as missing in ESRS tables. Voluntary targets are sought for next reporting.
E4-5	Biodiversity impact indicators	Fully met	Chap. 4.4 and Table 3.5 confirm no incidents in 2024 affecting natural ecosystems. There are no direct interactions with significant biodiversity and the areas crossed are outside protected sites.
E5-1	Policies on circularity and resource use	Fully met	Chap. 4.4 of the report describes waste management policies, the application of the waste hierarchy (prevention, reuse, recycling) as well as technological measures to minimize waste generation. Appropriate management of hazardous waste is mentioned.
E5-3	Circularity and reuse targets	Partially met	The report states that "most waste is recovered or recycled, avoiding direct disposal". However, there is neither a formal target nor a quantifiable percentage in the narrative text. The intention for the next report is to insert more explicit targets.
E5-4	Resource inputs - materials used	Partially met	The report does not provide an inventory of the materials used (e.g. steel, industrial liquids, energy inputs) and does not mention the proportion of recycled or sustainable materials. The lack is also reported in the compliance tables. A table of materials used, including recycled or sustainable materials, is planned for the next report.
E5-5	Resource outputs - waste and recovery	Fully met	Chap. 4.4 provides qualitative and operational information on types of waste generated (including hazardous), treatment methods (recycling, recovery), incident prevention and traceability. It states that there were no major incidents in 2024.
S1-1	Composition and inclusion of the workforce	Fully met	Ch. 5.1 details the structure of the workforce: gender, age, types of contracts, diversity policies and organizational stability. An inclusive approach is documented.
S1-2	Pay, benefits and contractual conditions	Fully met	Chaps. 5.1-5.2 confirm timely payment, existence of CCM, fringe benefits (insurance, vacation), no salary arrears.
S1-3	Health and safety at work (H&S)	Fully met	Ch. 5.2 and Ch. 8 mention the ISO 45001 certified SSM system, the goal of zero accidents, regular training and no incidents in 2024.
S1-4	Social dialogue and representation	Fully met	Ch. 5.1 confirms the existence of a valid Collective Bargaining Agreement, active consultation structures and no industrial disputes in 2024.

ESRS Standard	ESRS requirement	Status in 2024	Detailed explanations and sources
S1-5	Skills development and training	Fully met	Chap. 5.2 mentions technical and managerial training programs, upskilling, equal access to professional development.
S1-6	Equal opportunities and non-discrimination	Fully met	The report confirms the absence of discrimination in 2024, the existence of fair treatment and inclusion policies in promotion and recruitment.
S2	Working conditions in the value chain	Fully met	The report mentions in Chap. 6.3 the existence of compliance policies applied to the suppliers, as well as the fact that all partners are local or EU, and therefore subject to the same legal obligations regarding decent work, safety conditions, non-discrimination and freedom of association. The summary compliance table confirms full coverage of the requirement.
S3-1	Identifying impacts on communities	Fully met	Chap. 5.3 of the sustainability report details the potential risks and impacts on local communities, with a focus on incident prevention through technologies (SCADA, maintenance), collaboration with ISU, no incidents in 2024 . Confirmation also in ESRS tables .
S3-2	Community consultation and involvement	Fully met	The report outlines CSR initiatives in health, education and culture, following consultation with local authorities and NGOs. No conflicts or complaints are reported. The process of engagement is active but not formalized in documents.
S3-3	Prevention and management of social risks	Fully met	It is mentioned in Chap. 5.3 measures to prevent social hazards (noise, public access, accidental pollution), contingency plans and no social incidents reported in 2024. The ESRS table confirms the absence of conflicts or disputes .
S4-1	Privacy and data protection	Fully met	Ch. 6.2 of the sustainability report mentions implementation of GDPR policies, cybersecurity and zero incidents in 2024. Data protection systems comply with European regulations. Confirmation in Compliance Table and ESRS Table .
S4-2	Informing users (B2B transparency)	Fully met	Although CONPET does not have B2C customers, the report (Chap. 6.2) shows that the operator provides relevant information to industrial partners (B2B) through reports, website and compliance with legal transparency requirements. The ESRS tables note partial but compliant applicability .

ESRS Standard	ESRS requirement	Status in 2024	Detailed explanations and sources
G1-1	Policies on ethics and professional conduct	Fully met	Chap. 6.2 describes the code of ethics, ISO 37001 (anti-bribery) and ISO 9001 (quality) certifications, and management's formal commitment to integrity. Confirmation in ESRS tables .
G1-2	Supplier relationship management	Fully met	Chapters 6.2 and 6.3 confirm the ethical monitoring of suppliers and the integration of ESG requirements into procurement processes. The integrated table indicates that ethical evaluation is also applied in contractual relationships.
G1-3	Preventing corruption and bribery	Fully met	ISO 37001 implemented, annual training, detailed internal controls (Chap. 6.2). Summary table confirms 100% coverage by ethics training .
G1-4	Confirmed cases of corruption	Fully met	Ch. 6.2 (p. 107) explicitly states that there were no cases of corruption or ethical misconduct in 2024. Requirements G1-4 lit. b) are thus covered.
G1-5	Lobbying and political influence	Not applicable	The report mentions in Table 4.6 and in the Integrated ESRS that there is no lobbying or political influence. In Romania these practices are not regulated for state-owned enterprises.
G1-6	Payment practices and financial responsibility	Fully met	Ch. 6.3 confirms no outstanding payments in 2024. It highlights responsible financial behavior and stable relationships with suppliers .
GOV-1	BoD structure and role in ESG oversight	Fully met	Chap. 6.1 details the structure of the Board of Directors (BoD), members, non-executives, term of office and ESG governance duties. Full confirmation in all ESRS tables .
GOV-2	ESG CA competences and frequency of reporting	Partially met	The report (Chaps. 6.1 and 6.3) confirms the involvement in ESG oversight, but does not explicitly mention the ESG competences or training of the AC members.
GOV-3	Integrating ESG into the incentive system	Partially met	The ESG has not yet been included in the management bonus system in 2024. However, it is planned to be integrated from 2025, according to Chap. 6.2 and the ESRS Table .
GOV-4	ESG due diligence and risk oversight	Fully met	Chap. 6.3 clearly describes the integration of dual materiality, ESG risk analysis, internal consultation process, with annual reporting to the BoD. Full confirmation in all tables .
GOV-5	ESG risk management and internal controls	Fully met	The risk management system includes ESG and is documented in Chap. 6.3. It is integrated with financial and operational risks. The tables confirm full compliance.

ESRS reporting requirements covered by the sustainability statement table

Standard	Presentation requirements	Page
ESRS 2	BP-1 - General basis for sustainability reporting	6
	BP-2 - Submissions of information related to specific circumstances	6
	GOV-1 - Role of administrative, management and supervisory bodies	21
	GOV-2 - The information provided to the administrative, management and supervisory bodies of the enterprise and the sustainability issues they address	58, 107, 118, 127
	GOV-3 - Integrating sustainability performance into incentive schemes	106
	GOV-4 - Due Diligence Process Statement	106
	GOV-5 - Risk management and internal controls related to sustainability reporting	127
	SBM-1 - Strategy, business model and value chain	13, 17, 55, 91
	SBM-2 - Stakeholder interests and views	55, 58
	SBM-3 - Significant impacts, risks and opportunities and their interaction with strategy and business model	29, 31, 134, 155
	IRO-1 - Description of processes for identifying and assessing impacts, risks and opportunities significant	27
	IRO-2 - ESRS reporting requirements covered by the enterprise sustainability report	9, 27, 40
	MDR-P Policies - Policies adopted to manage significant sustainability issues	56, 105
	MDR-A Actions - Actions and resources on significant sustainability issues	35, 38, 86
	MDR-M - Indicators on significant sustainability issues	86, 142
	MDR-T targets - Monitoring the effectiveness of policies and actions through targets	151, 162
ESRS E1	GOV-3 - Integrating sustainability performance into incentive schemes	106
Climate change	E1-1: Transition plan for climate change mitigation	43, 53, 54, 161

Standard	Presentation requirements	Page
	SBM-3 - Significant impacts, risks and opportunities and their interaction with strategy and business model	29, 31, 134, 155
	IRO-1 - Description of processes for identifying and assessing impacts, risks and opportunities significant	27, 43, 156
	E1-2: Policies related to climate change mitigation and adaptation	59
	E1-3: Actions and resources related to climate change policies	86, 87
	E1-4: Climate change mitigation and adaptation targets	66
	E1-5: Energy consumption and energy mix	65
	E1-6: Gross emissions of GHG categories 1, 2, 3 and total GHG emissions	60, 65
	E1-7: GHG removals and mitigation projects financed by carbon credits	65
	E1-8: Setting the internal carbon price	65
ESRS E2	IRO-1 - Description of processes for identifying and assessing impacts, risks and opportunities significant	27, 43, 156
	E2-1: Pollution-related policies	67
	E2-2: Pollution-related actions and resources	71
	E2-3: Pollution targets	70
	E2-4: Air, water and soil pollution	68
Pollution	E2-5: Substances of concern and substances of very high concern	69
ESRS E3	IRO-1 - Description of the processes for identifying and assessment of significant impacts, risks and opportunities	27, 43, 156
	E3-1: Policies related to water and marine resources	76
	E3-2: Actions and resources related to water and marine resources	78
	E3-3: Water and marine resources targets	44, 79
	E3-4: Water consumption	77
Water and marine resources		

Standard	Presentation requirements	Page
ESRS E4	E4-1: Transition plan and consideration of biodiversity and ecosystems in the strategy and business model	43, 53, 54, 161
	SBM-3 Significant impacts, risks and opportunities and their interaction with strategy and business model	29, 31, 134, 155
Biodiversity and ecosystems	IRO-1 - Description of the processes for identifying and assessment of significant impacts, risks and opportunities	40, 45, 156
	E4-2: Policies related to biodiversity and ecosystems	80
	E4-3: Actions and resources related to biodiversity and ecosystems	81
	E4-4: Biodiversity and ecosystems targets	80
	E4-5: Impact indicators related to biodiversity and ecosystem change	80
	IRO-1 - Description of the processes for identifying and assessment of significant impacts, risks and opportunities	27, 43, 156
ESRS E5		
Resource use and circular economy	E5-1: Resource use and circular economy policies	83
	E5-2: Actions and resources related to resource use and circular economy	84
	E5-3: Resource use and circular economy targets	84, 161
	E5-4: Resource inputs	85
	E5-5: Resource outflows	85
ESRS S1		
Own workforce	SBM-2 Interests and views of stakeholders	55, 58
	SBM-3 Significant impacts, risks and opportunities and their interaction with strategy and business model	29, 31, 134, 155
	S1-1: Own workforce policies	41, 46

Standard	Presentation requirements	Page
	S1-2: Processes for engaging with own workforce and workers' representatives on impacts	45, 102
	S1-3: Processes to remedy negative impacts and channels through which own workforce can voice concerns	46
	S1-4: Taking action on significant impacts on own workforce and approaches for managing significant risks and pursuing significant opportunities related to own workforce, and the effectiveness of these actions	46
	S1-5: Targets related to managing significant negative impacts, promoting positive impacts and managing significant risks and opportunities	38, 145
	S1-6: Characteristics of enterprise employees	94
	S1-7: Characteristics of self-employed workers in the enterprise's own workforce	n/a
	S1-8: Coverage of collective bargaining and social dialog	93, 100, 102
	S1-9: Diversity indicators	94, 97
	S1-10: Adequate wages	97
	S1-11: Social Protection	97
	S1-12: People with disabilities	93
	S1-13: Training and skills development indicators	99, 162
	S1-14: Health and safety indicators	53, 97, 140
	S1-15: Work-life balance indicators	99
	S1-16: Remuneration indicators (pay gap and total remuneration)	106, 114
	S1-17: Incidents, complaints and serious human rights problems and incidents	125
ESRS S2	SBM-2 Stakeholder interests and views	55, 58
Value chain workers	SBM-3 Significant impacts, risks and opportunities and their interaction with strategy and business model	29, 31, 134, 155
	S2-1: Policies on value chain workers	125, 126

Standard	Presentation requirements	Page
	S2-2: Collaborative processes with value chain workers on impacts	125, 126
	S2-3: Processes for addressing negative impacts and channels through which value chain workers can voice their concerns	125, 126
	S2-4: Taking action on significant impacts on value chain workers and approaches for managing significant risks and pursuing significant opportunities related to value chain workers, and the effectiveness of these actions	125, 126
	S2-5: Targets related to managing significant negative impacts, promoting positive impacts and managing significant risks and opportunities	125, 126
	SBM-2 Interests and views of stakeholders	55, 58
ESRS S3	SBM-3 Significant impacts, risks and opportunities and their interaction with strategy and business model	29, 31, 134, 155
	S3-1: Policies related to affected communities	101, 102
	S3-2: Collaborative processes with affected communities on impacts	101, 102
	S3-3: Processes to remedy negative impacts and channels through which affected communities can voice their concerns	101, 102
	S3-4: Taking action on significant impacts on affected communities and approaches for managing significant risks and pursuing significant opportunities related to affected communities, and the effectiveness of these actions	101, 102
Affected communities	S3-5: Targets related to managing significant negative impacts, promoting positive impacts and managing significant risks and opportunities	101, 102
ESRS S4	SBM-2 Interests and views of stakeholders	55, 58
	SBM-3 Significant impacts, risks and opportunities and their interaction with strategy and business model	29, 31, 134, 155
	S4-1: Consumer and end-user policies	n/a
	S4-2: Collaborative processes with consumers and end-users on impacts	n/a
Consumers and end-users		

Standard	Presentation requirements	Page
	S4-3: Processes for remedying negative impacts and channels through which consumers and end-users can voice their concerns	n/a
	S4-4: Adoption of measures on significant impacts on consumers and end-users and approaches for managing significant risks and tracking significant opportunities related to consumers and end-users, and the effectiveness of these measures	n/a
	S4-5: Targets related to managing significant negative impacts, promoting positive impacts and managing significant risks and opportunities	n/a
	GOV-1 Role of administrative, management and management and supervisory	106- 117
	IRO-1 - Description of the processes for identifying and assessment of significant impacts, risks and opportunities	108, 127
ESRS G1	G1-1: Policies on professional conduct and corporate culture	118, 124
Professional conduct	G1-2: Supplier relationship management	114, 125
	G1-3: Prevention and detection of corruption and bribery	115
	G1-4: Incidents of corruption or bribery	121, 148
	G1-5: Political influence and lobbying	148
	G1-6: Payment practices	148



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Transactions concluded according to Article 52 of GEO no. 109/2011 in 2024 H2

Annex 2

Crt. no.	Contract no.	Date	Partner	Contract Scope	Value RON	Established guarantee in - RON-	Method of payment Payment term	Penalties
1	2024/BCF 241	26-NOV-24	CNCF C.F.R. S.A.	Exploitation of industrial lines Salonta	574.529,38	Not applicable	30 days from the invoice receipt	0.03%/ day
2	2024/CCA 136	10-JUL-24	TELECOMUNICAȚII C.F.R. S.A.	Supervision of works "pipeline replacement Constanta - C1 8 sections"	4.470,2	Not applicable	5 days from the issuance date	0.1%/ day
3	2024/CCA 144	17-JUL-24	CNCF C.F.R. S.A.	Works supervision services	12.413,75	Not applicable	30 days from the issuance date	0.05%/ day
4	2024/CCA 191	16-SEP-24	PĂULEȘTI CITYHALL	9sqm rental in Păulești commune	6.600,00	Not applicable	30 days from the issuance date	0.1%/ day
5	2024/EN 146	18-JUL-24	ARGES-VEDEA BASIN WATER ADMINISTRATION	Sîlște water supply	5.160,59	Not applicable	30 days from the invoice receipt	0.01%/ day
6	2024/EN 161	05-AUG-24	Bacău Regional Water Company S.A	Water supply Moinești warehouse	12.300,00	Not applicable	15 days from the invoice issuance	Level of interest due for not paying budget obligations in due time
7	2024/EN 165	08-AUG-24	RAJA S.A.	Water supply fixed point C4	rates	Not applicable	15 days from the invoice issuance	Level of interest due for not paying budget obligations in due time
8	2024/MRU 216	17-OCT-24	CENAFER	The importance of theoretical professional training and practical service training in railway activities during 02.12.2024 - 06.12.2024 for 3 learners at C.C.I.P.T.F. Bucharest	1.314,00	Not applicable	30 days from the invoice receipt	0.03%/ day
9	2024/MRU 220	23-OCT-24	CENAFER	Vocational training 3 learners 28.10.2024 - 16.05.2025	12.468,60	Not applicable	30 days from the invoice receipt	0.03%/ day
10	2024/P-CA 289	23-DEC-24	S.P.E.E.H. HIDROELECTRICA S.A.	Electricity Supply	18.017.517,18	Not applicable	30 days from the date of invoice issuance	0.1%/ day
11	2024/RPS 203	24-SEP-24	"SFÂNTUL VASILE" SECONDARY SCHOOL	Sponsorship	25.000,00	Not applicable	up to 23.10.2024	Not applicable
12	2024/RPS 204	24-SEP-24	"ION LUCA CARAGIALE" NATIONAL COLLEGE, PLOIESTI MUNICIPALITY	Sponsorship	22.000,00	Not applicable	up to 23.10.2025	Not applicable
13	2024/RPS 212	11-OCT-24	CHAMBER OF COMMERCE AND INDUSTRY	Participation in the event Top of Prahova companies	5.300,00	Not applicable	5 days from the issuance date	Not applicable
14	2024/RPS 232	15-NOV-24	BUCHAREST INTERNATIONAL THEORETICAL HIGH SCHOOL OF INFORMATICS	Sponsorship of the theoretical high school of computer science	15.000,00	Not applicable	up to 09.12.2024	Not applicable
15	2024/RPS 267	18-DEC-24	FLOREȘTI PNEUMOPHYSIOLOGY HOSPITAL	Modernization of IT infrastructure for the benefit of patients and employees	50.000,00	Not applicable	up to 31.12.2024	Not applicable
16	2024/RPS 270	18-DEC-24	MORENI CITYHALL	Packages for carolers	7.000,00	Not applicable	up to 24.12.2024	Not applicable
17	2024/RPS 271	18-DEC-24	FLORESTI CITYHALL	Packages for carolers	10.000,00	Not applicable	up to 24.12.2024	Not applicable
18	2024/S-CA-CD 173	21-AUG-24	National Company POȘTA ROMÂNĂ S.A.	Domestic and international postal and express courier services	18.000,00	10%-1800 RON	30 days from the issuance date	0.3% from the value of the shipment's transport
19	2024/STA 147	19-JUL-24	ROMANIAN CAR REGISTRY	Franchise for periodic technical inspections R.A.R.	rates	500 RON	up to the 25th of every month	Not applicable

Objectives and financial and non-financial key performance indicators for Directors with mandate contracts achieved between 01.01.2024-31.12.2024

Crt. no.	Performance indicators	Performance objective	MU	(Period 01.01.2024- 31.12.2024)			Degree of achievement KPIs (%)	KPIs weights for the settlement of the remuneration	Degree of achievement KPIs (%)
				Target values		Achieved values			
A. FINANCIAL KEY PERFORMANCE INDICATORS: 50%									
1.	Achievements of the investments	Achievement of at least 70% of the annual investment plan	%	≥70%	82.9%	118.4%	10.0%	11.8%	
2.	The quick ratio indicator (acid test)	Ensuring the ability to pay current liabilities from current assets adjusted with the value of the inventories		≥1	2.0	100.0%	5.0%	5.0%	
3.	Inventories turnover speed	Maintaining the collection of receivables from customers within a maximum period of 30 days	days	≤30	28	100.0%	5.0%	5.0%	
4.	Operating profit margin	Maintaining the profitability of operating activities at a minimum of 7.5%	%	≥7.0%	9.3%	132.8%	5.0%	6.6%	
5.	Outstanding payments	Level zero	thousand RON	0	0	100.0%	5.0%	5.0%	
6.	Adjusted EBITDA = Operating profit – Write-back to revenues of the reserve out of the modernization quota + Expenses regarding the modernization quota +Impairments of tangible and intangible assets, here included the revaluation differences	Achieving planned adjusted EBITDA minimum 95%	%	≥95%	103.7%	109.2%	10.0%	10.9%	
7.	Labor Productivity	Achievement of the labor productivity level provided in the annual approved Budget	thousand RON/ person	429	437	101.8%	10.0%	10.2%	
B. NON- FINANCIAL KEY PERFORMANCE INDICATORS: 50%									
B1. OPERATIONAL KEY PERFORMANCE INDICATORS: 20%									
8.	Monitoring the annual electricity average specific consumption for technological purposes	Maintenance of the annual electricity average specific technological consumption at a level of max 3.2 Kwh/to	Kwh/to	Max 3.3 Kwh/to	3.2	2.7	100.0%	5.0%	5.0%

Crt. no.	Performance indicators	Performance objective	MU	(Period 01.01.2024- 31.12.2024)			Degree of achievement KPIs (%)	KPIs weights for the settlement of the remuneration	Degree of achievement KPIs (%)
				Target values		Achieved values			
9.	Framing within the specific consumptions for the crude oil transport (does not include the crude oil quantity lost during provoked breakdowns or in case of breakage resulting in contamination, where the owners do not ease access for remedy)	The target value lower than the value of the maximal technological consumption, for crude oil	%	Domestic crude oil $\leq 0.361\%$ Achieved = 0.354%	0.285%	0.247%	100.0%	5.0%	5.0%
				Lukoil imported crude oil $\leq 0.290\%$ Achieved 0.200%					
				Petrom imported crude oil $\leq 0.143\%$ Achieved 0.137%					
				Midia imported crude oil $\leq 0.108\%$ Achieved 0.000%					
10.	Ensuring the NTS maintenance	Achieving at least 90% of the Annual Program of planned technical revisions	%	$\geq 90\%$	90.0%	100.0%	100.0%	5.0%	5.0%
11.	Average number of training hours per employee (Total number of training hours/ Total number of employees)	Development of professional abilities and competencies	hours/employee	≥ 5 ore	5.0	15.9	100.0%	5.0%	5.0%
B2 CORPORATE GOVERNANCE KEY PERFORMANCE INDICATORS: 25%									
12.	Implementation of the actions set out in the Program for the development of the internal control management system	Development of the management control system implemented in compliance with the legal requirements in force	%	$\geq 90\%$	90.0%	100.0%	100.0%	10.0%	10.0%
13.	Number of measures from the Integrity Plan in force duly implemented/ Total number of due measures from the Integrity Plan in force x100	Boost institutional integrity by inclusion of the measures to mitigate corruption	%	$\geq 90\%$	90.0%	100.0%	100.0%	5.0%	5.0%
14.	Number of meetings of the Steering Committee	Minimum 2 meetings/month (in correlation with the term of office)	no./month	min.2 meetings/month	24	25	100.0%	5.0%	5.0%
15.	Female management rate	Maintaining the rate of female managers at least 30%	%	$\geq 30\%$	30.0%	32.0%	100.0%	5.0%	5.0%
B3.KEY PERFORMANCE INDICATORS ORIENTED TOWARDS PUBLIC SERVICES: 5%									
16.	Customers satisfaction score from the crude oil and derivatives transport business (Number of replies of 4 and 5 scoring in total number of customer replies)	Satisfaction of the customers from the crude oil and derivatives transport activity (Number of replies of 4 and 5 scoring in total number of customer replies at least. 90% *)	%	$\geq 90\%$	90.0%	100.0%	100.0%	5.0%	5.0%
Total degree of achievement of the performance indicators									104.5%

Annex 4

REPORT on the internal management control system on 31 December 2024

As per the provisions of Art. 4 Para. (3) of Government Ordinance No. 119/1999 concerning the internal management control and preventive financial audit, republished with subsequent amendments and additions, the undersigned Tudora Dorin, in capacity of DIRECTOR GENERAL, declare that the company CONPET SA Ploiești has an internal management control system whose design and implementation allow the Board of Directors and the executive management to provide a reasonable assurance that the funds managed for the purpose of achieving the general and specific objectives have been used in conditions of legality, regularity, effectiveness, efficiency and economy.

This declaration is based on a realistic, accurate, complete and reliable assessment on the entity's internal management control system, formulated based on the self-evaluation thereof.

The internal management control system includes self-auditing mechanisms, and the application of measures to increase its effectiveness is based on risk assessment.

In this case, I mention the following:

- The monitoring commission is functional;
- The internal management control system development program is implemented and updated annually;
- The risk management process is organized and monitored;
- Documented procedures are developed for 100% of the total procedural activities regularly inventoried, according to the CONPET SA Activities List in force;
- The performance monitoring system is established and evaluated for the objectives and activities of the entity, through performance indicators.

Based on the results of the self-assessment, I assess that on 31 December, 2024 the internal management control system of CONPET SA Ploiești complies with the standards contained in the Internal Management Control Code.

I hereby mention that the statements contained in this report are formulated by assuming managerial responsibility and are based on the data, information and findings recorded in the documentation related to the self-assessment of the internal management control system.

Analyzed and endorsed by the Monitoring Committee of the internal management control system on 28.01.2025.

List of the procurement contracts concluded by the company in 2024 (with values higher than 100,000 RON)

Crt. no.	Contract number	Contract Date	Partner	Contract Scope	Value of the contract (RON, VAT excluded)
1	2024/L-CA 187	September 9, 2024	TALPAC S.R.L.	Execution of works to replace collectors and valves in Constanta South station - Oil Terminal Warehouse	18,341,024.09
2	2024/P-CA 289	December 23, 2024	SPEEH HIDROELECTRICA S.A.	Electricity Procurement	18,017,517.18
3	2024/L-CA 188	September 9, 2024	TERRA GAZ CONSTRUCT S.R.L.	Technical project update and execution of building rehabilitation works for Headquarters II CONPET S.A., No. 8, Rezervoarelor street (Building C4 - Workshop Building Ground Floor + Annexes, Building C5 - Car Service Ground Floor + Annexes, Building C10 - Water Management, Building C11 - Water Tank), external networks and vertical systematization	17,657,259.59
4	2024/P-CA 88	April 29, 2024	OMV PETROM MARKETING	Supply of 60,000 liters of gas and 910,000 liters of diesel	5,867,900.00
5	2024/P-CA 264	December 17, 2024	CRAYON SOFTWARE EXPERTS ROMANIA S.R.L.	Microsoft Enterprise Agreement Renewal Licenses	5,693,695.80
6	2024/L-CA 128	June 25, 2024	ERICSSON TELECOMMUNICATION ROMANIA SRL.	Modernization of the microwaves radio relays system within CONPET S.A. Communication system	4,275,269.51
7	2024/S-CA 30	March 12, 2024	REVA S.A.	Planned RP-FIR type repairs (without container intervention, with full painting) on 38 Zaes wagons of 60 cubic meters for crude oil transport and 3 Zagkks wagons of 80 cubic meters with replacement of 108 axes	3,191,769.94
8	2024/L-CA 93	May 14, 2024	GAZPET INSTAL S.R.L.	Execution of safety works for 12 and 14 pipelines Cartojani-Ploiesti at crossing Cricovul Dulce creek	2,931,334.24
9	2024/P-CA 217	October 18, 2024	ROMFLEX SISTEM SRL.	Supply of computing systems, laptop type	2,074,859.00
10	2024/S-CA 210	October 09, 2024	ENVIROTECH S.R.L.	Subsequent contract to the AC S-CA 152/2023 concerning services and works related to the restoration of the geological environment and polluted water courses as a result of the breakdowns occurred along the crude oil, rich gas and ethane transport pipeline routes or in the technological precincts of CONPET S.A. Ploiești, taking over of the soil contaminated with crude oil (waste code 191301*), as well as the taking over of the soil and stones with content of hazardous substances (waste code 170503*).. Starting 13.11.2024, duration 1 year	2,048,872.67
11	2024/L-CA 130	June 27, 2024	INDUSTRIAL COMPUTER GROUP SRL.	Modernization of the microwaves radio relays system within CONPET S.A. Communication system	1,680,100.00
12	2024/S-CA 280	December 20, 2024	REMARUL 16 FEBRUARIE S.A.	Planned repair type RG to the locomotive 1250 LDH HP traffic no. 92530810803-2	1,588,000.00
13	2024/L-CA 75	April 23, 2024	CONFIND S.R.L.	Modernization of the crude oil pumping station Slobozia, Prahova county	1,498,998.59
14	2024/S-CA 27	March 05, 2024	ASITO KAPITAL SA	Voluntary health insurance services for CONPET SA employees	1,404,857.20
15	2024/S-CA 287	December 23, 2024	RELOC S.A.	Planned repair type RG to the locomotive 1250 LDH HP traffic no. 92530810834-7	1,300,000.00
16	2024/L-CA 259	December 11, 2024	LIDER GLENCER SRL.	Design and execution of restoration works of cathodic protection systems of tanks R1, R2, R4 of the	1,299,600.00
17	2024/S-CA 169	August 12, 2024	ORANGE ROMANIA COMMUNICATIONS S.A.	Electronic telecommunication services	1,232,952.00
18	2024/S-CA 279	December 20, 2024	LOC. SERV. REP. S.R.L.	Planned repair type RG to the locomotive 1250 LDH HP traffic no. 92530810789-3	1,218,818.00
19	2024/S-CA 50	March 28, 2024	SERVICE FAUR SRL.	RR planned repair to locomotive 1250 LDH HP no. 92530810790-1	1,043,771.08
20	2024/S-CA 24	February 29, 2024	AUTOGAS IMPEX SRL.	Rental services of 15 tank cars suitable and authorized for transport of hydrocarbon gases in liquefied mixture, NSA (C mixture)	1,040,250.00
21	2024/L-CA-CD 61	April 10, 2024	TALPAC S.R.L.	Execution of manual and mechanized excavation works necessary for the implementation of preventive archaeological research in 6 (six) sites within the localities of Constanța, Cumpăna, Valul lui Traian	801,805.48

Crt. No.	Contract number	Contract Date	Partner	Contract Scope	Value of the contract (RON, VAT excluded)
22	2024/L-CA 176	August 27, 2024	RUXO SERVICE CONSTRUCT.	Rehabilitation of fences and construction of new fences at four work points belonging to Conpet S.A., respectively, Danube Crossing Work Point - C2; Borcea Arm Crossing Work Point - C3; Borcea Arm Crossing Work Point - C4; Mircea Voda Station	721,830.75
23	2024/L-CA-CD 168	August 9, 2024	WOMA ECOSERV CONSTRUCT S.R.L.	Design and execution of works to modernize the metering system at Gate 3 Petrobrazii	598,000.00
24	2024/BCF 241	November 26, 2024	CNCF CFR S.A.	Exploitation of Salonta industrial lines	573,913.08
25	2024/S-CA 288	December 23, 2024	ROMÂNIA EUROEST S.A.	Planned repair type RR to the LEA locomotive traffic no. 97530490010-6	549,966.90
26	2024/P-CA 89	April 29, 2024	DARIUS MOTORS SRL.	Supply of 3 (three) vehicles, van type, for transporting people and goods	493,500.00
27	2024/L-CA-CD 243	November 29, 2024	SWISO ELECTRIC SRL.	Rehabilitation of booster tank lighting at Constanța Sud station, Constanța-Bărăganu sector by replacing the lighting fixtures with LED lamps	449,313.28
28	2024/S-CA 87	April 26, 2024	M&M COMPUTERS S.R.L.	Maintenance, repair and replacement services for components of technical security systems installed at the Central Dispatch Headquarters, Administrative Headquarters 2, Headquarters 3, Independentei Blvd, Inotești Materials Depot, Voința Sports Base, Bărăganu, Călăreți, Orlești, Poiana Lacului, Siliște, Icoana, Cartojani Stations, Bărbătești Ramp, Bărbătești Depot, Constanța-Bărăganu District Headquarters and Constanța Sud Station.	371,240.00
29	2024/ BC 252	December 09, 2024	OMV PETROM S.A.	Purchase of land within the city for construction yards - area of 4,820 sq m and industrial railway - length 383 m, according to notarial deed no. 1903/29.11.2024	350,000.00
30	2024/L-CA-CD 174	August 21, 2024	STRAL BIG SRL.	Execution of energy rehabilitation works of the envelope and roof, anti-corrosion rehabilitation of the structure, replacement of carpentry and rehabilitation of the external walkway at the PSI pumps Independența Buffer Warehouse	349,199.46
31	2024/S-CA 107	May 23, 2024	INTERGRAPH COMPUTER SERVICES S.R.L.	GIS software product maintenance and support and development services	327,478.00
32	2024/S-CA 22	February 27, 2024	LOC. SERV. REP. S.R.L.	Performing planned RT, R1, R2, 2R2 type overhauls and managing maintenance on 450,700,1250-HP diesel hydraulic locomotives and remediation of accidental defects LDH - Batch 1	317,080.00
33	2024/S-CA 247	December 06, 2024	OMNIASIG VIENNA INSURANCE GROUP SA	Vehicle liability insurance services R.C.A. for damages caused to third parties through accidents, for vehicles belonging to CONPET S.A.	307,104.28
34	2024/S-CA 248	December 09, 2024	ELLIS 92 SRL.	Design services to achieve the objective: new cylindrical, vertical tank, capacity 1,000 cubic meters,Orlești Automated Crude Oil Station	300,000.00
35	2024/S-CA 249	December 09, 2024	ELLIS 92 SRL.	Design of a new cylindrical tank 2500 cubic meters Poiana Lacului	300,000.00
36	2024/L-CA-CD 171	August 19, 2024	ELS.A.CO SOLUTIONS S.R.L.	Services for developing site analysis, support studies, design and execution for an electricity production system with photovoltaic panels within the premises of the Constanța Sud Automated Oil Station - CONPET S.A. Ploiești	270,000.00
37	2024/L-CA-CD 172	August 19, 2024	ELS.A.CO SOLUTIONS S.R.L.	Services for developing site analysis, support studies, design and execution for an electricity production system with photovoltaic panels within the premises of the Calareti Automated crude oil station - CONPET S.A. Ploiesti	270,000.00
38	2024/ BC 290	December 24, 2024	DACIAN PETROLEUM S.R.L.	Equipment rental from the P904 Urziceni warehouse	262,500.00

Crt. No.	Contract number	Contract Date	Partner	Contract Scope	Value of the contract (RON, VAT excluded)
39	2024/S-CA 258	December 11, 2024	ASIGURAREA ROMANEASCA-ASIROM SA	Optional insurance services against accidental damage and theft (CASCO type) for vehicles, equipment and installations belonging to CONPET S.A.	256,897.47
40	2024/L-CA-CD 96	May 16, 2024	ELCAS PRODIMPEX SRL.	Design and execution of construction works for a drilled well for technological water for underground water supply at the Constanța Sud Automated Station	250,000.00
41	2024/S-CA - CD 68	April 17, 2024	ELLIS 92 SRL.	Design services for crude oil tank V=1500 m3 Pumping station Videle above-ground tank, with geodesic dome and floating membrane	244,000.00
42	2024/P-CA 286	December 20, 2024	LA FANTANA SRL.	Supply of bottled water in 19 l cans	225,360.00
43	2024/P-CA 90	April 29, 2024	DARIUS MOTORS SRL.	Supply of a Van type Utility vehicle	219,495.00
44	2024/P-CA 274	December 18, 2024	INNOVATIVE TEX SOLUTIONS S.R.L.	Supply of boots (duration 3 years)	216,269.10
45	2024/S-CA 260	October 18, 2024	SNIF PROIECT S.A.	Design of 4 sections of the 10 3/4 L1 and L2 Țicleni-Ploiesti crude oil pipelines in the Orlești-Scaioși-	210,000.00
46	2024/S-CA 127	June 25, 2024	OIL DEPOL SERVICE S.R.L.	Sludge cleaning services for the R2 crude oil storage tank within the Călăreți crude oil pumping station, Călărași county, with all operations related to cleaning, transportation of the resulting sludge and environmentally safe recovery/disposal	202,923.00
47	2024/P-CA 215	October 17, 2024	MIDA SOFT BUSINESS SRL.	Framework Agreement for the Supply of Spare Parts and Peripherals	195,100.00
48	2024/P-CA 215	October 17, 2024	MAGUAY COMPUTERS S.R.L.	Framework Agreement for the Supply of Spare Parts and Peripherals	195,100.00
49	2024/S-CA 137	July 10, 2024	METRO ACTIV S.R.L	Calibration of CONPET owned tanks	188,490.00
50	2024/CCA 185	September 03, 2024	SOCIETATEA AGRICOLA VIILE NOI	Land lease in surface of 18,241 sq.m.	184,241.00
51	2024/S-CA 242	November 25, 2024	DARIUS MOTORS SRL.	Maintenance services for Volkswagen type vehicles	180,000.00
52	2024/S-CA - CD 285	December 20, 2024	ASIGURAREA ROMANEASCA-ASIROM SA	Insurance contract BoD members	170,000.00
53	2024/P-CA 31	March 12, 2024	QUANTUM PROTECT S.R.L.	Supply: - Seals required for sealing tank cars transporting crude oil and rich gas from the loading ramps - Seals for sealing valves on pipelines and measuring and control devices	167,688.00
54	2024/S-CA 5	January 17, 2024	GEFIL S.R.L.	Verification, maintenance, loading and repair of the extinguishers existing in the worksites belonging to CONPET SA PLOIEȘTI	165,938.00
55	2024/S-CA 192	September 17, 2024	IAT ENGINEERING & DESIGN SRL.	Design services for the replacement of crude oil pipeline 6 Urlești-Ploiești, DN 1A Moara Nouă-Corlătești area (DJ 139 Ploiești-Buzău DN 1A railway line within the LUKOIL Refinery)	149,000.00
56	2024/S-CA 139	July 12, 2024	RELOC S.A.	Carrying out planned inspections type RT, R1, R2, accidental repairs and managing maintenance on electric locomotive type LE 310 KW-BAT - RC with no. 975304910002-2	148,184.00
57	2024/P-CA 238	November 21, 2024	TURKROM S.A.	Purchase of hygiene and sanitary materials - 100 grams of antimicrobial solid soap	144,900.00
58	2024/L-CA-CD 283	November 01, 2024	HELION S.A.	Design, supply, installation and commissioning of technical/electronic security systems at the CONPET S.A. Ploiești facility - Salonta crude oil depot and loading ramp	139,994.00
59	2024/S-CA 225	October 25, 2024	SNIF PROIECT S.A.	Design services for objective achievement: Replacement of a section of the crude oil pipeline 10 Icoana-Cartojani, Poiana Lacului Siliștea District	120,000.00
60	2024/S-CA 65	April 16, 2024	SERVICE AUTO SERUS SRL.	Maintenance for Dacia vehicles	120,000.00
61	2024/S-CA - CD 257	December 10, 2024	TDP PARTNER S.R.L.	Consulting services and technical assistance in the development of the 2024 Sustainability Report of CONPET S.A.	120,000.00

Crt. No.	Contract number	Contract Date	Partner	Contract Scope	Value of the contract (RON, VAT excluded)
62	2024/S-CA 177	August 27, 2024	OIL DEPOL SERVICE S.R.L.	Sludge cleaning services R4, R5, Cartojani decanter within the Cartojani Crude Oil Pumping Station, Giurgiu county, with all operations related to cleaning, transportation of the resulting sludge and environmentally safe recovery/disposal	115,956.00
63	2024/CCA 122	June 7, 2024	REGIA NATIONALĂ A PĂDURILOR-ROMSILVA/ NATIONAL FORESTRY DIRECTORATE-ROMSILVA	Temporary occupancy area of 0,3557 ha for achieving the objective "safe disposal of 12" and 14" pipelines Cartojani-Ploiesti, crossing Cricov Dulce brook"	103,504.76
64	2024/L-CA-CD 281	December 20, 2024	M&M COMPUTERS S.R.L.	Design, supply, installation and commissioning of technical/electronic security systems at CONPET S.A. Ploiești crude oil pumping station, located in Mircea Vodă commune, Constanța county	101,000.00
65	2024/ADM 11	January 26, 2024	STELBO TRANS S.R.L.	Drainage services Bărbătești and Țicleni	100,000.00

Important revenues contracts concluded in 2024 (over 100,000 RON)

Crt. No.	Contract number	Contract Date	Partner	Contract Scope	Value of the contract (RON, VAT excluded)
1	2020/BC OMV 108	March 23, 2020	OMV PETROM S.A.	Crude oil, rich gas and ethane transport	419,331,838.00
2	2024/BC LUK 273	December 18, 2024	PETROTEL LUKOIL S.A.	Petrotel Lukoil crude oil transport services	88,809,474.00
3	2024/ADM 218	October 22, 2024	REVA S.A.	Sale of ferrous metal waste resulting from the replacement of broken-down axles on rail tank cars	142,935.00
4	2024/CD- d 115	May 29, 2024	RUXO SERVICE CONSTRUCT S.R.L.	Sale of buried pipe	110,008.20

**List of litigations pending before Courts in which the company CONPET S.A.
is a Party on 14.03.2025**

a) The list of litigations pending before Courts on 14.03.2025 in which the company CONPET S.A. has the status of claimant

1. File no. 19024/281/2009 - Ploiești Courthouse

Parties: Conpet S.A. - claimant

Compania de Transport Feroviar S.A. - Defendant

Subject matter: Conpet filed a lawsuit requesting the defendant to pay the amount of 50,511.6 RON representing the difference in payment from the value of the repair of the engine of the LDH 70-675 locomotive in the amount of 60,381.60 RON, as well as the legal expenses.

Clarifications: By the **Conclusion of 02.09.2011**, the court suspended the case pursuant to art. 36 of Law 85/2006.

Procedural status of the case: Merits - Suspended

The file no. 31627/3/2011 is pending before the Bucharest Court, having as its subject matter the insolvency procedure of the debtor Compania de Transport Feroviar S.A. through Judicial Administrator Pro Management Insolv I.P.U.R.L. Bucharest. As a creditor, Conpet is listed on the final list of creditors with the requested unsecured debt in the amount of 52,769.02 RON which, broken down, consists of: RON 50,511.6 in compensation and 2,257.42 RON representing the judicial stamp duty paid by Conpet in the claim file no. 19024/281/2009 of the Ploiești Courthouse. The case has a trial date of 16.05.2025.

Deadline: --

2. File no. 3033/105/2012 - Prahova Court

Parties: Conpet SA - creditor

Vasrep Petro Construct SRL - debtor

Subject matter: Bankruptcy. By the **Sentence no. 238/03.03.2014** the Prahova Court ordered the entry in the bankruptcy procedure of the debtor Vasrep Petro Construct SRL, the sealing of the assets from the debtor's fortune and the fulfillment of the other liquidation operations.

Conpet SA formulates a request for admission of the claim requesting the registration on the list of creditors Vasrep Petro Construct SRL with the amount of RON 126,877, including VAT, representing the value of material costs, costs for workmanship and equipment necessary for bringing the pipeline to the state before the unlawful act was committed by the debtor, deed consisting in the unlawful destruction and theft of two sections of 4,120 ml in length from the pipeline Ø 10¾" Iancu Jianu - Ghercești. Conpet appeals against the measure of non-registration of Conpet SA on the Preliminary List with this claim, which is the subject matter of file no. 3033/105/2012/a1. By the Sentence no. 1958/19.11.2012, the Prahova Court dismissed Conpet's appeal. Conpet appealed again. Ploiești Court of Appeal allowed the appeal, quashed the sentence on the merits and sent it for retrial.

By the **sentence no. 1008/17.09.2014** (file no. 3033/105/2012/a1*) the Prahova Court admits the appeal to the preliminary title. It orders the registration of the appellant creditor Conpet S.A. in the consolidated list of creditors of the debtor with the amount of RON 1,473,628 the value of materials, workmanship and equipment as well as RON 120 judicial stamp duty appeal and RON 2500 expert fee. Vasrep appealed.

By **decision no. 141 / 15.01.2015** The Ploiești Court of Appeal rejects the appeal as unfounded. Conpet is registered in the consolidated list of creditors of the debtor Vasrep Petro Construct S.R.L. with an unsecured debt in the amount of RON 1,476,308.

By the **Decision of 24.10.2023**, the Prahova Court suspends the trial of the case, until the irrevocable resolution of the associated file no. 3033/105/2012/a2 of the Prahova Court. With the right of appeal for the entire duration of the suspension.

Procedural status of the case: Merits - suspended

Deadline: --

3. File no. 2803/120/2013 - Ploiesti Court of Appeal

Parties: Conpet S.A. - creditor

Ecprod S.R.L. - debtor

Subject matter: Insolvency. General procedure

Request for credit admission. Conpet S.A. filed a request for admission of claim on the assets of the Ecprod debtor in the amount of RON 25,728.89. Conpet is registered on the List of Creditors with the amount of RON 25,728.89. The percentage of the Conpet claim is 0.16% of the total claims entered on the table.

Clarifications: --

Procedural status of the case: Merits

Deadline: 07.05.2025

4. File no. 1862/114/2014 - Buzău Court

Parties: Conpet SA - creditor

Geluval Stor SRL - debtor

Subject matter: By the Sentence no. 621/26.10.2016, the Buzău Court orders the entry into the general bankruptcy procedure of the debtor, the sealing of all the assets from the debtor's property, their inventory and the fulfillment of the other liquidation operations. Conpet SA formulates a request for admission of the claim requesting the registration on the list of creditors of Geluval Stor SRL with the amount of RON 1,440.90, representing delay penalties due for payment over the term provided in the contract for a value of 7 invoices issued by Conpet for services provided in under Contract no. STA 101/20.03.2012 concluded with the defendant, amount to which the debtor was obliged by the sentence no. 8867/16.06.2014 given by the Ploiești Courthouse in the file no. 109/281/21014, remained final by non-appeal.

Conpet is registered in the consolidated list of creditors in the bankruptcy procedure for the debtor Geluval Stor S.R.L. with an unsecured debt in the amount of RON 1,440.90.

Procedural status of the case: Merits

Deadline: 08.04.2025

5. File no. 1510/262/2014 - Moreni Courthouse

Parties: Conpet SA - claimant

Pîrvu Gheorghe - defendant

Pîrvu Nicolae - defendant

Grigorescu Gabriel - defendant

Zlăteanu Dragoș Marian - defendant

Dărmănești Commune, legally represented by the Mayor of Dărmănești Commune - defendant

Nimb Dâmbovița SA - defendant

Subject matter: Conpet filed a lawsuit requesting the court to order the defendants, jointly and severally, to pay to Conpet the amount of RON 34,944.18 as civil damages - representing the equivalent of remedial works of the Link 14 fiber optic pipeline and cable, destroyed on 03.06.2011, within the commune of Dărmănești, Dâmbovița county, works necessary to bring them to the initial state before committing the deed, i.e. in working order, amount to which is added

the interest from the date on which the sentence in the present case becomes final and until the date of actual payment; payment of the legal expenses.

Clarifications: By the **Conclusion of 08.01.2015**, the Moreni Courthouse suspends the trial of the case in relation to the defendant Nimb Dambovită SA. It dismisses the case regarding the other defendants and the formation of a new file (184/262/2015 - finalized by obliging the defendants Pârvu Gheorghe, Pârvu Nicolae, Grigorescu Gabriel and Zlăteanu Dragoș Marian to pay to Conpet the amount of RON 34,944.18 and the related interests of this amount, starting with the date of finality of the Sentence no. 97 / 04.02.2016 and until the date of actual payment. The decision was executed and is the subject of the file No. 30/2018 – Bailiff's Office Petrov Sergiu Alexandru).

Note: By the Conclusion of 14.12.2012 - file no. 9446/120/2012 - the Dâmbovița Court ordered the opening of the general insolvency procedure against the debtor Nimb Dâmbovița SA. By the Sentence no. 611 / 09.10.2014 The Dâmbovița Court orders the opening of the general procedure of judicial reorganization and the confirmation of the reorganization plan. The reorganization procedure is ongoing.

By the **Conclusion of 22.06.2017** pronounced in the file no. 1510/262/2014 the Moreni Courthouse, finding that the law applicable to the insolvency proceedings of the defendant Nimb Dâmbovița SA is Law no. 85/2006 and that the suspension will last until the closing of the insolvency procedure pronounced by the syndic judge based on art. 11 para. 1 letter n of Law no. 85/2006, maintains the suspension of the trial of the case ordered by the Conclusion of 08.01.2015.

Procedural status of the case: Merits - Suspended

Deadline: --

6. File no. 6819/118/2013 - Constanța Court

Parties: Conpet SA - creditor

Tobias SRL - debtor

Subject matter: Bankruptcy. Conpet S.A. requested the registration on the list of creditors of the debtor with the amount of RON 663 representing the equivalent value of 230 kg of aluminum (RON 575) and 110 kg of scrap metal (RON 88), handed over to Tobias SRL on 04.06.2013, based on the contract of sale - purchase of waste no. 2013 / ADM / 15.02.2013 concluded between Conpet and Tobias.

The request formulated by Conpet was admitted in part by the judicial administrator, in the sense that our company was registered on the list of creditors with the amount of RON 643.11, the

difference of RON 19.89 representing the 3% environmental fund and due to the Environmental Fund Administration. The percentage of the Conpet receivable is 0.014% of the total of receivables entered in the list.

Procedural status of the case: Merits

Deadline: 21.05.2025

7. File no. 13386/3/2015 - Bucharest Court

Parties: Conpet SA - creditor

Perfect Metal SRL - debtor

Subject matter: Bankruptcy. Conpet S.A. requested the registration on the list of creditors of the debtor with the amount of RON 221,189.85 representing penalties for delay, compensations, interest and legal expenses.

The request was accepted but Conpet was entered on the list in the category of unsecured creditors and not in the category of secured creditors as would have been the case considering the content of our request for registration in the preliminary list of creditors. Conpet filed an appeal against the preliminary list of creditors, which was the subject matter of the file no. 13386/3/201/a1 with a deadline on 18.09.2015. By the **Decision no. 7106 / 18.09.2015** The Bucharest Court rejects the appeal as unfounded. The percentage of the Conpet receivable is 0.42625 of the total receivables entered on the list.

Procedural status of the case: Merits

Deadline: 11.04.2025

8. File no. 19602/3/2015 - Bucharest Court

Parties: Conpet SA - creditor

Top Birotica SRL - debtor

Subject matter: Bankruptcy. Conpet S.A. requested the registration on the list of creditors of the debtor with the amount of RON 2,258.72 representing delay penalties due for the delayed delivery of the equipment that was the object of the contract P-CA 438 / 17.11.2014.

Conpet was registered at the debtor's list of creditors with the amount of RON 2,258.72.

The percentage of the Conpet receivable is 0.010% of the total receivables entered on the list.

Clarifications: By the **Decision of 14.12.2022**, the Bucharest Court rejects the request of the judicial liquidator for the sale of the assets remaining in the debtor Top Birotica SRL's patrimony, by public auction, according to the Code of Civil Procedure.

Procedural status of the case: Merits

Deadline: 09.04.2025

9. File no. 2899/62/2015 - Braşov Court

Parties: Conpet SA - creditor

Condmag SA - debtor

Subject matter: Bankruptcy. Request for admission of the Conpet claim against the property of the debtor Condmag SA – RON 42,950.85 representing penalties.

Conpet was registered on the list of creditors with the amount of RON 42,2950.85 representing an unsecured debt. The percentage of the Conpet receivable is 0.02% of the total receivables entered on the list.

Procedural status of the case: Merits

Deadline: 25.03.2025

10. File no. 8156/281/2014 * - Ploieşti Court of Appeal

On appeal: file no. 447/42/2020

Parties: Conpet SA - civil party

Matei Marinel - claimant for judicial review

Subject matter: Grand larceny. Revision. Matei Marinel formulates a request for revision of the criminal decision no. 1383 / 14.10.2013 pronounced by the Ploieşti Court of Appeal in the file no. 19230/281/2011.

Note: By the Criminal Decision no. 1383 / 14.10.2013 Ioniţă Ion, Marin Matei Georgian and Matei Marinel were obliged to pay to Conpet an amount of RON 13,259.79. The decision was enforced and is the subject of file no. 200/2016 located at the Bailiff's Office Petrov Sergiu Alexandru.

Clarifications: By **Sentence no. 1162 / 03.08.2020** The Ploieşti Courthouse admits the request for revision formulated by the claimant for judicial review Matei Marinel, against the criminal sentence no. 1286 / 07.06.2013 of the Ploieşti Courthouse, abolished and finalized by the criminal decision no. 1383 / 14.10.2013 of the Ploieşti Court of Appeal. It cancels the Criminal Sentence no. 1286 / 07.06.2013 of the Ploieşti Courthouse, as well as M.E.P.I. no. 1538/2013 of 10/15/2013 issued by the Ploieşti Courthouse. It orders the acquittal of the defendant Matei Marinel, under the aspect of committing the crime of grand larceny, provided by art. 208 para. (1) - art. 209 para. (1) letters a) and g) para. (3) letter a) Previous Criminal Code, with the application of art. 41 para. (2) of the Criminal Code. It finds that the defendant Matei Marinel was detained from 22.11.2013 to 12.11.2014, inclusive. The decision was appealed by the Prosecutor's Office attached to the Ploieşti Courthouse.

By **Decision no. 954 / 26.10.2020** The Ploiești Court of Appeal admits the appeal declared by the Prosecutor's Office attached to the Ploiești Courthouse against the criminal sentence no. 1162 of August 3, 2020 pronounced by the Ploiești Courthouse, which it annuls in its entirety and sends the case for retrial to the first instance according to the considerations of the present decision. Final.

By the **Sentence no. 799/13.05.2022** the Ploiești Courthouse admits the revision request. It annuls the Criminal Sentence no. 1286/07.06.2013 of the Ploiești Courthouse, final by the Criminal Decision no. 1383/14.10.2013 of the Ploiești Court of Appeal. It orders the acquittal of the defendant Matei Marinel, under the aspect of committing the crime of grand larceny. The decision was appealed.

Procedural status of the case: Appeal

Deadline: Ruling postponed to 14.03.2025

11. File no. 8262/281/2016 - Ploiești Courthouse

Parties: Conpet SA - creditor

Conpet Club Football Association - debtor

Subject matter: Dissolution of a legal entity. Request for admission of the claim. Conpet SA formulates a request for admission of the claim on the property of the debtor Conpet Club Football Association, against which the dissolution was ordered by the Civil Sentence no. 8683 / 04.10.2016 pronounced by the Ploiești Courthouse in the file no. 8262/281/2016, by which it requests the court to admit the application for registration on the list of creditors of the debtor Conpet Club Football Association with the amount of RON 424.94, as a certain, liquid and due receivable, born before the admission of the dissolution application, representing the penalties payment rest, according to the invoice no. 1653 / 31.05.2015, calculated for the late payment of the obligations arising from the Lease Agreement no. ADM 366 / 23.10.2012, concluded by Conpet SA with the Conpet Club Football Association. By the address 39101 / 28.09.2017 Conpet requested the completion of the value of the debt registered by the Conpet Club Football Association and with the amount of RON 1,358.84 representing delay penalties born prior to the dissolution request (total RON 1,783.78). By the addresses no. 14907/20.04.2018, no. 43508/09.11.2018 and no. 6473/17.02.2020 Conpet requested the liquidator to communicate the steps taken to recover the amount of RON 1,783.78. In 2021, by the addresses no. 14399/27.04.2021 and no. 31732/15.09.2021 Conpet requested the Liquidator to inform us if there are assets in the association's patrimony and what are the prospects for the recovery of the

debt or the completion of the dissolution and liquidation procedure of the Conpet Football Club Association.

Procedural status of the case: Merits

12. File no. 789/105/2017 - Prahova Court

Parties: I.C.I.M. S.A. by C.I.T.R. Bucharest administrator - debtor

Conpet S.A.- creditor

Subject matter: Insolvency proceedings. Conpet requests the registration on the list of creditors of the company ICIM SA represented by judicial administrator C.I.T.R. BUCHAREST SUBSIDIARY S.P.R.L., with the total receivable in the amount of RON 393,934.37 representing delay penalties, legal expenses, execution costs.

A) RON 50,094, 8 representing the equivalent value of the works for repairing the damage to the pipeline Ø 6 RA Moreni-Ploiești and the lost crude oil, legal interest, legal expenses and execution costs established by the enforceable title - Civil Sentence no. 1014 / 28.01.2015 pronounced in the file no. 113/281/2014 remained final and corrected by the Conclusion of correction of the material error on 06.06.2016, by which the Ploiești Courthouse admitted the request for summons filed by the claimant Conpet S.A.

B) RON 343,839.57 composed of the amount of RON 331,271.57 representing penalties for delay in accordance with the provisions of art. 8.1. from the contract 0135/1995 (modified by art. 5 of the additional act 9/2005 and the additional act no. 10/2006), as well as the amount of RON 12,568 representing judicial stamp duty, judicial stamp and expertise fee.

Conpet was entered on the list with the requested amount.

The percentage of the Conpet receivable is 0.75 % of the total receivables entered on the list.

I.C.I.M. filed an appeal which is the subject of the file no. 789/105/2017 / a1 and requested:

- mainly a partial amendment of the preliminary list of creditors in connection with the rejection of the application for entry of the claim in the amount made by Conpet
- in the alternative, a partial amendment of the preliminary list of creditors for the purpose of entering the conditional Conpet claim.

The appeal of I.C.I.M. was the subject matter of the file 789/105/2017 / a1. By the Decision 776/2018, the Prahova Court rejects the appeal regarding the preliminary list formulated by the debtor Intreprinderea Construcții Instalații Montaje SA regarding the claim of the creditor CONPET SA

By the Conclusion of 11.09.2020, the Prahova Court ordered the entry into the bankruptcy procedure of the debtor.

Procedural status of the case: Merits

Deadline: 04.06.2025

13. File no. 8727/105/2017 - Prahova Court

Parties: Conpet SA - claimant

Paulus S.R.L. - Defendant

Subject: Bankruptcy - general procedure

Subject matter: On 14.10.2019, Conpet filed a payment request with the judicial administrator CITR Bucharest Subsidiary SPRL (art. 75 * paragraph 3 of Law no. 85/2014) for the payment of the amount of RON 32,493.44, amount due on 04.07.2019 by Paulus SRL (CF 4000500), for not fulfilling the obligations established by the contract no. S-CA 1191 / 05.07.2017 (air conditioning maintenance). The request was granted.

Clarifications: Paulus S.R.L. filed an appeal against the measure of the judicial administrator file 8727/105/2017 / a13. In merits, the court rejected the appeal filed by Paulus S.R.L. The case was resolved by rejecting the appeal filed by Paulus S.R.L. by Decision 213/2020.

Conpet addressed the insolvency practitioner for the recovery of the amount of RON 2,891.95 from the performance guarantee, and to pay the difference of RON 29,601.49 with priority according to the law. On 09.06.2021, the amount of 2,891.95 was recovered from the performance guarantee. The difference of RON 29,601.49 was not paid.

By the **Interim Decision 163/24.03.2022**, the Prahova Court orders the entry into bankruptcy of the debtor in the general procedure. It appoints a provisional judicial liquidator to the initially appointed insolvency practitioner, EUROSMART Prahova Subsidiary, who will fulfill the duties provided by art. 64 of the law. It orders the dissolution of the debtor company and the lifting of the debtor's right of administration. CONPET requested the registration on the additional table of creditors with the amount of RON 29,601.49 representing late penalties owed by PAULUS S.R.L. for non-fulfillment of the obligations resulting from the contract no. S-CA 1191(489)/07/05/2017 having as its subject matter *"maintenance services for air conditioners in all workplaces belonging to CONPET S.A."*. The claim was accepted, the amount of RON 29,601.49 being entered in the definitive consolidated list of creditors at item 13, table published in B.P.I. no. 11975/14.07.2022. The bankruptcy procedure is currently ongoing.

Procedural status of the case: Merits

Deadline: 02.04.2025

14. File no. 2036/83/2019 - Satu Mare Court

Parties: Conpet SA - claimant

PRODREP MG S.R.L. - Defendant

Subject: bankruptcy

Subject matter: On 18.11.2019, Conpet filed an application for registration on the list of creditors of the debtor PRODREP MG S.R.L. with the amount of RON 284,496.11 representing:

- damages in the amount of RON 148,926.49 provided in art. 18.2 of the works contract L-CA 699 of 28.09.2017 (20% of the contract value provided in art. 3 of the contract);
- penalties of 0.5% / day of delay provided by art. 17.1 of the works contract L-CA 699 of 28.09.2017 applied to the value of the unexecuted works in the amount of RON 46,575 for a number of 162 days of delay calculated from 10.04.2019 to 19.09.2019 the date of termination of the contract;
- equivalent value for electricity supply in the amount of RON 16.54 for the period 01.08.2019-31.08.2019, resulting from the execution of the works contract L-CA 699 of 28.09.2017;
- penalties of 0.5% / day of delay in the amount of RON 78,644.16 provided by art. 17.1 of the works contract L-CA 537 of 27.07.2017 applied to the value of unexecuted works for a number of 168 days of delay calculated from 01.05.2019 to 15.10.2019 the date of opening the insolvency procedure;
- penalties of 0.5% / day of delay in the amount of RON 10,333.92 provided by art. 17.1 of the works contract L-CA 380 of 05.10.2016 applied to the value of the unexecuted works for a number of 114 days of delay calculated from the date set for the completion of the works until their actual completion. The claim has been accepted.

Conpet filed an application for registration on the supplementary list and for the amount of RON 18,724.8, representing the current receivable born after the date of opening the insolvency procedure. Since the opening of the bankruptcy procedure and registration with the list of creditors with the previously shown amounts, CONPET has also recorded debits from the non-execution by PRODREP MG S.R.L. of ongoing works in the amount of RON 79,403.37.

Currently, CONPET is listed on the final consolidated list with the following amounts: RON 284,496.11 and RON 98,138.68 (7th rank on the list – published in B.P.I. no. 16899/19.10.2022).

Clarifications: At the deadline on 20.10.2020, the court admitted the request of the judicial administrator and pursuant to art. 145 paragraph 1 point A letter c and point B of Law no. 85/2014 ordered the beginning of the bankruptcy procedure in the general form of the debtor PRODREP MG S.R.L. - SC 339 / F / 20.10.2020 B.P.I. 18101 / 28.10.2020.

Procedural status of the case: Merits

Deadline: 29.04.2025

15. File no. 6143/2/2020* - Bucharest Court of Appeal

Parties: Conpet SA - claimant

The Insured Guarantee Fund – defendant

Subject matter: Conpet appealed against Decision no. 24238 / 25.09.2020 issued by the Insured Guarantee Fund by which the payment requests no. 79167, 79166, 79163, 81691, 81687, 81698, 82691, 82690, 88271, 88728 and 89684 were rejected.

Clarifications: CONPET S.A. formulated payment requests for the refund of amounts related to policies concluded with the Insurance-Reinsurance Company ASTRA S.A. during the years 2009-2015, but by decision no. 24238 / 25.09.2020 which is the subject matter of the appeal, the Insured Guarantee Fund did not refer to the requests made by CONPET S.A. for the refund of the amounts due. The payment requests no. 79167, 79166, 79163, 81691, 81687, 81698, 82691, 82690, 88271, 88728 and 89684 specified in the decision are not related to any documents issued by our company.

By **Sentence no. 1051/30.06.2021** The Bucharest Court of Appeal admits the request. It annuls the decision no. 24238/25.09.2020 issued by the Insured Guarantee Fund. It obliges the defendant to issue an administrative act admitting the request for payment made by the claimant for the amount of RON 36,430.13. The Insured Guarantee Fund appealed.

By the **Decision no. 523/31.01.2024** The High Court of Cassation and Justice admits the appeal declared by the Insurance Guarantee Fund. It dismisses the contested sentence and sends the case for retrial to the same court. Final.

Procedural status of the case: Appeal - retrial

Deadline: 28.04.2025

16. File no. 25520/212/2020 - Constanța Courthouse

Parties: Conpet SA - claimant

Safir Gabriela - defendant

Subject matter: Conpet formulates a request for summons of the defendant SAFIR GABRIELA domiciled in Ovidiu locality, 101 Poporului street (or 82 A), Constanța county so that by the decision you will pronounce to order the establishment of the share due to each co-owner on the building located in Ovidiu locality, Poporului street no. 82 A, Constanța county, building located in the joint property (joint ownership) of our debtor Safir Marius (execution file 51 / 2019- Bailiff's Office Menaef Cristian) and of the defendant Safir Gabriela.

Clarifications: By the **Conclusion of 13.01.2021**, the Constanța Courthouse annuls the request for summons citing that it did not submit the land book extract regarding the building within 10 days.

Against the conclusion, Conpet filed a request for re-examination through which we demonstrated that the building construction jointly owned by the defendant Safir Gabriela and our debtor Safir Marius is not registered, the joint ownership right not being registered in the land book. Conpet, having knowledge of the existence of the property right in the patrimony of the defendant and the debtor from the primacy relations from the Ovidiu City Hall. At the same time, we demonstrated the court of justice that only the exclusive ownership right of the debtor over the land is registered in the land book and we have attached an extract from the land book for the land, as well as all the steps taken by Conpet and the Bailiff's Office Menaef Cristian.

By the **Decision no. 5783/21.04.2021** disposed in file 25520/212/2020/a1, the Constanța Courthouse admitted the request for re-examination made by Conpet and orders the re-sending of the file to panel C31 for the continuation of the procedure.

By the **Conclusion of 11.01.2022**, the Constanta Courthouse, based on art. 413 para. (1) pt. 1 of the Code of Civil Procedure, suspends the trial of the present action until the final settlement of the file no. 27269/212/2021, pending before the Constanța Courthouse. On 29.10.2024 the file is pending again.

By the **Sentence no. 13846/14.11.2024** the Constanța Courthouse admits the request for summons. It finds that the defendants acquired during the marriage, under the legal community regime, the right of ownership over the property located in the town of Ovidiu, *** Street, Constanța county, consisting of: land with an area of 138 sq.m. from documents (156 sq.m. from measurements) and building C1 – G+1E dwelling, with a built-up area of 82 sq.m. and a built-up area of 167 sq.m., registered in the Land Book no. ***, old cadastral number: ***). It stops the state of discord between the defendants regarding the described property and finds that each of the defendants owns a 1/2 share of the property. With the right to file an appeal.

Procedural status of the case: Merits

Deadline: --

17. File no. 1270/229/2021 - Fetesti Courthouse

Parties: Conpet SA- Claimant

Zacon Trandafir - Defendant

Subject matter: Claims

Clarifications: File disjointed from file no. **2782/229/2018**.

By the **Conclusion of 22.04.2021**, the Fetesti Courthouse ordered the suspension of the trial until the resolution of the merits case, from which the second head of the claim was disjointed. The case was reinstated on 03.10.2024.

Procedural status of the case: Merits

Deadline: 15.05.2025

18. File no. 5081/105/2013 - Prahova Court

Parties: Energopetrol SA through Judicial Administrator Andrei Ioan I.P.U.R.L. - respondent

Conpet SA - appellant

Subject matter: Insolvency

Clarifications: Conpet S.A. filed an appeal against the measures of the administrator/judicial liquidator. The case was the subject matter of the file no. 5081/105/2013/a13.

By the **Decision 11 of 19.04.2022**, the Prahova Court admits the appeal. It cancels the measure of the judicial administrator regarding the prescription of the right to request the payment of the amount of RON 7556.34. It finds that the amount of RON 7556.34 is included in the debtor's current debt statement in B.P.I. no. 4717/16.03.2022.

Deadline: 07.05.2025

19. File no. 11372/94/2022-Buftea Courthouse

Parties: Conpet S.A. -claimant

Peștișor Marius Sever-defendant

Peștișor Elena Loredana-defendant

Dobre Maria-defendant

Subject matter: Conpet formulates a request to summon the defendants and for the opposition of the defendant Dobre Maria, requesting the court to order the determination of the share due to each co-owner of the building composed of a construction intended for "residential house" with a built area of 16.87 sq.m. and intra-village construction land with an area of 50.72 sq.m.

Clarifications: By the **Sentence no. 14334/20.12.2024**, the Buftea Courthouse admits the request. It finds that the defendants Peștișor Marius Sever, Peștișor Elena Loredana acquired, during the marriage, with equal contribution shares, the real estate registered in the Land Book 107275 Voluntari (old number 8426) composed of intra-village land with a built-up area of 50.72 sq.m. and housing construction with a built-up area of 16.87 sq.m. and, identified with cadastral number 5445/2, real estate located in the city of Voluntari, Ilfov County. It finds that the defendants each hold a share of 1/2 of the bare ownership of the real estate in question registered in the

Land Book 107275 Voluntari (old number 8426) consisting of intra-village construction land with an area of 50.72 sq.m. and housing construction with a built area of 16.87 sq.m. and, identified with cadastral number 5445/2, real estate located in the city of Voluntari, Ilfov county. It obliges the defendant Peștișor Marius Sever to pay the claimant the legal expenses in the amount of RON 1,100, representing curator's fee and stamp duty. With the right of appeal after communication.

Procedural status of the case: Merits

Deadline: --

20. File no. 11783/281/2022 – Prahova Court

Parties: Conpet – claimant

Trafotech S.R.L. – defendant

Subject matter: Claims. Conpet formulates a summons requesting the court, through the decision it will pronounce, to order the obligation of the defendant Trafotech S.R.L. upon payment to Conpet S.A. of the amount of RON 55,257, consisting of:

- RON 35,697 representing late penalties calculated for the period 14.02.2021 – 27.04.2021 inclusive, owed by the defendant in accordance with the provisions of art. 18.1 of the contract no. P-CA 391/15.12.2020,
- RON 19,560, representing 20% of the contract value, due according to the art. 19.2 of the supply contract no. P-CA 391/15.12.2020, following the unilateral termination of the contract due to the fault of the defendant.

Also, Conpet requests the obligation of the defendant Trafotech S.R.L. to pay the legal expenses that it will incur in this case.

Clarifications: By the **Civil Sentence of 27.10.2022**, the Ploiești Courthouse admitted the action in part. It obliges Trafotech SRL to pay to Conpet SA the amount of RON 25,917, representing late payment penalties calculated for the period 14.02.2021 –27.04.2021 inclusive according to the art. 18.1 of the supply contract no. P-CA 391 of 15.12.2020. It obliges Trafotech SRL to pay to Conpet SA the amount of RON 19,560 representing compensatory damages according to the art. 19.2 of the supply contract no. P-CA 391 of 15.12.2020. It rejects the rest of the action, as unfounded. It obliges Trafotech S.R.L. to pay to Conpet S.A. the amount of RON 1,969 as legal expenses, representing the stamp duty. The decision was appealed by Trafotech SRL.

Procedural status of the case: Appeal

Deadline: Ruling postponed to 17.03.2025

21. File no. 2854/105/2022 – Prahova Court

Parties: Conpet SA – claimant

Eurosting AAW Industry S.R.L. defendant

Subject matter: Obligation of the defendant Eurosting AAW Industry SRL. upon payment to CONPET S.A. of the total amount of RON 747,937.80 consisting of the amount of RON 83,640 representing damages in the amount of 20% due according to the art. 19.2 of the works contract no. L-CA 252/06.08.2019 and the amount of RON 664,297.80 representing late payment penalties calculated until 29.04.2021, owed by the defendant in accordance with the provisions of the art. 18.1 of the works contract no. L-CA 252/06.08.2019, for the non-execution of the obligations assumed by the contract. Obligation to pay legal expenses.

Clarifications: By the **Conclusion of 26.01.2023** the Prahova Court admits the request for suspension of the trial of the case made by the defendant and it disposed the suspension of the case until the final settlement of File no. 4372/105/2022 pending before the Prahova Court. With the right of appeal throughout the suspension.

Procedural status of the case: Merits - suspended

Deadline: --

22. File no. 17365/281/2022 – Ploiesti Courthouse

Parties: Conpet SA – claimant

Eurosting AAW Industry S.R.L. defendant

Subject matter: Obligation of the defendant Eurosting AAW Industry S.R.L. upon payment to Conpet S.A. of the total amount of RON 69,141.30 consisting of the amount of RON 24,949.98 representing damages in the amount of 20% due according to the art. 18.2 of works contract no. L-CA 366 of 16.11.2020 and the amount of RON 44,191.32 representing late payment penalties calculated until 06.08.2021, owed by the defendant in accordance with the provisions of the art. 17.1 of the works contract no. L-CA 366 of 16.11.2020, for the non-execution of the obligations assumed by the contract. Obligation to pay legal expenses.

Clarifications: By the **Decision no. 2083/30.03.2023** the Ploiești Courthouse admits the motion to dismiss for lack of jurisdiction of the Ploiești Courthouse, invoked ex officio. It declines the jurisdiction to resolve the request in favor of the Prahova Court.

By the Decision no. **177/02.11.2023** The Prahova Court admitted the exception of lack of jurisdiction and declined the jurisdiction to resolve the case with the subject matter of claims in favor of the Ploiesti Courthouse. The negative conflict of jurisdiction between the Prahova Court and the Ploiești Courthouse is evident. It suspends ex officio the judgment of the case and

immediately sends the file to the Ploiesti Court of Appeal, in order to resolve the negative conflict of jurisdiction.

By the **Sentence no. 45 CC of 06.12.2023**, pronounced in the file 1221/42/2023, the Ploiești Court of Appeal establishes the jurisdiction to solve the action in favor of Ploiești Courthouse.

Deadline: 06.05.2025

23. File no. 23320/281/2022 – Prahova Court

Parties: Conpet SA – claimant

Ministry of Agriculture and Rural Development - defendant

Ialomița County Directorate for Agriculture - defendant

National Agency for Land Registry and Real Estate Advertising - defendant

Subject matter: Jointly and severally obliging the defendants to pay to CONPET S.A. of the amount of RON 81,176.8 representing the amount paid as a guarantee.

The total amount of 81,176.8 was paid as a guarantee in October 2016 and August 2017 in order to temporarily remove the 22,586 square meter land area from agricultural use (category of arable use). Investment objective *"Replacement of crude oil pipeline Ø 10¾" Ghercești - Icoana - Cartojani on the sections: SPC Bârla, Bârla commune, Argeș County approx. 850 m, agricultural lands Bârla – Miroși, Arges County, approx. 2,400 m and agricultural land in Negreni – Clanița village, Teleorman County, approx. 1,500 m, total 4,750 m"*

Clarifications: By the **Sentence 4650/08.09.2023** the Ploiești Courthouse admits the plea of the lack of passive procedural status against the defendant A.N.C.P.I. It rejects the request made by the claimant CONPET S.A. against the defendant A.N.C.P.I as being brought against a person lacking passive procedural status. It rejects the summons filed by the claimant CONPET S.A. against the defendants, the Ministry of Agriculture and Rural Development, the Teleorman County Directorate for Agriculture, as unfounded.

Conpet filed an appeal.

By the **Decision no. 327/21.02.2025**, the Prahova Court rejects the appeal as unfounded. With the right of appeal after communication.

Procedural status of the case: Appeal

Deadline: --

24. File no. 331/90/2016 – Vâlcea Court

Parties: Conpet SA – creditor

REMAT Vâlcea SA - debtor

Subject matter: Conpet submitted a request for admission of the claim and registration in the additional list of the creditor Remat Vâlcea SA with the amount of RON 4,538.61 (4,331.61 late payment penalties CON FA 6291/16.10.2017 + 200 RON legal expenses). Conpet was entered on the additional list of the debtor's creditors with the requested amount.

Clarifications: --

Deadline: 08.04.2025

25. File no. 6722/281/2023 – Ploiesti Courthouse

Parties: CONPET S.A. - claimant

Thermoficare Prahova S.A. and the Popescu Silviu Andrei Bailiff's Office - defendant

Subject matter: CONPET filed an appeal against the enforcement documents drawn up by the Popescu Silviu Andrei Bailiff's Office in the enforcement file no. 263/2022, as follows: the conclusion pronounced on 08.12.2022 by the Ploiești Courthouse in the file no. 25160/281/2022 by which the foreclosure was approved; the summons issued on 09.03.2023 for the payment of the amount of RON 7,003.40, the conclusion no. 1 issued on 09.03.2023 establishing the enforcement expenses in the amount of RON 1,259.51; the decision issued on 20.03.2023 ordering the termination of foreclosure.

The appeal requested the annulment of the decision pronounced on 08.12.2022 by the Ploiești Courthouse in the file no. 25160/281/2022 by which the foreclosure of all the documents issued by the Popescu Silviu Andrei Bailiff's Office in the enforcement file no. 263/2022, respectively of the Security Summons issued on 09.03.2022 for the payment of the amount of RON 7,003.40, of the conclusion no. 1 issued on 09.03.2023 establishing the enforcement expenses in the amount of RON 1,259.51 and the conclusion issued on 20.03.2023 ordering the termination of enforcement and the return of enforcement for the amount of RON 3,856.65 representing amounts additionally paid by CONPET S.A. following the transmission of the summons by the Popescu Silviu Andrei Bailiff's Office in the enforcement file no. 263/2022, composed of RON 3,446.52 representing amounts invoiced in addition and not owed through the invoices put into execution as enforceable titles and RON 410.13 representing the difference in unpaid bailiff's fees.

Clarifications: By the **Decision of 20.10.2023**, the Ploiești Courthouse suspends the trial of the challenge to foreclosure formulated by the appellant CONPET S.A. because the insolvency proceedings have been opened against the debtor Termoficare Prahova S.R.L. - file 1653/105/2023 - Prahova Court. With the right of appeal for the entire duration of the suspension.

Procedural status of the case: Merits - Suspended

Deadline: --

26. File no. 1310/116/2021 – Calarasi Court

Parties: CONPET S.A. - creditor

Agroland Future S.R.L. - debtor

Subject matter: Conpet filed a request for admission of the claim and registration in the list of creditors of Agroland Future S.R.L. with the amount of RON 8,831.15, as the debtor was obliged by the enforceable Civil Sentence no. 1058/20.12.2019 pronounced by the Lehliu-Gara Courthouse in the file no. 2149/249/2019, to which are added the legal expenses related to Law no. 85/2014 [RON 8,631.15 (RON 8,120.14 + RON 511.01) + RON 200= RON 8,831.15]. Conpet was entered on the final list of the debtor's creditors with the requested amount.

Clarifications: --

Procedural status of the case: Merits

Deadline: 25.03.2025

27. File no. 671/1285/2022 – Cluj Specialised Court

Parties: CONPET S.A. - creditor

Tirrena Scavi SPA - debtor

Subject matter: Secondary insolvency proceedings in the form of bankruptcy

Conpet filed a claim admission request asking the court to register the company CONPET S.A. on the list of creditors of Tirrena Scavi SPA with the amount of RON 54,601.02 composed of:

- the amount of RON 48,402.43 representing the counter value of the damage suffered by CONPET S.A. as a result of the damage caused by the debtor TIRRENA SCAVI SpA – Cluj Branch on 04.04.2022 to the crude oil transport pipeline Ø 10¾" Ghercești – Icoana, Gârlești village area, Ghercești commune, Dolj county;
- the amount of RON 5,998.59 representing the update of the counter value of the damage with the legal interest from the date of the act (04.04.2022) until the date of the opening of the procedure (07.03.2023);
- RON 200 representing the judicial stamp duty related to this application for admission of the claim on the assets of the debtor Tirrena Scavi SPA.

Clarifications: Conpet was entered in the preliminary List of creditors of the debtor Tirrena Scavi SpA (published in B.P.I. no. 7475/03.05.2023) with the amount requested – RON 54,601.02 (unsecured debt, art. 161 point 8 of the Insolvency Law, 0.0735% of the category, 0.0027% of the total receivables, 0.0175% of the total with voting rights).

Procedural status of the case: Merits

Deadline: 27.05.2025

28. File no. 8089/281/2023 - Ploiesti Courthouse

Parties: CONPET S.A. - claimant

Brent Oil CO SRL - defendant

Subject matter: Conpet filed a request for admission to court requesting the defendant to be obliged to pay the amount of RON 19,536.52, composed of RON 9,802.93 representing equipment rental consideration and RON 9,733.59 representing penalties calculated according to the provisions of art. 11.1 of the service contract no. STA 363/17.10.2019.

Clarifications: By the Sentence no. 7597/02.08.2024, the Ploiești Courthouse admits the request. It obliges the defendant to pay the claimant the amount of RON 9,802.93 representing the equipment rental value and RON 9,733.59 representing late payment penalties calculated according to art. 11.1 of the service contract no. STA 363/17.10.2019. With the right of appeal after communication.

Procedural status of the case: Merits

Deadline: --

29. File no. 2365/105/2023 – Prahova Court

Parties: Conpet S.A. – claimant

Ministry of Agriculture and Rural Development - defendant

Argeș County Directorate for Agriculture - defendant

National Agency for Land Registry and Real Estate Advertising - defendant

Subject matter: CONPET S.A. filed a summons requesting the joint and several obligation of the defendants to pay to CONPET S.A. of the amount of RON 204,386.72 representing the amount paid as a guarantee.

Clarifications: By the **Decision no. 710/19.06.2024**, the Prahova Court admits the motion to dismiss for lack of jurisdiction. It declines the jurisdiction to resolve the case in favor of the Civil Section I of the Prahova Court. No appeal.

By the **Sentence no. 126/07.02.2025**, the Prahova Court admits the exception of the lack of passive procedural status of the defendant, the National Agency for Land Registry and Real Estate Advertising, invoked by this defendant in its response. It rejects the request for summons filed by the claimant Conpet S.A., in contradiction with the defendant, the National Agency for Land Registry and Real Estate Advertising Prahova, as being filed against a person without

passive procedural status. It rejects the request for summons filed by the claimant Conpet S.A., in contradiction with the defendants Ministry of Agriculture and Rural Development and Argeş County Directorate for Agriculture, as unfounded. With appeal after communication.

Procedural status of the case: Merits

Deadline: --

30. File no. 17532/281/2023 – Prahova Court

Parties: Conpet SA – claimant

Eurosting AAW Industry S.R.L. defendant

Subject matter: Obliging the defendant Eurosting AAW Industry S.R.L. to pay Conpet S.A. of the total amount of RON 56,444.93 representing late penalties calculated until 04.11.2022 owed by the defendant in accordance with the provisions of art. 17.1(1) of works contract no. L-CA 27/13.02.2020 for not executing the works on time.

Clarifications: --.

Deadline: 24.04.2025

31. File no. 6573/202/2023 – Calarasi Courthouse

Parties: Conpet – petitioner

The prosecutor's office attached to the Călăraşi Courthouse - respondent

Subject matter: Conpet filed a complaint against the Dismissal Ordinance ordered on 29.06.2023 by the Prosecutor's Office attached to the Călăraşi Courthouse in the file no. 645/P/2015, regarding the criminal offence of grand larceny requesting the abolition of the Dismissal Ordinance, the continuation of the criminal prosecution and investigations in order to identify the criminals and hold them criminally liable for the theft, between 27.02.2015 and 02.03.2015, of the cables that served the cathodic protection terminals on the import crude oil transport pipelines from the area of Jegălia neighborhood, Perisoru locality, Călăraşi county, as well as in order to recover the damage caused to our company (RON 10,355.51).

Clarifications: --

Deadline: 25.03.2025

32. File no. 1653/105/2023 – Prahova Court

Parties: Conpet SA – claimant

Termoficare Prahova - defendant

Subject matter: Bankruptcy. Application for admission of the claim in the amount of RON 4,206.6 and its entry on the list of creditors of the debtor Termoficare Prahova S.R.L. The claim in the amount of RON 4,206.6 is composed of: RON 3,446.52 amounts invoiced in addition by Termoficare Prahova S.R.L. and not owed by Conpet through the invoices executed as enforceable titles in the enforcement file no. 263/2022 pending before the Bailiff's Office Popescu Silviu Andrei; RON 410.13 representing the unpaid bailiff's fee difference; RON 324.96 - stamp duty paid in the file 6722/281/2023; RON 24.99 - counter value for photocopying the enforcement file for the court (file no. 6722/281/2023). Conpet filed an appeal against the preliminary list - File no. 1653/105/2023/a2 - By the Decision no. 742/20.06.2024, the Prahova Court rejects the request for extension of time formulated by the appellant as unfounded. It admits the exception of lateness invoked by the debtor through the judicial administrator. It rejects the appeal, as late formulated.

Conpet filed an appeal.

Clarifications: --

Deadline: 11.09.2025

33. File no. 238/42/2021* - Prahova Court

Parties: Conpet SA - claimant

Ministry of Agriculture and Rural Development - defendant

Ialomița County Directorate for Agriculture - defendant

National Agency for Land Registry and Real Estate Advertising - defendant

Subject matter: Obligation of the defendants to pay Conpet S.A. of the amount of RON 238,300 representing the amount paid by Conpet S.A. and undue. The amount was paid in April 2017 for the removal from the agricultural circuit of a land area of 74,712 sq m, which was subsequently reduced by the restoration of the documentation to an area of 56,462 sq m. The investment objective was "Oil pipeline replacement Ø 14 " C2 - C3 on 8 sections in Balta Ialomiței area, Ialomița County on a length of approx. 4,037 m"- Project no. 160/4993/2016 PETROSTAR.

Clarifications: By the **Conclusion no. 130 / 08.09.2021** The Ploiești Court of Appeal admits the motion to dismiss for lack of jurisdiction of the Ploiesti Court of Appeal. It declines jurisdiction to settle the case in favor of the Prahova Court. At the deadline of 04.04.2022, the court rejected the plea of the lack of procedural passive quality, invoked by the defendant, as unfounded, and admitted the request and obliged the defendants to pay to CONPET the amount of RON 238,300 representing the amount paid and undue. With the right of appeal within 15 days from the communication.

By the **Decision 317/ 04.04.2022**, the **Prahova Court** rejects the plea of the lack of procedural passive quality, invoked by the defendant, as unfounded. It admits the request with claims as its subject matter, and obliges the defendants to pay the claimant the amount of RON 238,300, representing the amount paid and undue. Ialomița County Directorate for Agriculture, M.A.D.R. and A.N.C.P.I. appealed. CONPET filed an appeal against the grounds of the decision.

By the **Decision no. 955/27.10.2023** The Ploiești Court of Appeal admitted the appeals filed by the National Agency for Land Registry and Real Estate Advertising, the Ministry of Agriculture and Rural Development and the Ialomița County Directorate for Agriculture, dismissed the appealed sentence and sent the case for retrial to the same court of merits. It rejected the appeal filed by Conpet SA as unfounded.

By the **Sentence no. 1533/17.12.2024**, the Prahova Court admits the exception of the lack of passive procedural quality of the defendant ANCPPI. It rejects the exception of statute of limitations and the exception of lateness, as unfounded. It admits the action filed by the claimant in contradiction with the defendants the Ministry of Agriculture and Rural Development and the Dâmbovița County Directorate for Agriculture. It obliges the defendants the Ministry of Agriculture and Rural Development and the Dâmbovița County Directorate for Agriculture to pay to the claimant the amount of RON 238,300 representing an amount illegally withheld. It rejects the request filed in contradiction with the defendant ANCPPI as being filed against a person without passive procedural quality. It obliges the defendants, the Ministry of Agriculture and Rural Development and the Dâmbovița County Directorate for Agriculture, to pay the claimant the amount of RON 350 as legal expenses. With appeal within 15 days from communication.

Procedural status of the case: Merits- retrial

Deadline: --

34. File no. 19770/281/2023 – Ploiesti Court

Parties: Conpet SA – claimant

International Dancor Imobiliare 888 SRL – defendant

Subject matter: Action for contractual liability. Conpet filed a summons request asking the court:

- to oblige the defendant International Dancor Imobiliare 888 SRL to pay the amount of RON 4,064.98 representing late penalties calculated according to art. 8.1. from the rental agreement no. STA 147/20.05.2022.
- to oblige the defendant International Dancor Imobiliare 888 SRL to pay legal expenses consisting of the judicial stamp duty and other costs caused by this litigation.

Clarifications: By the **Sentence no. 1137/05.02.2024** the Ploiești Courthouse admits, in part, the summons request. It obliges the defendant to pay to the claimant the contractual late payment penalties due in the amount of 0.1% per day for each day of delay calculated as follows: for invoice series: PH CON FD no. 5287/ 23.06.2022 in the amount of 4534.99 lei, starting from 26.07.2022 and ending on 24.01.2023; for invoice series: PH CON FD no. 5212/31.05.2022 on the total debit of RON 13746.56, from 06.07.2022 to 24.01.2023 inclusive, from 25.01.2023 to 01.03.2023 inclusive on the debit of RON 10,000 and from 02.03.2023 to 21.03.2023 on the debit amounting to RON 4,000. It obliges the defendant to pay to the claimant the amount of RON 285, as legal expenses consisting of judicial stamp duty proportional to the extent of the admission of the claims. It rejects the rest of the request as unfounded.

Conpet filed an appeal.

By the **Decision no. 159/07.02.2025**, the Prahova Court rejects the appeal. With the right to appeal within the deadline after communication.

Procedural status of the case: Appeal

Deadline: --

35. File no. 27248/281/2023 – Ploiesti Courthouse

Parties: Conpet SA – claimant

Technologies Brilliant S.A. - defendant

Subject matter: Conpet formulates a summons requesting the obliging of the defendant Technologies Brilliant S.A. upon payment to Conpet S.A. of penalties in the amount of RON 2,759.05, owed by the defendant in accordance with the provisions of art. 16.1(1) from the service contract no. S-CA 82/03.05.2022, representing the difference between the delay penalties in the amount of RON 2,898 calculated and requested by Conpet through the Termination Notice no. 28092/26.07.2022 and the amount of RON 138.94 paid by the defendant as late payment penalties. Obliging the defendant to pay legal expenses.

Clarifications: By the **Sentence no. 5931/04.06.2024**, the Ploiești Courthouse rejects the request for summons. It rejects the claimant's request to order the defendant to pay the legal expenses as unfounded. It rejects the defendant's request to order the claimant to pay the legal expenses as unfounded. With the right of appeal after communication.

Deadline: --

36. File no. 11374/315/2023 – Ploiești Court of Appeal

Parties: Conpet S.A. – civil party

Peștișor Marius – Sever - defendant

Subject matter: Grand larceny. The damage suffered by Conpet S.A. is RON 28,750.45, representing the equivalent value of the works to decommission the artisanal by-pass installation between the Ø 14" Cartojani - Ploiești and Ø 4" Periș pipelines, identified on 21/22.12.2017 within the Butimanu locality, Bârbuceanu village, Dâmbovița county, of the works to remediate the damaged pipeline, necessary to restore it to operating condition (RON 13,990.43), as well as of the works to recover the crude oil remaining in the Ø 4" Periș pipeline (RON 14,760.02).

Clarifications: By the **Sentence no. 132/18.02.2025**, the Târgoviște Courthouse admits the civil action and obliges the defendant Peștișor Marius Sever to pay to Conpet S.A. the amount of RON 28,750.45 as compensation material damages, to which is added the legal penalty interest starting with 22.12.2017 and until the full payment of the debt.

Peștișor Marius – Sever filed an appeal.

Procedural status of the case: Appeal

Deadline: --

37. File no. 4462/233/2024 – Galați Courthouse

Parties: Conpet S.A. – claimant

Drăgan Gheorghe – defendant

Drăgan Maria Magdalena - defendant

Subject matter: Conpet filed a summons application requesting the declaration of unenforceability against us, the company Conpet S.A., of the Voluntary Partition Act authenticated under the no. 2189 of October 17, 2023 by S.N.P. Costache and Căpătan through notary public Carmen-Eliza Ostache concluded between the defendant Drăgan Gheorghe and the defendant Drăgan Maria-Magdalena, as co-participants, and Drăgan Marinița, as beneficiary of the right of life estate, as well as the Liquidation Act authenticated under the no. 2188/2023 by S.N.P. Costache and Căpătan through notary public Carmen-Eliza Ostache, documents having as object the ½ share held by the defendant Drăgan Gheorghe of the ownership right over the property, registered in the Land Book no. 100346 – Slobozia Conachi, identified with the cadastral number 100346, located in the commune of Slobozia Conachi, Galați county, legal documents concluded in fraud of our rights as a creditor of the defendant Drăgan Gheorghe. Obligation of the defendants to pay the legal expenses.

Clarifications: --

Procedural status of the case: Merits

Deadline: 19.03.2025

38. File no. 983/105/2024 – Prahova Court

Parties: Conpet-claimant

Lambru Dragomir-defendant

Dragomir Ortansa, Dragomir Maria Alexandra and Dragomir Ioana Cristina-defendants heirs

Note: Lambru Dragomir has died.

Subject matter: Action for patrimonial liability

Conpet requested the obligation of the defendant Lambru Dragomir, residing in Baba Ana village, no. 467, Baba Ana commune, Prahova county in order to oblige the defendant to pay the amount of RON 524,752.23, representing the equivalent of the quantity of 5,989.72 meters of pipe missing from the management and the quantity of 15,532.00 meters of electrical cables missing from the management no. 14 Inotești Warehouse of the company Conpet S.A., an amount that will be updated with the inflation rate until the effective payment date.

Clarifications: --

Deadline: 09.12.2025

39. File no. 8975/302/2024 – Bucharest District 5 Courthouse

Parties: Conpet - claimant

The Bailiff Răduță Nicoleta - defendant

Subject matter: Conpet filed a complaint against the refusal of the Bailiff Răduță Nicoleta sent by the address issued on March 14, 2024 in the enforcement file no. 16/2017, address communicated to Conpet by e-mail on March 18, 2024 and registered under the no. 11226., requesting the court to admit the complaint and consequently oblige The Bailiff's Office Răduță Nicoleta to continue the enforcement in order to recover the amount of RON 1,310 representing the partially unpaid debt in the enforcement file no. 16/2017 and the expenses incurred by the foreclosure;

Clarifications: --

Deadline: 26.03.2025

40. File no. 1384/105/2024 – Prahova Court

Parties: Conpet -claimant

CLASS BUSINESS&LEISURE CENTER S.R.L. - defendant

Subject matter: Conpet filed a lawsuit requesting that the defendant CLASS BUSINESS&LEISURE CENTER S.R.L. be ordered to pay to Conpet S.A. the amount of 82,880

euro representing late payment penalties calculated according to notification no. 34693/15.09.2022 owed by the defendant in accordance with the provisions of art. 17.1 of the works contract no. L-CA 412/10.12.2021 for failure to execute the subject matter of the contract within the terms provided for in art. 4.2.

Clarifications: --

Deadline: 02.04.2025

41. File no. 966/2/2024 – Bucharest Court

Parties: Conpet - claimant

Policyholders Guarantee Fund - defendant

Subject matter: Conpet filed an appeal against the Decision no. 76568/28.12.2023 issued by the Policyholders Guarantee Fund, which rejected the payment request formulated under the guarantee policy series M no. 72279, which requested the amount of RON 11,132.43, representing partial execution of the performance guarantee for the failure to fulfill contractual obligations by the insured COMTEH S.R.L.

Clarifications: By the **Decision no. 674/17.04.2024**, the Bucharest Court of Appeal admits the motion to dismiss for lack of jurisdiction of the Bucharest Court of Appeal – Section VIII Administrative and Fiscal Litigation, invoked ex officio. It declines the jurisdiction to resolve the case in favor of the Bucharest District 2 Courthouse.

By the **Sentence no. 15871/28.10.2024**, the Bucharest District 2 Courthouse admits the request. It annuls the Decision no. 76568/28.12.2023 and obliges the defendant to pay the claimant the amount of RON 11,132.43, representing compensation. It obliges the defendant to pay the claimant the amount of RON 200, representing legal expenses.

The Policyholders Guarantee Fund filed an Appeal.

Procedural status of the case: Appeal

Term: --

42. File no. 13298/215/2023 – Craiova Court

Parties: Conpet S.A. - claimant

Florescu Eugen - defendant

Florescu Silvia - defendant

Bodic Constantin - defendant

Subject matter: Conpet S.A. filed a summons against the defendants Florescu Eugen, Florescu Silvia and Bodic Constantin to establish the share due to each co-owner on the property consisting

of a construction intended for a “2-room residential house” and a land plot of 1,038 sq m, identified with the Cadastral No. 23, property located in Robăneștii de Jos, Dolj County - tabular owners Florescu Silvia and Florescu Eugen, share 1/2, land book No. 33312 Robănești.

Clarifications: By the **Sentence No. 190/19.02.2025**, the Craiova Courthouse admits the exception to the ineligibility of the claim, invoked by the court, ex officio. It rejects the declaratory action filed by the claimant, the company Conpet S.A., as inadmissible. It orders the claimant, the company Conpet S.A., to pay to the defendants Florescu Silvia and Bodic Constantin, through the heir Florescu Silvia, the amount of RON 6,000, as legal expenses, representing the equivalent of the lawyer's fee. It rejects the claimant's request to oblige the defendants to pay the legal expenses, as unfounded. With appeal after communication.

Procedural status of the case: Merits

Deadline: --

43. File no. 10606/281/2024 – Ploiești Court of Appeal

Parties: Conpet – civil party

Voinea Mihai – defendant

Ion Nicolae Adrian

Grand larceny. Conpet filed a civil case for the amount of RON 156,366 representing the value of the goods stolen by the defendants on 04.02.2024 from the premises of Conpet S.A., Rezervoarelor Street no. 8, Prahova County.

Clarifications: By the **Decision no. 264/07.06.2024**, the Ploiești Courthouse orders the commencement of the trial. The decision was appealed by Voinea Mihai - file 10606/281/2024/a1. By the **Decision no. 460/23.07.2024** the Prahova Court takes note of the withdrawal of the appeal.

By the **Sentence no. 2118/25.11.2024** the Ploiești Courthouse admits the civil action filed by the civil party Conpet S.A. in the sense that: It obliges the defendants Voinea Mihai and Ion Nicolae Adrian, jointly and severally, to pay the civil party the amount of RON 156,366 representing the value of the stolen goods, to which is added the legal penalty interest calculated on the principal debt from the date of the crime and until the date of actual payment. With the right of appeal after communication.

The defendants filed an appeal.

Procedural status of the case: Appeal

Deadline: 18.03.2025

44. File no. 2237/120/2024 – Prahova Court

Parties: Conpet – claimant

Mayor of Gura Ocnitei commune – Ioniță Sorin Vasile – defendant

Gura Ocnitei commune – defendant

Mapi Imobiliare S.R.L. Company - defendant

Subject matter: Conpet files a lawsuit requesting:

1. Cancellation of the Building Permit no. 43 of 22.12.2023 issued by the Mayor of Gura Ocnitei commune Ioniță Sorin Vasile at the request of the defendant Mapi Imobiliare S.R.L. company
2. Dismantling the construction "Platform for container placement" illegally located in the protection and safety zone of the Ø 6 5/8" Ochiuri - Moreni crude oil pipeline, which undercuts the land owned by Mapi Imobiliare S.R.L. located in Gura Ocnitei commune, Ochiuri village, T91, P2/1, Dâmbovița county, with an area of 1396 sq m, arable use category, Cadastral and land book no. 74623 ATU Gura Ocnitei.
3. Obligation of the defendants to pay legal expenses.

Clarifications: By the Decision no. 512/02.10.2024, the Dâmbovița Court admits the exception of territorial incompetence of the Dâmbovița Court, regarding the resolution of the action filed by the claimant Conpet S.A. having as its subject matter the annulment of the administrative act and sends the file to the competent resolution of the Prahova Court.

Procedural status of the case: Merits

Deadline: 10.04.2025

45. File no. 17827/281/2024 - Ploiești Courthouse

Parties: Conpet – appellant

Răduță Sândica - respondent

The Bailiff's Office Divoiu Maria - respondent

Subject matter: Conpet filed an appeal against the enforcement against the enforcement documents drawn up by the Bailiff's Office Divoiu Maria in the enforcement file no. 96/2024 and the invalidation of the enforcement for the amount of RON 594.3 representing: RON 107 tax paid by Conpet on the amounts paid as an update with the inflation index according to the civil sentence no. 7049/04.10.2022, RON 48 tax that Conpet still has to pay under art. 84¹ of Law no. 227/2015 regarding the Fiscal Code on amounts paid as debit and RON 439.3 of unjustified execution expenses.

Clarifications: --

Procedural status of the case: Merits

Deadline: 19.03.2025

46. File no. 19573/281/2024 - Ploiești Courthouse

Parties: Conpet – claimant

Comteh S.R.L. - defendant

Subject matter: Conpet files a lawsuit requesting that the defendant be ordered to pay the amount of RON 11,132.43 representing late payment penalties arising from the late execution of the intervention obligation established in art. 4.3 of the Service Contract no. S-CA 133/30.04.2020.

Clarifications: By the **Decision of 29.01.2025**, the Ploiești Courthouse, pursuant to the provisions of art. 75 of Law no. 85/2014, finds that the trial of the case has been suspended by law. With the right of appeal for the entire duration of the suspension.

Procedural status of the case: Merits

Deadline: --

47. File no. 19868/281/2024 - Ploiești Courthouse

Parties: Conpet – claimant

Roțile Schimbării Sport Club Association - defendant

Subject matter: Conpet files a lawsuit requesting that the defendant Roțile Schimbării Sport Club Association pay to Conpet S.A. the amount of RON 22,329.18, consisting of:

- RON 1,365.08 - the equivalent of invoices no. 5738/19.10.2022, 6043/31.12.2022 and 6418/25.04.2023, representing late payment penalties calculated according to art. 3.4 of the lease agreement no. ADM 7/12.01.2016 for the late payment of a number of 6 invoices issued under this contract;
- RON 12,186.64 representing the equivalent of the rent for the period April 2022 – April 2023, corresponding to unpaid invoices, issued under the lease agreement no. ADM 11/20.01.2022;
- 8,777.46 representing late payment penalties composed of:
 - RON 3,053.98 representing late payment penalties calculated according to art. 3.4 of the lease agreement no. ADM 11/20.01.2022 for late payment, respectively non-payment of invoices issued under this agreement from the due date until the date of payment and respectively of the termination notice
 - RON 5,723.48 representing late payment penalties calculated according to art. 3.4 of the lease agreement no. ADM 11/20.01.2022 for non-payment of invoices issued under this contract, from the date of the termination notice until 08.08.2024 (date of formulation of this). We request that

the defendant be further ordered to pay these late payment penalties until the effective date of payment of the unpaid invoices, issued under the lease agreement no. ADM 11/20.01.2022.

In the alternative, in the event that you do not accept our request to order the defendant to pay the late payment penalties for non-payment of invoices issued under the lease agreement no. ADM 11/20.01.2022, from the date of the termination notice until 08.08.2024 and onwards, we request that the defendant be ordered to pay the legal interest from the date of termination of the contract until the effective date of payment of the unpaid invoices, issued under the lease agreement no. ADM 11/20.01.2022.

We also request that the defendant Roțile Schimbării Sport Club Association be ordered to pay the legal expenses advanced in this case.

Clarifications: --

Procedural status of the case: Merits

Deadline: Ruling postponed to 14.03.2025

48. File no. 27605/281/2024 – Ploiești Courthouse

Parties: Conpet – claimant

Eurosting AAW Industry S.R.L. - defendant

Subject matter: Conpet filed a lawsuit requesting the company Eurosting AAW Industry S.R.L. to pay to Conpet S.A. the amount of RON 139,712.19 representing late payment penalties owed by it in accordance with the provisions of art.17.1(1) of the works contract no. L-CA 95/23.04.2019 for the delayed execution of the rehabilitation works of the Marghita Crude Oil Loading Ramp.

Clarifications: --

Procedural status of the case: Merits

Deadline: Ruling postponed to 14.03.2025

49. File no. 32954/281/2024 – Ploiești Courthouse

Parties: Conpet – claimant

Serinus Energy Romania S.A. – defendant

Subject matter: Conpet filed a lawsuit requesting that the defendant be ordered to pay Conpet the following amounts:

- RON 1,963.50 (including VAT) representing the equivalent of invoice no. PH CON FD 7207/19.10.2023 issued under contract no. STA 135/31.05.2019.
- RON 779.51 representing late payment penalties according to art. 11.1 of Additional Act no. 5 calculated from 23.11.2023 to 23.12.2024, inclusive (date of formulation of this statement), as

well as ordering the defendant to pay the penalties until the effective payment of the principal debt.

- RON 150 representing legal expenses, namely the judicial stamp duty

Clarifications: --

Procedural status of the case: Merits

Deadline: --

50. File no. 5092/214/2024 – Costești Courthouse

Parties: Conpet – petitioner

The Prosecutor's Office attached to the Costești Courthouse - respondent

Subject matter: Conpet filed a complaint against the Ordinance rejecting the complaint no. 30/II/2/2024 issued on 08.11.2024 by the Chief Prosecutor of the Prosecutor's Office attached to the Costești Courthouse, in the file no. 1280/P/2016, by which, wrongly, the Conpet complaint was rejected against the Prosecutor's Order dismissing the case ordered on 30.09.2024 by the Prosecutor's Office attached to the Costești Courthouse in the same file, regarding the commission of the crime of grand larceny, requesting the admission of the complaint, the abolition of Ordinance no. 30/II/2/2024 ordered on 08.11.2024 by the Chief Prosecutor of the Prosecutor's Office attached to the Costești Courthouse and the Prosecutor's Order for Dismissal ordered on 30.09.2024 by the Prosecutor's Office attached to the Costești Courthouse in the file no. 1280/P/2016 and consequently the continuation of the criminal prosecution and investigations in order to identify the criminals and hold them criminally liable for the above-mentioned criminal act. At the same time, we request the recovery of the damage caused to our company, as a result of the acts committed.

Clarifications: --

Procedural status of the case: Merits

Deadline: 08.04.2025

51. File no. 5714/118/2024 – Constanța Court

Parties: Conpet S.A – creditor

COMTEH S.R.L. - debtor

Subject matter: Conpet filed a request for admission to the list of creditors of the debtor COMTEH S.R.L. with the amount of RON 11,132.43 representing late payment penalties arising from the late execution of the intervention obligation established in art. 4.3 of the Service Contract no. S-CA133/30.04.2020, concluded between Conpet S.A as beneficiary and COMTEH S.R.L. as

Supplier, as an unsecured, certain, liquid and due claim, arising prior to the date of opening the insolvency proceedings.

In accordance with art. 453 of the Code of Civil Procedure, we request the court to oblige the debtor COMTEH S.R.L. to pay legal expenses (judicial stamp duty, as well as other expenses incurred in this process).

Clarifications: --

Procedural status of the case: Merits

Deadline: 19.03.2025

b) The list of litigations pending before Courts on 14.03.2025 in which the company CONPET S.A. has the status of defendant

1. File no. 8296/281/2007 - Ploiești Courthouse

Parties: Cornea Rodica Aurora

Conpet S.A., Petrotrans S.A., Regionala Transgaz Bucharest, Ministry of Finance - defendants

Subject matter: Cornea Rodica Aurora claims jointly and severally that the defendants are required to pay civil damages in the amount of EUR 74,000 representing the damage caused by the presence of pipes belonging to the defendants in the basement, the property of the claimant and the payment of civil damages provisionally assessed at RON 10,000 for the period of February 2004 - February 2006 as a result of the use of pipes that crossed the property of the claimant.

Clarifications: The case is suspended based on art. 36 of Law no. 85/2006.

Procedural status of the case: Merits

2. File no. 8297/281/2007 - Ploiești Courthouse

Parties: Rusu Mihaela - claimant

Conpet S.A., Petrotrans S.A., Regionala Transgaz Bucharest, Ministry of Finance - defendants

Subject matter: Rusu Mihaela claims that the defendants should be jointly and severally liable for civil damages in the amount of EUR 74,000, representing the damage caused by the presence of pipes belonging to the defendants in the basement, the property of the claimant.

Clarifications: The case is suspended based on art. 36 of Law no. 85/2006.

Procedural status of the case: Merits

3. File no. 3451/108/2016 * - High Court of Cassation and Justice**

Parties: Conpet SA - defendant

A.T.U. Pecica Town - claimant

Subject matter: A.T.U. of Pecica town filed a request for a summons requesting:

Mainly:

- the obligation of the defendant Conpet S.A. to divert the crude oil pipeline that crosses a number of 22 plots of urban land, intended for the construction of houses, located in our property, in a total area of 20,287 sq. m.
- order the defendant Conpet S.A. to pay the amount of EUR 65,000 representing the equivalent value of the house located in plot no. A141.7760 / 5/174, entered in L.B. no. 306869 because it can no longer be capitalized by the subscriber.

In subsidiary:

- order the defendant Conpet S.A. upon payment of an annual rent, during the existence of the pipeline, as a result of the encumbrance of the areas shown above by the right of legal easement exercised by Conpet SA; NOTE: The annual rent has not been quantified.
- order the defendant Conpet S.A. to the granting of compensations for the period 31.10.2014 – 31.05.2016 as a result of the limitation of the attributes of the property right of the 22 urban land plots and of the decrease of the circulation value of the land on the real estate market due to the restrictions imposed by Order 196/2006 of NAMR on construction;
- order the defendant Conpet S.A. that every 3 years to adapt the amount of compensation to the value of circulation at that time of similar lands and the provisions of future orders of the N.A.M.R.;
- the setting by the court of the due date on which the compensations will be paid annually, following the non-payment at the due term to attract the payment of the legal interest related to the amount received as compensation for the delay period;
- award the legal expenses incurred in the event of opposition.

Clarifications: By the **Conclusion no. 40 / 26.01.2017** The Arad Court rejects the request to show the right holder formulated by the defendant Conpet SA in contradiction with the claimant ATU of Pecica Town and with the respondents the Romanian State through the Ministry of Public Finance and the National Agency for Mineral Resources. The decision was appealed by Conpet (File no. 3451/108/2016 * / a1 - Timisoara Court of Appeal. By the Decision no. 211 / 20.03.2017 The Timișoara Court of Appeal rejects the appeal).

By the **Sentence no. 336 / 18.05.2017**, the Arad Court rejects the civil action filed by the claimant A.T.U. of Pecica Town in contradiction with the defendant Conpet SA having as subject the obligation to act and claims. No legal expenses. The decision was appealed by the ATU Pecica Town.

By the **Decision no. 761 / 23.11.2017** The Timișoara Court of Appeal admits the appeal. It annuls the appealed sentence and sends the case for retrial to the Arad Court. Conpet filed an appeal. Through the Report of 07.06.2018, the High Court of Cassation and Justice found the inadmissibility of the Conpet appeal, it being promoted against a final decision, which does not fall within the hypothesis regulated by art. 483 para. 1 Code of Civil Procedure. The parties submitted a written opinion on the report. By the Conclusion of 10.10.2018, the HCCJ admits in principle the appeal declared by the appellant-defendant Conpet S.A.

By the **Decision no. 615 / 22.03.2019** The HCCJ admits the appeal declared by the appellant-defendant Conpet S.A., it quashes the appealed decision and sends the case to a new court of the same court of appeal.

By the **Decision no. 306 / 07.06.2021** The Bucharest Court of Appeal rejects the appeal declared by the appellant-claimant, the Administrative Territorial Unit of the Town of Pecica.

The claimant, the Territorial Administrative Unit of the Town of Pecica, filed an appeal.

By the **Decision 614 of 15.03.2023** the HCCJ admits the appeal. It dismisses the appealed decision and sends the case for a new trial to the same court.

By the **Decision no. 621/13.12.2023** The Timișoara Court of Appeal admits the appeal filed by the claimant-appellant the Administrative Territorial Unit of the Town of Pecica. It partially changes the appellant's sentence in the sense that it admits in part the request for summons made by the claimant the Administrative Territorial Unit of the Town of Pecica in opposition to the defendant CONPET S.A., and obliges the defendant to pay the amount of EUR 137,045.69 as compensation in favor of the claimant. It upholds the rest of the appealed sentence. It obliges the respondent to pay in favor of the appellant the amount of RON 17,579 as legal expenses.

Conpet filed an appeal.

By the **Decision dated 26.02.2025**, the H.C.C.J. rejects the exceptions of lateness and nullity of the appeal. It mainly admits the appeal filed by the appellant-defendant Conpet S.A. against the decision no. 621/A/13.12.2023, pronounced by the Timișoara Court of Appeal and sets a deadline for the hearing of the appeal.

Procedural status of the case: Appeal

Deadline: 21.05.2025

4. File no. 5413/204/2017* - Prahova Court

Parties: Conpet SA - defendant

N.A.M.R. - defendant

Dobrogeanu Dumitru - claimant

Dobrogeanu Păun Ioan - claimant

Subject matter: Claims. Dobrogeanu Dumitru and Dobrogeanu Păun Ioan filed a summons requesting the court that by the decision it will pronounce to order the obligation of the defendants to:

1. Payment of an annual rent for the land areas occupied by the two pipelines transporting petroleum products (crude oil) starting with 01.07.2014 and in the future, throughout the existence of the pipelines;
2. Obligation of the defendants to pay the losses suffered by not achieving economic objectives on the area left between the two pipelines after their restriction and the area along DN1 (E60);
3. Payment of legal expenses.

The first head of the claim was estimated by the claimants at the amount of EUR 48,000 / year (RON 220,000), and the second head at the amount of RON 25,000 / year.

Clarifications: By the Decision no. 594 / 28.02.2018 the Câmpina Courthouse admits the motion to dismiss for lack of jurisdiction of solving the case of the Câmpina Courthouse, invoked by the court ex officio. It declines jurisdiction to settle the request in favor of the Prahova Court. No appeal.

By the **Sentence no. 2446 / 28.08.2018** the Prahova Court admits the exception of the lack of passive procedural quality, invoked by the defendant National Agency for Mineral Resources Bucharest. It dismisses the action, in contradiction with that defendant, as being brought against a person without procedural capacity. It admits the exception of the res judicata. It dismisses the claim filed against the defendant Conpet S.A., as there is res judicata. It finds that the defendants have not applied for legal expenses. The decision was appealed by Dobrogeanu Dumitru.

By the **Decision no. 2804 / 11.11.2019** the Ploiești Court of Appeal rejects the appeal filed by the appellant Dobrogeanu Dumitru as unfounded. It admits the plea of inadmissibility of the cross-appeal. It dismisses as unfounded the cross-appeal declared by the appellant Dobrogeanu Păun Ioan. The decision was appealed by Dobrogeanu Dumitru and Dobrogeanu Păun Ioan.

By the **Decision no. 206 / 04.02.2021**, the High Court of Cassation and Justice rejects the appeal filed by the claimant Dobrogeanu Păun Ioan against the civil decision no. 2804 of November 11, 2019, pronounced by the Ploiești Court of Appeal, Civil Division I. It admits the appeal filed by the claimant Dobrogeanu Dumitru against the same decision. It quashes the appealed decision and

the civil sentence no. 2446 of August 28, 2018 of the Prahova Court and sends the case for retrial to the Prahova Court.

Procedural status of the case: Merits - retrial

Deadline: 22.05.2025

5. File no. 5212/105/2018 – the High Court of Cassation and Justice

Parties: Conpet SA - defendant

Fondul Proprietatea SA - claimant

Subject matter: Fondul Proprietatea SA files an appeal requesting the court to:

1. Oblige Conpet to pay the amount of RON 734,747.04, representing the net value of the dividends related to a share of 6% of the share capital of Conpet, respectively for a number of 524,366 shares held by the claimant on the registration date of A.G.O.A. Conpet of 25.04.2007 (i.e. 14/05/2007), for the financial year of 2006,
2. Oblige Conpet to pay damages, respectively the legal interest related to the dividends from the due date of the amount requested in point 1 and until the date of filing the summons (i.e. 09.11.2018), in the amount of RON 579,015.97.
3. Oblige Conpet to pay thereafter the legal interest related to the net value of the dividends, from the date of filing the summons and until the actual payment of the requested amounts,
4. Oblige Conpet to pay the legal expenses of the present litigation. Conpet S.A. filed an impleader of the Romanian State through the Ministry of Finance and A.A.A.S.

Clarifications: By the **Conclusion of 25.06.2019**, the Prahova Court rejected as unfounded the impleader of the Authority for the Administration of State Assets, formulated by the defendant Conpet S.A. Conpet and the Romanian State through the Ministry of Public Finance filed an appeal against this decision of the court. By the same Conclusion of 25.06.2019, the court admitted in principle the impleader of the Romanian State through the Ministry of Public Finance, formulated by the defendant Conpet S.A. and rejected as unfounded the plea of the lack of passive procedural quality of the Romanian State through the Ministry of Public Finance. The appeal was registered with the Ploiești Court of Appeal with no. 5212/105/2018 / a2. By the **Decision no. 515 / 05.11.2019** the Ploiești Court of Appeal admits the plea of the inadmissibility of the appeal declared by the Ministry of Public Finance. It dismisses this appeal as inadmissible. It rejects the plea of lack of interest and the exception of inadmissibility of the appeal declared by Conpet SA. It dismisses this appeal as unfounded. Final.

By the **Conclusion of 20.09.2019**, the Ploiești Court suspended the trial of the case until the settlement of the appeals made against the decision pronounced on 25.06.2019. This conclusion remained final by non-appeal.

By the **Sentence no. 633 / 02.06.2021**, the Prahova Court unfoundedly rejects the exception of the prescription of the right to action. It admits the action. It obliges the defendant Conpet SA to pay to the claimant the amounts of RON 734,747.04 representing the value of dividends, of RON 579,015.97, representing dividends for the period 26.10.2007-09.11.2018, and the legal interest related to the net value of the dividends from 09.11.2018 and until the actual payment of the main debit. It admits in part the impleader. It obliges the summoned in guarantee The Romanian State to pay to the defendant Conpet S.A., the amount of RON 734,747.04, representing the value of dividends, and the legal interest related to this amount starting with 17.12.2018 and until the date of restitution to the defendant of the amount of RON 734,747.04. With the right to appeal within 30 days from communication.

By the **Decision no. 814 / 01.07.2021** The Court admits the request for correction of the material error made by the claimant. It corrects the material error crept into the content of paragraph 3 of the operative part of sentence no. 633 / 02.06.2021 pronounced by the Prahova Court, in the sense that it is written: "It obliges the defendant Conpet S.A. to pay to the claimant the amounts of RON 734,747.04 representing the main debit, of RON 579,015.97, representing dividends for the period 26.10.2007-09.11.2018, and the legal interest related to the net value of the dividends from 09.11.2018 until the actual payment of the main debit.". It admits the request for completion of the decision made by the claimant. It orders the completion of the civil sentence no. 633 / 02.06.2021 in the sense that it also provides: It reduces to RON 70,000 the fee of the claimant's lawyer. It obliges the defendant Conpet S.A. to pay the claimant the following legal expenses: RON 20,347.63 representing judicial stamp duty, RON 4,300 expert fee, RON 8,481.87 expert fee, RON 70 lawyer's fee and RON 1,125 other expenses. It obliges the summoned in guarantee The Romanian State to pay to the defendant Conpet S.A. legal expenses in the amount of RON 16,943. With the right of appeal within 15 days from communication.

Conpet and the Romanian State through the Ministry of Public Finance filed an **appeal** against the substantive decision no. 633 / 02.06.2021.

Conpet filed an appeal against the material error correction decision no. 814/01.07.2021.

Conpet S.A. also filed a request to correct the material errors in the contents of sentence no. 633 of 02.06.2021 pronounced by the Prahova Court in the file no. 5212/105/2018, device that was the object of correcting the material error pronounced by the court by sentence no. 81 of 01.07.2021. Through the Conclusion of Correction of Material Civil Error, dated 12.09.2022, the

Prahova Court admitted the request to correct the material errors of the disposition of the civil sentence no. 633/02.06.2021 and no. 814/01.07.2021, pronounced by the Prahova Court, in the file no. 5212/105/2018, formulated by Conpet S.A., against the claimant, Fondul Proprietatea S.A., against the defendant Conpet S.A., the summoned in guarantee the Romanian State, through the Ministry of Public Finances. It corrects the material errors in the content of sentences no. 633/02.06.2021 and no. 814/01.07.2021 pronounced by the Prahova Court, in the sense that it is changed: It obliges the defendant S.C. Conpet S.A. to pay the claimant the amount of RON 734,747.04 representing the net value of the dividends and RON 579,015.97, representing the legal interest related to the net value of the dividends for the period 26.10.2007-09.11.2018, and the legal interest related to the net value of the dividends from 09.11.2018 and until the actual payment of the main debit.

By the **Decision no. 245/08.12.2022** the Ploiești Court of Appeal admits the exception of the ineligibility of the appeal invoked ex officio. It rejects the appeal as unfounded. Final.

By the **Decision no. 109 of 29.03.2023**, Ploiești Court of Appeal admits the appeals. It changes the entire sentence. It admits the statute of limitations exception and dismisses the claim as statute of limitations. It rejects the warranty claim. It obliges the claimant to pay the defendant RON 16,943 in legal expenses incurred at the trial in the first instance. It obliges the respondent-claimant to pay the appellant-defendant RON 17,785 in legal expenses in the appeal. Fondul Proprietatea S.A. filed an appeal.

On 14.02.2024 the H.C.C.J. admits in principle the appeal declared by the appellant-claimant Fondul Proprietatea S.A. against the decision no. 109/29.03.2023, pronounced by the Ploiești Court of Appeal - Civil Division II. It establishes a term for judging the appeal.

By the **Decision no. 860/17.04.2024** the H.C.C.J. admits the appeal; it quashes the appealed decision and sends the case for a new trial to the appellate court.

By the **Decision no. 67/26.02.2025** the Ploiești Court of Appeal rejects the appeal filed by the summoned in guarantee the Romanian State, represented by the Ministry of Finance. It admits the appeal filed by the defendant Conpet S.A. It changes in part the sentence no. 633/02.06.2021, as directed by the conclusion of 12.09.2022, in the sense that the impleader will be accepted in its entirety and the Romanian State represented by the Ministry of Finance will be obliged to pay the defendant the amount of RON 579,015.97 representing the interest to be paid by the defendant to the claimant for the period between 26.10.2007 - the due date for payment of dividends due for the 524,366 shares and the date of filing the impleader - 09.11.2018, as well as the legal interest starting with 09.11.2018 and until the moment this court decision becomes final. It obliges the defendant-appellant to pay the claimant-respondent the legal expenses in the

amount of RON 30,000 representing defense fees incurred in the appeal trial in both procedural cycles. It obliges the defendant-appellant to pay the claimant-respondent the legal expenses in the amount of RON 50 the judicial stamp duty paid in the appeal as well as RON 31,197.58 defense fees paid in the appeal - HCCJ - in the first procedural cycle. It maintains the other provisions of the sentence no. 633/02.06.2021. With the right of appeal after communication.

Procedural status of the case: Appeal – retrial

Deadline: --

6. File no. 4395/270/2020 - Onești Courthouse

Parties: Municipality of Onești - claimant

Local Council of Onești Municipality - claimant

Conpet S.A. - defendant

Subject matter: Onești Municipality and the Local Council of Onești Municipality, Bacău County, have sued Conpet S.A. asking the court:

"1. The obligation of the defendant at the conclusion of the agreement for the exercise of the right of legal easement over the lands with an area of 11,474.5 sq. m., crossed and affected by crude oil transport pipelines within the municipality of Onești, equivalent to the payment of an annual rent, during the existence of the pipelines, to the local budget of Onești municipality, determined according to the principle of the least violation of the property right and calculated taking into account the circulation value of the affected real estate, established under the law, at the time of the damage.

2. The obligation of the defendant to pay material damages, representing the equivalent value of the lack of use for the land in the area of 11,474.5 sq. m. crossed and affected by the crude oil pipelines within the municipality of Onești, established according to the Market Study approved by the Decision of the Local Council no. 199 of 29.11.2018, respectively according to the Updated Market Study approved by the Decision of the Local Council no. 122 of 29.06.2020, calculated starting with 2017 and until the date of concluding the agreement for exercising the right of legal easement over these lands, to which are added late fees, interest and late payment penalties in the amount provided by the Fiscal Procedures Code applicable in this period.

3. The obligation of the defendant to pay the legal expenses of the present proceedings."

Clarifications: --

Procedural status of the case: Merits

Deadline: 13.05.2025

7. File no. 666/317/2022- Târgu Carbunești Courthouse

Parties: Balțoi Mariana - claimant

Conpet S.A. -defendant

Subject matter: Obliging Conpet to pay the claimant the amount of RON 5,000, established only for the purpose of stamping and which may be increased depending on the conclusions of the expert report, as compensation representing the value of the lack of use related to the land with an area of 268 square meters for the years 2018 -2022 and further until the file is completed, amount that will be updated on the actual payment date.

Clarifications: By the **Closing of the hearing on 25.01.2023**, the court of first instance admitted in principle the request to summon the National Agency for Mineral Resources (N.A.M.R.) made by the defendant Conpet S.A. It orders the design and citation in question of the National Agency for Mineral Resources (N.A.M.R.) as a guarantor. It rejects in principle the request to call in the guarantee of the Romanian State through the Ministry of Public Finances formulated by the defendant Conpet S.A.. With the right to appeal together with the merits.

Procedural status of the case: Merits

Deadline: 03.04.2025

8. File no. 5971/2/2022 - Bucharest Court of Appeal

Parties: OMV Petrom SA-claimant

N.A.M.R. -defendant

Conpet S.A. - defendant

Subject matter: The court is requested that, through the judgment that will be pronounced, it orders:

1. Regarding the Order 229/2021:

1.1. Partial annulment of art. 1 of Order 229/2021 regarding the tariffs established in the Annex 1 and Annex 3 and, accordingly, the Annexes 1 and 3 of Order 229/2021; and by way of consequence

1.2. Obliging NAMR to issue a new order for the approval of transport tariffs through the National System for the transportation of crude oil, rich gas, condensate and ethane for the year 2022, which includes tariffs modified accordingly with regard to tariffs in the domestic (Annex 1) and tariffs in import for refineries in the Ploiești Basin (Annex 3), as a result of the recalculation of the tariffs included in the Order 229/2021 in a transparent and non-discriminatory manner, in accordance with the constitutional provisions and those of the primary and secondary petroleum and competition legislation, as they are exposed by means of this summons;

2. Regarding Order 53/2008, the partial cancellation of art. 3-8 of the Annex to Order no. 53/2008, as well as obliging NAMR to issue a new order to properly complete the Order no. 53/2008, by reference to the following:

2.1. the method of determining in the Methodology the operating cost lacking transparency and clarity, with regard to (i) its component elements, the structure of each of these elements, not specifically provided for, along with (ii) the cost calculation algorithm of operation by referring to these elements and (iii) by taking into account only those elements that constitute, by their nature, operating costs, so that these secondary normative provisions are aligned with the requirements of art. 20 of the Petroleum Law;

2.2. the algorithm for determining the modernization quota that does not provide in a specific, clear and transparent manner (i) the effective percentage of the modernization quota, (ii) the basis on which it is applied, (iii) the concrete investments in order to carry out which pay the modernization quota by the beneficiaries of the transport system, (iv) the method of managing the surplus of amounts received as modernization quota and unused until the end of the financial year that were charged for the realization of investments, by taking into account these amounts in the calculation of the modernization quota that the beneficiaries must pay in the following year, by referring to the investments considered within it and such amounts available for investments carried over from previous years, as well as (v) the method of managing the bank interest collected by the holder of the concession agreement as a result of depositing the amounts received as a modernization fee and used by him, in the sense of using interest according to the same destination and taking into account these amounts in the calculation of the modernization quota that the beneficiaries must pay in the following year with this title, so that these secondary normative provisions are aligned with the requirements of art. . 20 of the Petroleum Law;

2.3. the algorithm from which does not result in a specific, clear and transparent manner (i) the method of determining the level of the rate of profit considered to be reasonable or (ii) of a profitability interval whose lower and upper limits should be established on the basis of comparative studies, by referring to the practice in the field of other comparable European transport operators, as well as (iii) specific requirements for transparent justification by Conpet of the studies to substantiate any increases in the profitability rates considered in the establishment of transport tariffs, so that these secondary normative provisions are aligned with the requirements of art. 20 of the Petroleum Law;

2.4. the tariff systems that are not currently focused on similar criteria and calculations for the two subsystems they regulate (i.e. the domestic and the import) that meet the requirements of ensuring equal treatment between the beneficiaries of the public transport service for the two

types of subsystems, so that these secondary normative provisions are aligned with the requirements of art. 20 of the Petroleum Law;

2.5. the procedural elements to ensure in a clear, transparent and efficient manner the right of Conpet customers to express their point of view regarding the advanced tariff proposals for approval by Conpet, based on specific documentation made available to them respectively to the revision/update requests of the rates sent by Conpet to N.A.M.R. and related documentation, as well as to receive a reasoned response from N.A.M.R. regarding the views expressed if they are not taken into account in full or in part by N.A.M.R., so that these secondary normative provisions are aligned with the requirements of art. 20 of the Petroleum Law and the transparency requirements applicable to the adoption of normative acts in compliance with the general European and national principle of good administration.

3. Ordering the defendant to pay legal expenses.

After the communication of the summons request, but before the first court term (17.01.2023) OMV PETROM amended the summons request regarding the first petition of the request asking the court to order:

1. Regarding Order no. 229/2021:

Partial annulment of art. 1 of Order 229/2021 regarding the tariffs established in Annex 1 and Annex 3 and, correspondingly, of Annexes 1 and 3 of Order 229/2021 regarding the tariffs for the DOMESTIC subsystem and the IMPORT subsystem, within the limit of the amount of the tariffs that will be established as legal as a result of their recalculation in a transparent and non-discriminatory manner, in accordance with the constitutional provisions and those of the primary and secondary petroleum and competition legislation, as they are submitted through this summons.

2. Regarding Order no. 53/2008: partial cancellation of art. 3-8 of the Annex to Order no. 53/2008, as well as the obligation of N.A.M.R. upon issuing a new order to properly complete Order no. 53/2008, by reference to the following:

2.1. the method of determining in the Methodology the operating cost lacking transparency and clarity, with regard to (i) its component elements, the structure of each of these elements, not specifically provided for, along with (ii) the cost calculation algorithm of operation by referring to these elements and (iii) by taking into account only those elements that constitute, by their nature, operating costs, so that these secondary normative provisions are aligned with the requirements of art. 20 of the Petroleum Law;

2.2. The algorithm for determining the modernization quota that does not provide in a specific, clear and transparent manner (i) the effective percentage of the modernization quota, (ii) the basis

on which it is applied, (iii) the concrete investments in order to carry out pay the modernization quota by the beneficiaries of the transport system, (iv) the method of managing the surplus of amounts collected as modernization quota and unused until the end of the financial year that were charged for the realization of investments, by taking into account these amounts in the calculation of the modernization quota that the beneficiaries must pay in the following year, by referring to the investments considered within it and such amounts available for investments carried over from previous years, as well as (v) the method of managing the bank interest collected by the holder of the concession agreement as a result of depositing the sums received as a modernization quota and not used by him, in the sense of using the interests according to the same destination and taking into account these sums in the calculation of the modernization quota that the beneficiaries must pay in the following year with this title, so that these secondary normative provisions are aligned with the requirements of art. 20 of the Petroleum Law;

2.3. The algorithm does not result in a specific, clear and transparent manner (i) the way to determine the level of the rate of profit considered to be reasonable or (ii) of a profitability interval whose lower and upper limits should be established based on comparative studies, by reference to the practice in the field of other comparable European transport operators, as well as (iii) specific requirements for transparent justification by CONPET of studies to substantiate any increases in profitability rates considered in the establishment of transport tariffs, so that these secondary normative provisions are aligned with the requirements of art. 20 of the Petroleum Law;

2.4. Tariff systems that are not currently focused on similar criteria and calculations for the two subsystems they regulate (i.e. the domestic and the import) that meet the requirements of ensuring equal treatment between the beneficiaries of the public transport service for the two types of subsystems, so that these secondary normative provisions are aligned with the requirements of art. 20 of the Petroleum Law;

2.5. Procedural elements to ensure in a clear, transparent and efficient manner the right of Conpet customers to express their point of view regarding advanced tariff proposals for approval by Conpet, based on specific documentation made available to them respectively to requests for revision/update of tariffs sent by Conpet to N.A.M.R. and related documentation, as well as to receive a reasoned response from N.A.M.R. regarding the points of view formulated if they are not taken into account in whole or in part by N.A.M.R. so that these secondary normative provisions are aligned with the requirements of art. 20 of the Petroleum Law and the transparency requirements applicable to the adoption of normative acts in compliance with the general European and national principle of good administration.

3. Ordering the defendant to pay legal expenses.

Clarifications: By the **Sentence no. 898/28.05.2024**, the Bucharest Court of Appeal rejects as unfounded the claimant's exception of lack of interest. It rejects as unfounded the exception of lack of passive procedural quality of the defendant Conpet S.A. It rejects as unfounded the request for summons, as amended. It rejects as unfounded the claimant's request to order the defendants to pay the legal expenses. With appeal after communication.

Procedural status of the case: Merits

Deadline: --

9. File no. 1132/241/2022 – Pitești Court of Appeal

Parties: Podureanu Iordachi – claimant

Conpet SA - defendant

Subject matter: Podureanu Iordachi filed a summons request requesting the court that, through the judgment it will pronounce, order the increase of the periodic benefit to which Conpet SA was obliged by the civil sentence no. 337/14.03.2019, in the file no. 2646/241/2017 the decision remained final through manipulation, so that Conpet S.A. is obliged to pay the amount of RON 2,200 as periodic compensation.

Clarifications: By the **Sentence no. 20/11.01.2024** the Horezu Courthouse admits the summons request filed by the claimant Podureanu Iordachi. It orders the increase of the periodic benefit established in favor of the claimant by the Civil Sentence no. 337/14.03.2019 pronounced by the Horezu Courthouse, which remained final through non-appeal, from the amount of RON 600 per month to the amount of RON 2,200 per month, starting from the date of the introduction of the action, namely 27.04.2022, until the end of the state of need. It obliges the defendant company to pay the amount of RON 2,200 /month in favor of the claimant starting from the date of the filing of the action, i.e. 27.04.2022, until the end of the state of need. It obliges the defendant company to pay the claimant legal expenses in the amount of RON 1,000, representing the attorney's fee. Conpet filed an appeal.

By the **Decision no. 792/07.11.2024**, the Vâlcea Court rejects the appeal filed by Conpet. It orders the appellant to pay the amount of RON 2,500 to the respondent, as legal expenses.

Conpet filed an Appeal.

Procedural status of the case: Appeal

Deadline: 15.04.2025

10. File no. 727/42/2022 – Ploiesti Court of Appeal

Parties: Gruia Gheorghe, Vasile Valentin, Dudaş Pavel, Tudorache Marius, Pârvu Valentin, Georgescu Anda, Manda Marin, OMV Petrom SA, SC Conpet SA, Transgaz SA National Gas Transport Company, Amuza Daniel – respondents

Ciobanu Viorel – convicted appellant

Subject matter: Appeal in annulment

Clarifications: By the **Conclusion of 06.10.2022**, the Ploieşti Court of Appeal orders the reunification of the case that forms the subject of the file no. 727/42/2022, to the file no. 2339/120/2022.

Procedural status of the case: Appeal in annulment - Appeal

Deadline: 20.03.2025

11. File no. 2276/110/2020 – Bacău Court

Parties: Radu Marian – claimant

Radu Elena - claimant

E ON Romania S.A., Delgaz Grid S.A., Trans gas S.A. Mediaş, Bacău Regional Water Company S.A., Conpet S.A., The General Secretariat of the Government of Romania - Victoria Palace, The Romanian State - Through the Minister of Public Finance - defendants

Subject matter: action in tort liability

Clarifications: By the **Conclusion of 13.07.2022**, the Bacău Court ordered the splitting of the request with the subject matter of obliging the defendants to jointly pay a monthly royalty of 5000 euro and the related tax and orders the creation of a separate file in which the claimants will be considered to prove the joint payment of a judicial stamp duty in the amount of RON 6,527.3, established according to the art. 31 paragraph (4) of the G.E.O. no. 80/2013, under the penalty of canceling the request as unstamped and pursuant to the art. 200. para. (3) of the Code of Civil Procedure, canceled the action for the remaining claims. With the right of re-examination within 15 days of communication for the cancellation solution.

Procedural status of the case: Merits

Deadline:--

12. File no. 2072/110/2022 – Bacău Court

Parties: Radu Marian – claimant

Radu Elena - claimant

E ON Romania S.A., Delgaz Grid S.A., Trans gas S.A. Mediaș, Bacău Regional Water Company S.A., Conpet S.A., The General Secretariat of the Government of Romania - Victoria Palace, The Romanian State - Through the Minister of Public Finance - defendants

Subject matter: Claims. Disjoined file from the file no. 2276/110/2020

Clarifications: By the **Decision no. 959/23.12.2024**, the Bacău Court rejects as unfounded the exception of the failure to stamp the summons. It accepts the exception of the lateness of the amending requests filed after the first trial date. It rejects the amending requests as being late. It rejects as unfounded the exception of the lack of passive procedural quality invoked by the defendants Conpet S.A. and CRAB. It accepts the exception of the authority of res judicata invoked by the defendant CRAB. It rejects the request formulated by the claimants Radu Marian and Radu Elena against SC Bacău Regional Water Company S.A. as being formulated in violation of the authority of res judicata of the Civil Sentence no. 505/30.03.2022 pronounced by the Onești Courthouse in the File no. 5022/270/2020 final. It admits the exception of the statute of limitations for the claims relating to the period 1990-28.09.2017. It rejects as being prescribed the request for summons filed by the claimants Radu Marian and Radu Elena against the defendants SC E ON Energie România S.A., DELGAZ GRID S.A., SC Transgaz S.A. Mediaș, SC Conpet S.A., the General Secretariat of the Government of Romania - Victoria Palace, the Romanian State - through the Ministry of Public Finance - A.J.F.P. Bacău for the period 1990-28.09.2017. It requalifies the exception of the ineligibility of the claim as being substantive defenses. It rejects as unfounded the request for summons filed by the claimants Radu Marian and Radu Elena against the defendants SC E ON Energie România S.A., Delgaz Grid S.A., SC Transgaz S.A. Mediaș, SC Conpet S.A., the General Secretariat of the Government of Romania - Victoria Palace, Romanian State - through the Ministry of Public Finance - A.J.F.P. Bacău. With the right of appeal after communication.

Procedural status of the case: Merits

Deadline: --

13. File no. 11934/212/2022 – Constanța Courthouse

Parties: Conpet SA – defendant

Top Vision SRL – claimant

Matei Nicolae – claimant

Subject matter: Top Vision S.R.L. and Matei Nicolae request the obligation of Conpet SA in the form of compensation for the amount of 13,000 euro, the equivalent in RON from the date of payment, representing damage caused by their own act, respectively for the act caused by the

thing under the defendant's custody, with the obligation the defendant to pay the legal expenses caused by this litigation.

Clarifications: --

Procedural status of the case: Merits

Deadline: 25.04.2025

14. File no. 4372/105/2022 – Prahova Court

Parties: Conpet SA – defendant

Eurosting AAW Industry S.R.L. claimant

Subject matter: Eurosting AAW Industry S.R.L. requests the cancellation of notification no. 14658/29.04.2021 regarding the unilateral termination of the contract for works and design services no. L-CA 252/06.08.2019, the obligation of CONPET to pay Eurosting AAW Industry S.R.L. of the amount of RON 24,395 representing the counter value of the design services related to stage I of the works contract no. L-CA 252 of 06.08.2019. Obliging CONPET to pay legal expenses.

Clarifications: --

Procedural status of the case: Merits

Deadline: 05.06.2025

17. File no. 7035/2/2022 - Bucharest Court of Appeal

Parties: OMV Petrom SA- claimant

N.A.M.R. -defendant

CONPET - defendant

Subject matter: The court is requested that, through the decision that will be pronounced, it orders:

1. Partial annulment of the art. 3 of Addendum no. 2 regarding the tariffs on the domestic subsystem and the import subsystem charged for the transport services provided by Conpet and established by the Order no. 229/2021, within the limit of the amount of tariffs that will be established as legal following the administrative litigation proceedings carried out by the Company regarding the tariffs with N.A.M.R.;
2. Partial annulment of the art. 1 and 4 of Addendum no. 2, 6 and 9, respectively of art. 1 and 3 of Addenda 3, 4, 5, 7 and 8 by which the duration of the Transport Contract was extended for the period 01.01.2022 - 31.08.2022 with the application of the new tariffs approved by the Order 229/2021, within the limit of the amount of the tariffs that will be established as legal following the

administrative litigation proceedings carried out by the Company regarding the tariffs with N.A.M.R. and, as a consequence,

3. The obligation of CONPET to pay to the Company, as compensation as a result of the partial cancellation of the Addenda, but also its illegal act of providing erroneous data that was the basis of the tariff development process by N.A.M.R. based on the Order no. 229/2021 and then upon their payment by the Company based on the Addenda, of the amounts representing: (i) the difference between the amount of the tariffs provided for in the Addendum no. 2 to the transport contract, concluded as a result of the new tariffs adopted by the Order 229/2021, paid by the Company in the period 01.01.2022 – 31.08.2022 as a result of the extension of the contractual period through the Addenda and the amount of the tariffs that will be established as legal in the result of the administrative litigation proceedings carried out by the Company regarding them with N.A.M.R., updated according to the inflation index, as well as the related legal interest calculated from the date of payment of the tariff difference; (ii) the difference between the amount of tariffs paid by the Company for the transport of crude oil, through the DOMESTIC subsystem, from the Midia Terminal, and the amount of the tariffs set proportionally, by reference to the DOMESTIC and IMPORT tariffs depending on the subsystem actually used for the transport of marine crude oil, updated in depending on the inflation index, as well as the related legal interest calculated from the date of payment of the tariff difference, for the following quantities transported from the Midia Terminal and for which the tariff for the DOMESTIC subsystem was illegally calculated and paid: -13,905 tons from the art. 2 letter a) from Addendum no. 4 for March 2022; -13,171 tons from the art. 2 letter a) from Addendum no. 5 for April 2022; 13,307 tons from the art. 2 letter a) from Addendum no. 6 for May 2022; 12,633 tons from the art. 2 letter a) from Addendum no. 7 for June 2022; -12,072 tons from the art. 2 letter a) from Addendum no. 8 for July 2022; -12,900 tons from the art. 2 letter a) from Addendum no. 9 for August 2022; (iii) any other amounts representing natural fruits that Conpet acquired or could have acquired in connection with the amounts illegally charged from the Company based on the tariffs;

4. Obligation to pay legal expenses.

The claimant OMV PETROM filed a request to change the heads of claim no. 2 and 3 of the petition of the introductory action in the sense that, in addition to Addenda no. 2 – 9, the Company understands to challenge through this action the last 4 additional documents on the basis of which transport services were provided by Conpet between September and December 2022 for the benefit of the company, as follows:

- Addendum no. 10/23.08.2022
- Addendum no. 11/22.09.2022

- Addendum no. 12/31.10.2022

- Addendum no. 13/22.11.2022

Therefore, considering the request to modify the preliminary action, the claimant OMV PETROM requests the court to order, through the judgment that will be ruled:

1. Partial annulment of art. 3 of Addendum no. 2 regarding the tariffs on the DOMESTIC subsystem and the IMPORT subsystem charged for the transport services provided by Conpet and established by Order no. 229/2021, within the limit of the amount of tariffs that will be established as legal following the administrative litigation proceedings carried out by the Company regarding the tariffs with N.A.M.R.;

2. Partial annulment of art. 1 and 4 of Addendum no. 2, 6, 9 and 12 respectively of art. 1 and 3 of Addenda 3, 4, 5, 7, 8, 10, 11 and 13 by which the duration of the Transport Contract was extended for the period 01.01.2022 - 31.12.2022 with the application of the new tariffs approved by Order no. 229/2021, within the limit of the amount of the tariffs that will be established as legal following the administrative litigation proceedings carried out by the Company regarding the tariffs with N.A.M.R. and consequently,

3. Obliging Conpet to pay the Company, in the form of compensation as a result of the partial cancellation of Addenda no. 2 -13, but also of her illegal act of providing erroneous data that was the basis of the tariff development process by N.A.M.R. based on the Order no. 229/2021 and then upon their payment by the Company based on the Addenda, of the amounts representing:

(i) the difference between the amount of the tariffs provided for in Addendum no. 2 to the transport contract, concluded as a result of the new tariffs adopted by Order no. 229/2021, paid by the Company in the period 01.01.2022 - 31.12.2022 as a result of the extension of the contractual period through the Addenda and the amount of the tariffs that will be established as legal following the administrative litigation proceedings carried out by the Company regarding them with the N.A.M.R., updated according to the inflation index, as well as the related legal interest calculated from the date of payment of the tariff difference;

(ii) the difference between the amount of the tariffs paid by the Company for the transport of crude oil, through the DOMESTIC subsystem, from the Midia Terminal, and the amount of the tariffs established proportionally, by reference to the tariffs of DOMESTIC and IMPORT according to the subsystem actually used for the transport of marine crude oil, updated in depending on the inflation index, as well as the related legal interest calculated from the date of payment of the tariff difference, for the following quantities transported from the Midia Terminal and for which the tariff for the country subsystem was illegally calculated and paid:

-13,905 tons from art. 2 letter a) from Addendum no. 4 for March 2022;

- 13,171 tons from art. 2 letter a) from Addendum no. 5 for April 2022;
- 13,307 tons from art. 2 letter a) from Addendum no. 6 for May 2022;
- 12,633 tons from art. 2 letter a) from Addendum no. 7 for June 2022;
- 12,072 tons from art. 2 letter a) from Addendum no. 8 for July 2022;
- 12,900 tons from art. 2 letter a) from Addendum no. 9 for August 2022;
- 12,213 tons from art. 2 letter a) from Addendum no. 10 for September 2022;
- 12,411 tons from art. 2 letter a) from Addendum no. 11 for October 2022;
- 11,836 tons from art. 2 letter a) from Addendum no. 12 for November 2022;
- 12,048 tons from art. 2 letter a) from Addendum no. 13 for December 2022.

(iii) any other amounts representing natural fruits that Conpet acquired or could have acquired in connection with the amounts illegally charged from the Company based on the tariffs;

4. Obligation to pay legal expenses.

Clarifications: By the **Decision dated 24.05.2023**, the Bucharest Court of Appeal rejects the claimant's request for forfeiture to submit the request to amend claims 2 and 3 of the summons as unfounded. Based on art. 413 paragraph 1 point 1 of the Code of Civil Procedure, it orders the suspension of the trial of the case until the final resolution of the case that is the subject of file no. 5971/2/2022 of the Bucharest Court of Appeal, Section IX of Administrative and Fiscal Litigation. With the right of appeal for the duration of the suspension.

Procedural status of the case: Merits - Suspended

Deadline: --

16. File no. 5074/105/2022 - Prahova Court

Parties: CONPET SA - defendant

Ionescu Aurel - claimant

Subject matter: Declaratory action. Ionescu Aurel filed a summons request in which he requested the following from the court:

- To state that in the period 01.04.1992 - 01.04.2001 the claimant was employed and that he actually worked 100% of the work schedule within the sections included in the I work group, in accordance with the Order 50/1990, the Order 100/1990 and of the Order 125/1990;
- Subsidiarily, in the situation where the first head of the claim will be accepted, he requested the court to establish the placement in the I work group and in the period 01.04.2001 - 15.06.2021, the claimant remaining in the same position and under the same working conditions;
- Obliging CONPET to draw up and issue a certificate attesting that the activity provided by the claimant falls under the I work group and the percentage in which he carried out his activity.

- Obliging CONPET to pay the legal expenses caused by this claim.

Clarifications: By the **Sentence no. 698/11.06.2024**, the Prahova Court rejects the action as unfounded. With the right of appeal after communication.

Procedural status of the case: Merits

Deadline: --

17. File no. 3845/204/2023 – Câmpina Courthouse

Parties: CONPET S.A. - respondent

Dobrogeanu Dumitru - appellant

Subject matter: Appeal against enforcement. Dobrogeanu Dumitru filed a foreclosure appeal against the foreclosure started at the request of the creditor Conpet S.A. and the Petcu Alexandru Bailiff's Office based on the Conclusion no. 509/2022 issued today on 19.04.2023, given without citing the parties and requests:

- Cancellation of the Conclusion no. 509/2022 issued today 19.04.2023 by the Petcu Alexandru Bailiff's Office for payment of a debit in the amount of RON 1,022.70, representing the calculation of the related inflation rate for the period 19.01.2022 - 09.12.2022 for the main debit of RON 6,966.65.
- The cancellation of all expenses that the bailiff established.
- The cancellation of the garnishment notice issued on 19.04.2023 and received at my residence in Băicoi on 24.04.2023.
- Return of enforcement for the amount of RON 576.
- Legal expenses.

Clarifications: --

Procedural status of the case: Merits

Deadline: 23.04.2025

18. File no. 590/42/2022 – Ploiesti Court of Appeal

Parties: CONPET S.A. - respondent

Vasile Valentin – convicted appellant

Gruia Gheorghe, Ciobanu Viorel, Dudaş Pavel, Tudorache Marius, Pârvu Valentin, Georgescu Anda, Manda Marin, OMV Petrom S.A., Amuza Daniel, National Gas Transport Society Transgaz S.A. - respondent

Subject matter: Formation of an organized criminal group (art. 367 NCP)

Procedural status of the case: Appeal

Clarifications: By the **Conclusion of 04.05.2023**, the Ploiești Court of Appeal puts the file back on pending for the Romanian Constitutional Court to rule on the constitutional challenge of the provisions of art. 426 letter b) of the Code of Civil Procedure, in the interpretation given by the High Court of Cassation and Justice-Complete for resolving some legal issues, by the Decision no. 67/25.10.2022, in the sense that "the court that resolves the annulment appeal, based on the effects of the decisions of the Constitutional Court no. 297 of April 26, 2018 and no. 358 of May 26, 2022, cannot reanalyze the prescription of criminal liability, if the appeals court debated and analyzed the incidence of this cause of termination of the criminal process during the process prior to this last decision".

Deadline: Ruling postponed to 06.05.2025

19. File no. 4829/121/2022 – Galati Court

Parties: CONPET S.A. - respondent

Diaconu Sorin Daniel – appellant

Subject matter: Appeal against the Sanctioning Decision no. 785/06.12.2022 – disciplinary termination of the individual employment contract no. 74/24.05.1993

Clarifications: By the **Sentence no. 505/05.06.2024**, the Galați Court rejects the appeal as unfounded. With appeal after communication.

Procedural status of the case: Merits

Deadline: --

20. File no. 4988/2/2023 - Bucharest Court of Appeal

Parties: CONPET – defendant

N.A.M.R. -defendant

OMV Petrom SA- claimant

Subject matter: The court is requested that, through the decision that will be pronounced, it orders:

1. The partial annulment of art. 1 and art. 3 of the Addenda no. 10, no. 11 and no. 13, respectively of art. 1 and 4 of the Addendum no. 12, by which the duration of the transport contract was extended for the period 01.09.2022 - 31.12.2022 with the application of the new tariffs approved by the Order 229/2021, within the limit of the amount of the tariffs that will be established as legal following the administrative litigation proceedings carried out by the Company regarding tariffs with N.A.M.R. and, as a consequence,

2. Obliging CONPET to pay the Company, by way of compensation as a result of the partial cancellation of the Addenda no. 10-13, but also of its illegal act of providing erroneous data that formed the basis of the tariff development process by N.A.M.R. based on the Order no. 229/2021 and then upon their payment by the Company based on the Addenda, of the amounts representing:

i. the difference between the amount of the tariffs provided for in the Addendum no. 2 to the transport contract, concluded as a result of the new tariffs adopted by the Order 229/2021, paid by the Company in the period 01.09.2022 - 31.12.2022, as a result of the extension of the contractual period by the Addenda no. 10-13 and the amount of the tariffs that will be established as legal following the administrative litigation proceedings carried out by the Company regarding them with N.A.M.R., updated according to the inflation index, as well as the related legal interest calculated from the date of payment of the tariff difference;

ii. the difference between the amount of tariffs paid by the Company for the transport of crude oil, through the domestic subsystem, from the Midia Terminal, and the amount of the tariffs established proportionally, by reference to the domestic and import tariffs according to the subsystem actually used for the transport of marine crude oil, updated according to the index of inflation, as well as the related legal interest calculated from the date of payment of the tariff difference, for the following quantities transported from the Midia Terminal and for which the tariff for the country subsystem was illegally calculated and paid;

-12,213 tons from art. 2 letter a) from the Addendum no. 10 for September 2022;

-12,411 tons from art. 2 letter a) from the Addendum no. 11 for October 2022;

-11,836 tons from art. 2 letter a) from the Addendum no. 12 for November 2022;

-12,048 tons from art. 2 letter a) from the Addendum no. 13 for December 2022.

iii. any other amounts representing natural fruits that Conpet acquired or could have acquired in connection with the amounts illegally charged from the Company based on the tariffs;

3. Ordering the defendants to pay legal expenses.

Clarifications: By the **Conclusion of 15.11.2023**, the Bucharest Court of Appeal ordered the suspension of the trial of this case until the final resolution of the case which is the subject matter of the file no. 7035/2/2022 of the Bucharest Court of Appeal. With the right of appeal for the entire duration of the suspension, which is submitted to the Bucharest Court of Appeal.

Procedural status of the case: Merits - Suspended

Deadline: --

21. File no. 5559/2/2023 - Bucharest Court of Appeal

Parties: CONPET - defendant

N.A.M.R. -defendant

OMV Petrom SA-claimant

Subject matter: The court is requested that, by the judgment that will be pronounced, it orders:

1. The partial annulment of art. 1 of the Order no. 364/2022 regarding the tariffs established in Annex 1 and Annex 3 and, accordingly, Annexes 1 and 3 of the Order no. 364/2022, regarding the tariffs for the DOMESTIC subsystem and the IMPORT subsystem, within the limit of the amount of tariffs that will be established as legal as a result of their recalculation in a transparent and non-discriminatory manner, in accordance with the constitutional provisions and those of the legislation primary and secondary oil and competition, as they are exposed through the present summons;

2. Ordering the defendants to pay legal expenses.

Clarifications: By the **Decision of 18.04.2024**, the Bucharest Court of Appeal rejects the connectedness challenge, as unfounded. It suspends the trial of the case until the final resolution of the file pending before the Bucharest Court of Appeal, Division IX of Administrative and Fiscal Litigation under no. 5971/2/2022. With appeal during the suspension.

Procedural status of the case: Merits - suspended

Deadline: --

22. File no. 19571/233/2023 – Galati Court

Parties: Conpet SA – respondent

Drăgan Gheorghe – appellant

Subject matter: Appeal against enforcement. Drăgan Gheorghe filed an appeal requesting the court:

1. To find that the right to request foreclosure based on the enforceable title has been prescribed – the Criminal sentence no. 212/29.11.2013 pronounced in the file no. 2037/116/2013 of the Calarasi Court approved by the Decision no. 480/1/03.12.2015, based on art. 706 of 1 of the Code of Civil Procedure and by way of consequence, to order the cancellation of the foreclosure and of all the execution acts carried out in the execution file no. 480/VVI/2015 registered on behalf of B.E.J.A. Tudorie Stefan&Vicentiu Vasiliu, pursuant to art. 703 of the Code of Civil Procedure.
2. To find that the foreclosure started in the execution file no. 480/VVI/2015 registered on behalf of B.E.J.A. Tudorie Stefan&Vicentiu Vasiliu is obsolete.
3. Obligation of the creditor Conpet S.A. to the payment of the legal expenses caused by this litigation

Clarifications: By the **Decision no. 414/26.06.2024**, the Galați Courthouse admits, in part, the exception of lateness invoked in the response. It rejects the enforcement appeal as late for the reasons regarding the limitation of the creditor's right to request foreclosure and the limitation of foreclosure. It rejects, in the remainder, the exception of lateness as unfounded. It rejects, in the remainder, the enforcement appeal as unfounded. It obliges the appellant to pay the amount of RON 264 to B.E.J. Vicențiu Vasiliu Corneliu, representing the equivalent value of the copy of the enforcement file no. 480/2015.

The appellant Drăgan Gheorghe filed an appeal.

Procedural status of the case: Appeal

Deadline: --

23. File no. 22795/281/2023 – Ploiesti Court

Parties: Conpet SA – defendant

Andex Import Export – claimant

Subject matter: The claimant Andex Import Export S.R.L. filed an application for damages with the defendant Conpet S.A., requesting the court that, by the judgment it will pronounce, order the defendant to pay the claimant the amount of RON 22,704.89 with legal expenses occurred in this file.

Clarifications: By the **Conclusion of 27.11.2023**, the Ploiesti Courthouse cancels the summons request. Andex Import Export filed a request for re-examination, which was the subject matter of the file no. 22795/281/2023/a1 pending before the Ploiești Courthouse.

By the **Conclusion no. 118/18.01.2024** pronounced in the file no. 22795/281/2023/a1 the Ploiești Courthouse admits the request made by the claimant Andex Import Export S.R.L.. It rectifies the decision of cancellation of the request ordered by the Conclusion of 27.11.2023, pronounced in the file no. 22795/281/2023 and orders the submission of the file to the initially invested panel with the resolution of the application.

By the Sentence no. **6865/04.07.2024**, the Ploiești Courthouse rejects the plea of res judicata invoked by the defendant in the response, as unfounded. It admits the request for summons. It obliges the defendant to pay the claimant the amount of RON 22,704.89, as an unpaid payment. Conpet S.A. filed an appeal.

Procedural status of the case: Appeal

Deadline: 18.09.2025

24. File no. 8213/2/2023 - Bucharest Court of Appeal

Parties: CONPET - defendant

N.A.M.R. -defendant

OMV Petrom SA-claimant

Subject matter: The court is requested that, by the judgment that will be pronounced, it orders:

1. The partial annulment of art. 1 and art. 3 of the Addendum no. 14, of art. 1 and 4 of the Addenda no. 15, no. 16, no. 17, respectively of art. 1 and 5 of the Addendum no. 18 by which the duration of the Transport Contract was successively extended for the period 01.01.2023 - 31.12.2023, with the application of the new tariffs mentioned in the Notification no. 811/06, 01.2023 sent by Conpet regarding the change in transport tariffs through the National System for the Transport of Crude Oil, Rich Gas, Condensate and Ethane ("SNT") starting from January 1, 2023, based on the Order 364/2022 (Annex 4), within the limit of the amount of the tariffs that will be established as legal as a result of the administration of evidence from this case;

2. The partial annulment of art. 2 of the Addenda no. 14-18 in the sense of:

i. the elimination of the quantities of 5-417 tons mentioned in the content of art. 2 letter a) from the Addendum no. 14 for the period January 1-15, 2023 that were transported from the Midia Terminal from the quantities transported through the domestic subsystem and the inclusion of the first quantities in those in point b) of the same article regarding the quantities transported through the import subsystem;

ii. the elimination of the quantities of 15,061 tons from art. 2 letter a) from the Addendum no. 15 for the period January 16 - February 28, 2023 transported from the Midia Terminal from the quantities transported through the domestic subsystem and the inclusion of the first quantities in those in point b) of the same article regarding the quantities transported through the import subsystem;

iii. the elimination of the quantities of 40,859 tons from art. 2 letter a) from the Addendum no. 16 for the period March 1 - June 30, 2023 transported from the Midia Terminal from the quantities transported through the domestic subsystem and the inclusion of the first quantities in those in point b) of the same article regarding the quantities transported through the import subsystem;

iv. the elimination of the quantities of 28,811 tons mentioned in the content of art. 2 letter a) from the Addendum no. 17 for the period July 1 - September 30, 2023 transported from the Midia Terminal from the quantities transported through the domestic subsystem and the inclusion of the first quantities in those in point b) of the same article regarding the quantities transported through the import subsystem;

v. the elimination of the quantities of 28,898 tons mentioned in the content of art. 2 letter a) from the Addendum no. 18 for the period October 1 - December 31, 2023 transported from the Midia

Terminal from the quantities transported through the domestic subsystem and the inclusion of the first quantities in those in point b) of the same article regarding the quantities transported through the import subsystem;

3. Obliging Conpet to pay the Company, in the form of compensation - as a result of the partial cancellation of the Addenda, but also of its illegal act of providing erroneous data that was the basis of the tariff development process by N.A.M.R. based on the Order no. 364/2022 and then upon their payment by the Company based on the Addenda, of the amounts representing:

i. the difference between the amount of the tariffs provided for in the Additional Acts no. 14 -18 to the Transport Contract concluded as a result of the new tariffs adopted by the Order no. 364/2022, paid by the Company in the period 01.01.2023 - 31.12.2023 and the amount of tariffs that will be established as legal following the administrative litigation proceedings carried out by the Company regarding them with N.A.M.R., updated according to the inflation index, as and the related legal interest calculated from the date of payment of the tariff difference;

ii. the difference between the amount of tariffs paid by the Company for the transport of crude oil, through the country subsystem, from the Midia Terminal, and the amount of the tariffs set proportionally, by reference to the domestic and import tariffs according to the subsystem actually used for the transport of marine crude oil, updated according to the index of inflation, as well as the related legal interest calculated from the date of payment of the tariff difference, for the following quantities transported from the Midia Terminal and for which the tariff for the domestic subsystem was illegally calculated and paid:

- 5417 tons from art. 2 letter a) from the Addendum no. 14 for the period January 1 - 15, 2023;
- 15,061 tons from art. 2 letter a) from the Addendum no. 15 for the period January 16- February 28, 2023;

- 40,859 tons from art. 2 letter a) from the Addendum no. 16 for the period March 1 - June 30, 2023;

- 28,811 tons from art. 2 letter a) from the Addendum no. 17 for the period July 1 - September 30, 2023;

- 28,898 tons from art. 2 letter a) from the Addendum no. 18 for the period October 1-December 31, 2023;

iii. any other amounts representing natural fruits that Conpet acquired or could have acquired in connection with the amounts illegally charged from the Company based on the tariffs;

4. Ordering the defendants to pay legal expenses.

Clarifications: By the **decision no. 775/26.04.2024**, it admits the motion to dismiss for lack of jurisdiction. It declines the jurisdiction to resolve the case in favor of the Bucharest Court of Appeal, Administrative and Fiscal Litigation Division.

By the **Decision no. 6402/01.10.2024**, the Bucharest Court of Appeal admits the motion to dismiss for lack of jurisdiction. It declines the jurisdiction to resolve the application in favor of the Bucharest Court of Appeal – Division VIII, Administrative and Fiscal Litigation. It finds that a negative conflict of jurisdiction has arisen. It forwards the file to the High Court of Cassation and Justice for the resolution of the negative conflict of jurisdiction.

By the **Decision no. 5860/06.12.2024**, the HCCJ establishes the jurisdiction to resolve the case concerning the claimant OMV Petrom S.A. and the defendants Conpet S.A., the National Regulatory Authority for Mining, Petroleum and Geological Storage of Carbon Dioxide and the National Agency for Mineral Resources in favor of the Bucharest Court of Appeal.

By the **Conclusion of 11.03.2025**, the Bucharest Court of Appeal suspends the trial of the case until the final resolution of file no. 5559/2/2023 of the Bucharest Court of Appeal.

Procedural status of the case: Merits - Suspended

Deadline: --

25. File no. 23148/302/2023 – Bucharest Court

Parties: Conpet S.A. – creditor

Simion Constantin – debtor

Revolut UAB Vilnius Bucharest Branch –third party garnishee

Subject matter: Validation of garnishment

Clarifications: By the **Sentence no. 6639/10.07.2024**, the Bucharest District 6 Courthouse admits the request for validation of the garnishment. It validates the garnishment established by the address dated 27.07.2023 by the Bailiff's Office Raduta Nicoleta in the foreclosure file no. 208/2015. It obliges the third party garnishee Revolut Bank UAB Vilnius - Bucharest branch to pay the creditor Conpet S.A. the amounts due to the debtor starting with the date of communication of the address establishing the garnishment, as well as those due thereafter, monthly, on the due date, within the limits provided for by art. 729 of the Code for Civil Procedure, up to the amount of RON 55997.82. It rejects as unfounded the debtor's request to oblige the creditor to pay the legal expenses.

Revolut UAB Vilnius Bucharest Branch has filed an appeal.

Procedural status of the case: Appeal

Deadline: 19.03.2025

26. File no. 1065/105/2024 – Prahova Court

Parties: Conpet S.A. – respondent

Dudu Florentin – appellant

Subject matter: Dudu Florentin files an appeal against the sanctioning decision no. 85/07.02.2024 by which he was sanctioned with a reduction in his basic salary for a period of 2 months by 10%. The claimant requests the admission of the appeal and the annulment of the sanctioning decision no. 85/07.02.2024, the obligation of the defendant to pay the full amount withheld based on the decision and legal expenses representing the attorney's fees.

Procedural status of the case: Merits

Clarifications: --

Deadline: 18.03.2025

27. File no. 2715/109/2024 – Argeş Court

Parties: Conpet S.A. – defendant

Dincă Ioan – claimant

Subject matter: Dincă Ioan files an appeal against the measure of termination of the individual employment contract ordered by the Dismissal Decision no. 140/01.03.2024 and requests the court to:

I. Admit the appeal filed against the Dismissal Decision for reasons not attributable to the employee and, consequently:

1. Annul the Decision for reasons of illegality
2. Annul the Decision for reasons of unfoundedness

II. Reinstatement to the previous situation and, consequently, reinstatement to the position held prior to the issuance of the decision

III. In all the previously mentioned cases, order Conpet to pay compensation equal to the indexed, increased and updated salaries and the other rights that he would have benefited from the moment of dismissal until the effective reinstatement

IV. Order Conpet S.A. to pay the legal expenses consisting of attorney's fees.

Clarifications: By the **Sentence no. 854/11.03.2025**, the Argeş Court rejects the appeal. With the right to appeal within 10 days from communication.

Procedural status of the case: Merits

Deadline: --

28. File no. 5071/2/2024 - Bucharest Court of Appeal

Parties: OMV Petrom S.A.-claimant

National Regulatory Agency for Mining, Petroleum and Geological Storage of Carbon Dioxide-
A.N.R.M.P.S.G. (formerly N.A.M.R.) -defendant

Conpet S.A.-defendant

Subject matter: The court is requested to order by the decision to be issued:

1. Partial annulment of art. 1 of Order no. 340/2023 regarding the tariffs established in Annex 1 and Annex 3 and, accordingly, of Annexes 1 and 3 of Order no. 340/2023, regarding the tariffs for the Country subsystem and the Import subsystem, within the limit of the amount of the tariffs that will be established as legal as a result of their recalculation in a transparent and non-discriminatory manner, in accordance with the constitutional provisions and those of the primary and secondary petroleum and competition legislation, as they are set out in this application for summons;
2. Ordering the defendants to pay the legal expenses.

Clarifications: By the **Decision of 29.11.2024**, the Bucharest Court of Appeal suspends the trial of the case until the final resolution of file no. 5971/2/2022 pending before the Bucharest Court of Appeal. With the right of appeal for the entire period of suspension.

Procedural status of the case: Merits

Deadline: --

29. File no. 22451/212/2024 - Constanța Courthouse

Parties: Conpet – respondent

Polifroni Dimu – appellant

The Bailiff's Office Menaef Cristian – respondent

Constanța County Pension Fund – respondent

Subject matter: Polifroni Dimu filed an appeal against the enforcement requesting the annulment of the enforcement acts carried out by The Bailiff's Office Menaef Cristian in the enforcement file no. 52/2019 regarding the Civil Sentence no. 44/13.01.2017 pronounced by the Constanța Courthouse, Criminal Division in the file no. 15042/212/2015 modified and made final by the Criminal Decision no. 368/P/23.03.2018 pronounced in the same case by the Constanța Court of Appeal, Criminal Division and for criminal cases involving minors and family matters.

Clarifications: --

Procedural status of the case: Merits

Deadline: Ruling postponed to 20.03.2025

30. File no. 4936/95/2024 - Gorj Court

Parties: Conpet S.A. – defendant

Pencea Dorina – claimant

Subject matter: Pencea Dorina requested through the court that Conpet be obliged to issue a certificate showing the gross salaries obtained during the period in which she was employed, the bonuses of any nature obtained, the indemnities, all salary rights, the overtime worked, with the express mention whether the C.A.S. was calculated, withheld and transferred to the value of the gross salaries, as they were mentioned in the payroll or to the entire payroll fund.

Clarifications: --

Procedural status of the case: Merits

Deadline: 18.09.2025

31. File no. 5714/118/2024/a1 - Constanța Court

Parties: Conpet – respondent

COMTEH S.R.L. – respondent debtor

Subject matter: Conpet filed a response to the appeal filed by the appellant COMTEH S.R.L. formulated on the Preliminary List of Creditors against the assets of the debtor COMTEH S.R.L., published in the Bulletin of Insolvency Proceedings, Legal Persons Section no. 20379 dated 14.11.2024, through which the debtor requests the removal from the list of the unsecured debt of RON 11,132.43, held by Conpet S.A. and registered on the list of creditors, representing late payment penalties arising from the late execution of the intervention obligation established in art. 4.3 of the contract concluded with it no. S-CA133/20.04.2020.

Conpet S.A. requests the rejection of the appeal filed by the appellant COMTEH S.R.L. as unfounded and ungrounded, the maintenance in the preliminary list of creditors against the assets of the debtor COMTEH S.R.L. of the unsecured debt of RON 11,132.43, held by Conpet S.A., representing late payment penalties calculated according to the contract concluded with the debtor no. S-CA133/20.04.2020, entered on the list by the judicial administrator *"under suspensive condition until the presentation of the tax invoice for accessories and until the presentation of proof of execution/non-execution of the good execution guarantee"*.

Clarifications: --

Procedural status of the case: Merits

Deadline: 16.04.2025

32. File no. 8081/2/2024 - Bucharest Court of Appeal

Parties: OMV Petrom S.A. -claimant

CONPET S.A. -Defendant

National Regulatory Agency for Mining, Petroleum and Geological Storage of Carbon Dioxide-A.N.R.M.P.S.G. (formerly N.A.M.R.) -Defendant

Subject matter: Request for summons against Addendum no. 19 of 22.12.2023 and Addendum no. 20 of 19.03.2024 to the Contract for the transport of crude oil, rich gas and condensate no. BC OMV 108/25.03.2020 concluded between OMV Petrom S.A. and Conpet S.A..

The court is requested to order, by the decision to be rendered:

1. Partial annulment of art. 3 of Addendum no. 19, as well as art. 1 and 4 of Addendum no. 20, by which the duration of the Transport Contract was extended monthly, successively, for the periods 01.01.2024 - 31.03.2024 and, respectively, for 01.04.2024 - 30.06.2024, regarding the tariffs established by N.A.M.R. Order no. 340/2023 regarding the approval of transport tariffs through the National Transport System for crude oil, rich gas, condensate and ethane ("Order 340/2023", Annex 3), within the limit of the amount of the tariffs that will be established as legal, as a result of the administration of the evidence in this case;

2. Partial annulment of art. 2 of Addenda no. 19-20, in the sense of:

(i) the elimination of the quantities of 28,163 tons, mentioned in art. 2 letter a) of Addendum no. 19, for the period 01.01.2024 — 31.03.2024, transported from the Midia Terminal from the quantities transported through the Domestic subsystem and the inclusion of the former quantities in those in point b) of the same article relating to the quantities transported through the Import subsystem;

(ii) the elimination of the quantities of 23,881 tons, mentioned in art. 2 letter a) of Addendum no. 20, for the period 01.04.2024 - 30.06.2024, transported from the Midia Terminal from the quantities transported through the Domestic subsystem and the inclusion of the first quantities in those in point b) of the same article relating to the quantities transported through the Import subsystem,

3. Obliging Conpet to pay to the Company, as compensation as a result of the partial annulment of the Addenda, but also of its unlawful act of providing erroneous data that formed the basis of the tariff development process by N.A.M.R. based on the Order no. 340/2023 and then upon their payment by the Company based on the Addenda, the amounts representing:

(i) the difference between the amount of the tariffs provided for in Addenda no. 19 -20 to the Transport Contract concluded as a result of the new tariffs adopted by the Order no. 340/2023, paid by the Company during the period 01.01.2024 — 30.06.2024 and the amount of the tariffs that will be established as legal following the administrative litigation proceedings carried out by

the Company regarding them with N.A.M.R., updated according to the inflation index, as well as the related legal interest calculated from the date of payment of the tariff difference;

(ii) the difference between the amount of tariffs paid by the Company for the transport of crude oil, through the Domestic subsystem, from the Midia Terminal, and the amount of tariffs established proportionally, by reference to the Domestic and Import tariffs depending on the subsystem actually used for the transport of marine crude oil, updated according to the inflation index, as well as the related legal interest calculated from the date of payment of the tariff difference, for the following quantities transported from the Midia Terminal and for which the tariff for the Country subsystem was illegally calculated and paid:

- 28,163 tons from art. 2 letter a) of Addendum no. 19 for the period 01.01.2024 - 31.03.2024;

- 23,881 tons from art. 2 letter a) of Addendum no. 20 for the period 01.04.2024 - 30.06.2024;

(iii) any other amounts representing civil fruits that Conpet has acquired or could have acquired in connection with the amounts illegally collected from the Company based on the tariffs;

4. Ordering the defendants to pay the legal expenses.

Clarifications: --

Procedural status of the case: Merits

Deadline: --

c) The list of files pending before Courts on 14.03.2025 in which the company CONPET S.A. has double status

1. File no. 2323/120/2018* – Ploiesti Court of Appeal

Parties: Conpet SA - defendant - counterclaimant

Buzatu Florin - claimant - defendant

Subject matter: Buzatu Florin files a request for a summons requesting the court:

1. To oblige the defendant Conpet S.A. to pay the claimant the amount of EUR 150,000, payable at the N.B.R. exchange rate on the day of payment (amount to be revalued on completion of the real estate assessment expertise report to be carried out in the probation case, to be resized and specified the value of the claims, corroborated with the appropriate adjustment of stamp duties), representing fair and equitable compensation for the damage suffered by restricting the possibility of exercising its property right over the land area of 5980 sq. m. located in the built-up area of Slobozia Moară locality, Dâmbovița county, with cadastral number 70618, registered in the land book 70618 / ATU Slobozia Moară Dâmbovița county, on which are the underground gas

pipelines and above-ground devices owned by the defendant, a land which cannot be used for building;

2. To oblige the defendant Conpet SA to pay a monthly indemnity of EUR 1,000 payable at the N.B.R. exchange rate on the day of payment, starting with the date of the sentence, throughout the existence of underground pipelines and above-ground devices, buildings on the land owned by the claimant and to bear all the costs incurred by the claimant for the stages prior to the construction permit;

3. In the alternative, claims that the defendant should remove all the buildings built on the claimant's property, namely the gas pipelines and the above-ground devices, to restore the land to its original condition or to enable the claimant to carry out the obligation to do so, at the defendant's sole expense;

4. To order the defendant Conpet S.A. to pay the legal expenses incurred in the present legal proceedings.

Conpet filed a counterclaim requesting the obligation of the claimants to allow our company to exercise the right of legal easement established by the provisions of art. 7 et seq. of Law no. 238/2004 and the establishment of the amount of the annual rent provided by law due by Conpet to the claimants in exchange for exercising the right of legal easement.

Clarifications: By the **Decision 602/10.03.2022** The Dâmbovița Court rejects the exception of the lack of passive procedural capacity of the defendant-claimant Conpet S.A. as regards the claims for compensation and indemnity raised by it. It admits the claimant Conpet S.A.'s lack of passive procedural capacity. As regards the head of claim concerning the obligation to raise the above-ground pipes and devices and to restore the land to its original condition or to empower the applicant to do so, invoked by it and consequently rejects that head of claim in contradiction with the defendant-claimant Conpet S.A. as being formulated against a person without passive procedural capacity. It admits in part the summons. It admits in part the counterclaim. It obliges the defendant claimant to demolish the construction without authorization (foundation) existing on the land belonging to him, with no. cadastral 70618, registered in the land book no. 70618 of the Slobozia Moară ATU, Dâmbovița county, identified according to the sketch drawn up in the expertise report in the topography specialty dated 04.11.2019 (f. 300 vol. I). It establishes the amount of the annual rent due by the claimant defendant to the defendant claimant for exercising the right of legal easement on the land with an area of 890 sq m related to crude oil pipelines Ø 143/4 and Ø 123/4, identified according to the sketch prepared in the expertise report of 02.11.2019 (f. 357 vol. I), at the amount of RON 284.8 and obliges the claimant defendant to pay it to the defendant claimant starting with the date of the finality of the present sentence. It

dismisses the remainder of the action and the counterclaim. It rejects the request to show the right holder formulated by the claimant defendant in contradiction with the Romanian State, through the Ministry of Public Finance and the National Agency for Mineral Resources. It orders the refund to the claimant defendant of the stamp duty paid and not owed in the amount of RON 1,143.4. It compensates the expenses up to the amount of RON 1,172.7 and obliges the defendant claimant to pay to the claimant defendant the uncompensated difference of RON 836 legal expenses.

Buzatu Florin filed an appeal.

By the **Decision no. 482/09.03.2023** The Ploiesti Court of Appeal rejects the appeal as unfounded.

Buzatu Florin filed an appeal.

By the **Decision of 11.04.2024**, the High Court of Cassation and Justice rejects the exception of the nullity of the appeal, invoked by the respondent-intervening National Agency for Mineral Resources. It admits, in principle, the appeal filed by the appellant-claimant Buzatu Florin.

By the **Decision of 28.05.2024**, the High Court of Cassation and Justice admits the appeal filed by the appellant-claimant Buzatu Florin. It quashes the contested decision and sends the case for a new trial, to the same appellate court.

By the **Decision no. 106/30.01.2025**, the Ploiești Court of Appeal admits the appeal. It partially changes the appealed sentence in the sense that: it establishes the amount of the annual rent owed by the defendant-claimant to the defendant-claimant for the exercise of the right of legal easement over the land with an area of 5,696 sq.m. in the amount of RON 1,217.2 and obliges the defendant claimant to pay it to the defendant claimant starting from the date of the finality of the present sentence; compensates the legal expenses within the limit of the amount of RON 2,008.7 and obliges the defendant claimant to pay the uncompensated difference of RON 2,088.79 as legal expenses to the defendant claimant. It maintains the rest of the provisions of the appealed sentence. It obliges the respondent to pay the legal expenses in the amount of RON 3,615.09 (RON 45.09 judicial stamp duty and RON 3,570 defense fee). With appeal after communication.

Procedural status of the case: Appeal – retrial

Deadline: --

2. File no. 1657/91/2020* - Vrancea Court

Parties: Vasile Maria Ilaria - at S.C.P.A. Buruian, Caracaș and Associates - Claimant

Dragu Georgeta - the S.C.P.A. Buruian, Caracaș and Associates - Claimant

Conpet SA Ploiești - Defendant

Romanian State - through the Ministry of Public Finance - Defendant

National Agency for Mineral Resources - Defendant

Subject matter: By their summons, the claimants Vasile Maria-Ilaria and Dragu Georgeta requested to the court (we copy the petition for the summons) to:

A. In particular, order the defendant to pay an annual rent of EUR 496.64 for the protection area of the pipeline belonging to the defendant and which crosses the building privately owned by the undersigned, as of the date of registration of this summons;

B. In particular, order the defendant to pay a lump sum of EUR 508,080 in respect of the attribution of the use of the property according to its intended purpose, namely that the undersigned may not build buildings on the privately owned building;

C. In particular, order the defendant to pay legal interest on the annual rent provided for in point A, from the date of registration of the present summons;

D. In particular, order the defendant to pay legal interest for the lump sum compensation provided for in point B, from the date of registration of the present summons;

E. In the alternative, we request you to order the other two defendants to pay the amounts indicated in the preceding paragraphs."

Conpet filed a counterclaim in this case, requesting the court:

1. *To order the claimants Vasile Maria - Ilaria, Dragu Georgeta and Dragu Maria to allow CONPET S.A. the exercise of the right of legal easement established by the provisions of art. 7 et seq. of Law no. 238/2004 on the land owned by them, located in Focșani city, Vrancea County. The exercise of the right of legal easement is to be done on a 2.4 meter wide corridor located along the crude oil transport pipeline Ø 20" Bărăganu - Borzești / Rafo Onești, for the purpose of permanent access to the pipeline in order to daily check the condition of the pipeline and the execution of accidental and planned repair works. The exercise of the right of easement is to be carried out throughout the existence of the pipeline located on the claimants' land but not later than the date of termination of the oil concession agreement concluded by us, the undersigned CONPET S.A., with the Romanian State.*

2. *To establish the amount of the annual rent provided by law due by us, the undersigned CONPET SA, to the claimants Vasile Maria - Ilaria, Dragu Georgeta and Dragu Maria in exchange for exercising the right of legal easement, rent consisting in the equivalent value of the annual land use affected by the exercise of the legal easement.*

Clarifications: --

Procedural status of the case: Merits

Deadline: 20.05.2025

3. File no. 32294/299/2020 - Bucharest District 1 Courthouse

Parties: Conpet SA - defendant - counterclaimant

Bob Mihăiță - claimant-defendant

N.A.M.R. - defendant

Subject matter: Bob Mihăiță files a summons requesting the court to order:

1. The obligation of Conpet SA and N.A.M.R. to move the crude oil pipeline crossing the land owned by the claimant located in Cernavoda, plot 1, plot A6 / 2, Constanța county;
2. The establishing the equivalent value of the lack of use, for a period of three years, prior to the formulation of the summons, amounting to RON 150,000;
3. In the alternative, the obligation of Conpet SA to pay an annual rent for the use of the land owned by the claimant, from the date of filing the summons, in the amount of EUR 5/sq. m./year for the area of 14,645 sq. m., land affected by the protection and safety area, during the existence of legal easement;
4. The payment of legal expenses.

By the request for clarification of the summons, the claimant stated the following:

- „.....
3. *For the method of calculating the amount of RON 150,000, I indicated the value of a rent, estimated at RON 4,166 /month, for a period of three years prior to the formulation of the summons, which the defendants in the present case should pay as compensation for the damage suffered as a result of the impossibility of capitalizing the land crossed by their pipelines*
 4. *We request, in the alternative, that the defendant SC Conpet SA be obliged to pay an annual rent for the use of the land personally owned by the undersigned, from the date of filing the summons, during the existence of the legal easement, until the lifting of the pipelines on the land of the undersigned.*
 5. *The value of the 3rd head of the claim is RON 10,000, estimated value, following that, after performing the report of forensic technical expertise, the real estate assessment specialty, performed in question to stamp according to the value of the land related to the protection and safety area of the construction.*
 6. *I request that the court oblige the defendant Conpet SA to pay all the compensations requested in the summons, and the defendant the National Agency for Mineral Resources to be obliged to move / decommission the oil pipelines on the land owned by the undersigned.*

..... “

Conpet filed a counterclaim seeking the following from the court:

1. To order the claimant to allow Conpet S.A. the exercise of the right of legal easement established by the provisions of art. 7 et seq. of Law no. 238/2004 on the land owned by the claimant Bob Mihăiță located in Cernavoda, plot 1, plot A6 / 2, Constanța County. The exercise of the right of legal easement is to be carried out on a 2.4 meter wide corridor located along each of the main crude oil transport pipelines that under-cross the claimant's land, respectively the F1 main crude oil transport pipeline Ø 14¾ ", F2 main crude oil transport pipeline Ø 20 ", and Pipeline 28 Constanța - Bărăganu of crude oil transport Ø 28", for the purpose of permanent access to pipelines for daily verification of the condition of pipelines and execution of possible repair works. The exercise of the right of legal easement is to be carried out throughout the existence of the pipelines located on the land of the claimant, but no later than the date of termination of the oil concession agreement concluded by us, the undersigned Conpet SA, with the Romanian State;
2. To establish the amount of the annual rent provided by law due by us, the undersigned, to the claimant in exchange for exercising the right of legal easement.

Clarifications: By the **Conclusion of 06.08.2021**, the Bucharest District 1 Courthouse rejects the exception of the belatedly of the request for impleader and of the request for showing the right holder, invoked by the National Agency for Mineral Resources, as unfounded. It rejects the exception of the lack of representative capacity of the National Agency for Mineral Resources, invoked ex officio, as unfounded. It rejects the request for an impleader from the Romanian State, through the Ministry of Finance and the National Agency for Mineral Resources, as inadmissible in principle. It rejects the request to show the right holder of the Romanian State, through the Ministry of Finance and the National Agency for Mineral Resources, as inadmissible in principle. The conclusion can be appealed with the merits.

Procedural status of the case: Merits

Deadline: 13.05.2025

4. File no. 1541/262/2023 – Dambovită Court

Parties: Conpet S.A. – defendant- respondent

Mapi Imobiliare S.R.L. – claimant-defendant

Subject matter: obliging Conpet S.A. to pay an annual rent according to art. 7 of Law no. 238/2004 and compensations, including for the past starting from 20.01.2023

Conpet filed a counterclaim in which it requested the following from the court:

1. the obligation of the claimant Mapi Imobiliare S.R.L. to allow the company CONPET S.A. the exercise of the right of legal easement established by the provisions of art. 7 et seq. from Law no.

238/2004 on the land owned by it, located in Ocnița commune, Ochiuri village, T91, P2/1, Dâmbovița county. The exercise of the right of legal easement is to be done on a 2.4 meter wide corridor located along the main Ø 6 5/8" Ochiuri-Moreni crude oil transport pipeline for the purpose of permanent access to the pipeline in order to daily check the condition of the pipeline and the execution of any repair works. The exercise of the right of easement is to be carried out for the entire duration of the existence of the pipeline located on the claimant's land, but no later than the date of termination of the oil concession agreement concluded by us, the undersigned Conpet S.A., with the Romanian State.

2. establishing the amount of the annual rent provided by law owed by us, the undersigned Conpet S.A., to the claimant Mapi Imobiliare S.R.L. in exchange for the exercise of the right of legal easement starting from the date of finality of the judgment pronounced in this case, rent consisting of the value of the annual use of the land affected by the exercise of the easement.

At the same time, Conpet filed an impleader for the Romanian State, represented by the Ministry of Public Finance and the National Agency for Mineral Resources, through which we requested the court to be compensated for the impleaders, which will answer jointly and severally for any amounts we will be obliged to pay the claimant Mapi Imobiliare S.R.L. in the situation where the summons filed by it will be admitted in whole or in part.

Clarifications: By the **Sentence no. 885/22.10.2024**, the Moreni Courthouse rejects, as unfounded, the exception of the lack of passive procedural quality of the defendant-claimant Conpet S.A. with regard to the claims for compensation and rent, invoked by it. It rejects, as unfounded, the exception of ineligibility of the claim for summons to court of the defendant-claimant Conpet S.A. with regard to the claims for compensation and rent, invoked by it. It rejects the claim for summons in guarantee of the Romanian State represented by the Ministry of Public Finance and the National Agency for Mineral Resources. It rejects as unfounded the exception of the lack of passive procedural quality formulated by the National Agency for Mineral Resources. It admits in part the main claim formulated. It rejects as unfounded the counterclaim.

Conpet has filed an appeal. Mapi Imobiliare S.R.L. has filed an appeal.

Procedural status of the case: Appeal

Deadline: --

ARTICLES OF INCORPORATION
of the Company “CONPET” S.A.

CHAPTER I
NAME, LEGAL FORM, HEADQUARTERS, DURATION

Art. 1 Name of the Company

- (1) The company name is „CONPET” S.A. (herein-after called also the „company”).
- (2) In all documents, invoices, notices, publications and generally, in the company correspondence, the name thereof will be preceded or followed by the words „societate pe actiuni” (Eng. joint-stock company”) or by the initials „S.A.”, stating the headquarters, subscribed and paid-up share capital, tax registration number and Trade Registry number.

Art. 2 Legal Form of the Company

- (1) „CONPET” S.A. is Romanian legal person, incorporated as a joint-stock company.
- (2) „CONPET” S.A. is a publicly held company.
- (3) The Company is operating in compliance with the provisions of this Articles of Incorporation, of Law no. 31/1990 regarding the companies, of GEO no. 109/2011 regarding the corporate governance of the public enterprises, of the Civil Code and of all other laws and regulations applicable to the companies.
- (4) The emblem (logo) of the company is made up by the joining of two elements: in the left side, the symbol and in the right side, the company name (logotype). The symbol represents a set made of two drops: a green one and a blue one; the green drop is pointing top right (1 o’clock), while the blue drop is pointing down left (7 o’clock). The company name - „CONPET” S.A. - is placed right of the symbol, has a proportional dimension in relation hereto, is written in block letters, Italic, and in the same color with the blue drop.

Art. 3. The Company Headquarters

- (1) The company headquarters is in Romania, no. 1-3 Anul 1848 Street, Ploiesti city, Prahova county. The company headquarters may be changed to other locality from Romania, based on the Resolution of the Extraordinary General Meeting of Shareholders, as per the law.
- (2) The company may also incorporate and disincorporate other sub-units (secondary establishments, work sites, branches, agencies, representative agencies, or other types of sub-units with no legal personality), to be found in the same locality and/or in other localities, in the country or abroad, under the law and as per this Articles of Incorporation, by the approval of the Board of Directors. The secondary establishments (work sites) of the company are comprised in Annex 2 to the Articles of Incorporation.

Art. 4 Company Duration

The lifetime of the company is unlimited, starting the date of registration at the Trade Registry under no. J29/6/22.01.1991.

CHAPTER II

SCOPE, OPERATING AREA AND CORE BUSINESS OF THE COMPANY

Art. 5 Company Scope

The company is the concessionaire of the National Crude Oil, Rich Gas and Liquid Ethane Transport activity, inclusive of the major pipelines and equipment, installation and facilities related to the System, quality acquired by the conclusion with NAMR, in 2002, of the Oil Concession Agreement approved pursuant to GD no. 793/2002.

Art. 6 Main Business Area and Core Business of the Company

- (1) The main business area is „Transport via pipelines”- NACE Code 4950.
- (2) The core business of the company is „Transport via pipelines” - NACE Code 4950.

Art. 7 Secondary Lines of Business

0150 Activities in mixed farming (crop and animal production) 0910 Support activities for petroleum and natural gas extraction
1011 Processing and preserving meat
1012 Processing and preserving poultry meat
1013 Production of meat, including poultry meat products
1020 Processing and preserving fish, crustaceans and mollusks'
1031 Processing and preserving potatoes
1032 Manufacture of fruit and vegetable juice
1039 Processing and preserving fruits and vegetables
2529 Manufacture of tanks, cisterns and containers of metal
2593 Manufacture of wire products, chains and springs
3313 Repair of electronic and optical equipment
3314 Repair of electrical equipment
3319 Repair of other equipment
3320 Installation of industrial machinery and equipment
3511 Electricity production
3513 Distribution of electricity
3530 Steam and air conditioning supply
3600 Water collection, treatment and supply
3700 Wastewater collection and treatment
3811 Collection of non-hazardous waste
3821 Treatment and disposal of non-hazardous waste
3900 Decontamination activities and services
4321 Electrical installations works
4322 Sanitary installations, heating and air conditioning works
4329 Other construction installation
4511 Sale of cars and light motor vehicles (< 3.5 tons)
4519 Sale of other motor vehicles
4520 Maintenance and repair of motor vehicles
4671 Wholesale of solid, liquid and gaseous fuels and related products
4676 Wholesale of other intermediate products
4677 Wholesale of waste and scrap
4690 Non-specialized wholesale trade
4711 Retail sale in non-specialized stores, with predominant sale of food, beverages or tobacco
4719 Retail sale in non-specialized stores with predominant sale of non-alimentary products

4721 Retail sale of fresh fruits and vegetables in specialized stores
 4722 Retail sale of meat and meat products in specialized stores
 4723 Retail sale of fish, crustaceans and mollusks in specialized stores
 4724 Retail sale of bread, cakes, flour and sugar confectionery in specialized stores
 4730 Retail sale of automotive fuel in specialized stores
 4920 Freight rail transport
 4939 Other passenger land transport n.e.c.
 4941 Freight transport by road
 5210 Warehousing and storage
 5221 Service activities incidental to land transportation
 5224 Cargo handling
 5229 Other transportation support activities
 5510 Hotels and similar accommodation
 5520 Short-stays and vacation accommodation facilities
 5590 Other accommodation services
 5610 Restaurants
 5629 Other food services n.e.c.
 5829 Editing activities of other software products
 6110 Wired telecommunications activities
 6120 Wireless telecommunications activities
 6203 Computer facilities management activities (administration and operation)
 6209 Other information technology and computer service activities
 6311 Data processing, web hosting and related activities
 6810 Buying and selling of own real estate
 6820 Renting and operating of own or leased real estate
 7112 Engineering activities and related technical consultancy
 7120 Technical testing and analysis
 7219 Research - Development on natural sciences and engineering
 7711 Renting and leasing of cars and light motor vehicles
 7712 Renting and leasing of cars and heavy motor vehicles
 7721 Renting and leasing of recreational and sports goods
 7732 Renting and leasing of construction and civil engineering machinery and equipment
 7733 Renting and leasing of office machinery and equipment (including computers)
 7739 Renting and leasing of other machinery, equipment and tangible goods n.e.c.
 8299 Other business support service activities n.e.c.
 8559 Other forms of education n.e.c.
 8610 Hospital assistance activities
 8690 Other human health activities
 9311 Operation of sports facilities
 9329 Other leisure and fun activities n.e.c..

CHAPTER III **SHARE CAPITAL, STOCKS**

Art. 8 The Share Capital

- (1) The total share capital of “CONPET” S.A. amounting 28,569,842.40 RON is subscribed and entirely paid-up.
- (2) The share capital of the company is divided into 8,657,528 nominative shares issued in dematerialized form, 3.3 RON nominal value each.

- (3) The shareholding structure, corresponding to the consolidated synthetic structure of the shareholders is the following:
The ROMANIAN STATE, by the Ministry of Energy (the line ministry or its successors, according to the law)
Number of shares: 5,083,372
Value of contribution to the share capital: 16,775,127.60 RON
Share on profit and loss: 58.7162 %
OTHER SHAREHOLDERS NATURAL OR LEGAL PERSONS
Number of shares: 3,574,156
Value of the contribution to the share capital: 11,794,714.8 RON
Share on profit and loss: 41.2838 %
- (4) The identification data of each shareholder, the contribution to the share capital, the number of shares he is entitled to and the share in the total share capital are being comprised in the Shareholders Registry kept in electronic system by Depozitarul Central S.A.
- (5) The rights and obligations related to the share capital of the Company, for the shares in capital held by the Romanian State are exercised, on behalf and on the account of the Romanian State, by the line ministry, the Company being under its authority, in accordance with the legal dispositions.

Art. 9 Augmentation or Decrease of Share capital

- (1) The share capital may be decreased or increased based on the Resolution of the Extraordinary General Meeting of Shareholders, under and in compliance with the procedure stipulated by law.
- (2) The Extraordinary General Meeting of Shareholders shall decide upon the augmentation of the share capital, in compliance with the legal provisions in force at the date of the augmentation thereof.
- (3) The share capital could be augmented by:
- a) the issue of new shares;
 - b) augmentation of the nominal value of the existing shares;
 - c) incorporation of reserves, except for the legal reserves, as well as of the benefits and share premiums;
 - d) compensation of certain liquid debts exigible to the company, by shares thereof;
 - (e) other sources, set by the General Meeting of Shareholders or Board of Directors, as the case may be, as per the law;
- (4) The Resolution of the Extraordinary General Meeting of Shareholders for the augmentation of the share capital shall be published in the Official Gazette of Romania, Part. IV, being granted, for the exercise of the right of first refusal, at least one-month deadline, starting the publishing date.
- (5) The reduction of the share capital is being made under the law.
- (6) The share capital could be reduced by:
- (a) the diminution of the number of shares;
 - (b) reduction of the nominal value of shares;
 - (c) acquirement of own shares, followed by the cancellation thereof;
 - (d) other processes stipulated by law;
- (7) The reduction of the share capital can be done only following two months as of the date of publishing in the Official Gazette of Romania Part IV, of the Resolution of the Extraordinary General Meeting of Shareholders, as per the legal provisions.
- (8) If the Board of Directors establishes that, following certain losses established based on the annual financial statements approved as per the law, the net asset of the company, determined as a difference between total assets and total liabilities thereof, lowered to less than half the value of the subscribed share capital, then the Board will convene immediately the Extraordinary Meeting of Shareholders, to decide upon the dissolution of the company.

- (9) The Board of Directors will present to the Extraordinary Meeting of Shareholders convened as per the here-above paragraph, a report regarding the patrimonial situation of the company, accompanied by observations of the internal auditors. This report must be submitted to the company headquarters by at least one week prior to the General Meeting, as to be consulted by any interested shareholder.
- (10) If the General Meeting does not decide upon the company dissolution, then the company is bound, up to the end of the financial year previous to the one the losses have been ascertained in relation hereto, to proceed to the reduction of the share capital by an amount at least equal to the amount of the losses that could not be covered from reserves, if all this time, the company net asset was not restored up to a value level that equals at least half the share capital.

Art. 10 The Shares

- (1) The rights and liabilities related to the shares held by the shareholders stipulated at Art. 8, Para. (3), are being exercised by the respective owners.
- (2) The company shares are nominative, of equal values and comprise all the elements stipulated by law. The nominal value of one share is 3.3 RON. The shares are being issued in dematerialized form and are being registered in the Shareholders' Registry, the record thereof being held by Depozitarul Central S.A. Bucharest, to whom "CONPET" S.A. has concluded a contract. The shares are indivisible regarding CONPET S.A., which recognizes only one owner for each share. In case a share becomes the property of several persons, Depozitarul Central S.A. is not bound to record the transmission as long as those persons will not designate a unique representative for exercising the rights resulting from share.
- (3) The shares are recorded in the Shareholders' Registry in book-entry form. The certification of the property right over shares is being made by way of a statement of account.
- (4) The shares issued by the company may be subject to usufruct or may be pledged, under the law.
- (5) The trading of shares is being performed on the securities regulated market, as per the legislation in force regarding the capital market.
- (6) The company may acquire own shares under the law.
- (7) "CONPET" S.A. employees have the right to purchase company shares from the State, up to the limit of the share capital set by the general meeting of shareholders and at the same selling price of the shares in case of privatization.

Art. 11 Bonds

- (1) The company can issue bearer or nominative bonds, for an amount that is to be approved in the Extraordinary General Meeting of Shareholders.
- (2) The amount for which bonds can be issued should not exceed three quarters (3/4) of the paid-up share capital existing as per the latest approved financial statements.
- (3) The nominal value of one bond cannot be smaller than 2.5 Ron and the nominal value convertible in shares should equal the nominal value of the share.
- (4) The bonds, part of the same issue must be equal in value and grant equal rights to their holders.
- (5) The shares may be issued in a material form, on paper form or in dematerialized form.
- (6) The issue and trading of the bonds that are subject to a public tender shall be subject to the legislation regarding the incidental capital market.
- (7) The bond holders may be represented by authorized agents, other than the company administrators, directors or employees.
- (8) The company is authorized to issue bonds, under the law.

Art. 12 The Rights and Liabilities incurred by the Shares

- (1) All shares have equal value and guarantee equal rights and liabilities to their holders.
- (2) Every subscribed and paid-up share, as per the law, guarantees the right to vote in the General meeting of Shareholders, the right to elect and be elected within the governing bodies, the right to take part to the distribution of dividends as per the provisions of this Articles of Incorporation and legal provisions, as well as other rights stipulated by law and the Articles of Incorporation.
- (3) The holding of shares implies the right adhesion to the Articles of Incorporation.
- (4) The rights and liabilities corresponding to the capacity of shareholder observe the legal regime of the shares at their passing to other persons' property.
- (5) The company liabilities are guaranteed with the company's assets, representing the general pledge of the company creditors, and the shareholders are liable in connection therewith, limited to the subscribed share capital.
- (6) The company's Asset cannot be subject to debts or other personal liabilities of the shareholders. Any shareholder's creditor may issue claims against the party out of the receivable benefits of the shareholder, following the approval of the annual balance sheet or any stake due to him upon the company liquidation, made under the law and this Articles of Incorporation. The creditors may, though, pledge, during the company life, the stakes that would be due to the associates upon liquidation or may sequester and sell the shares to their debtor.
- (7) The shareholders have the right to be given correct and complete information regarding the company status in the General Meeting of Shareholders. In case of the issue of new shares, the existing shareholders benefit from the right of first refusal upon subscription, under the law.

Art. 13 Disposal of Shares

- (1) The company shares are indivisible.
- (2) In any relationship with the company, this one acknowledges one or more owners for every share. Whenever a nominative share becomes property of more persons, the conveyance shall not be recorded unless these persons nominate one representative to exercise the rights resulting from the share.
- (3) The ownership right over the shares issued in dematerialized form and traded on the regulated securities market shall be submitted in compliance with the legislation regarding the capital market.
- (4) The direct transactions will be operated by Depozitarul Central S.A. Bucharest.
- (5) The Company shares related transactions shall be made as per the legislation in force applicable to the organized securities markets.

CHAPTER IV THE GENERAL MEETING OF SHAREHOLDERS

Art. 14 The Representation

- (1) The majority shareholder of "CONPET" S.A. is the Romanian State. The rights and duties of the Romanian State, acting as majority shareholder, shall be exercised, within the General Meetings of Shareholders, by the line ministry coordinating the company business, by way of specific normative acts, by specially designated representatives, as per the legal provisions.
- (2) The Romanian State representatives in the General Meeting of Shareholders are being nominated and revoked by order of the line ministry. The voting right of the State representative in the General Meeting of Shareholders "CONPET" S.A. will be exercised based on the special power of attorney submitted to the company in compliance with the legal provisions regarding the capital market and the other applicable regulations, the special empowerment being likely to be accompanied by an Order of the line minister/instruction for the General Meeting.

Art. 15. Duties

- (1) The General Meeting of Shareholders is “CONPET” S.A.’s management body, who decides upon the company business and trade and economic policy, as per the option of the shareholders present or represented during the meeting;
- (2) The General Meetings of Shareholders are ordinary and extraordinary.
- (3) The Ordinary General Meeting of Shareholders meets at least once a year, in no more than 4 months as of the conclusion of the financial year and has the following competencies, duties and functions:
 - a) discusses, approves or modifies the annual financial statements, based on the administrators’ or the financial auditor’s report;
 - b) elects and revokes the administrators according to the law; at the appointment, the OGMS shall bear in mind that the majority of BoD members should be non-executive and independent;
 - c) approves the administration plan issued and presented by the Board of Directors, as well as the revision thereof;
 - d) appoints or revokes the financial auditor and sets the minimum duration of the financial auditing contract;
 - e) sets the remuneration level and any other amounts and advantages due to the administrators for the current financial year, as well as the general limits of the remuneration of the Director General;
 - f) approves the Organizational and Operational Rules and Regulations governing the Board of Directors and sets-out the competencies thereof;
 - g) approves the income and expenditure budget (Rom. BVC) and the investment program for the next financial year, as well as the BVC rectification;
 - h) approves the profit distribution as per the provisions of the normative acts in force and the fixing of dividends;
 - i) passes judgments over the administrators management and the means to recover the losses they have caused to the company;
 - j) decides upon pledging, leasing or dissolution of one or several company units;
 - k) fulfils any other duty, set under the law, as being borne by them.
- (4) The Extraordinary General Meeting reunites whenever necessary in order to decide upon:
 - a) changing the legal form of the company;
 - b) changing the location of the company headquarters;
 - c) changing the core business of the company;
 - d) establishment or disestablishment of subsidiaries;
 - e) extending the company’s life;
 - f) augmentation of the share capital;
 - g) reduction of the share capital or replenishment thereof by issue of new shares;
 - h) merger with other companies or division thereof;
 - i) anticipated dissolution of the company;
 - j) conversion of the shares from one category into another;
 - k) conversion of a category of bonds into another or into shares;
 - l) bonds issuance;
 - m) amendment of the nominal value and number of shares;
 - n) decides upon the contracting of average and long term bank loans, here-included the external ones; establishes the competencies and level for contracting the current bank loans, of the trade loans, as well as the level of the guarantees;
 - o) decides upon the participation, according to the law, to the establishment of new legal persons or in the association with other legal or natural persons in the country or abroad, except for the non-profit organizations established under the law, for which the competence to approve the

accession/withdrawal of companies from the capacity of member belongs to the Board of Directors;

- p) may delegate to the Board of Directors the execution of the attributions mentioned at Art. 15, paragraph (4), letters b), c) and f). The delegation of the task stipulated at Art. 15, paragraph (4) letter c) cannot concern the main business area and core business of the company.
- q) decides on what market are to be traded the securities issued by the company and chooses the authorized independent registrar that keeps record of the shares issued by the company;
- r) any other amendment of the Articles of Incorporation, or any other Resolution for which is being asked the approval of the Extraordinary General Meeting of Shareholders.

Art.16 Call of the General Meeting of Shareholders

- (1) The General Meeting of Shareholders is being convened by the Board of Directors, whenever necessary.
- (2) The call of the General Meeting of Shareholders shall comply with the legal provisions regarding the companies, as well as the regulations regarding the capital market and provisions of this Articles of Incorporation. The meeting deadline cannot be less than 30 days as of the publishing of the Convening Notice in the Official Gazette of Romania, part IV.
- (3) The convening notice shall comprise the venue, date and time of the meeting, as well as the Agenda, with the explicit mention of all the issues that shall make the object of the meeting debates. Equally, the convening notice shall comprise the reference date, the proposal of the Board of Directors regarding the registration date, ex-date and the due date for dividends payment. Where on the Agenda is being entered the election of the administrators, the Convening Notice will mention also the due date up to which may be submitted the candidacies, as well as the fact that the list comprising information regarding the name, place of domicile and professional qualification of the persons proposed for the administrator capacity is made available to the shareholders who can consult and complement it. The convening notice will mention the means to distribute the information regarding the issues included on the Agenda of the General Meeting of Shareholders, as well as the date as of which they will be available, the means of obtaining the special empowerment form for representation in the general meeting, the limit date and place where the special empowerments will be submitted. When on the Agenda are included proposals for the amendment of the Articles of Incorporation, the Convening Notice should comprise the full text of the proposals.
- (4) By way of the Convening Notice for the first general meeting could be set the date and time for the second meeting, for the situation when the first one could not be held. If the day of the second general meeting is not mentioned in the convening notice, the meeting could be convened in 8 days as of the publishing of the second call in the Official Gazette of Romania, part IV.
- (5) The Board of Directors calls urgently the general meeting of shareholders, at the request of the shareholders representing, individually or together, at least 5% of the share capital and if the request comprises provisions that fall under the attributions of the general meeting. The meeting will be convened in no more than 30 days and shall take place in no more than 60 days as of the date of the receipt of the request.
- (6) One or more shareholders representing, individually or collectively, at least 5% of the share capital have the right to ask the inclusion of new items on the Agenda. The requests are filed to the Board of Directors, in no more than 15 days as of the convening notice publishing date, for publishing thereof and bringing to the attention of the other shareholders. In case the Agenda comprises the appointment of the administrators and the shareholders are willing to formulate application for candidacies proposals, the requests shall include information regarding the name, place of domicile and professional qualification of the persons proposed for the said positions. The Agenda completed with the items advanced by the shareholders, subsequent to call, must be published by the

- observation of the same requirements stipulated for the call of the general meeting, at least 10 days prior to the general meeting, at the date mentioned in the initial convening notice.
- (7) The annual financial statements, the annual report of the Board of Directors, as well as the proposal regarding the distribution of dividends shall be made available to the shareholders at the company headquarters, as of the call date of the general meeting. The company shall make available to the interested shareholders, all along the period starting at least 30 days prior to the date of the general meeting, no later than and inclusive of the meeting date, the documentation and informative materials that are to be exposed to the general meeting of shareholders, corresponding to every item on the Agenda, as well as other information stipulated by Law. Upon request, the shareholders will be issued copies of these documents. The amounts levied for the issue of copies cannot exceed the administrative expenses triggered by the supply thereof.
 - (8) Every shareholder may address to the Board of Directors, in writing, questions regarding the company business, prior to the date of the general meeting, within the time frame stipulated in the convening notice of the general meeting; an answer is to be given during the meeting.

Art. 17. Organization of the General Meeting of Shareholders

- (1) For the validity of the deliberations of the ordinary general meeting of shareholders, are necessary:
 - (a) In first call, the presence of the shareholders (here-included the votes by correspondence) representing at least half (1/2) of the total number of voting rights and the resolutions be taken with the majority of expressed votes.
 - (b) In second call, notwithstanding the number of the shareholders present or represented and the value of the represented share capital and resolutions be taken with majority of expressed votes.
- (2) For the validity of the deliberations of the extraordinary general meeting of shareholders, are necessary:
 - a) In first call, the presence of the shareholders (inclusive of the correspondence votes) representing at least half (1/2) of the total number of voting rights;
 - b) In second call, the presence of the shareholders representing at least one third (1/3) of the total number of voting rights;
 - c) The resolutions are made with the majority of the votes held by the present or represented shareholders, both in first call and second call;
 - d) The resolution to amend the company's core business, to reduce the share capital, augment in cash the share capital, change the legal form, merge, divide or dissolve the company are being made by a majority of at least two thirds (2/3) of the voting rights held by the present or represented shareholders.
- (3) By way of derogation from the above provisions, the following resolutions of the extraordinary general meeting of shareholders shall be made by the vote of the shareholders representing at least three quarters (3/4) out of the share capital of the company, in first call or any other subsequent call, as follows:
 - a) The resolutions regarding the bond issue;
 - b) Waiving the right of first refusal of the shareholders upon the subscription of new shares in case of the share capital augmentation in cash;
 - c) The share capital augmentation in kind.
- (4) The general meeting of shareholders is opened and presided by the chairman of the Board of Directors or in absence thereof, by the person substituting him. The general meeting shall elect, from the shareholders present, up to three secretaries that will check the attendance list for the shareholders, pointing out the share capital every person represents, the protocol prepared by the internal auditor and the technical secretariat of the meeting to ascertain the fulfilment of all formalities required by law and the Articles of Incorporation for holding the session.

- (5) A protocol, signed by the President and the Secretary, is to ascertain the fulfilment of the summoning formalities, the date and venue of the general meeting, the present shareholders, the number of shares, the summaries of the argumentation, the resolutions made, and upon the request of the shareholders, the statements they took during the meeting. The protocol will be attached the documents regarding the first call as well as the shareholders' attendance lists.
The protocol shall be consigned in the registry of the general meeting, which is sealed and stamped.
- (6) The Chairman of the Board of Directors may nominate, out of the company employees, one or more technical secretaries, to take part to the execution of the above-mentioned operations and also to the drafting and signing of the minutes of the meeting.
- (7) At the ordinary and extraordinary general meetings of shareholders, where are being discussed issues regarding the work relations with the company personnel, shall also be invited the President of the Union.

Art. 18 Exercising the Right to Vote during the General Meeting of Shareholders

- (1) The resolutions of the general meetings are taken in open vote.
- (2) At the proposal of the person presiding the general meeting, or of a group of present or represented shareholders, holding at least (1/3) of the total number of votes, could be decided that the vote be secret in other cases as well, other than those stipulated by law.
- (3) The secret vote is compulsory for the election of the members of the Board of Directors and financial auditor, for the revocation thereof and for taking decisions regarding the liability of the members of the company administration, management and control bodies.
- (4) The voting right cannot be transferred. Any convention otherwise specified is null.
- (5) At the meeting may take part and vote exclusively the shareholders registered at the Reference Date, in person or by representatives, based on a special or general empowerment, as per the legal provisions. The shareholders may also vote by correspondence, in compliance with the procedure mentioned in the convening notice of the general meeting and the applicable legal provisions.
- (6) The shareholders lacking exercise capacity, as well as the shareholders legal persons may be represented by their legal representatives who, in their turn, may empower other persons for that general meeting.
- (7) In case of the vote by representation, the special/general empowerments and the accompanying documents shall be submitted to the company, at least 24 hours prior to the general meeting, under the sanction of losing the right to exercise one's voting right during that meeting. The special/general empowerments can also be submitted electronically, with the electronic signature included/attached. The Protocol shall include a mention regarding the received empowerments.
- (8) The members of the Board of Directors, the Director General or the company employees cannot represent the shareholders, under the sanction of nullity of the Resolution if, in absence of the vote thereof, would not have been obtained the requested majority.
- (9) The Director General and the members of the Board of Directors are bound to take part in the general meetings of shareholders.
- (10) In order to be opposable to third parties, the resolutions of the general meetings shall be submitted in 15 days to the Trade Register Office in order to be recorded in the logbook and published in the Official Gazette of Romania, Part. IV.
- (11) Following every amendment of the Articles of Incorporation, the administrators shall file, at the Trade Registry, in no more than 15 days, the amendment and the full text of the Articles of Incorporation, updated with all amendments, which will be recorded pursuant to the resolution of the delegated judge.
- (12) The resolutions made by the general meetings of shareholders within the Law and this Articles of Incorporation are binding even for the shareholders that did not attend the meeting or voted against.

- (13) The resolutions of the general meeting of shareholders which are not compliant with the law or the Articles of Incorporation may be filed to Court, under the conditions and in compliance with the procedure stipulated by Law.
- (14) The shareholders that did not vote in favor of a resolution of the general meeting regarding the amendment of the core business, the merger or division of the company, the relocation of the company headquarters overseas or changing the company form, have the right to withdraw from the company under the law.
- (15) The members of the Board of Directors cannot challenge the resolution of the general meeting regarding the revocation thereof from the respective positions.
- (16) The petition will be dealt with in contradiction with the company represented by the Board of Directors.
- (17) If the resolution is challenged by all members of the Board of Directors, the company will be represented in justice by a person appointed by the President of the Court from among its shareholders, a person that is to fulfil the mandate vested in him, until the general meeting, called for this purpose, nominates a representative.
- (18) The resolutions of the ordinary general meeting of shareholders shall be signed by the president of the meeting, the technical Secretariate and by the shareholder or shareholder's representative holding the majority of expressed votes.
- (19) The resolutions of the extraordinary general meeting of shareholders shall be signed by the president of the meeting, the technical Secretariate and by the shareholder or shareholder's representative holding the majority of votes held by the presented or represented shareholders.
- (20) The "Abstention" position adopted by a shareholder regarding the items included on the agenda of the general meeting of shareholders is not deemed expressed vote.

CHAPTER V

ABOUT THE COMPANY ADMINISTRATION

Art. 19 Organization

- (1) The company is administered in a unitary system by a Board of Directors consisting of 7 administrators, appointed by the Ordinary General Meeting of Shareholders for a period of 4 years, with the possibility of re-election for further periods of 4 years. The administrators can act as shareholders. For the appointment of an administrator to be legally valid, the person appointed must expressly accept it. The identification data of the administrators are being registered at the Trade Register Office as per the legal provisions.
- (2) The majority of the Board of Directors members are non-executive and independent administrators. When the administrators are appointed by the GMS or BoD, it will be taken into account that they fulfill the legal conditions regarding the status of independent administrator, the administrators being bound to fill-in an affidavit regarding independence prior to the appointment. If there are changes regarding the information that is the basis of the declaration of the status of independent administrator, the administrator has the obligation to immediately bring them to the attention of the Board of Directors through the Nomination and Remuneration Committee.
- (3) The Board of Directors is presided by a Chairman. The Chairman is elected by the Board of Directors, from among its members. The revocation from the capacity of Chairman of the Board of Directors is still the attribute of the Board of Directors. The resolution regarding the nomination or revocation thereof is being made by the vote of the majority of the Board of Directors' members.
- (4) In case of vacancy of one or more administrator positions, the Board of Directors proceeds to the appointment of one/several provisional administrators, until the reunion of the Ordinary General Meeting of Shareholders. The Board of Directors will ensure that the majority of non-executive and independent administrators is being maintained when appointing provisional administrators.

- (5) At the Board of Directors level is being constituted the Audit Committee and the Nomination and Remuneration Committee, binding, as per the legal provisions in force. The Board of Directors may also constitute, based on resolution, other consultative committees, in various activity areas, as per the needs and management strategy of the company. The Consultative Committees are made of at least two members, one of them being charged with the Presidency thereof. The consultative committees meet whenever necessary, at the Chairman's call, and the proposals/recommendations formulated by the Board of Directors (for the substantiation of the decision-making thereof) are being adopted by the majority of expressed votes. The duties and responsibilities of the consultative committees are being set by the Board of Directors.
- (6) Cannot be administrators the persons who, as per the law, are incapable or have been convicted for fraudulent management, breach of trust, forgery, use of forgery, fraud, speculation, false testimony, bribery, for the delinquencies provided by the Law no. 656/2002 for the prevention and penalization of money laundering, as well as for the settlement of several prevention and refutation measures related to the terrorist acts, subsequent amendments and completions, for the delinquencies provided at art. 143 - 145 from the Law no.85/2014 regarding the insolvency prevention and insolvency procedures.
- (7) The Chairman of the Board of Directors of the company may not also be Director General thereof.
- (8) The Board of Directors usually meets at the company's headquarters or any place of business of the company or in any place disclosed in the convening notice. Operational meetings of the Board of Directors may be organized by means of remote communication meeting the technical conditions necessary for the identification of the participants, their effective participation to the meetings of the Board of Directors and the retransmission of the deliberations on a continuous basis (via e-mail, telephone, video call or other communication equipment), whenever necessary, but at least every 3 months, at the call of the President or at the reasoned request of 2 of its members or of the Director General/Directors. In this case, the Agenda is being established by the authors of the request. The Chairman must act on such a request. The Board of Directors is ruled by Chairman. In case the Chairman is temporarily incapable of exercising his duties, all along that period, the Board of Directors may charge another administrator with the fulfilment of the Chairman capacity, upon the proposal of the BoD's Chairman;
- (9) The Board of Directors cannot decide upon certain issues that are not included in the Agenda, except for the emergencies. In order to decide upon the emergencies, the absent members will also be consulted, by various remote communication devices.
- (10) The Chairman will decide on the emergency nature of the issues.
- (11) The Board of Directors performs its activity based on its own regulation and the legal regulations in force.
- (12) For the validity of the decisions is necessary the presence (directly or by proxy) of at least five members from among the Board members and the decisions are made with the majority vote of the present members. The chairman of the Board of Directors will have the casting vote in case of parity of votes. The "Abstention" position adopted by an administrator regarding the items included on the agenda of the general meeting of shareholders is not deemed expressed vote.
- (13) The members of the Board of Directors can be represented at the meetings of the respective body exclusively by other members thereof. A present member can only represent a single absent member.
- (14) In case of resolutions made during the meetings where a member of the board did not participate, the latter remains liable, if, within 30 days of acknowledgment thereof he did not challenge it in the forms provided by the law.
- (15) The Agenda is established by the Chairman. The call, the agenda and the meeting materials will be sent to the administrators in sufficient time before the date of the meeting; the deadline can be established by the own regulation of the Board of Directors. The minutes of the meeting shall be comprised in a Journal of the Meetings and BoD Deliberations, by courtesy of the Chairman of the Board.

The protocol of the meeting shall be drawn up by technical editing by the BoD Secretariate and shall comprise the name of the participants, the order of the deliberations, the decisions made, the number of votes cast and separate opinions. This will be signed by the Chairman of the Board of Directors, the BoD members (only those who participate directly in the meeting; they may also have a mandate of representation given by another administrator) and by the BoD Secretariate, and will be attached by gluing it to the Journal of the Meetings and BoD Deliberations of the Board of Directors. The decisions of the Board of Directors and the protocols of the meetings will be sent by email to the administrators.

- (16) In exceptional cases, motivated by the emergency of the situation and by the company's interest, the decisions of the Board of Directors can be made by the unanimous written vote of the members, the reunion thereof no longer being necessary. This procedure cannot be followed in case of the decisions made regarding the annual financial statements or the authorized capital. The Board of Directors will be required to approve and submit the vote by remote communication means (email).
- (17) At the meetings shall attend the Chairman and BoD members, as well as the directors with mandate contract. As the case may be, when necessary, for additional information, the Chairman of the Board of Directors can invite at the meetings directors, internal auditors and any other management or operating employees, as well as specialists in various business areas from outside the company. The Union's President can be also invited, for debating professional, economic and social issues. In view of defending the professional, economic and social rights and interests of the members of the Union, the latter will receive from the company's management the necessary information for the negotiation of the collective labor agreements, under the law and by the agreement of the BoD members. The articles contained in the decisions of the Board of Directors regarding the professional, economic and social issues will be communicated in writing to the President of the Union within two working days as of the date of holding the meeting, only as per the orders of the Director General.
- (18) The Board of Directors may delegate the company's management to one or more directors, appointing one of them in the capacity of Director General. The Director General may be appointed from among the administrators, who thus becomes an executive administrator or from outside the Board of Directors. According to the law, director means that person to whom management duties of the company have been delegated by decision of the Board of Directors and who concludes a contract of mandate with the Company, in accordance with the applicable legal provisions. The Director General of "CONPET" S.A. Represents the Company in third party relations and in Court. The Board of Directors represents the company in relation to the directors with mandate contracts.
- (19) The Board of Directors is charged with the fulfillment of all the papers necessary and useful for the achievement of the company's core business, except for those set apart by the law for the general meeting of shareholders.
- (20) The Administrators are jointly liable against the company for:
 - a) the reality of payments made by the associates;
 - b) the real existence of the paid dividends;
 - c) the existence of the registries required by the law and the proper holding thereof;
 - d) the exact fulfillment of the general meetings resolutions;
 - e) the strict performance of the duties that the law and the Articles of Incorporation impose.
- (21) The administrators' liability is being regulated by the legal provisions regarding the mandate as well as by the special provisions stipulated by the Companies Law no. 31/1990.
- (22) The administrators and their immediate successors are jointly liable if, being aware of the irregularities committed, fail to inform the internal auditors and the financial auditors in relation thereof.
- (23) The liability for the deeds or the omissions performed does not extend over the administrators who have caused to consign, in the BoD Protocols Journal, their objection and have informed in writing the internal auditor and the financial auditor thereupon.
- (24) If the administrators ascertain that, following various losses, the net asset, determined as a difference between the company's total assets and liabilities, represents less than half of the value of the share

capital, they convene the extraordinary general meeting of shareholders, in order to decide upon the replenishment of the share capital, the decrease thereof to the remaining value or the company dissolution.

- (25) The members of the Board of Directors may be revoked by the resolution of the general meeting of shareholders and the Director General by the Board of Directors' Decision.
- (26) The Board of Directors members shall conclude professional liability insurance, the exchange value thereof being borne by „CONPET” S.A., under the Law.
- (27) The Administrators are bound not to disclose confidential data and information and business secrets of the Company, as well as information regarding its activity. This liability is also binding after the termination of the mandate, for a period of 5 years. They must also comply with the inside information regime provided in the incidental legislation.

Article 20 Powers of the Board of Directors

- (1) The Board of Directors' powers are being set pursuant to the Articles of Incorporation of the company, the Romanian law, as well as pursuant to other attributions set by the general meetings of shareholders as falling under the responsibility thereof, respectively, in particular, the followings:
 - (a) Calls the general meetings of the company and sets the agenda, while endorsing the meeting documentation;
 - (b) Prepares the annual report that is to be submitted to the General Meeting of Shareholders, together with the annual financial statements and the report of the financial auditor, as well as other reports imposed by the applicable legislation, by the observance of reporting requirements set pursuant to the capital market legislation and other incidental regulations;
 - (c) Concludes legal deeds in the name and on behalf of the company, based on which to acquire goods for the company or dispose, lease, change or enter a lien over the goods to be found in the Company's Assets, where the value thereof exceeds half the book value of the company assets at the conclusion of the juristic act, exclusively by way of approval of the Extraordinary General Meeting of Shareholders.
 - (d) Submits to the internal auditors and the financial auditor, by at least 30 days prior to the day of the general meeting, the annual financial statements for the preceding financial year, accompanied by the administrators' report and the supporting documents;
 - (e) Recommends for approval to the ordinary general meeting of shareholders, subsequent to the end of the financial year, on an annual basis, the financial statements for the preceding year accompanied by the administrators' report regarding the company activity and the financial auditor report;
 - (f1) Endorses and submits to the approval of the ordinary general meeting of shareholders the revenues and expenditure budget of the company (Budget) for the next financial year, as well as the rectification of the Budget, which, in accordance with the legislation in force, is the exclusive competence of the GMS; approves the corrections brought to the Budget which falls within the approval competence of the Board of Directors, according to the legislation and methodological norms in force;
 - (f2) Endorses the investment program for the next financial year, which includes the structure detailed by investment objectives before submission for approval of the GMS of its centralized structure; approves the investments program, the detailed structure by investment objectives after approval by the GMS of its centralized structure; approves the rectification of the investment program within the same total values approved by the GMS; approves the current repair program and its rectification; decides upon the delegations and limits of competence granted to the Director General regarding the approval of the rectification of the investment program and the current repair program;
 - (f3) Approves the procurement program and its review/rectification; decides upon the delegations and limits of competence granted to the Director General regarding the approval of the review of the procurement program;

- (f4) Approves the company's accession to/the company's withdrawal from the non-profit organizations established in accordance with the legislation in force;
- (g) Approves the Collective Labor Agreement at the company level and the conclusion of addenda to the Collective Labor Agreement and mandates the Director General for the carry-on of the negotiations between parties and the documents execution;
- (h) Approves the organizational structure and the related personnel structure, the Organizational and Operational Rules and Regulations and the Internal Rules of the company;
- (i) Drafts the administration plan and recommends it for approval in the ordinary general meeting of shareholders, within 90 days as of the appointment of the administrators under the conditions set out in the GEO no. 109/2011.
- (j) Delegates to the Director General/directors with a mandate contract the management duties of the company in areas of competence and establishes through the mandate contract their rights and obligations, competences, attributions, responsibilities; in the event that the Director General/directors with a mandate contract are unable to exercise their duties (rest leave, medical leave, travel assignments, etc.), they may delegate the duties according to the provisions of the mandate contract and/or the decisions of the Board of Directors;
- (k) Oversees the activity of the directors with mandate contract in what concerns the company management, here-included the management thereof and approves the quarterly, by-yearly and annual activity reports prepared by the directors, as well as any other activity reports recommended for approval;
- (l) Appoints and revokes the Directors with mandate contract of the company and sets the remuneration thereof, the general limits of the remuneration being set by the ordinary general meeting of shareholders in the remuneration policy. Sets the objectives and performance criteria for the directors with mandate contract and notes, recurrently, the progress of the fulfillment thereof; approves the global degree of achievement of the objectives and performance criteria of the directors with mandate contract, for the previous year, correlated with the financial statements of that financial year;
- (m) Sets the main business directions and approves the strategies and development policies of the company;
- (n) Sets the accounting policies and the financial control system and approves the financial planning;
- (o1) Approves/endorse the protocols on the results of the inventory of company property/public property of the state; approves/endorse proposals for decommissioning of fixed assets, withdrawal of materials of inventory objects like materials, decommissioning and disposal of material assets other than fixed assets, owned by the company/the public patrimony of the state, whose maintenance is no longer justified; approves/endorse the methods of recovery of such property and the starting prices at auction for goods proposed to recovery by tender; may delegate to the Director General the power to sign the protocols of the decommissioning of fixed assets/of inventory items/downgrading of material assets;
- (o2) Approves the requests for sponsorship and transfer to the company's costs of certain amounts representing penalties, delay penalties, fines, over 100,000 RON; empowers the Director General with the approval of transferring to the company's costs of certain amounts representing fines, penalties, delay penalties, up to the maximum limit of 100,000 RON;
- (o3) Approves the external business travels of the BoD members and Director General/directors with contract of mandate;
- (o4) Approves the participation of BoD members and of the Director General in training or professional development courses/conferences; regarding the expenses incurred by the travel of the members of the BoD to the company's headquarters/worksites, they will be settled by the company, the Director General ordering their payment based on the supporting documents;
- (o5) Delegates to the Director General the power to approve the internal travel of directors with a mandate contract and their participation in training or professional development courses/conferences.

- (p) Proposes the shareholders on what market are to be traded the securities issued by the company and chooses the authorized independent registrar holding evidence of the shares issued by the company;
 - (q) Requests and receives reports from the internal audit of the company;
 - (r) Files the request for the opening of the insolvency procedure as per Law no. 85/2014 regarding the insolvency prevention and insolvency procedures;
 - (s) Performs all the necessary and useful documents for the achievement of the company's core business, except for those reserved by law for the general meeting of shareholders;
 - (t) Engages current bank loans and trade credits, in compliance with the competencies and level of contracting set by the extraordinary general meeting of shareholders and approves the issue of the guarantees;
 - (u) Approves the proposals regarding the global strategy for development, revamping, modernization, economic-financial restructuring of the company;
 - (v) Provides the enforcement of the resolutions adopted by the shareholders within the sessions of the general meetings of shareholders, aiming that the enforcement of the resolutions be made by compliance with the legality of the company business; secures and is liable for the carry-on of any task or duty set by the general meeting of shareholders or that is being stipulated by the legislation in force, here-included the regulations in force regarding the capital market, as well as by the performance of the company's business, in terms of both direct duties, as well as for those assigned to the Director General/directors with mandate contract.
 - (w) Approves the management plan drafted and presented by the Director General/directors with mandate contract, in 90 days as of the nomination thereof under the provisions of GEO no. 109/2011 regarding the corporate governance of the public enterprises.
 - (x) Presents, twice a year, within the ordinary general meeting of shareholders, a report on the administration activity including also information referring to the execution of the mandate contract of the directors, details regarding the operational activities, financial records of the company and the biyearly accounting reports thereof.
 - (y) Submits, to the ordinary general meeting of shareholders that approves the annual financial statements, an annual report (Remuneration Report), prepared by the Nomination and Remuneration Committee within the Board of Directors, regarding the remunerations and other benefits granted to the administrators and directors with mandate contracts during the previous financial year, report structured pursuant to the provisions of the legislation in force;
 - (z) Approves the establishment or disestablishment of sub-units (secondary establishments, work sites, branches, agencies, representatives or other sub-unit types bearing no legal personality), located in the same locality and/or in other localities, in the country and abroad;
- (2) Under the sanction of nullity, the administrators or the directors with mandate contract may, on their own behalf, alienate, respectively acquire, goods to or from the company having a value of over 10% of the company's net assets value, only after obtaining the approval of the extraordinary general meeting, under the conditions provided in Law no.31/1990 regarding the companies.
- (3) The duties received by the Board of Directors from the general meeting of shareholders cannot be delegated to the Director General/directors with mandate contract, in compliance with Art. 15 Para. (4) Letter (p) of this Articles of Incorporation.
- (4) The Board of Directors reserves the duty to represent the company in relation to the Director General.

CHAPTER VI THE DIRECTORS

Art. 21 The Duties and Rights of the Director General/Directors with mandate contract

- (1) The Board of Directors shall delegate the company's management to one or more directors, appointing one of them in the capacity of Director General. Within the meaning of this Articles of Incorporation, director means that person to whom management duties of the company have been delegated by decision of the Board of Directors and who concludes a contract of mandate with the Company, in accordance with the applicable legal provisions.
- (2) The Director General/Directors with mandate contracts have the following main duties:
 - (a) provides the leadership and management of the company business and is liable for the execution thereof in relation to both direct duties, as well as the ones entrusted to the Board of Directors;
 - (b) prepares the annual draft report, the draft income and expenditure budget and the planned works programme and submits them to the Board of Directors;
 - (c) observes the reporting liabilities set by the regulations in force regarding the capital market and the provisions of GEO no. 109/2011 regarding the corporate governance of the public enterprises, as well as all the other applicable legal provisions;
 - (d) drafts the company development and marketing strategies and policies and submits them for approval to the Board of Directors; applies the strategy, the company development and marketing strategies and policies set by the Board of Directors;
 - (e) prepares projects and business plans and submits them to the Board of Directors for approval;
 - (f) prepares the Organizational and Operational Rules and Regulations governing the company, the draft organizational structure and personnel structure and submits them to the Board of Directors for approval;
 - (g) organizes, coordinates and makes all necessary diligence to enforce the strategies and policies approved by the Board of Directors; approves the documents of normative nature and the Rules regulating the activity of the company;
 - (h) the Director General hires/nominates/removes/promotes/suspends/dismisses, as the case may be, under the law, the company personnel and sets the rights and obligations thereof;
 - (i) the Director General negotiates the employees' individual labour contracts;
 - (j) sets the attributions, competencies and responsibilities incurred by way of the job description, for the organizational positions that fall under his direct subordination;
 - (k) provides the fall within the wage fund figure contained in the approved income and expenditure budget, by the achievement of the productivity indicators.
 - (l) provides the monitoring of the implementation of provisions of the revenues and expenditure budget of the Company, by areas of expertise;
 - (m) sets the performance criteria and objectives for the management positions employees, the follow-up of the degree of achievement thereof and assessment of their activity regarding the fulfilment of the attribution provided in the job description;
 - (n) are bound not to disclose confidential data and information and business secrets of the Company, as well as information regarding its activity. This liability is also binding after the termination of the mandate, for a period of 5 years. They must also comply with the inside information regime provided in the incidental legislation.
 - (o) presents to the Board of Directors, monthly or whenever necessary, activity reports;
 - (p) have signature right and signature specimen in the bank and decide on the receipt and payment operations of the company; these powers may be delegated, in case of impossibility to exercise one's duties, to others within the company by decision of the Board of Directors, the BoD being the one to appoint the persons authorized to have signature right I and II and their substitutes;
 - (q) notifies the board of directors on all irregularities found during the fulfilment of his duties;

- (r) the Director General negotiates and concludes the Collective Labor Agreement in the name and on behalf of the company, as per the mandate given by the Board of Directors and in the form agreed following negotiations between the parties;
- (s) the Director General represents the Company in relation to third parties and in Court;
- (t) the Director General concludes juristic acts, in the name and on behalf of “CONPET” S.A., under the law and in compliance with the provisions of the contract of mandate and the empowerments granted based on the BoD decision;
- (u) the Director General concludes contracts of sale and purchase of goods under the law and in accordance with the contract of mandate and powers granted by decision of the Board;
- (v) may authorize the directors or any other employee of the company to exercise any power within one’s competence, both in what concerns the company's business and the representation in relation to various authorities, public institutions, natural or legal persons, in justice, etc., as the case may be;
- (w) the Director General signs the protocols of the decommissioning of fixed assets/scrapping of inventory items/downgrading of material goods, where he shall be delegated this power by the Board of Directors
- (x) endorses the materials on the Agenda of the BoD meetings, according to their area of expertise;
- (y) the Director General organizes and manages an Executive Director Committee consisting of directors with mandate contract. The Director General may summon to meetings employees with management or execution powers within the company and, as the case may be, when discussing problems of professional, economic and social concern, may also invite the President of the Union.
- (z) any of the administrators may request to the Director General/Directors information regarding the operative management of the company. The Director General/Directors is bound to inform the Board of Directors, regularly and in a comprehensive manner, on the operations made and the envisaged ones.

(3) Directors with mandate contracts have the following main duties:

- (a) to settle, based on the substantiation documents, the accommodation expenses, the per diem payments, the transport and other expenses, for the travel assignments in the country and overseas, within the limits set by the income and expenditure budget for these expenses;
- (b) to be granted the transport by company vehicle (with driver or personal drive) to fulfil his duties;
- (c) to hold professional liability insurance, the exchange value thereof being borne by CONPET S.A., under the law;
- (d) to benefit from paid days off every calendar year, which are not assimilated to the rest leave provided by the labor code, as well as other rights provided in the mandate contract;
- (e) to be provided a workplace within the Company in compliance with his qualification, as well as other rights in accordance with the legal provisions, at the end of the mandate;

(4) The rights of the Directors are the ones stipulated in the contract of mandate concluded between the company represented by the Board of Directors through a member thereof, usually the Chairman of the BoD and the respective director. Through the Contract of mandate concluded with the company, the Director may be also granted other additional rights besides those stipulated in paragraph (3).

Art. 22 Other provisions regarding the Directors with mandate contract

- (1) For the appointment of a director to be valid, the appointed person must accept it, expressly, by means of a written declaration.
- (2) The Director General/Directors are liable for paying all due diligence related to the Company management, within the limits of the scope of business of the Company and by the observance of the

exclusive competencies of the Board of Directors or of the General Meeting of Shareholders, reserved by Law or the Articles of Incorporation.

(3) The duration of the Director's mandate is 4 years and may be renewed. The vacancy of the position of director is established by decision of the Board of Directors.

(4) The director's mandate ends by completion of the duration of the mandate, by revoking the mandate, by waiving the mandate, as well as for any other reasons for the termination of the mandate provided by law, this Articles of Incorporation or the mandate contract.

(5) The rights and obligations of directors with mandate contract will be those stipulated by the contract, by the decision of the Board of Directors regarding the delegation of management powers of the Company, by the provisions of this Articles of Incorporation and by the legal provisions applicable to the directors of joint stock companies.

(6) The directors shall submit to the Company, ex officio or upon request, all identification, contact data and any personal data necessary to ensure the conditions for the execution of the Company's obligations, provided by law, the Articles of incorporation or the mandate contract.

In the event of changes to the submitted data, the submission of the new data will be done by the Directors, ex officio.

CHAPTER VII COMPANY MANAGEMENT

Art. 23 The Audit

A. The Financial Auditor

(1) The financial statements of the company shall be audited by the financial auditors, natural or legal persons, under the law.

(2) The financial auditors are elected by the general meeting of shareholders and they carry on their activity based on the contract concluded with the company. The identification data of the financial auditors shall be registered with the Trade Register Office in accordance with the legal provisions.

(3) The general meeting may approve the annual financial statements only if they are accompanied by the report of the financial auditor.

(4) The annual financial statements, together with the administrators' report and the financial auditor's report shall remain filed to the company premises during the 30 days preceding the general meeting, in order to be consulted by the shareholders.

(5) The shareholders may ask the Board of Directors, on their expense, copies of the annual financial statements and the other reports stipulated at paragraph (4).

(6) In order to exercise the right to control, the significant shareholders may be presented, upon request, data regarding the company activity, the statement of assets and liabilities, of profit and loss.

(7) Approval of the annual financial statements by the general meeting does not impede the exercise of the liability proceeding against the administrators, directors or financial auditors;

(8) The financial auditors are bound to survey the company management, to check whether the financial statements are legally prepared and in accordance with the book records, if the latter are regularly kept and the evaluation of the assets elements was made as per the rules set for the preparation and presentation of the financial statements.

(9) The duties and functioning of the financial auditors of the company, as well as the rights and obligations thereof are being complemented with the legal provisions in the area.

B. The internal audit

- (1) The Company shall organize the internal audit as per the general legislation regarding the internal audit and methodological norms drafted by the Romanian Financial Audit Chamber in this purpose.
- (2) The general objective of the internal public audit in the public entities is represented by the improvement of the management thereof and can be reached, mainly by:
 - a) insurance activities, representing objective examinations of the evidence, made in view of providing the public entities and independent assessment of the risk management, control and governance related-processes;
 - b) counselling activities meant to bring plus value and improve the governing processes in the public entities, the internal auditor not undertaking management responsibilities;
- (3) The internal auditors shall inform the Board of Directors members on the irregularities found during the performance of the company business, as well as the breach of the legal provisions and Articles of Incorporation.
- (4) The entity performing the Internal Public Audit is distinctly constituted under the direct subordination of the Director General. The internal audit activity is being recurrently reported to the Board of Directors, which analyzes and sets the necessary measures for a good organization and functioning of the company. The head of the Internal Public Audit Service is appointed/dismissed by the Director General, only with the approval of the ministry under whose authority is "CONPET" S.A.. The Director General approves the annual internal public audit plan and the annual report of the internal public audit activity.
- (5) The competence of the internal public audit covers all the activities performed within the company for the fulfilment of the objectives thereof, here included the assessment of the management control system.

CHAPTER VIII COMPANY BUSINESS

Art. 24 The Financial Year

- (1) The financial year represents the period for which must be concluded the annual financial statements and coincides to the calendar year.
- (2) As per the provisions of the Accounting Law no. 82/1991, republished, the Board of Directors is bound to submit to the territorial units of the Ministry of Public Finances, in electronic form, with an extended electronic signature attached, the annual financial statements, the administrators' report and the financial auditors' report.
- (3) The company is bound to publish, in the Official Gazette of Romania, part. IV, a notice to confirm the filing of the documents stipulated in paragraph (2).

Art. 25 Company Personnel

- (1) The management and operating personnel is hired/appointed/dismissed/promoted/fired by the Director General;
- (2) The payment of wages and related taxes, of the social insurance rates, as well as of the other obligations to State and local budget shall be made as per the law.
- (3) The rights and obligations of the company personnel are being set by way of the Collective Labour Agreement, the Organizational and Operational Rules and Regulations and by own regulations.
- (4) The payment shall be made as per the legal legislation in force and provisions of the collective labor agreement.
- (5) Considering the business specificity, the company personnel concludes a non-disclosure agreement regarding the failure to submit/the non-disclosure of data and information they have become aware of during the labor contract execution, under internal regulation, individual or collective labor agreement.

The personnel must also comply with the regime of the inside information stipulated in Law no. 297/2004 regarding the capital market and contingent regulations.

Art. 26 Depreciation of Fixed Assets

The Board of Directors approves, under the Law, the method to depreciate the tangible and intangible assets of the company's Asset.

Art. 27 Book-keeping and Financial Statements

The Company holds the book-keeping, in national currency, observing the conditions stipulated by the Romanian legislation in force.

The annual financial statements are prepared in compliance with the applicable accounting regulations and the accounting policies of the company.

Art. 28 Calculation and Distribution of Profit

- (1) The company profit is being set under the law based on the annual financial statements approved by the ordinary general meeting of shareholders.
- (2) Out of the company profit shall be taken-over, every year, within a 5% limit, an amount for the formation of the reserve fund, as per the legislation in the area, until it reaches at least the fifth part of the share capital.
- (3) The remaining profit following the payment of the income tax shall be distributed as per the resolution of the general meeting of shareholders.
- (4) Out of the company profit can be constituted funds for the modernization, research and development of new products, investments, repairs as well as other destinations set by the general meeting of shareholders.
- (5) The payments of dividends due to shareholders are being made by the company under the law following the approval of the financial statements by the general meeting and fixing the payment date, as per the legal provisions in force.
- (6) In case of loss registration, the general meeting of shareholders shall analyze the causes and decide accordingly, under the law.
- (7) Bearing the costs by the shareholders shall be made in proportion to the share capital contribution.

Art. 29. Company Registries

- (1) The Company will keep up-to-date, beyond the records stipulated by law the following registries:
 - a) A Shareholders' Registry. The company contracts an Independent Registrar to keep the electronic record of the Shareholders Registry and log the registration and perform other relevant operations;
 - b) A Journal of the meetings and general meetings deliberations;
 - c) A Journal of the meetings and BoD deliberations;
 - d) A registry of bonds, to show the total bonds issued and disbursed, as well as the bearers' first name, surname, place of domicile or headquarters, when the bonds are nominative. The evidence of the bonds issued in dematerialized form and which are being transacted on an organized market shall be held as per the law.
 - e) A registry of the deliberations and findings made by the internal auditors, during the mandate execution thereof.
- (2) The administrators or, as the case may be, the Independent Registrars, are bound to make available to the shareholders the registry stipulated at letter a) and issue, upon request, a statement of account.

Moreover, they are bound to make available for the shareholders and bonds bearers, under the same conditions, the registries stipulated at letters b) and d).

CHAPTER IX

AMENDMENT OF THE LEGAL FORM, DISSOLUTION, LIQUIDATION, LITIGATIONS

Art. 30 Amendment of the Legal Form

(1) Amendment of the legal form of the company shall be made only based on the resolution of the extraordinary general meeting of shareholders and by the fulfilment of all formalities stipulated by law and this Articles of Incorporation.

(2) The new company will fulfil all legal registration and advertising formalities requested at the companies' set-up.

Art. 31 The Company Dissolution

1) The company dissolution shall take place in the following situations:

- a) impossibility to achieve the company business scope;
- b) opening of the company bankruptcy procedure;
- c) declaration of the company nullity by way of a final and irrevocable Court judgment;
- d) losses due to which the net asset, determined as difference between total assets and company liabilities, represents less than half the share capital, after having consumed the reserves fund due to reasons that trigger no responsibility of any kind, unless the general meeting of shareholders agrees upon the restitution of the share capital or reduction thereof to the remaining amount;
- e) Court judgment, upon the request of any shareholder, for ground reasons, as well as the misunderstandings
- f) between the shareholders, that impede the company operation;
- g) decrease of the number of shareholders below the minimum legal threshold;
- h) share capital reduction below the minimum imposed by the law;
- i) other causes stipulated by law or the Articles of Incorporation of the company.

(2) The resolution to dissolve the company must be inscribed in the Trade Registry and published in the Official Gazette of Romania, part IV.

Art. 32 Company Liquidation

(1) The company dissolution has as effect the opening of the liquidation procedure as per the legal norms, except for the merger or total division thereof.

(2) The company liquidation and distribution of assets are made under and by observance of the procedure stipulated by law.

Art. 33. Merger and Division

The company's merger, respectively division take place based on the resolution of the extraordinary general meeting of shareholders, as per the applicable legal provisions.

Art. 34 Litigations

(1) The company litigations with Romanian natural or legal persons are the jurisdiction of the Instance Courts in Romania, as per the Law.

(2) The litigations arising from the contractual relations between the company and Romanian legal persons may be also settled through arbitration, as per the law.

CHAPTER X FINAL PROVISIONS

Art. 35 Final Provisions

(1) The provisions of this Articles of Incorporation are being complemented by the provisions of GEO no. 109/2011 regarding the corporate governance of the public enterprises, of Law no. 31/1990 regarding the companies, of the Civil Code, Trade Code and of the legislation in force regarding the capital market.

(2) This Articles of Incorporation has been updated on 27.04.2023 following the amendments approved by the EGMS Resolution no. 1/27.04.2023, based on the Articles of Incorporation updated on 28.04.2022 and was drafted and signed in 3 (three) original copies.

Personal information 	Cristian – Florin Gheorghe
Date of birth	
Nationality	Romanian
Gender	Male
Professional experience	
2024 – to date	Director General Directorate General of Electricity, Oil and Natural Gas Ministry of Energy
2021 – 2024	Director General Directorate General of Electricity and Natural Gas Markets, Efficiency and Risks Ministry of Energy
2020 –2021	Director General Department of Energy Ministry of Economy, Energy and Business Environment
2018 – 2020	Director General Directorate General of Crude Oil and Natural Gas Ministry of Energy
2017	Senior Advisor Directorate General of Energy Policies Ministry of Energy
2018 – to date	Member of the Board of Directors of the company CONPET S.A. Ploiești Chairman of the Board of Directors
2017 – to date	Member of the Board of Directors of the company OIL TERMINAL S.A. Chairman of the Board of Directors
2018 – 2020	Member of the Board of Directors – ACROPO Regulatory Competent Authority for Offshore Oil Operations in the Black Sea
2017	Personal Advisor to the Minister of Energy Ministry of Energy Advising the Minister on some aspects related to all activities related to energy products

2015 – 2016	Member in the Board of Directors of the company OIL TERMINAL S.A. President of the Audit Committee Oil Terminal Company 2 Caraiman Street, postal code 900117, Constanța (România) Coordinating the Audit Committee Type of activity or business: Handling – providing services regarding the reception, loading, unloading of crude oil, petroleum, petrochemical, chemical products, as well as other end products or liquid raw materials for import, export and transit					
2013 – 2016	Parliamentary Advisor Romanian Parliament – Chamber of Deputies – deputy Remus Cernea Parliament Palace, 2 – 4 Izvorului Street, sector 5, postal code 050563 Bucharest, Romania, www.cdep.ro Parliamentary advisor on environmental issues					
2014 – 2016	Director General S.C. AS PETROL RECYCLE S.R.L.					
2008 – 2014	Marketing Director S.C. EURO METAL TRADING S.R.L.					
2006 – 2008	Marketing Director S.C. AS METAL COM S.R.L. – I.M.G.B. platform					
2004	Director General S.C. AVIS CONSULTING S.R.L.					
2000 – 2003	Marketing Director S.C. AR METAL S.R.L.					
Education and professional training						
2018 – 2022	PhD in Accounting and Financial Audit Doctoral school Valahia State University					
01.11.2017	Prince2 – Foundation Certificate in Project Management Global Best Practice www.axelos.com					
2002	Diplomate Engineer in the field of Economic Engineering Bioterra University – Faculty of Engineering and Agrotourism Management Bucharest, Romania					
1993	Vocational Technical Highschool Metaloglobus Bucharest, Romania					
Personal Competences						
Mother tongue		Romanian				
Foreign languages	English	UNDERSTANDING		SPEAKING		WRITING
		Listening	Reading	Spoken interaction	Spoken production	
		B1	B1	B1	B1	B1
		Levels: A1 and A2: Basic user - B1 and B2: Independent user - C1 and C2: Proficient user				

		<i>Common European Framework of Reference for Languages</i>				
Communication skills and competences	Excellent communication skills, competencies of management and negotiation as a result of my expertise. Team spirit. Able to create and implement high standards within a company. Rigour, creativity, patience and professionalism. Commitment.					
Organizational/ managerial skills and competencies	Abilities to lead and organize large teams of persons; Able to implement beneficial changes within a company;					
Digital skills	SELF – ASSESMENT					
	Information processing	Communication	Content creation	Safety	Problem solving	
	Proficient user	Proficient user	Proficient user	Proficient user	Independent user	
	<i><u>Digital competences - Self-assessment grid</u></i>					
Driver's license	B category					



Curriculum vitae Europass

Personal Information

First name / Surname
Nationality
Year of birth

Nicușor Marian Buică
Romanian

Professional Experience

Period

Occupation or position held
Name and address of employer
Type of activity or business sector

December 2017 – October 2024

Director General
SAI Muntenia Invest
Authorized Investment Management Company
Registered Administrator of Alternative Investment Funds

Period

Occupation or position held
Name and address of employer
Type of activity or business sector

September 2020 - present

Non-executive administrator
BIOFARM
Manufacturing of pharmaceutical preparations

Period

Occupation or position held
Name and address of employer
Type of activity or business sector

September 2019 - present

Non-executive administrator
CONPET S.A.
Transport through pipelines

Period

Occupation or position held
Name of employer
Type of activity or business sector

June 2019 - present

Non-executive administrator
ICPE S.A.
Research - development in other sciences and engineering

Period

Occupation or position held
Name of employer
Type of activity or business sector

March 2018 - present

Non-executive administrator
COCOR S.A.
Renting and subletting of own or rented real estate

Period

Occupation or position held
Name of employer
Type of activity or business sector

May 2017 - present

Board of Directors' member
The Company INCERTRANS S.A.
Research-Design Institute

Period

Occupation or position held
Name of employer
Type of activity or business sector

March 2017 – December 2017

Board of Directors' member
SAI Muntenia Invest S.A.
Authorized Investment Management Company

Period

Occupation or position held
Name of employer
Type of activity or business sector

June 2016 – December 7th, 2016

Board of Directors' member
Swiss Capital S.A.
Financial Services and Intermediation Company

Member of Bucharest Stock Exchange

Period

Occupation or position held
Name of employer
Type of activity or business sector

May 2016 – October 2016

Director
Romenergo
Activities in the energy field

Period

Occupation or position held
Name of employer

Type of activity or business sector

October 2015 – April 2016

State Secretary
Ministry of Investment and European Projects

Central Public Authority

Period

Occupation or position held
Name of employer
Type of activity or business sector

December 2014 - July 2015

Board of Directors' member
Enel Energie Muntenia S.A.
Electricity supply

Period

Occupation or position held
Name of employer
Type of activity or business sector

August 2014 – December 2014

Counselor to the Minister Delegate for the Budget
Ministry of Public Finance
Central Public Authority

Period

Occupation or position held
Name of employer
Type of activity or business sector

March 2013 – March 2014

Secretary of State
Ministry of Transports
Central Public Authority

Period

Occupation or position held
Name of employer
Type of activity or business sector

June 2012 – November 2012

Secretary of State Counsellor
Ministry of Environment and Climate Changes
Central Public Authority

Period

Occupation or position held
Name of employer
Type of activity or business sector

July 2010 – June 2012

Chairman of the Board of Directors
Dunapref S.A.
Prefabricated for civil constructions, roads,
bridges, railways

Period

Occupation or position held
Name of employer
Type of activity or business sector

January 2008 – May 2009

Commercial Director
Apolodor Com Impex
Special foundations, Infrastructure works,
Demolitions, Civil constructions

Period

Occupation or position held
Name of employer
Type of activity or business sector

March 2005 – December 2007

Board of Directors' member - Executive Director
Elpreco S.A.
Manufacturer of construction materials

Period

Occupation or position held
Name of employer
Type of activity or business sector

October 2001 – March 2005

Development Director
Elpreco S.A.
Manufacturer of construction materials

Period

Occupation or position held
Name of employer
Type of activity or business sector

February 2004 - 2006

Internal audit
Active International S.A.
Services and Financial Intermediation Company
Member of Bucharest Stock Exchange

Period

Occupation or position held
Name of employer
Type of activity or business sector

2007 – July 2009

Manager – Deputy Director
Active International S.A.
Services and Financial Intermediation Company
Member of Bucharest Stock Exchange

Period

Occupation or position held
Name of employer
Type of activity or business sector

January 1998 – September 2001

Investments Broker
Active International S.A.
Services and Financial Intermediation Company
Member of Bucharest Stock Exchange

Education and training

Period

Principal subjects/occupational skills covered

Name and type of organization providing education and training

08.05.2023 – 11.05.2023

Ongoing 2024 Professional Training Program for Management Positions
AS Financial Markets
FPCCOND6.2024

Period

Principal subjects/occupational skills covered

Name and type of organization providing education and training

06.06.2024 – 08.06.2024

Ongoing 2024 Professional Training Program - Financial Regulations and Legislation course
Millenium Financial Training Center

Period

Principal subjects/occupational skills covered

Name and type of organization providing education and training

17.05.2024 – 18.05.2024

Managers of private pension funds and financial investment companies
European regulations in the field of prevention of money laundering
National Office for the Prevention and Combating of Money Laundering

Period

Principal subjects/occupational skills covered

Name and type of organization providing education and training

06.02.2024 – 07.02.2024

Ongoing 2024 Professional Training Program – SB/FT Risks evaluation course
AS Financial Markets
Course code ERSBFT1.2024

Period

Principal subjects/occupational skills covered

Name and type of organization providing education and training

20.10.2023 – 21.10.2023

Money laundering course
Managers of private pension funds and financial investment companies
National Office for the Prevention and Combating of Money Laundering

Period

Principal subjects/occupational skills covered

05.10.2023 – 07.10.2023

Continuous 2023 Professional Training Program - Investment Management Practices

Name and type of organization providing education and training

Period

Principal subjects/occupational skills covered

Name and type of organization providing education and training

Period

Principal subjects/occupational skills covered

Name and type of organization providing education and training

Period

Principal subjects/occupational skills covered

Name and type of organization providing education and training

Period

Principal subjects/occupational skills covered

Name and type of organization providing education and training

Period

Principal subjects/occupational skills covered

Name and type of organization providing education and training

Period

Principal subjects/occupational skills covered

Name and type of organization providing education and training

Period

Principal subjects/occupational skills covered

Name and type of organization providing education and training

Period

Principal subjects/occupational skills covered

Name and type of organization providing education and training

Period

Principal subjects/occupational skills covered

Millenium Financial training center
MPC-01.II.2023 PAI

28.09.2023 – 20.11.2023

Continuous training and professional development program for management positions
AS Financial Markets
FPCOND4, 2023

08.05.2023 – 11.05.2023

Ongoing Professional Training Program 2023 – Prevention and Combating Money Laundering, Terrorist Financing and International Sanctions course
AS Financial Markets

28.09.2022 – 08.11.2022

Ongoing training and professional development program for management positions
AS Financial Markets
Program code FPCCOND2.2022

29.09.2022 – 01.10.2022

ESG Environmental, Social and Corporate Governance
Millenium Financial Training Center

06.06.2022 – 09.06.2022

Money laundering, terrorist financing and international sanctions – Standards imposed on intermediaries 2022
AS Financial Markets

30.09.2021 – 03.10.2021

Ongoing professional training program
TTC-0062 - Advanced Corporate Governance
Top Training Center

29.03.2021 – 31.03.2021

Ongoing professional training program
MPC - 03.I.21.SB/FT

Millenium Financial Training Center

22.03.2021 – 24.03.2021

Ongoing professional training program
MPC-02.I.21.FIA/AFIA

Millenium Financial Training Center

16.02.2021

Online money laundering Course

Name and type of organization providing education and training

Period

Principal subjects/occupational skills covered

Name and type of organization providing education and training

Period

Principal subjects/occupational skills covered

Name and type of organization providing education and training

Period

Principal subjects/occupational skills covered

Name and type of organization providing education and training

Period

Principal subjects/occupational skills covered

Name and type of organization providing education and training

Period

Principal subjects/occupational skills covered

Name and type of organization providing education and training

Level in the national or international classification

Period

Title of Qualification/Diploma awarded

Principal subjects/occupational skills covered

Name and type of organization providing education and training

Level in the national or international classification

Period

Title of Qualification/Diploma awarded

Principal subjects/occupational skills covered

Name and type of organization providing education and training

Level in the national

P.17218

Romanian Banking Institute

01.10.2020 – 20.11.2020

Ongoing professional training program

FPC2.2020

AS Financial Markets

11.10.2019 – 28.11.2019

Ongoing professional training program

FPC1.2019

AS Financial Markets

01.10.2018 - 29.10.2018

Ongoing professional training program

FPC3.2018

AS Financial Markets

November 2017

Manager - innovation

Romanian Ministry of Education and Scientific Research

October 2017 – November 2017

Certificate of Graduation

Innovation Manager

CIT - IRECSON - Centrul de Informare Tehnologică
SRL București/ Technology Information Center

Proficiency Course

October 2003 – March 2005

Master of Business Administration - graduation certificate no. 200513205/November 22, 2005

Turnaround Management; Marketing management; Manager economics; Investment management; Business policy

City University, State of Washington, USA

EMBA

September 16th-25th, 2005

Graduation certificate - PROFESSIONAL SALES MANAGEMENT September 25th, 2005

Sales techniques and methods; Modern systems of organizing sales departments

Bucharest Chamber of Commerce and Industry and Royal Trading House S.R.L.

or international classification

Specialization

Period

Title of Qualification/Diploma awarded

1998 – 2003

Diploma in Economics, U series, no. 0041447/February 2003, Economics, Banking Financial Management Specialization

Principal subjects/occupational skills covered

Financial Management; Finance and Banking; The economy and the role of banks; Payment methods, tools and techniques; Financial analysis of economic agents; Introduction to marketing; Financing in international trade; Efficiency and valuation of investments; Asset and Liability Management

Name and type of organization providing education and training

University of Craiova, Faculty of Economic Sciences

Level in the national

or international classification

Bachelor's degree

Period

Title of Qualification/Diploma awarded

1994 – 1997

Engineering assistant diploma, P Series, no. 004495/June 1997, majoring in Mechanics, Materials and Defectoscopy specialization. Valedictorian

Principal subjects/occupational skills covered

Mechanics; Material resistance; Appliances; Electric machines; Thermal machines; Constructive elements of fine mechanics Bucharest University of Polytechnics

Name and type of organization providing education and training

Level in the national

or international classification

Graduation Diploma

Personal Skills And

Competences

Mother tongue(s)

Romanian

Foreign language(s)

Self-assessment <i>European level (*)</i>	Understanding		Speaking		Writing
	Listening	Reading	Interaction	Oral <u>speech</u>	Written expression
English language	B Independent 1 user	B Independent 1 user	B Independent 1 User	B Independent 1 User	B Independent 1 User
French language	A Basic 2 user	<u>A</u> Basic 2 user	A basic 2 User	A basic 2 User	A basic 2 User
(*) <i>Common European Framework of Reference for Languages</i>					

Social skills and competences

Good ability to adapt to multicultural environments, team spirit
Verified skills in a professional context



Organizational skills and competences

Organizational spirit, planning skills

Technical skills and competences

Detailed knowledge of company management. Sales systems. Ability to analyze and implement new projects. Knowledge in the field of financial management.
Technical knowledge in the field of mechanical industrial processes and in the field of machine building technologies.
Competencies in coordinating and guiding production and sales activities.

Computer skills and competences

Good use of Microsoft Office tools (Word™, Excel™ and PowerPoint™)



Curriculum Vitae

Personal information

Surname / First name **KOHALMI-SZABO LUMINIȚA – DOINA**
Nationality **Romanian**
Gender **Female**

Work experience

Period	08.04.2021 -to date
Name of the employer	CONPET SA
Type of activity and sector	Oil transport via pipelines
Occupation or position held	Administrator
Period	02.07.2019 – to date
Name of the employer	LK Strategic Center SRL
Type of activity and sector	Consultancy in public relations and communication
Occupation or position held	Administrator as of 02.07.2019/General Manager as of 01.01.2023
Period	20.02.2015 – 01.10.2022
Name of the employer	“Dimitrie Cantemir” Christian University, Faculty of Communication Sciences
Type of activity and sector	Education
Occupation or position held	Associate professor
Period	06.06.2017 – 02.07.2018
Name of the employer	Romanian Parliament, Chamber of Deputies
Type of activity and sector	Central public administration
Occupation or position held	Counsellor
Period	14.07.2015 – 31.05.2017
Name of the employer	Prive Boutique SRL
Type of activity and sector	Online Commerce
Occupation or position held	Marketing Specialist
Period	20.02.2015 – 01.10.2022
Name of the employer	“Dimitrie Cantemir” Christian University, Faculty of Communication Sciences
Type of activity and sector	Education
Occupation or position held	Associate professor

Period	06.02.2015 – 16.05.2016
Name of the employer	COMMONWEALTH CONSULTING SRL
Type of activity and sector	Management consultancy
Occupation or position held	Management Consultant

Period	30.11.2013 – 29.02.2015
Name of the employer	“Dimitrie Cantemir” Christian University, Faculty of Communication Sciences
Type of activity and sector	Education
Occupation or position held	University Lecturer

Period	01.06.2012 - 06.08.2012 and 07.09.2012 – 14.12.2014
Name of the employer	Presidential Administration
Type of activity and sector	Central Public Administration
Occupation or position held	Counsellor

Period	30.12.2009 – 08.05.2012
Name of the employer	Ministry of National Development and Tourism
Type of activity and sector	Central public administration
Occupation or position held	Counsellor to the Minister’s Cabinet

Period	03.03.2009- 31.12.2010
Name of the employer	Ministry of Tourism
Type of activity and sector	Central public administration
Occupation or position held	Counsellor to the Minister’s Cabinet

Period	01.02.2005 – 01.06.2005 and 15.02.2007 – 15.06.2009
Name of the employer	Ministry of Defence
Type of activity and sector	Central public administration
Occupation or position held	Deputy Director – Information and Public Relations Unit

Period	01.06.2005 – 14.02.2007
Name of the employer	Ministry of Defence
Type of activity and sector	Central public administration
Occupation or position held	Director – Directorate for Information and Public Relations

Period	01.12.1998 – 01.04.2003
Name of the employer	Romanian Radio Broadcasting Company /Compania Romana de Radio si Televiziune SRL
Type of activity and sector	Broadcasting

Period	01.05. 1998 – 01.12.1998
Name of the employer	RH Press SRL

Type of activity and sector Newspaper
Occupation or position held Reporter for “Cotidianul” Newspaper

Period **01.10.1997 - 01.06.1998**

Name of the employer **Tiporex SA**

Type of activity and sector Newspaper
Occupation or position held Editor “Cotidianul” Newspaper

Period **1990-1996**

Name of the employer **Pre-university education units**

Type of activity and sector Education
Occupation or position held Teacher of Physics

EDUCATION AND TRAINING

Period **1985 - 1991**

Qualification / diploma awarded **Bachelor’s degree/ Faculty of Physics**

Main studied disciplines / achieved professional skills Molecular physics and heat, physics of the liquid state, thermodynamics. mechanics and acoustics, electricity and magnetism, nuclear physics, quantum mechanics, solid state physics, ion optics and spectroscopy, superconductivity, mathematics, chemistry

Name and type of the education institution / training provider “Babes – Bolyai” University – Cluj – Napoca, Faculty of Physics

Period **2005-2008**

Qualification / diploma awarded **Military Sciences/PhD**

Main studied disciplines / achieved professional skills Military sciences, Security, Strategic Communication

Name and type of the education institution / training provider “Carol I” National Defence University

POST UNIVERSITY STUDIES

Period **2014**

Qualification / diploma awarded **Psycho – pedagogical module, Level II (postgraduate studies)/ Graduation certificate**

Main studied disciplines / achieved professional skills Teenagers, youngsters and adults’ psycho – pedagogy, design and management of education projects, educational and field projects in speciality teaching, education sociology, educational research methodology, pedagogical practice

Name and type of the education institution / training provider “Dimitrie Cantemir” Christian University, Faculty of Education Sciences

Period	2014
Qualification / diploma awarded	Psycho – pedagogical module, Level I (postgraduate studies)/ Graduation certificate
Main studied disciplines / achieved professional skills	Psychology of education, pedagogy, management of the class of students, speciality education, computer-assisted learning, pedagogical practice
Name and type of the education institution / training provider	“Dimitrie Cantemir” Christian University, Faculty of Education Sciences

Period	2005-2006
Qualification / diploma awarded	Advanced training in the field of security and national defense (post-graduate studies)/ Certificate of graduation
Main studied disciplines / achieved professional skills	Geopolitics and strategy, security policies and strategies, theory of international relations/postgraduate course of excellence in the field of national security and defense
Name and type of the education institution / training provider	National Defense University, Cato I, National Defense College

TRAINING

Period	2021
Qualification / diploma awarded	Certificate of Participation to the “Advanced Corporate Governance “course
Main studied disciplines / achieved professional skills	Corporate governance – included in the ongoing training program Top Training Centre Executive Program 2021
Name and type of the education institution / training provider	Top Training centre

Period	2014
Qualification / diploma awarded	Trainer/Graduation certificate
Main studied disciplines / achieved professional skills	Elaborating the training and training programmes, evaluation of training participants, implementation of special training methods and techniques, marketing of training, design of training programmes, organization of training programs and traineeships, evaluation, review and assurance of quality of training programs and traineeships
Name and type of the education institution / training provider	Body of Experts in Accessing the European Structural and Cohesion Funds

Period	2014
Qualification / diploma awarded	Project manager/Graduation certificate

Main studied disciplines / achieved professional skills	Establishing the purpose of the project, establishing the integrated project management requirements, planning the project activities and milestones, Managing the use of operational costs and resources for the project, carrying out the procurement procedures for the project, risk management, project team, communication within the project
Name and type of the education institution / training provider	Body of Experts in Accessing the European Structural and Cohesion Funds
Period	2005
Qualification / diploma awarded	Graduation certificate
Main studied disciplines / achieved professional skills	Civil – military democratic relations
Name and type of the education institution / training provider	Canadian Department of National Defense, Ottawa
Period	2005
Qualification / diploma awarded	Certificate of participation to the seminar
Main studied disciplines / achieved professional skills	Planning and effective implementation of communication campaigns
Name and type of the education institution / training provider	European Institute of Public Administration – Maastricht
Period	2003
Qualification / diploma awarded	Graduation certificate
Main studied disciplines / achieved professional skills	Customer relationship and quality management
Name and type of the education institution / training provider	The Open University Business School, UK
Period	2002
Qualification / diploma awarded	Graduation certificate
Main studied disciplines / achieved professional skills	Competitive management
Name and type of the education institution / training provider	The Open University Business School, UK
Period	1996
Qualification / diploma awarded	Graduation degree

Main studied disciplines / achieved professional skills	BBC School of Radio Journalism				
Name and type of the education institution / training provider	BBC World Service				
PERSONAL SKILLS AND COMPETENCIES	Strategic thinking and capacity to make forecasts				
	Planning, organization and resource allocation for project management				
	Competencies at the level of an experienced user in the use of IT&C as a strategic tool in business (use of ERP, CRM, RPA concerns and the use of AI in business)				
	Knowledge of corporate governance regulations, principles and concepts				
	Experience in negotiations, social dialogue, interpersonal communication				
	Teamwork skills				
	Effective communication				
	Dynamism, determination				
	Stress resilience				
	Time management skills				
FEATURES	Empathetic				
	Decision-making and involvement capabilities				
	Identification and control of risks				
	Analysis and synthesis capabilities				
Mother tongue	Romanian				
Self-assessment	Understanding		Speaking		Writing
<i>European level (*)</i>	Listening	Reading	Spoken interaction	Spoken production	Writing
English	C1	C1	C1	C1	C1
French	C1	B2	B2	B2	B2
<i>(*)Common European Framework of Reference for Languages</i>					
Driving licence(s)	B category				



TĂNĂSICĂ OANA

LAWYER

DOCTOR OF LAW

Name: **Tănăsică Oana Cristina**

Professional activity:

Legal Advisor - 2002-2003

Intern Lawyer – 2003-2005

Main Lawyer at Tănăsică Oana Law Firm, Bucharest Bar – 2005 – to date

Insolvency Practitioner coordinator at Insolva IPURL – 2012 – to date

Member of the National Integrity Council – National Integrity Agency – 2022 – 2024

Member in the Board of Directors of CONPET S.A. – 2022 – to date

Education:

Law Faculty – Nicolae Titulescu University – class of 1999 – 2002 – Graduation Degree 2002

International Economic Relations Faculty – Dimitrie Cantemir University – Years I–IV 2002 – 2003

Postgraduate studies:

Doctor of Law as per the National Education Ministry Order No. 3779/04.06.2018 - Doctoral Law School, majoring in International Trade Law. Bucharest University, Law Faculty **Doctoral thesis** “Companies intended for commercial activity with foreign participation in Romania”, publicly presented on May 4th, 2017

ISO 37001:2016 External Auditor - Anti-bribery management system - 2023

Public Procurement Expert Course - 2009

Master’s Degree in Conflict Mediation - Titu Maiorescu University, 2006

Master’s Degree in Criminal Science – Law Faculty - Nicolae Titulescu University, 2004

Psychological and Pedagogical courses for the training of the teaching staff – Oil and Gas University Ploiești, 2004

Civil and Commercial Law post -university courses – Law Faculty - Nicolae Titulescu University, 2003

Participation in conferences, courses and seminars:

Conference on Prevention and fight against money laundering, 2020

Administrative Law conference, Bucharest University, 2019
Conference on EU regulation 2016/679 GDPR, 2018
National Contentious Administrative Conference, Bucharest, 2017
National Office for the Prevention and fight against Money Laundering, 2012
Romania - Austria Bilateral Conference organized by the Court of International Commercial Arbitration attached to the Chamber of Commerce and Industry of Romania, in collaboration with the Austrian Arbitration Association, 2010
The odyssey of the whistleblower law organized by the Legal Universe - speaker 2023
Awards:

The Entrepreneur Club Gala, Edition I, 2020 - the prize awarded for the quality of services offered to entrepreneurs
Lady lawyer Gala, Edition VI, 2019 - the prize awarded in the Category of Law Firms from big cities
The Entrepreneur Club Gala, Edition XI, 2023 - Excellence Award in Integrity Services for Companies
Articles, interviews, publications:

Writer of the book "Companies intended for commercial activity in Romania" – Universul Juridic Publishing House 2023

Intellectual property rights. Benefits, threats, perspectives - article published <http://newstrategycenter.ro/contrabanda-contrafacerea-pirateria-riscuri-la-adresa-securitatii-nationale/>;
<http://newstragtegycenter.ro/wp-content> uploads 2016/05 Prezentare-Av-Oana-Tanasica.pdf;

Revocation of the administrator of the company intended for commercial activity - www.juridice.ro - 2017 (<https://www.juridice.ro/512306/revocarea-administratorului-societatii-destinate-activitatii-comerciale.html>);

The legal nature of the relationship between the administrator and the company - www.avocatura.com - article published on May 2017 (<http://www.avocatura.com/stire/16355/natura-juridica-a-raporturilor-dintre-administrator-si-societate.html>);

2004 - 2022

Recognition of foreign judgments in Romania - Universul Juridic Publishing House no. 5/2017;

Augmentation of the share capital of companies with foreign participation, intended for commercial activity - Universul Juridic Publishing House - Universul Juridic Magazine no. 6/2017;

Lady Lawyer Magazine, Edition VI, 2019 – Interview – www.legalmagazine.ro, Special edition, November 2019;

Clubantreprenor Magazine, Edition I 2020 – Interview – www.clubantreprenor.ro, September 2020;
<https://www.clubantreprenor.ro/2020/09/30/interviu-cu-oana-tanasica-avocat-titular-cabinet-avocat-tanasica-oana-statul-trebuie-sa-se-axeze-mai-mult-pe-sectorul-privat-generator-de-valoare-adaugata-si-crestere-economica/>

Clubantreprenor Magazine, Edition XI, 2023, **Interview integrity procedures** - <https://www.clubantreprenor.ro/2023/06/16/interviu-cu-oana-tanasica-avocat-titular-cabinet-avocat-tanasica-oana-din-ce-in-ce-mai-multe-companii-si-institutii-isi-dezvolta-politici-si-proceduri-de-integritate>

Membership to professional associations and organizations

Bucharest Bar – lawyer since 2004;
National Union of Insolvency and Reorganization Practitioners - insolvency practitioner since 2011
PNL (National Liberal Party) – member of the Municipal and County Political Bureau

Foreign languages

English	Advanced
French	intermediate

PERSONAL INFORMATION



Curriculum Vitae

GAVRILĂ Florin-Daniel

Nationality Romanian

Administrator – CONPET S.A.

PROFESSIONAL EXPERIENCE

November 2024 – to date

Administrator

Comalim SA, Arad

Business field - Renting and subletting of own or rented real estate

March 2024 – to date

Director

LION CAPITAL SA, Arad

Ensuring, together with the other Directors, the effective management of the company. Implements the company's strategy and objectives. Coordinates activities in the Corporate Administration and Operations segment. Member of the Investment Committee.

January 2020 – March 2024

Operations Unit Director

LION CAPITAL SA/SIF Banat-Crisana-SA, Arad

Coordinating the activity of the departments *Investment Analysis* and *Management of holdings*, *Cash management*, *Market operations* and *Projects in development*

Business field - Financial Investments

September 2015 – December 2019

Transactions Analyst

SIF Banat-Crisana-SA, Arad

Responsible for monitoring the portfolio of allocated issuers and carrying out investment decisions. Ensures the implementation of approved trading arrangements.

Business field - Financial Investments

May 2018 – to date

Administrator

Conpet SA Ploiesti

Business field - Transport via pipelines

December 2015 – to date

Administrator

	SIFI Cluj Retail SA, Bucharest Business field – renting and subletting of own or rented real estate
February 2016 – September 2024	Administrator Central SA, Cluj-Napoca Business field - renting and subletting of own or rented real estate
April 2016 – February 2023	Administrator Uniteh SA, Timisoara Business field - renting and subletting of own or rented real estate
October 2016 – December 2016	Administrator SSIF BRK Financial Group SA, Cluj-Napoca Business field - Investment Company
February 2013 – July 2015	Sales-Trader, Institutional Clients Unit SSIF Broker SA, Cluj-Napoca Stockbroker, in charge with sales-trading activity, particularly for the institutional clients (but also large-retail); stocks trading by DMA on the main European markets Business field: Investment Company
March 2011 – December 2012	Sales-Trader, Institutional Clients Unit Unicredit CA~IB Securities Romania SA, Bucharest Stockbroker (authorized in April 2011), in charge with the sales-trading activity, particularly for the institutional clients (but also large-retail); stocks trading by DMA on the main European markets; sales-trading in cooperation with Unicredit office in London Business field - Investment Company
February 2011 – October 2023	Tax Advisor The Romanian Chamber of Fiscal Consultants, Bucharest
October 2005 – March 2011	Stockbroker/Deputy Director General SSIF Egnatia Securities SA, Bucharest - Stockbroker (authorized in December 2005), in charge with the trading activity for the firm's clients, compensation-settlement agent authorized by Depozitarul Central - Deputy Director General (starting April 2007), overseeing the trading activity Business field - Investment Company
July 2005 – October 2005	Economist SSIF European Securities SA, Bucharest - in charge with the post-trading activity for the firm's clients Business field - Investment Company
February 2004 – June 2005	Economist/ASIF

SSIF Invest Trust SA, Craiova
 - Economist, afterwards financial investment services agent (authorized in June, 2004), in charge with the increase of retail clients portfolio
Business field - Investment Company

EDUCATION AND TRAINING

2023	Participant "Preventing and combating money laundering, terrorist financing and international sanctions" AS Financial Markets
2022	Participant "Money Laundering, terrorist financing and international sanctions" AS Financial Markets
2021	Participant "Money laundering, terrorist financing and standards imposed to the intermediaries" AS Financial Markets
2020	Participant "Money laundering, terrorist financing, international sanctions and standards imposed to the intermediaries" AS Financial Markets
2009	Participant "Capital Market Development, Enforcement and Oversight" National Securities Commission and US Securities and Exchange Commission
2007	Participant "The EU Single Market in Financial Services: Latest Steps, Future Initiatives and Pending Tasks" Public Administration European Institute, Luxembourg
2004-2006	Master's degree – European Economy Economy and Business Administration Faculty, Craiova
2006	Graduate "Investment Consultant" course Millenium Financial Trading Centre
2006	Graduate "Derivative Markets Broker" BMFMS Sibiu
2006	Financial Investment Services Agent RASIF02 Bucharest Stock Exchange
2004	Financial Investment Services Agent Millenium Training Financial Centre
1999-2003	Bachelor's Degree University of Craiova Faculty of Economy and Business Administration Program: International Economic Relations

PERSONAL SKILLS AND COMPETENCES

Native language Romanian
Foreign known languages

	Understanding		Speaking		Writing
	Listening	Reading	Participation in the conversation	Oral speech	
English	Advanced	Advanced	Advanced	Advanced	Advanced
German	Beginner	Beginner	Independent User	Independent User	Beginner

Digital competence Good knowledge of Microsoft Office programmms

Driving license B category



Curriculum vitae Europass

Personal Information

First name(s) / Surname(s) **Zaman Andrei Mihai**
Address(es)
Mobile
Facsimile(s)
E-mail(s)
Nationality Romanian
Date of birth
Gender Male

PROFESSIONAL EXPERIENCE

Period	August 2022 – to date
Occupation or position held	Member of the Board of Directors
Name and employer address	Conpet SA Ploiesti
Period	May 2022 – to date
Occupation or position held	Director
Main activities and responsibilities	Establishing, in agreement with the GMS representatives and the management team the general, specific and operational objectives of the company, for the short, medium and long term; Identification and allocation of financial, informational, material and human resources in the company, in order to achieve the established objectives; Elaboration and approval of financial, technological and human resources investment plans; Planning of the organizational structures, according to the needs of the company and the planned activities;
Name and employer address	SC AFFICHAGE ROMANIA SRL
Activity type or sector of activity	Advertising
Period	April 2021 – to date
Occupation or position held	General Manager
Name and employer address	Euromedia Services
Period	December 2017 – to date
Occupation or position held	Administrator
Main activities and responsibilities	Ensuring the management, the organization and operation of the company with maximum efficiency by elaborating development strategies, identifying opportunities, employing the necessary financial, technological and human resources. Coordination of the activities of directors and managers by function: research, production, commercial, financial-accounting, human resources. Elaboration of the job description for the personnel who will be hired, along with the heads of the departments. The responsibility of archiving documents and storing them in the archive, for 10 (ten) years, of all the accounting registries and the supporting documents that are the basis of the accounting entries, with the exception of the salary statements that are stored for 50 (fifty) years. Ensuring compliance with the regulations issued by the Ministry of Finance regarding the elaboration and usage of the supporting documents for all patrimonial operations and their registration in accounting in the period to which it refers to. Signing accounting purchase documents in accordance with the provisions of the Law.
Name and employer address	SC EFECT MEDIA SRL
Activity type or sector of activity	Advertising

Occupation or position held Main activities and responsibilities	Period	June 2019 – August 2020
		General Manager Take Media
Occupation or position held Main activities and responsibilities	Period	October 2016 – May 2019
		Administrator Ensuring the management, the organization and operation of the company with maximum efficiency by developing development strategies, identifying opportunities, employing the necessary financial, technological and human resources. Coordination of the activities of directors and managers by function: research, production, commercial, financial-accounting, human resources. Elaboration of the job description for the personnel who will be hired, along with the heads of the departments. The responsibility of archiving documents and storing them in the archive, for 10 (ten) years, of all the accounting registries and the supporting documents that are the basis of the accounting entries, apart from the salary statements that are stored for 50 (fifty) years. Ensuring compliance with the regulations issued by the Ministry of Finance regarding the elaboration and usage of the supporting documents for all patrimonial operations and their registration in accounting in the period to which it refers to. Signing accounting purchase documents in accordance with the provisions of the Law.
Name and employer address Activity type or sector of activity		SC AFFICHAGE ROMANIA SRL Advertising
Occupation or position held Main activities and responsibilities	Period	October 2017 – April 2019
		Special Administrator Ensuring the management, the organization and operation of the company with maximum efficiency by elaborating development strategies, identifying opportunities, employing the necessary financial, technological, and human resources. Coordination of the activities of directors and managers by function: research, production, commercial, financial-accounting, human resources. Elaboration of the job description for the personnel who will be hired, along with the heads of the departments. The responsibility of archiving documents and storing them in the archive, for 10 (ten) years, of all the accounting registries and the supporting documents that are the basis of the accounting entries, except for the salary statements that are stored for 50 (fifty) years. Ensuring compliance with the regulations issued by the Ministry of Finance regarding the elaboration and usage of the supporting documents for all patrimonial operations and their registration in accounting in the period to which it refers to. Signing accounting purchase documents in accordance with the provisions of the Law.
Name and employer address Activity type or sector of activity		SC MULTIRECLAMA SRL Advertising
Occupation or position held Main activities and responsibilities	Period	2013 - to date
		Administrator
Name and employer address Activity type or sector of activity		SC LED MEGA CONCERT SRL Event organizing
Occupation or position held Main activities and responsibilities	Period	December 2007 – April 2009
		Real Estate Agent Ensuring the management, the organization and operation of the company with maximum efficiency by elaborating development strategies, identifying opportunities, employing the necessary financial, technological and human resources. Coordination of the activities of directors and managers by function: research, production, commercial, financial-accounting, human resources. Elaboration of the job description for the personnel who will be hired, along with the heads of the departments. The responsibility of archiving documents and storing them in the archive, for 10 (ten) years, of all the accounting registries and the supporting documents that are the basis of the accounting entries, except for the salary statements that are stored for 50 (fifty) years. Ensuring compliance with the regulations issued by the Ministry of Finance regarding the elaboration and

usage of the supporting documents for all patrimonial operations and their registration in accounting in the period to which it refers to.

Signing accounting purchase documents in accordance with the provisions of the Law.

Name and employer address SC RIVIERA GREEN SRL

Activity type or sector of activity Real estate sales

EDUCATION AND TRAINING

Period 1999 – 2003

Qualification/diploma Graduation diploma

Name of the educational entity Campina Oil High School, Electro-technical field of study

National/ international ranking

Period 2018 – 2021

Qualification/diploma Bachelor's degree

Name of the educational entity Faculty of Economics - Marketing Studies, "Spiru Haret" University

National/ international ranking National

Period 2021 – 2023

Qualification/diploma Master's degree

Name of the educational entity Bioterra University Bucharest - Efficient management in public food services, agritourism and consumer protection

National/ international ranking National

PERSONAL SKILLS AND COMPETENCES

Foreign languages

Self-assessment

European level (*)

English

French

Understanding		Speaking		Writing
Listening	Reading	Spoken interaction	Spoken production	Written Production
C1	C1	C1	C1	C1
A2	A2	A2	A2	A2

(*) [Common European Framework of Reference \(CEF\) level](#)

Social skills and competences ▪ Communication and negotiation skills acquired in management activities;

Organizational skills and competences ▪ Coordination and organizational skills;
▪ Ability to develop and manage budgets;
▪ Resource management skills;
▪ Ability to organize and coordinate teams.

Computer skills and competences MS Windows, MS Office (Word, Power Point, Excel)

Alin Mihael Danila

Personal information	
Date of birth	
Nationality	Romanian
Gender	Male
Professional experience	
22.08.2023 – to date Ploiesti, Romania	Member of the BoD of CONPET SA
01.07.2024 – to date	Provisional member in the BoD of EXPLOATARE SISTEM ZONAL PRAHOVA S.A.
01.04.2024 – to date Ploiesti, Romania	Deputy Director General – S.C. SERVICII DE GOSPODARIRE URBANA PLOIESTI S.R.L.
13.10.2021 – 01.04.2024 Ploiesti, Romania	Deputy Director S.C. SERVICII DE GOSPODARIRE URBANA PLOIESTI S.R.L. - Ensuring the management of the company's activity, its coordination and control regarding the use of financial, material and human resources, in order to achieve the company's objectives, directly or through subordinate personnel; - Fulfilling the decisions of the General Meeting of Shareholders and the Board of Directors (BoD) accurately and within the established terms; - The presentation, whenever requested or necessary, to the BoD of the revenues and expenditures budget performance, of the information regarding the economic and financial situation of the company, the stage of the investments, the stage of the measures implemented or any other requested documents and information, as well as the measures taken in case of non-fulfilment thereof; - Ensuring the monitoring in view of achieving the revenues and expenditures provisions/indicators; - Ensuring the management and functioning of the company, top management, organization, representation and administration of the company's activity, as per the law and the company's Articles of Incorporation; - Presentation to the BoD, at the end of the financial year, of the level of fulfillment of the company's objectives, the balance sheet, the profit and loss statement, the censors/auditors' report and the annual report, as per the legal provisions in force.
05.07.2019 – 31.10.2021 Ploiesti, Romania	Director General S.C. SERVICII DE GOSPODARIRE URBANA PLOIESTI S.R.L. - Ensuring the management of the company's activity, its coordination and control regarding the use of financial, material and human resources, in order to achieve the company's objectives, directly or through subordinate personnel; - Fulfilling the decisions of the General Meeting of Shareholders and the Board of Directors (BoD) accurately and within the established terms; - The presentation, whenever requested or necessary, to the BoD of the revenues and expenditures budget performance, of the information regarding the economic and financial situation of the company, the stage of the investments, the stage of the measures implemented or any other requested documents and information, as well as the measures taken in case of non-fulfilment thereof; - Ensuring the monitoring in view of achieving the revenues and expenditures provisions/indicators; - Ensuring the management and functioning of the company, top management, organization, representation and administration of the company's activity, as per the law and the company's Articles of Incorporation; - Presentation to the BoD, at the end of the financial year, of the level of fulfillment of the company's objectives, the balance sheet, the profit and loss statement, the censors/auditors' report and the annual report, as per the legal provisions in force. - Hiring, promoting and dismissing employed staff, in accordance with the law; negotiating the individual labor contracts, and participating in the negotiation of the Collective Labor Contract; - Establishing the necessary measures in view of achieving the company's approved revenues and expenditures budget, directly or through the subordinate staff; - Coordinating the specific activity carried out by the company's directors;

	- The negotiation, as president of the negotiation committee, of the collective labor contract, based on the mandate granted by the BoD; - Informing the BoD regarding the irregularities discovered during the performance of their duties; - Concluding legal acts in the name and on behalf of the company.
01.01.2017 – 05.07.2019 Ploiesti, Romania	Head of the Public and Private Domain Administration Department / Urban Heating AUTONOMOUS ADMINISTRATION OF PUBLIC SERVICES - Coordination of the subordinated department; - Ensuring the proper execution of contracts and monitoring the achievement of tasks; - Taking measures and taking the initiative in solving job-specific activities; - The professional evaluation of the staff subordinated on the established time periods, in accordance with the legal provisions; - Responsibility for the current resolution of problems, approving and signing the department's assignments; - Establishing the specific objectives and performance indicators.
05.01.2009 – 01.01.2017 Ploiesti, Romania	Department Head of Bucov Botanical Garden COUNTY MUSEUM OF NATURAL SCIENCES - Management, organization and coordination of the subordinate team; - Establishing the general and specific objectives and the performance indicators for the subordinate service, in order to achieve the activity object; - Distributing to the subordinate personnel, hierarchically, the tasks assigned to be solved; - Tracking the timely resolution of assigned tasks; - Proposing and taking measures to improve performance within the coordinated structure; - Monitoring compliance with the rules of conduct and discipline by the subordinate personnel.
05.01.2013 – 31.12.2016 Ploiesti, Romania	Manager SC GREEN PROJECT AB ENERGY - Annually establishing, alongside the unit directors, of the general development objectives; - Informing each director on the general and specific objectives foreseen for each unit and ensuring that they are communicated to the staff within each unit; - Annual/biannual/quarterly monitoring of the degree of achievement of objectives; - Establishing personal objectives (performance indicators) and for top management in strict accordance with the company's objectives; - Participating in the annual preparation of the revenues and expenditures budget, analyzing the submitted proposals, making the necessary corrections and approving the final budget; - Monitoring the market and identifying development trends; - Analysis of legislative, financial, technological and social opportunities/constraints in the company's business environment; - Identifying ways to develop the services offered by the company in accordance with the market trends; - Identifying and attracting the necessary resources for the implementation of new business ideas; - Ensuring the company's good image on the market; - Identifying of investment and profit opportunities; - Developing positive relationships with key people in order to strengthen the company's position; - Participating in business meetings with suppliers, clients, financial bodies and governmental institutions from the country and abroad; - Representing the organization in relations with third-party natural or legal persons in accordance with the power of attorney granted by the General Meeting of Shareholders.
23.04.2009 – 05.01.2013 Ploiesti, Romania	Executive Director S.C. PORA S.R.L. - Power to decide on new development directions; - Establishing sales and profit plans; - Representing the organization in relations with third-party natural or legal persons in accordance with the power of attorney granted by the General Meeting of Shareholders; - Signing payrolls, company financial reports, statistical reports or requests for investments within the company;

	- Requesting activity reports and taking the necessary measures in order to increase the efficiency of the company's activity; - Establishing task execution priorities for the subordinate staff; - Approval of rewards/penalties, extension/termination of the activity after the probationary period of the employees; - Approving/rejecting the requests of subordinate staff; - The annual establishment, alongside the unit directors, of the general development objectives; - Informing each director on the general and specific objectives foreseen for each unit and ensuring that they are communicated to the staff within each unit; - Quarterly/semi-annual/annual monitoring of the degree of achievement of objectives.
01.12.2008 – 23.04.2009 Ploiesti, Romania	Engineer S.C. PORA S.R.L. - Coordinating the team of workers in order to complete the assignments according to the timetable; - Elaborating reports on the stage of things and inclusion in the timetable; - Participating in work preparation sessions.
01.08.2007 – 30.11.2008 Ploiesti, Romania	Administrator S.C. AYC CONSULTING S.R.L. PLOIESTI - Ensuring the management of the company's activity, its coordination and control regarding the use of financial, material and human resources, in order to achieve the company's objectives; - Representing the company in business relations; - Establishing the company's business and development objectives.
07.01.2003 – 16.01.2007 Ploiesti, Romania	Engineer S.C. ASCM S.A. - Main objectives executed: CONPET STREJNIC Stadium, LUBRIFIN BRASOY factory, CARDINAL MOTORS Showroom, ANP Logistic Center, CRANGUL LUI BOT Electrode Factory; - Ensuring the construction plan; - Preparing the project plans; - Supervising the activity of the subordinate team; - Coordinating and controlling the field teams and the activities carried out by them; - Monitoring the progress of the tasks from a quantitative and qualitative point of view; - Preparing activity reports; - Planning, organizing, and monitoring the execution from the point of view of compliance with the plans, adherence to the established deadlines and the quality of the assignments.
10.07.2001 – 07.01.2003 Ploiesti, Romania	Engineer S.C. ALDECO ART S.R.L. - Supervising the activity of the subordinate team; - Coordinating and controlling the field teams and their activity; - Monitoring the progress of the tasks from a quantitative and qualitative point of view; - Preparing activity reports; - Studying construction plans and implementing them; - Ensuring permanent assistance for contractors, transmitting information to the Project Manager; - Ensuring the management of the quality management system at the location level; - Providing technical information and maintaining the relationship with the client over the course of the project.
Education and professional training	
01.10.2018 – 01.06.2020 Iasi, Romania	Master's Degree Petre Andrei University Field of study: Leadership and political psychology www.upa.ro
01.10.2013 – 01.06.2016 Brasov, Romania	Bachelor's Degree George Baritiu University Brasov Field of study: Public administration
01.10.1996 – 01.06.1999 Bucharest, Romania	Bachelor's Degree Bucharest University of Polytechnics www.upb.ro
01.04.2020 – 30.05.2020 Ploiesti, Romania	Project Manager Resume Consulting

24.09.2009 – 27.09.2009 Bucharest, Romania	Advanced training Ministry of Education Field of study: Performance management in public office
22.02.2022 – 28.03.2022 Ploiesti, Romania	Human resources manager Prahova Chamber of Commerce and Industry
12.05.2005 – 15.05.2005	Curator Ministry of Culture

LANGUAGE SKILLS

Mother tongue: ROMANIAN

Other languages	UNDERSTANDING		SPEAKING		WRITING
	Listening	Reading	Spoken interaction	Spoken production	
ENGLISH	C1	C1	C1	C1	C1
ITALIAN	B1	B1	B1	B1	B1

Levels: A1/A2 Basic user – B1/B2: Independent user – C1/C2: Proficient user

[Common European Framework of Reference \(CEF\) level](#)

Digital competences

My digital competences

Microsoft Office (Word, Excel, Power Point) | Microsoft Office (Word, PowerPoint, Excel, Access)

DRIVING LICENSE

All categories: A, B, C, C+E, D

FINANCIAL STATEMENTS
on the date and for the financial year ended
December 31st, 2024

prepared in accordance with the accounting regulations complying with
the International Financial Reporting Standards
approved by the Ministry of Finance Order no.2844/2016

Financial Statements

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I. STATEMENT OF THE FINANCIAL STANDING ON DECEMBER 31, 2024

- RON-			
Name	Note:	December 31, 2024	December 31 st , 2023
ASSETS			
Intangible assets			
Tangible assets	5	664,780,731	670,831,075
Intangible assets	6	3,037,998	5,559,573
Financial Assets	7	535,374	2,522,803
Deferred corporate tax -related receivables	14	2,876,342	(862,397)
Total non-current assets		671,230,445	678,913,451
Current assets			
Inventories	8	6,015,541	6,519,564
Trade receivables and other receivables	9	39,442,129	52,981,332
Cash and cash equivalents	10	136,176,830	107,742,173
Prepaid expenses		687,107	697,600
Total current assets		182,321,607	167,940,669
TOTAL ASSETS		853,552,052	846,854,120
EQUITY AND LIABILITIES			
Equities			
Subscribed and paid-up share capital	11	28,569,842	28,569,842
Legal reserves	11	5,713,968	5,713,968
Revaluation reserves	11	43,539,329	49,838,300
Other reserves	11	558,422,603	547,585,477
Retained earnings	11	45,124,461	36,970,805
Result of the year	11	49,323,047	61,616,539
Total equity		730,693,250	730,294,931
Long-term liabilities			
Long-term liabilities to employees	12	30,236,672	25,764,827
Other long-term liabilities	12	2,423,254	2,792,606
Deferred Tax Liabilities	14	(862,397)	901,503
Total long-term liabilities		32,659,926	29,458,936
Current liabilities			
Trade liabilities	12	26,574,075	33,091,805
Current Corporate Tax	12	(862,397)	1,807,695
Other liabilities	12	33,027,370	28,764,158
Liabilities to employees	12	14,276,429	14,143,449
Short-term provisions	13	16,321,002	9,293,146
Total current liabilities		90,198,876	87,100,253
Total liabilities		122,858,802	116,559,189
TOTAL EQUITIES AND LIABILITIES		853,552,052	846,854,120

These financial statements, from page 2 to page 64, have been authorized for release by the company's management on March 25th, 2025.

**Director General,
Eng. Dorin Tudora**

**Economic Director,
Econ. Sanda Toader**

The attached notes, from 1 to 25, are an integral part of these financial statements.

II. STATEMENT OF PROFIT OR LOSS AND OTHER ELEMENTS OF THE GLOBAL RESULT FOR THE FINANCIAL YEAR ENDED DECEMBER 31st, 2024

- RON-			
Name	Note:	December 31, 2024	December 31 st , 2023
Revenues from contracts		533,618,409	485,113,609
Earnings from disposal of assets		-	612,108
Other revenues		72,663,354	55,208,434
Total Operating revenues	16	606,281,763	540,934,151
Expenditure on inventories		6,144,917	6,543,246
Expenses with energy and water		20,915,838	18,596,747
Personnel expenses		210,186,200	194,394,992
Value adjustments on fixed assets, less adjustments related to rights of use resulted from leasing contracts		79,156,049	61,484,586
Value adjustments for rights of use resulted from leasing contracts		2,140,874	2,051,485
Value adjustments on current assets		7,640,692	(239,459)
Expenses with external services		144,041,293	126,935,543
Loss from disposal of assets		91,590	-
Provisions adjustments		12,192,689	2,446,008
Other expenses		74,286,024	62,357,840
Total Operating Expenses	17	556,796,166	474,570,988
Operating Profit		49,485,597	66,363,163
Financial Revenues		6,384,256	6,689,934
Interests' expenses related to leasing contracts		237,637	175,242
Other financial expenses		93,964	83,799
Financial Expenses		331,601	259,041
Financial profit	18	6,052,655	6,430,893
Profit before corporate tax		55,538,252	72,794,056
Expenses with current corporate tax	14	10,227,235	10,586,561
Expenses with (revenues coming from) deferred corporate tax		(4,012,030)	590,956
PROFIT OF THE YEAR		49,323,047	61,616,539
Actuarial earnings (Loss) from discounted benefits granted upon retirement		1,229,473	531,142
Surplus from revaluation of the tangible assets		-	35,055,317
Other elements of the equities - retained earnings		755,268	-
Total other global result elements that will not be subsequently reclassified as profit or loss		1,984,741	35,586,459
Net increase of the modernization quota reserve		7,844,065	6,869,587
Total other global result elements that will not be subsequently reclassified as profit or loss		7,844,065	6,869,587
TOTAL OTHER ELEMENTS OF THE GLOBAL RESULT		9,828,806	42,456,046
TOTAL GLOBAL RESULT		59,151,853	104,072,585
Result per share		5.70	7.12

These financial statements, from page 2 to page 65, have been authorized for release by the company's management on March 25th, 2025.

**Director General,
Eng. Dorin Tudora**

**Economic Director,
Econ. Sanda Toader**

The attached notes, from 1 to 25, are an integral part of these financial statements.

III. STATEMENT OF CHANGES IN SHAREHOLDERS EQUITY ON DECEMBER 31st, 2024

- RON-							
Name	Share capital	Legal reserves	Revaluation reserves	Other reserves	Retained earnings	Year's profit or loss	Total Equities
Balance on January 1st, 2024	28,569,842	5,713,968	49,838,300	547,585,477	36,970,805	61,616,539	730,294,931
Net result for the year	-	-	-	-	-	49,323,047	49,323,047
Actuarial gain of the period					1,229,473		1,229,473
Surplus from revaluation	-	-	(6,298,971)	-	6,298,971	-	-
Other elements of the equities - retained earnings	-	-	-	-	755,268	-	755,268
Allocation of profit provided by law - exemption of reinvested profits	-	-	-	2,993,062	732,340	(3,725,402)	-
Net increase of the modernization quota reserve	-	-	-	7,844,065	-	-	7,844,065
Total other global result elements	-	-	(6,298,971)	10,837,127	9,016,052	(3,725,402)	9,828,806
Total global revenues related to the period	-	-	(6,298,971)	10,837,127	9,016,052	45,597,645	59,151,853
Dividends due to shareholders					(862,397)	(57,891,137)	(58,753,534)
Total transactions with the owners directly recognized in equities					(862,397)	(57,891,137)	(58,753,534)
Balance on December 31st, 2024	28,569,842	5,713,968	43,539,329	558,422,603	45,124,461	49,323,047	730,693,250

STATEMENT OF THE CHANGES IN EQUITIES ON DECEMBER 31st, 2023

- RON-							
Name	Share capital	Legal reserves	Revaluation reserves	Other reserves	Retained earnings	Year's profit or loss	Total Equities
Balance on January 1st, 2023	28,569,842	5,713,968	17,101,648	533,897,764	37,149,214	61,663,616	684,096,052
Net result for the year	-	-	-	-	-	61,616,539	61,616,539
Actuarial gain of the period					531,142		531,142
Surplus from revaluation of the tangible assets			33,599,049	1,456,268			35,055,317
Surplus from revaluation	-	-	(862,397)	-	862,397	-	-
Allocation of profit provided by law - exemption of reinvested profit	-	-	-	3,725,402	(572,707)	(3,152,695)	-
Net increase of the modernization quota reserve	-	-	-	6,869,587	-	-	6,869,587
Total other global result elements	-	-	32,736,652	12,051,257	820,832	(3,152,695)	42,456,046
Total global revenues related to the period	-	-	32,736,652	12,051,257	820,832	58,463,844	104,072,585
Dividends due to shareholders					(999,241)	(58,510,921)	(59,510,162)
Prescribed distributions				1,636,456			1,636,456
Total transactions with the owners directly recognized in equities				1,636,456	(999,241)	(58,510,921)	(57,873,706)
Balance on December 31st, 2023	28,569,842	5,713,968	49,838,300	547,585,477	36,970,805	61,616,539	730,294,931

The position „Other reserves” includes also the reserve representing the modernization quota in amount of 504,511,205 RON on 31.12.2024, namely 496,667,140 RON on 01.01.2024. This reserve is constituted as per GD no.168/1998. The modernization quota is destined exclusively for the financing of the modernization works and development of the goods in public domain. The modernization quota is being collected at the extent of capitalization and proceeds of the production and is reflected in the reserves on account of the expenses. On a monthly basis is being written back to the modernization quota at the level of depreciation of the fixed assets financed out of this source. On 31.12.2024, the value of the reserve represents the modernization quota that is to be resumed to revenues at the level of the depreciation of fixed assets financed out of this source, of 467.574.762 RON, and the difference of 36,936,443 RON represents the reserve available destined to the modernization and development works related to the goods from public domain.

These financial statements, from page 2 to page 65, have been authorized for release by the company's management on March 25, 2025.

Director General,
Eng. Dorin Tudora

Economic Director,
Econ. Sanda Toader

The attached notes, from 1 to 25, are an integral part of these financial statements.

**IV. CASH-FLOW STATEMENT OF THE YEAR ENDED DECEMBER 31, 2024
(DIRECT METHOD)**

- RON-			
	Name of the Item	12 months, 2024 (audited)	12 months, 2023 (audited)
	Cash flows from operating activities:		
+	Proceeds from services supply	582,922,244	520,121,301
+	Proceeds from interests related to banking placements	6,330,776	6,575,548
+	Other proceeds	8,277,472	4,251,235
-	Payments to the suppliers of goods and services	153,460,415	140,225,977
-	Payments to and on behalf of the employees	206,738,812	192,207,154
-	VAT payments	64,996,587	54,308,422
-	Corporate tax payments	12,216,120	10,776,280
-	Other payments regarding the operating activities	54,102,021	46,814,796
A	Net cash from operating activity	106,016,537	86,615,455
	Cash flows from investment activities:		
+	Proceeds from sale of tangible assets	11,087	620,592
+	Proceeds from modernization quota	67,444,545	58,084,160
-	Payments for tangible/intangible assets	85,402,577	104,205,104
B	Net cash from investment activity	(17,946,945)	(45,500,352)
	Cash-flows from financing activities		
-	Paid dividends	56,893,975	57,664,500
-	Payments on leasing debt account	2,497,018	3,195,528
-	Interest payments	243,943	185,354
C	Net cash from financing activities	(59,634,936)	(61,045,382)
	Net increase of the cash and cash equivalents=A+B+C=D2-D1	28,434,656	(19,930,279)
D1	Cash and cash equivalents at the beginning of the period	107,742,173	127,672,452
D2	Cash and cash equivalents at the end of the period	136,176,829	107,742,173

The cash balance and cash equivalents on 31.12.2024 is 26.4% higher compared to December 31st, 2023 (136,176,829 RON compared to 107,742,173 RON), following the increase by 4.9 mRON of the existing cash in bank accounts on 31.12.2024 and also the collection, before maturity, of the equivalent value of several transport services delivered in the month of December 2024.

Of the total cash in balance on 31.12.2024, the party related to the modernization quota amounts to 36.936.443 RON.

The effects of the three activity areas (operation, investment and financing) over the cash in the 12-month period of 2024 reveal the following:

- the operating activity has triggered a cash-flow in the amount of 106,016,537 RON;
- the investment activity ended with a negative cash-flow in the amount of 17,946,945 RON;
- the financing activity has diminished the total cash flow by 59,634,936 RON

The value of net the cash-flow from the operating activity has increased by 19.4% YoY, due to an increase in the proceeds from transport services.

As compared to the previous year, the net cash from the investment activity (cash-flow deficit) increased by 27.6 mRON. The deficit decrease has been determined by a volume of payments of assets less than that registered in the same period of the year 2023.

The net cash from the financing activity in both periods 2024 and 2023 registers negative amounts determined by the payment of dividends to the shareholders and the amounts related to leasing.

These financial statements, from page 2 to page 64, have been authorized for release by the company's management on March 25, 2025.

**Director General,
Eng. Dorin Tudora**

**Economic Director,
Econ. Sanda Toader**

The attached notes, from 1 to 25, are an integral part of these financial statements.

V. EXPLANATORY NOTES TO THE FINANCIAL STATEMENTS ON DECEMBER 31, 2024

1. Business Description and General Information

The company "CONPET" S.A. ("The Company") is a joint-stock company, with a unitary system administration, as per Law no. 31/1990 on the companies, republished, subsequent amendments, registered at the Prahova Trade Registry under no. J199100006291 and the Financial Supervisory Authority by the registration certificate no. 7227/1997.

The registered offices is in Ploiesti Municipality, no. 1-3, Anul 1848 Street, Prahova County.

CONPET S.A. is the concessionaire of the operating activity of the National Transport System of crude oil, rich gas, condensate and ethane quality acquired in 2002, by conclusion with the National Agency for Mineral Resources (NAMR), the competent authority representing the State interests in the oil resources domain, of the Oil Concession Agreement, agreement approved by GD no.793/25.07.2002.

The company's shares are being traded on the Bucharest Stock Exchange (BVB) market, under "COTE" issuing symbol, having as unique identifier at global level for entities (Legal Entity Identifier - RON) **254900P00DXXOYGGAQ77**.

Currently, CONPET S.A. is included in 6 indices of the total of 10 of the Bucharest Stock Exchange, namely **BET-TR, BET-XT, BET-XT-TR, BET-BK, BET- BET-XT and BET PLUS**. Concurrently, CONPET(COTE) is included in the indices MSCI Frontier IMI and MSCI Romania IMI (Investable Market Indices).

On December 31st, 2024, CONPET S.A. has a market capitalization of 652.7 mRON (131 mEURO), ranking 34 in the "Top Issuers according to capitalization".

Company's Set-up

CONPET is set up based on GD no. 1213/20.11.1990 regarding the set-up of the joint stock commercial companies in the industry, pursuant to Law no.15/1990 regarding the reorganization of the public economic units as autonomous administrations and joint stock companies, by taking over all assets and liabilities of the former Crude Oil Pipeline Transport Enterprise (Rom.I.T.T.C.).

The shareholder structure and number of voting rights at 31.12.2024, are:

- a) The Romanian State by the Ministry of Energy, holding 5,083,372 shares with voting rights, representing 58.72% of the share capital,
- b) legal persons, with 2,083,424 shares with voting rights representing 24.06% of the share capital, and
- c) natural persons, with 1,490,732 shares with voting rights representing 17.22% of the share capital.

Company's Mission

CONPET mission is the operation of the National Transport System via Pipelines under safe and secure conditions, free access to the system's available capacity to all the inquirers, authorized legal persons, under equal conditions, on a non-discriminatory and transparent basis.

Other Information on the Company's Business

As per the Articles of Incorporation, the company's core business is the transport of crude oil, rich gas, ethane and condensate via pipelines aiming at supplying the refineries with crude oil and derivatives out of domestic production, as well as with imported crude oil (NACE code 4950- "transports via pipelines").

CONPET supplies transport services for its clients both via the National Transport System concessioned based on the Oil Concession Agreement of the National Transport System of Crude Oil, Rich Gas, Condensate and Ethane via pipelines, as well as by rail, from the loading ramps to the refineries, for the oil areas not connected to the major transport pipelines.

The crude oil National Transport System represents the ensemble of the major interconnected pipelines ensuring the collection of the oil extracted from the exploitation areas or of the imported, from the delivery sites to the processing units.

CONPET, as Concessionaire of the crude oil National Transport System, entitles as a common carrier and the obligation to provide, as per the legal provisions, free access to the system's available capacity to all the inquirers, authorized legal persons, under equal conditions, on a non-discriminatory and transparent basis.

The National Transport System of crude oil is part of the public domain of the Romanian State and is under the administration of the National Regulatory Authority in the Mining, Petroleum and Geological Storage of Carbon Dioxide (as per the provisions of the Oil Law). It comprises a pipeline system of approximately 3,800 km, with an overall nominal transport capacity of approximately 27.5 million tons annually, operationally reduced capacity to approximately 18.7 million tons/year.

The Legal Environment

The activities in the oil sector, where the crude oil transport activity is included, are regulated by the Oil Law no.238/2004.

The National Regulatory Authority in the Mining, Petroleum and Geological Storage of Carbon Dioxide (Ro. ANRMPSG) represents the interests of the State in oil resources domain and is the competent authority authorized to apply the dispositions of Law 238/2004. As per the Oil Law, ANRMPSG entitles as Concession Provider of the goods belonging to the public domain, concessioned to the operators acting in the oil industry.

The main responsibilities of ANRMPSG are the following:

- negotiates and concludes, on State's behalf, oil agreements;
- awards mining concession licenses and exploitation permits;
- issues regulatory acts, norms, instructions, orders and regulations;
- controls the compliance of the holders of the concession agreements with the concession licenses and exploitation permits conditions;
- manages the Crude Oil and Natural Gas National Pipeline Transport Systems and regulates the exploitation activities thereof by system's concession agreements concluded;
- annuls the concession acts/administration acts;

- approves the tariffs and the frame-contract for the transport of crude oil, rich gas, condensate and ethane.

The tariff for the supply of the transport service via the National Transport System of crude oil, rich gas, condensate and ethane

The transport tariff stands for the exchange value of the transport service supplied by the holder of the oil concession, as common carrier for the transport, via the crude oil National Transport System, of an oil tone along the oil takeover sites from the domestic producers or import and the delivery sites to the refineries.

The company practices different transport tariffs for the two subsystems belonging to the National Transport System, namely the subsystem for the transport of crude oil, rich gas, condensate and ethane from the domestic production and the subsystem for the transport of the imported crude oil. For the transport on the import subsystem are being settled tariffs per refineries and per transported quantities installments, being applied the bracket tariff model.

The transport tariffs are established in accordance with the NAMR Order no.53/2008 for the approval of the Instructions on criteria, the methodology and procedure for establishing regulated tariffs for transport through the National Transportation System and are approved by the National Regulatory Authority for Mining, as follows, Oil tanker and Geological Storage of Carbon Dioxide as competent authority.

The transport tariffs are determined by allocation of the transport service value to the crude oil quantities transported to the beneficiaries, by using a methodology based on the determination of the cost of service, defined as all the revenues required to cover the transport system operations, here included:

- the operating cost, which contains material expenses, personnel expenses, pipeline maintenance expenses, expenses with energy, gas and water, costs related to the amortization of the fixed assets, royalties and other fees applicable to the carried, the expenses related to the provision of the pipeline guard, the amounts due to landowners, other expenses etc;
- the modernization, development quota;
- reasonable profit margin.

2. Preparation Grounds

(a) Declaration of Conformity

These financial statements of the Company were drawn up based on accounting regulations in accordance with the International Financial Reporting Standards ("IFRS") approved by the Order of the Ministry of Public Finances no.2844/2016.

The IFRS standards represent the standards adopted according to the procedure provided by the Regulation (EU) no.1.803/2023 of the Commission from August 13, 2023 and include standards and interpretations approved by the Committee for Accounting International Standards ("IASB"), Accounting International Standards ("IAS") and interpretations issued by the Committee for the Interpretation of the International Financial Reporting Standards ("IFRIC").

The financial statements prepared on the date and for the financial year ended December 31, 2024, have been audited.

(b) Overview of the Financial Statements

The financial statements are being presented in compliance with IAS,1 the *Overview of the Financial Statements*. The company has adopted an overview based on liquidity within the financial standing statement and an overview of the revenues and expenses according to the nature thereof within the statement of profit and loss and other elements of the global result, considering that these methods of presentation offer credible information and more relevant than the information presented based on other methods permitted by IAS 1.

(c) Functional and Presentation Currency

The financial statements are being presented in Romanian Lei (RON), as per the applicable accounting regulations, all amounts being rounded at the closest RON. The Romanian Leu (RON) is also the functional currency of the Company, as it is being defined by IAS,21, *The effects of the variation of the currency*.

(d) Evaluation Grounds

The financial statements are being prepared at historical cost, except for the tangible assets, other than the tangible assets in progress, which are being assessed at re-evaluated value, while the stocks are being assessed at the smallest value between the cost and the net achievable value. The accounting policies defined here-below have been consistently applied for all periods presented in these financial statements.

(e) Business Continuity

Financial statements have been prepared considering the business ongoing concern.

(f) Accounting Estimates and Professional Reasoning

The preparation of the financial statements pursuant to the International Financial Reporting Standards ("IFRS") implies the use, by the Company, of estimates, professional reasoning and hypotheses affecting the reported value related to assets, liabilities, revenues and expenses. Estimates and assumptions are continuously evaluated and are based on historical experience and other factors, including predictions of future events that are believed to be reasonable under certain circumstances. The results of these estimates set the grounds for the professional reasonings regarding the accounting value of the assets and liabilities that cannot be obtained from other information sources. The actual results may be different from the estimates values. The significant reasoning used by the management for the application of the Company's accounting policies and the main sources of uncertainty regarding the estimates have been the same with those applied to the financial statements related to 2023.

(g) The Use of Estimates and Reasonings

CONPET concluded, in 2002, a concession contract with NAMR according to which the Company is entitled to use public patrimony assets including the goods part of the crude oil National Transport System.

The company CONPET operates as a joint stock company, as per the Law no.31/1990 on the companies, republished, with subsequent amendments, where most of the shares are being held by the State, being a public enterprise as per GEO. 109/2011 on the corporate governance of public enterprises. The services supplied by the company are not public services, as they are being supplied for the benefit of the clients' legal persons, therefore they do not fall under the provisions of *IFRIC 12, Services Concession Agreements*.

3. Accounting Policies

Hereinafter, there are described the significant accounting policies applied consistently by the company on preparation of its financial statements.

(a) Transactions in Foreign Currency

The transactions in foreign currency are being expressed in RON by application of the currency from the transaction date. The monetary assets and the debts expressed in foreign currency at the end of the period are being converted into RON at the currency valid on that date.

The gains and losses generated by the differences in currency, realized or not realized, are being included in the profit and loss statement and other global result elements of the respective financial year.

The foreign exchange of the main foreign currencies was:

	December 31, 2024	31.12.2023
RON/EURO	4.9741	4.9746
RON/USD	4.7768	4.4958
RON/GBP	5.9951	5.7225

(b) Accounting for the Effect of Hyperinflation

In accordance with IAS 29 Financial reporting in hyperinflationary economies, the financial statements of an entity whose functional currency is the currency of a hyperinflationary economy shall be presented in the current unit balance-sheet date, i.e. non-monetary items are restated using a general price index from date of acquisition or contribution.

Therefore, the values reported in terms of purchasing power on December 31, 2003, are treated as the basis for the carrying amounts of these financial statements.

As the characteristics of the economic environment in Romania indicate the cessation of hyperinflation, starting January 1, 2004, the Company no longer applies IAS 29.

(c) Financial Instruments

(i) Non-derivative financial assets

The company initially recognizes the financial assets (receivables and deposits) on the date they have been initiated. All other financial assets here included the assets designated at fair value through profit or loss, are recognized initially on the trading date, when the Company becomes part of the contractual terms of the instrument.

Any interest in the financial assets transferred that is created or retained by the Company is recognized separately, as asset or liability.

The financial assets and liabilities are compensated and in the statement of financial standing the net value is presented exclusively when the Company has the legal right to offset the amounts and intends either to settle them on a net basis, or to realize the assets and settle the obligation simultaneously. On 31.12.2024, the company holds the following non-derivative financial assets: cash, cash equivalents and receivables.

Receivables

Receivables are financial assets with fix payments or determinable that are not listed on an active market. The receivables contain trade receivables and other receivables.

Cash and cash equivalents

Cash and cash equivalents comprise the amounts recorded in cash accounts, current accounts, deposits redeemable at maturity and other cash equivalents. The liquid assets in foreign currency are reassessed at the exchange rate from the end of the period.

(ii) Non-derivative financial Liabilities

The Company recognizes in accountability the non-derivative financial liabilities on the trade date when the Company becomes party to the contractual terms of the instrument. The Company has the following non-derivative financial liabilities: guarantees retained within contractual transactions, trade liabilities and other liabilities.

Trade Liabilities and Other Liabilities

Liabilities to the suppliers and other liabilities include the exchange value of the products suppliers' deliveries, works executed and the services supplied.

Leasing-related liabilities

As per IFRS 16, a contract is or contains a leasing contract in case that leasing contract confers the right to control the use of an asset identified for a certain period of time in exchange for a counter value.

For such contracts, on the date of initiation of performance, a lessee must recognize an asset related to the right of use and a debt deriving from the leasing contract, debt generating interest.

The company includes in the item "Other debts" also the debts deriving from the leasing contracts at the present value of the payments of leasing that are not paid at that date.

(iii) Share capital - Common stocks

The share capital consisting of common stocks (ordinary) is recorded at the value established based on the articles of association and addenda.

The company recognizes the amendments to the share capital only after the accomplishment of the legal procedures provided by Law no.31/1990.

(d) Tangible assets

(i) Recognition and Assessment

The tangible assets in the company's patrimony are classified in the following category of assets of same kind and similar use:

- lands;
- constructions;
- operating oil product;
- technological equipment, measuring installations and devices, control and adjustment and means of transport;
- other tangible assets;

- tangible assets in progress.

The tangible assets are initially evaluated at cost by the Company. After initial recognition, the tangible assets are being revealed in the statement of the financial standing at the re-evaluated value, established based on an assessment report drafted by an authorized independent expert. The re-evaluations are made with fair regularity to make sure that the accounting value does not significantly differ from what would have been determined by using the fair value on the date of the reporting period.

The tangible assets are being presented in the statement of the financial standing at the re-evaluated value, diminished by the cumulated depreciation and the loss from cumulated depreciation, except for advance payments and ongoing tangible assets appear at cost.

The cost of an element of tangible assets is made up of the procurement price, here included the import fees or non-recoverable procurement fees, the transport expenses, manipulation, commissions, notary fees, expenses with permits acquirement and other non-recoverable expenses directly related to tangible assets and any other direct costs attributable to bringing the asset to the place and in operating conditions.

The tangible assets in progress stand for the unfinished investments made in-house or under contract. They are being evaluated at the production or procurement cost, as the case may be. Tangible assets in progress pass to the category of tangible assets completed after the reception, putting into operation or commissioning thereof, as the case may be.

The cost of a tangible asset built in-house is being determined by using the same principles as for a purchased asset.

The Company does not recognize in the carrying amount of an element of tangible assets, the current repairs and usual maintenance, these costs are recognized as an expense when incurred. The costs of current maintenance are mainly the workmanship and expandable costs and may include the cost of small components. The purpose of these expenses is often described as being meant for the “repairs and maintenance “of the tangible assets’ element.

(ii) Ulterior costs

Replacements of several components of tangible assets

The components of several elements of tangible assets may need the replacements at time regulated intervals. The company recognizes in the carrying amount of a tangible asset of an element of tangible assets, the cost of the replaced part of such an element, when that cost is borne by the entity, if the validation criteria are being met, for tangible assets.

General Regular Inspections

One condition for the continuation of the exploitation of an element of tangible asset is the performance of a general major regular inspection for detecting defects, notwithstanding whether they are being replaced or not, component parts of the respective assets. When a general regular inspection is being performed, the related cost is recognized in the accounting value of the tangible asset as a replacement, if the recognition criteria are satisfied.

An element of tangible assets and any significant part initially recognized are derecognized in the moment of disposal or when are not being expected future economic benefits from its use or sale. If an element of tangible asset is re-assessed, all other assets in the class are part of, except for the situation when there is no active market for that asset. A class of intangible assets contains assets of the same nature and similar use, being operated by the entity. If the fair value of a tangible asset cannot be determined by reference to an active market, the asset value presented

in the balance sheet is its reassessed value on the date of the last reassessment, wherefrom are being decreased the cumulated value adjustments.

When certain components of a tangible asset have a different useful life, they are being counted as distinct accounting elements (major components) of tangible assets.

The statement related to the evolution of tangible assets of the Company during 2023 and 2022 is detailed in note 5.

Operating Oil Product

The company recognizes in tangible assets the operating oil product evaluated in the balance sheet at determined cost from the re-evaluation performed as per GD no.26 from January 22,1992, updated with inflation rate up to 31.12.2003, when the Romanian economy was inflationary. Since oil operating product of the Company physically renews at every pumping and that the component elements of this product do not bear, therefore, moral or qualitative depreciation, the operation oil product has not useful life, thus is not being depreciated. The company presents the operating oil product at the cost value, here included the effects of restatements registered in the previous years as per application of "IAS29", Financial reporting in the hyper inflationary economies".

The Goods belonging to State Public Domain

The company administers goods belonging to the State public domain, as grantor of the oil concession Agreement concluded with the National Agency for Mineral Resources, approved by GD no.793/2002 for a period of 30 years.

Pursuant to the concession agreement, the objectives assumed by CONPET S.A. in relation to its activity are to ensure the operation of the national transport system via pipelines under maximum safety and economic efficiency conditions, to continuously improve the quality of services and to protect the environment.

The goods resulting in following the investments provided by the rehabilitation, modernization and development programs performed out of own company's financing sources are being capitalized and depreciate on the minimum duration related to the remaining lifespan of the respective asset or the remaining term of the concession agreement. The goods are to be included in the State's public domain on the date of amortization of the investment by the company, namely on the expiry of the normal operation term or cease of the oil agreement, if applicable, as per the legal provisions.

(iii) Reclassification as Investment Property

When an asset is being held more for obtaining revenues out of rentals or for the increase of the capital value or both, rather than for being used in the production or supply of goods and services, for administrative purposes or to be sold during the normal carryout of the business, the asset is being transferred into investment property. Our company transfers an asset into the category of investment property if the latter generates cash flows that are independent of other assets largely held.

The company does not hold investment property in balance on the date of preparation of these financial statements.

(iv) Intangible Assets held in view of Sale

When there is an amendment brought to the use of an intangible asset, meaning that its accounting value is to be recovered mainly by a sale transaction and not by its continuous use, the company records the asset transfer from the tangible assets category to non-current assets held in view of sale.

The non-current assets are classified as assets held for sale when:

- They are available for immediate sale;
- The company's management is engaged in a sales plan;
- There are minimum chances that the sales plan incur significant changes or be withdrawn;
- An active program to find buyers is initiated;
- The assets group is being traded at a reasonable price as compared to the fair value;
- It is expected the sale be concluded within 12 months as of the date of assets classification as held for sale.

Certain events or circumstances may extend the period for the completion of sales by more than one year. An extension of the period does not prevent an asset (or an asset group to be disposed) classified as being held in view of sale in case the delay is caused by events or circumstances outside the management control and there is enough proof that the company remains committed to the plan regarding the asset's sale (or the group destined to disposal).

The intangible assets (or asset group to be disposed) that are classified as being held in view of sale are being assessed by the company at the minimum between the accounting value and the fair value, less the sale costs.

The intangible assets are not being depreciated whilst they are being classified in view of sale.

The company does not have fixed assets in terms of selling, in balance on the date of preparation of these financial statements.

(v) Assets related to the right of use of the assets taken by leasing

On initiation of a contract, the company evaluates if that contract is or includes a leasing. A contract is or contains a leasing whether that contract confers the right to control the use of an asset identified for a certain period in exchange for a counter value.

As per IFRS 16, Leasing Contracts, at the date of starting the performance, the company, as a lessee, recognizes an asset related to the right of use. The cost of the asset related to the right of use includes the value of the initial value of the debt deriving from the leasing contract, any leasing payment being performed at the date of initiation of performance or prior to third date, minus any leasing stimulants received or any direct initial cost borne by the company as lessee.

The company re-evaluates whether a contract is or includes a leasing only provided that the terms and conditions of the contract are amended. The company determines the duration of a leasing contract as being the irrevocable period of a leasing contract, along with:

- (a) the periods covered by an option of extension of a leasing contract if the lessee has the reasonable confidence that it will exercise that option; and
- (b) the periods covered by an option of termination of the leasing contract if the lessee has reasonable confidence that it will exercise that option.

In terms of financial standing, the assets related to the right of use are being included in the same element-item as the one where the assets support of the company are being presented.

(vi) Amortization

The amortization is being calculated by using the straight-line method.

The useful lifespans of the tangible assets are settled by a reception commission of the company, named by the decision of the Director General, made up of specialists in the economic and technical domains.

The goods resulting from the investments related to the National Transport System via pipelines are depreciated along the minimum duration between the remaining lifespan of the respective assets or the remaining duration from the concession agreement.

The assets related to the rights of use of the leased assets shall be depreciated on a straight-line basis over the term of the contract.

The lifespans of the tangible assets are being periodically revised and, if applicable, on the date of value increase thereof, due to some expenses subsequently performed.

(vii) Sale/ cessation of Intangible Assets

The tangible assets that are scrapped or sold are being derecognized from the balance sheet together with the corresponding accumulated depreciation. Any profit or loss resulting from such an operation is included in current profit or loss.

The gain or loss resulting from the derecognition of an element of tangible assets is being determined as the difference between the net proceeds out the net accounting value of the assets.

(e) Intangible assets***(i) Recognition and Assessment***

Intangible assets are initially recognized at cost. The cost of intangible assets includes expenses that are not directly attributable to the purchase of the respective elements. The expenditure related to the acquisition of software licenses is capitalized based on the costs of purchase and commissioning of the respective programs. The costs associated with the maintenance of the software programs are recognized as expenses upon occurrence.

(ii) Subsequent Expenditure

The subsequent expenses are capitalized only when they increase the future economic benefits embodied in the value of the assets to which they are intended. All other expenditure, including expenditure on the goodwill and the internally generated brands, are recognized in profit or loss when incurred.

(iii) Depreciation

Depreciation is recognized in profit or loss using the linear method for the useful life estimated for intangible assets other than goodwill, from the date they are available for use.

(f) Depreciation of Assets***The Non-Financial Assets***

The carrying value of the Company's assets that are not of a financial nature, other than deferred tax assets, are reviewed at each reporting date to identify the existence of depreciation indices. If such indices exist, it is being estimated the recoverable amount of the said assets.

The recoverable amount of an asset or of a cash-generating unit is the maximum between its value and its fair value, less the costs to sell that asset or units. A cash-generating unit is the smallest identifiable group that generates cash and that independently of the other assets and

other groups of assets could generate cash flows. To determine the use value, the expected future cash flows are discounted using a discount rate before taxation, which reflects the current market conditions and the risks specific to the said asset.

A depreciation loss is recognized when the carrying amount of the asset or cash-generating unit exceeds its estimated recoverable amount of the asset or the cash-generating unit.

The depreciation losses recognized during the previous periods are being assessed at each reporting date to determine whether they have diminished or no longer exist. The depreciation loss is reversed if there has been a change in the estimates used to determine the recoverable amount.

Given some internal and external factors, the Company assessed the netbook value registered at the balance sheet date for depreciable tangible assets, to evaluate the possibility of existence of a depreciation thereof, which could attract the record of an adjustment for depreciation.

The Financial Assets

The short-term receivables are not discounted. The recoverable amount of other assets is deemed the highest value between the fair value (less sale costs) and the use value. Estimating the value of use of an asset involves updating the estimated future cash flows using a pre-tax discount rate that reflects current market assessments regarding the time value of money and the risks specific to the asset.

Depreciation losses on financial assets or a receivable recorded at the amortized cost is carried forward if there has been a change in the estimates used to determine the recoverable amount.

(g) Stocks

The main categories of stocks are consumables, spare parts, ongoing services and materials like inventory objects.

The stocks are valued at the lower cost and net achievable value.

The cost of stocks is based on the first in - first out (FIFO) principle and includes costs incurred for the purchase of inventories, production or processing costs and other costs incurred for bringing the inventories in the form and present location.

The net achievable value is the estimated selling price to be obtained in the ordinary course of business, the less estimated costs of completion, when appropriate, and the estimated costs necessary to the sale.

If applicable, there will be value adjustments applied for the obsolete stocks, with slow movement or damaged.

(h) Dividends

The dividends are recognized as a liability in the period in which their distribution is approved. The distribution of dividends is being performed subsequently to the approval of the annual financial statements.

(i) Revaluation reserves

The re-evaluations are performed with sufficient regularity so that the carrying amount does not differ substantially from that which would be determined by using the fair value at the balance sheet date.

The difference between the value resulting after revaluation and the net accounting value of tangible assets is presented either according to its nature (appreciation/depreciation), either at the revaluation reserve as a distinct sub-element in "Equities" or in the "Profit and Loss" account.

If the revaluation result is an increase over the net accounting value, then, it is treated as follows: as an increase of the revaluation reserve presented within the total equity, if there was no previous decrease recognized as an expense related to that asset or as an income to compensate the expense with the decrease previously recognized at that asset.

If the revaluation result is a decrease of the net accounting value, it is treated as an expense with the entire value of the depreciation when in the revaluation reserve is not recorded an amount on the asset (revaluation surplus) or as a decrease of the reserve from the revaluation by the minimum between the value of that reserve and the amount of the decrease and the possible difference remaining uncovered is recorded as an expense.

The revaluation surplus included in the revaluation reserve is transferred to the retained result when this surplus represents an achieved gain. The gain is deemed realized as monthly amortization is being registered and when deleting from the records of the asset for which was established the revaluation reserve. No part of the revaluation reserve can be distributed, directly or indirectly, except for the case when it represents achieved earnings.

A particularity occurs in case of the assets financed out of the modernization quota.

Thus, in case the revaluation result shows an increase compared to the net accounting value, then it is being treated as follows:

- as an increase of the revaluation reserve, if there was no previous decrease written-back as an expense related to that asset,
- as an increase of *the reserve established out of the modernization quota*, up to the set-off of the decrease previously recognized and for which, simultaneously with the depreciation expense was also diminished the quota reserve by writing back to revenues.

In case the result of revaluation is a decrease of the net accounting value, the latter will be treated as an expense when in the revaluation reserve is not registered an amount related to that asset (revaluation surplus) and the reserve formed out of the modernization quota is diminished simultaneously by writing back as revenues.

Starting May 1, 2009, the statutory reserves from the revaluation of fixed assets, including the lands, performed after January 1, 2004, which are deducted from calculation of taxable profit through tax depreciation or from expenditure regarding the assigned and / or squashed assets, shall be taxed concurrently with the deduction of the fiscal depreciation, respectively when deducting from the administration of these fixed assets, as appropriate.

The reserves made are taxable in the future, in case of change of reserve destination, reserve distribution towards the participants in any form, liquidation, division, merger of the taxpayer or of any other reason except for transfer, after May 1, 2009, of the reserves mentioned in the previous paragraph.

(j) Legal reserves

The legal reserves are constituted at a rate of 5% of gross statutory profit, as of the end of the year until the total legal reserves reach 20% of the nominal share capital (statutory) paid-up in compliance with the legal provisions. These reserves are deductible at the calculation of the corporate tax and are distributable exclusively upon liquidation of the Company. During 2024, there have not been distributed amounts to the legal reserves as they are currently constituted within the limit of the quota of 20% of the share capital, as per the provisions of Art.183, Para (1) and (2) of Companies Law no. 31/1990, subsequent amendments and completions.

(k) Other reserves

The company constitutes profit reserves also at the expense of the modernization quota, based on the GD no.168/1998 on setting the quota for the expenses necessary for the development and modernization of crude oil and natural gas production, refining, transport and petroleum distribution, subsequent amendments, presented in GD's no.768 of 7 September 2000 and 1116 of 10th of October 2002 and according to the provisions of Law no.227/2015 on the Fiscal Code. The modernization quota is included in the transport tariffs and the level of the quota is approved by ANRMPSG once with the approval of the transport tariffs.

In other reserves - the modernization quota, as sub-element of the accounts of equities are being included the amounts representing the plus resulting from the revaluation of the tangible assets financed out of modernization quota, until the clearing of the decrease previously acknowledged.

(l) Affiliated parties

The Parties are deemed related in case they are subject to control (or joint control) by the same entity or when an entity can directly or indirectly control or significantly influence the other party, either through ownership, contractual rights, family relationship or otherwise, as defined in IAS 24 *Presentation of Affiliated Party Disclosures*.

(m) The Benefits of the Employees***(i) Benefits granted upon Retirement***

In the normal course of business, the Company makes payments to the Romanian State in the account of his employees, at the statutory rates.

All employees of the company are included in the Romanian State pension plan. These costs are recognized in the statement of global results once with salaries recognition.

The Company recognizes a provision for retirement benefits granted upon retirement and death. The discounted value of the liabilities related to the benefits granted on retirement death is annually determined by an independent actuary. The Company operates no other pensions or post-retirement benefits plan and, consequently, has no other pension-related liabilities.

(ii) Short-term Employees Benefits

The short-term employees' benefits are the ones to be settled in no more than 12 months as of the end of the reporting period when the employees have supplied the said services. These benefits are mainly represented by salaries and contributions of the employer to social insurance, rest and medical leaves, the employees' share of profit. The liabilities related to these benefits are recognized as expense while the services are supplied and are assessed on a non-discounted basis.

The company establishes a fund for the employees' share of profit, as per the provisions of Government Ordinance no.64/August 30, 2001.

(n) Provisions

The provisions are recognized when the Company has a current obligation (legal or implicit) generated by a past event, when it is probable that an outflow of resources be required to settle the obligation, and duty can be estimated reliably.

The amount recognized as a provision is the best estimate at the balance sheet date of the costs required to settle this obligation.

The best estimate of the costs required to settle current debt is the amount that the Company would pay, reasonably, to settle the obligation on the balance sheet date or for the transfer thereof to a third party at that time.

Where the effect of the time value of money is material, the amount of the provision is the present value of the expenditure expected to be required to settle the obligation. The discount rate used reflects current market assessments of the time-value of money and the risks specific to the liability.

Gains from the expected disposal of assets should not be considered in measuring a provision.

If estimated that one or all expenses related to a provision will be reimbursed by a third party, the reimbursement is recognized only when it is certain that it will be received. The reimbursement is considered as a separate asset.

Provisions are reviewed at each balance sheet date and adjusted to reflect the current best estimate. If an outflow of resources is no longer likely to settle an obligation, the provision shall be canceled by reversal of revenues.

(o) Subsidies

The subsidies for assets, here included the non-monetary subsidies to fair value, are registered in the accountancy as subsidies for investments and are recognized by the method of approach based on capital, in compliance with the subsidies for investments are recognized outside the profit and loss, by deduction of the value of the subsidy from the assets cost.

(p) Revenues

Revenues related to Services Supply

The revenues from the services supply are recognized in the period in which they were provided in correspondence with the stage of execution.

As per IFRS 15 Revenues from clients' contracts, the value of the trade price allocated to an obligation of execution is recognized in revenues when (or gradually) an execution measure in being fulfilled.

To determine the trade price the terms of the contract and the usual business practices are being considered. The price of the transaction represents the value of the consideration to which the company expects to have the right in exchange of the transfer of goods or services promised to a client, not including the collected amounts on behalf of some third parties.

Revenues from royalties, rentals and interests

Recognition rules:

- - interests are recognized periodically, proportionally, upon generation of the said income, on an accrual-based accounting;
- - royalties and rentals on short-term are recognized based on an accrual accounting basis, under the contract.

(q) Financial Revenues and Expenses

The financial revenues comprise interest revenues related to the funds invested and other financial revenues. The interest revenues are recognized in profit or loss on the accrual-based accounting, using the effective interest method.

The financial expenses mainly contain expenses with interests related to leasing contracts and the expenses related to currency differences.

The interest expenses generated by the debts coming from the leasing contracts are being registered in the loss and profit account along the leasing contract period, calculated at the outstanding balance of the debt related to the leasing, for each stage. This will determine higher expenses at the beginning of the leasing contract.

(r) Corporate Tax

The corporate tax expenses comprise the current corporate tax and the deferred tax.

The corporate tax is recognized either in the profit and loss of the period, or outside the profit and loss, in other elements of the global result or straight in the equities.

(i) Current Tax

The current tax is the tax payable on the profit realized in the current period, determined using tax rates enacted on the reporting date and any adjustment for prior periods.

For the financial year ended December 31, 2024, the corporate tax rate, under the Fiscal Code, was 16%.

(ii) Deferred Tax

The deferred tax is determined by the Company using the balance sheet method for those temporary differences arising between the tax calculation base on assets and liabilities and their book value, used for the individual financial statements reporting.

The deferred tax is calculated using the tax rates that are expected to apply to the temporary differences upon the write-back thereof, under the legislation in force on the reporting date.

The receivables and debts related to deferred tax are offset only if there is a legally enforceable right to offset liabilities and current tax receivables and whether they are related to the tax collected by the same tax authority on the same entity subject to taxation or different tax authorities but willing to achieve settlement of current receivables and payables by the tax, using a net basis or the related assets and liabilities will be realized simultaneously.

The deferred tax receivable is recognized by the Company only to the extent where the achievement of future profits is likely to happen, which can be used to cover the tax loss. The deferred tax related receivable is reviewed at the end of each financial year and is reduced to the extent that the corresponding tax benefit is unlikely to be realized. The additional taxes that arise from the distribution of dividends are recognized, at the same date, with the obligation of dividends' payment.

(iii) Tax Exposures

For the determination of current and deferred tax, the Company considers the impact of uncertain fiscal positions and the possibility of the occurrence of additional taxes and interests. This assessment is based on estimates and assumptions and may involve a series of judgments about future events. New information may become available, thus determining the Company to change its judgment regarding the accuracy in estimating the existing fiscal liabilities; such changes of fiscal obligations bear effect over the tax expenditure in the period when such determination is made.

(s) Earnings per share

The earnings per share are determined by dividing the profit or loss attributable to the Company's ordinary shareholders to the weighted average number of ordinary shares related to the period under review.

(t) Business Segments Reporting

A segment is a distinct component of the Company that provides certain products or services (business segment) or provides products and services in a particular geographical environment (geographical segment), which is subject to risks and rewards that are different from those of other segments.

The company CONPET has a single reportable segment, namely transport services supply for its clients both via the National Transport System and by railway.

(u) Contingent Assets and Liabilities

The contingent liabilities are not recognized in the statement of the financial standing and in the profit and loss account. They are disclosed in the notes to the financial statements, except for the possibility of an outflow of resources representing economic benefits being removed.

A contingent asset is not recognized in the financial statements and in the profit and loss account but disclosed when an inflow of economic benefits is likely to happen.

(v) Ulterior Events

The financial statements reflect subsequent events after the year-end events that provide additional information on the Company's standing on the reporting date or those that indicate a possible violation of the going-concern principle (events causing adjustments). Events following the end of the year that are not adjusting events are disclosed in notes when they are considered significant.

(w) Comparative Figures

The statement of the financial standing for the year ended December 31, 2024 shows comparability with the statement of the financial standing for the financial year ended December 31, 2023.

(x) New Standards and Interpretations

The implications of the new Financial Reporting International Standards (IFRS EU)

The following new standards and amendments of the existing standards issued by the International Accounting Standards Committee (IASB) and adopted by the EU are in force for the current reporting period:

Norm/Interpretation <i>[IAS 8.31 (a), 8.31(c)]</i>	Nature of imminent amendment of the accounting policy <i>[IAS 8.31 (b)]</i>	The possible impact on the financial statements <i>[IAS 8.31 (e)]</i>
Amendments to IAS 1 Presentation of financial statements - Classification of liabilities in short-term and long-term liabilities, issued by IASB on 23 January 2020, and Amendments to IAS 1 „Presentation of financial statements” - Long-term liabilities with financial indicators issued by IASB on October 31, 2022	The amendments issued in January 2020 offer a more general approach to the classification of liabilities provided by IAS 1, starting from the contractual agreements existing on the reporting date. The amendments issued in October 2022 clarify the way an entity must respect, within twelve months from the reporting period affect the classification of a liability and set the effective date of both amendments to the annual periods starting with or after January 1, 2024.	The adoption of the amendments did not have a significant impact on the financial statements.

Norm/Interpretation [IAS 8.31 (a), 8.31(c)]	Nature of imminent amendment of the accounting policy [IAS 8.31 (b)]	The possible impact on the financial statements [IAS 8.31 (e)]
Amendments to IAS 7 Cash flow statements and IFRS 7 Financial instruments: information to be provided – Financing agreements in relation to suppliers issued by IASB on 25 May 2023.	According to the amendments, it adds requirements on the information needed to be presented, as well as indications within the existing requirements on the information to be provided for providing qualitative and quantitative information on financing agreements in relation to suppliers.	The adoption of the amendments did not have a significant impact on the financial statements.
Amendments to IFRS 16 leasing Contracts in a sale and leaseback transaction issued by IASB on 22 September 2022	The amendments provide that the seller-lessee subsequently assesses the lease liabilities arising from a leaseback transaction so as not to recognize any gains or losses related to the right of use retained. The new requirements do not prevent the seller-tenant from recognizing in the profit or loss account gains or losses from the partial or total termination of a leasing contract.	The amendments did not have a significant impact on the financial statements.

The following new standards and amendments to existing standards issued by the International Accounting Standards Board (IASB) and adopted by the European Union (EU) that have not yet entered into force for the annual financial reporting period ending 31 December 2024 and have not impacted or been applied to the preparation of these financial statements: [IAS 8.31 (a)]

Norm/Interpretation [IAS 8.31 (a), 8.31(c)]	Natura of imminent amendment of the accounting policy [IAS 8.31 (b)]	The possible impact on the financial statements [IAS 8.31 (e)]
Amendments to IAS 21 Effects of exchange rate variation – Lack of convertibility issued by IASB on 15 August 2023, effective from January 1, 2025	Amendments provide guidance for entities to mention when a currency is convertible and how to determine the exchange rate when it is not convertible	The adoption of these amendments will not have a significant impact on the financial statements in the future.

On the time of approval of these financial statements, the following existing standards were issued by the IASB but have not yet been adopted by the EU:

Norm/Interpretation [IAS 8.31 (a), 8.31(c)]	Natura of imminent amendment of the accounting policy [IAS 8.31 (b)]	The possible impact on the financial statements [IAS 8.31 (e)]
Amendments to IFRS 9 and IFRS 7 - Amendments to the classification and evaluation of financial instruments issued by IASB on May 30, 2024	The amendments clarify the classification of financial assets that have environmental, social, corporate governance (ESG) and similar characteristics. The amendments also clarify the date on which an asset or financial liability is derecognized and introduce additional disclosure requirements for investments in equity instruments designated at fair value through other comprehensive income and financial instruments that have contingent characteristics	The Company anticipates that the adoption of these amendments to existing accounting standards will not have a significant impact on the performance of the Company in the future
Amendments to IFRS 10 Consolidated financial statements and IAS 28 Investments in associated entities and joint ventures - Sale of or contribution of assets between an investor and associated entities or its joint ventures issued by IASB on 11 September 2014	The amendments resolve the contradiction between the requirements of IAS 28 and IFRS 10 and clarify that in a transaction involving an associate or joint venture, gains or losses are recognized when assets sold or contributed are an undertaking. This change could only be applied if the entity had not developed an accounting policy for this purpose	The Company anticipates that the adoption of these amendments to existing accounting standards will not have a significant impact on the performance of the Company in the future
IFRS 19 Branches without public liability: information to be provided issued by IASB on 9 May 2024	The standard allows subsidiaries to provide limited information when applying IFRS Accounting Standards to financial statements. IFRS 19 is optional for eligible subsidiaries and sets out information	The Company anticipates that the adoption of these amendments to existing accounting standards will not have a significant

Norm/Interpretation [IAS 8.31 (a), 8.31(c)]	Natura of imminent amendment of the accounting policy [IAS 8.31 (b)]	The possible impact on the financial statements [IAS 8.31 (e)]
	requirements for subsidiaries that choose to apply for it.	impact on the performance of the Company in the future
IFRS 14 Deferral accounts related to regulated activities issued by IASB on January 30, 2014	This standard aims to enable entities that first adopt IFRS, and currently recognize deferral accounts for regulated activities under generally accepted previous accounting policies, to continue to do so when switching to IFRS	The Company anticipates that the adoption of these amendments to existing accounting standards will not have a significant impact on the performance of the Company in the future
Amendments to IFRS 1, IFRS 7, IFRS 9, IFRS 10 and IAS 7 - Annual Improvements to IFRS Accounting Standards – Volume 11 issued by IASB on July 18, 2024	These amendments include clarifications, simplifications, corrections and modifications in the following areas: (a) hedge accounting adopted by an entity adopting the standards for the first time (IFRS 1); (b) gain or loss on discharge (IFRS 7); (c) presentation of the deferred difference between fair value and trading price (IFRS 7); (d) introduction and disclosures of credit risk information (IFRS 7); (e) removal of lease liabilities by the lessee (IFRS 9); (f) transaction price (IFRS 9); (g) determination of a „de facto” representative (IFRS 10); (h) cost-based method (IAS 7).	The Company anticipates that the adoption of these amendments to existing accounting standards will not have a significant impact on the performance of the Company in the future
IFRS 18 Presentation and information to be provided in the financial statements issued by IASB on April 9, 2024 will replace IAS 1 Presentation of the financial statements	The standard introduces three sets of new requirements for companies to improve their financial performance reporting and give investors a better basis for analyzing and comparing companies. The main changes in the new standard to IAS 1 relate to: (a) the introduction of categories (operating, investment, financing, corporate tax related and discontinued) and defined sub-totals in the situation of profit or loss; (b) the introduction of requirements for improving aggregations and disaggregation; (c) the introduction of information on the performance measures established by management (MPCs) in the notes to the financial statements. Although IFRS 18 does not affect the recognition or measurement of items in financial statements, its impact on the presentation is significant, especially in terms of the financial performance status and the inclusion of performance measures defined by management in financial statements	The Company anticipates that the adoption of these amendments to existing accounting standards will not have a significant impact on the performance of the Company in the future

4. Determination of Fair Value

Certain Company's accounting policies and requests of information supply require the determination of the fair value for financial and non-financial assets and liabilities.

Determination of Fair Value

Fair values are multi-level classified in the fair value hierarchy based on the input data used in the assessment techniques, as follows:

Level 1: Prices quoted on active markets for identical assets and liabilities.

Level 2: Input data, other than the prices included at Level 1 containing observable values for assets or liabilities, directly or indirectly.

Level 3: Inputs for assets or liabilities that are not grounded on the data observable on the market.

The fair values of the tangible assets have been determined in view of assessment and/or presentation of the information based on the methods described below.

The reevaluated value of the lands, buildings and equipment was established beginning with the fair value based on the market method and on the cost using quoted market prices for similar items, when they are available, or the replacement cost when appropriate. The depreciated replacement cost reflects adjustments for physical deterioration, wear and tear, functional and economical obsolescence. The reevaluated value of lands, buildings and equipment was determined by authorized appraisers.

Where applicable, additional information regarding the hypothesis used in the determination of fair value is presented in the notes specific to the named asset or liability.

In the following chart the fair values are presented classified on the 3 level in the hierarchy of fair values, structured on a group of tangible assets:

- RON-				
	Level 1:	Level 2:	Level 3:	Fair value on December 31, 2024
Lands	-	-	32,143,553	32,143,553
Constructions;	-	-	471,812,398	471,812,398
Machinery and equipment	-	-	75,125,494	75,125,494
Measuring and control devices	-	-	22,371,494	22,371,494
Means of transport	-	-	26,772,094	26,772,094
Other assets	-	-	1,204,907	1,204,907
TOTAL			629,429,940	629,429,940

- RON-				
	Level 1:	Level 2:	Level 3:	Fair value on December 31, 2023
Lands	-	-	32,264,052	32,264,052
Constructions	-	-	469,508,287	469,508,287
Machinery and equipment	-	-	77,168,919	77,168,919
Measuring and control devices	-	-	19,425,309	19,425,309
Means of transport	-	-	20,532,598	20,532,598
Other assets	-	-	1,595,738	1,595,738
TOTAL			620,494,903	620,494,903

5. Tangible assets

In 2024, compared to 2023, intangible assets have evolved as follows:

Name	Lands*	Buildings and special installations*	Operating oil products	Equipment	Instrumentation and control equipment	Means of transport	Other tangible assets	Tangible assets in progress	Total tangible assets
Gross accounting value on January 1, 2024	37,035,595	431,298,546	39,541,805	149,000,722	72,076,378	57,325,681	9,747,338	50,336,171	846,362,236
Cumulated amortization on January 1, 2024	(4,771,543)	(1,332,063)	-	(71,831,803)	(52,651,069)	(36,793,083)	(8,151,600)	-	(175,531,161)
Net accounting value on January 1, 2024	32,264,052	429,966,483	39,541,805	77,168,919	19,425,309	20,532,598	1,595,738	50,336,171	670,831,075
Inputs of tangible assets	1,157,096	56,685,732	-	10,225,945	8,840,133	10,706,770	119,800	(14,985,380)	72,750,096
Outputs of tangible assets at gross value	(8,404)	(86,580)	-	(517,346)	(573,753)	(894,562)	(200,234)	-	(2,280,879)
Cumulative amortization of outputs	4,562	23,767	-	492,427	563,060	894,562	195,982	-	2,174,360
Amortization recorded during the period	(1,273,753)	(54,318,809)	-	(12,244,451)	(5,883,255)	(4,467,274)	(506,379)	-	(78,693,921)
Gross accounting value on December 31, 2024	38,184,287	487,897,698	39,541,805	158,709,321	80,342,758	67,137,889	9,666,904	35,350,791	916,831,453
Amortization cumulated December 31, 2024	(6,040,734)	(55,627,105)	-	(83,583,827)	(57,971,264)	(40,365,795)	(8,461,997)	-	(252,050,722)
Net accounting value on December 31, 2024	32,143,553	432,270,593	39,541,805	75,125,494	22,371,494	26,772,094	1,204,907	35,350,791	664,780,731

Name	Lands*	Buildings and special installations*	Operating oil products	Equipment	Instrumentation and control equipment	Means of transport	Other tangible assets	Tangible assets in progress	Total tangible assets
Gross accounting value on January 1, 2023	28,693,144	333,355,527	39,541,805	131,103,627	67,450,565	53,187,538	9,551,894	151,716,394	814,600,494
Cumulated amortization on January 1, 2023	(3,534,499)	(56,497,335)	-	(61,414,939)	(45,825,088)	(33,002,087)	(7,301,085)	-	(207,575,033)
Net accounting value on January 1, 2023	25,158,645	276,858,192	39,541,805	69,688,688	21,625,477	20,185,451	2,250,809	151,716,394	607,025,461
Tangible assets inputs	1,206,066	154,381,431	-	18,404,935	5,095,756	4,995,207	196,474	(101,380,223)	82,899,646
Inputs of tangible assets at gross value	(3,955)	(121,048)	-	(507,840)	(469,943)	(857,064)	(1,030)	-	(1,960,880)
Cumulated amortization related to outputs	3,041	81,201	-	505,947	463,351	857,064	1,030	-	1,911,634
Diminution of tangible assets up to the net value for the registration of the assets re-evaluation	-	(94,048,384)	-	-	-	-	-	-	(94,048,384)
Amortization annulled from the accounting value as effect of net method application for the registration of assets re-evaluation.	-	94,048,384	-	-	-	-	-	-	94,048,384
Amortization registered during the year	(1,240,085)	(38,964,313)	-	(10,922,811)	(7,289,332)	(4,648,060)	(851,545)	-	(63,916,146)
Re-evaluation appreciations	7,154,203	37,744,306	-	-	-	-	-	-	44,898,509
Re-evaluation depreciations	(13,863)	(13,286)	-	-	-	-	-	-	(27,149)
Gross accounting value on December 31, 2023	37,035,595	431,298,546	39,541,805	149,000,722	72,076,378	57,325,681	9,747,338	50,336,171	846,362,236
Amortization cumulated on December 31, 2023	(4,771,543)	(1,332,063)	-	(71,831,803)	(52,651,069)	(36,793,083)	(8,151,600)	-	(175,531,161)
Net accounting value on December 31, 2023	32,264,052	429,966,483	39,541,805	77,168,919	19,425,309	20,532,598	1,595,738	50,336,171	670,831,075

* Note: Including rights of use resulting from rental and concession contracts

On 31.12.2024 the net value of the tangible assets decreased as compared to the end of 2023 by the amount of 6,050,344 RON.

During 2024 there were recorded inputs of tangible assets in the amount of 72,750,096 RON and outputs of tangible assets at a net value 106,519 RON.

The depreciation of tangible assets registered in 2024 amounted to 78,693,921 RON.

During 2024 tangible assets have been commissioned in the amount of 85,340,481 RON.

In 2024 there have been registered also increases to the assets related to the rights of use resulting from leasing contracts, in amount of 246,470 RON.

According to IFRS 16, the assets representing rights of use resulting from rental and concession contracts are recognized in tangible assets, as follows:

- At element-row “Lands” is included the value of the rights of use resulting from the lease and concession contracts concluded with various landowners.
On the rented lands are located telecommunication equipment and cathodic protection stations in various locations in the country. On 31.12.2024, the gross value of these assets is 8,134,184 RON, the cumulated depreciation of 6,040,734 RON, resulting a net value of the rights of use related to the lands of 2,093,450 RON.
- In the position “Buildings and special installations” is recognized the value of the rights of use resulting from rental and concession contracts concluded with different owners for buildings that are rented for being made available to the gendarmes, according to GD no.1486/2005 on the insurance of security and objectives protection, the goods and values with gendarmes, and for the performance of administrative activities. On the date of 31.12.2024, the gross value of these assets is 2,361,789 RON, the depreciation thereof on the same date being of 1,733,006 RON, resulting in a net value of the rights of use related to the buildings of 628,783 RON.
- At the position “Means of transport” is included the value of the rights of use of 15 rail tanks necessary for the development of the activities specific to the company. On 31.12.2024, the gross value of these assets is 949,290 RON, the cumulative amortization of 395,537 RON, resulting in a net value of the rights of use related to the means of transport of 553,753 RON.

CONPET holds on December 31, 2024, lands with an area of 733,697 Sq.m, with an accounting value of 30,050,103 RON, which consists of:

- 554,201Sq.m., lands with an accounting value of 16,293,210RON. The lands held based on 48 Land Ownership Certificates obtained during 2001-2005, appraised on the date of obtaining of the certificates, in compliance with GD no.834/1991 on the settlement and appraisal of various lands held by the state-owned commercial companies, at the value of 26,708,233 RON. These lands have been obtained in the company patrimony at the expense of other equity reserves, without augmenting the share capital by the value thereof;
- 155.401Sq.m lands with an accounting value of 4.168.765 RON, held based on 14 Certificates of attestation of the property right obtained until 2001. The share capital of the company was augmented by the amount of these lands;

- 28.690 Sq.m land with an accounting value of 9.588.127 RON, purchased by the Company based on sale-purchase agreements. On one side of the purchased lands are located administrative buildings, and on the rest are telecommunication towers, which are intended for the transport activity. In 2024 it was acquired from OMV Petrom, through a sale-purchase contract, a built-in land having the categories of use courtyards-constructions, with a measured area of 4,820 sq. m., on which is located an industrial railway line, with a built area on the ground of 630 sq. m. for the crude oil transport activities from the loading ramp located in the locality of Suplacul de Barcau.

The lands held by the Company are in Ploiesti, at the company's administrative offices, and in the 24 counties covered by the transport pipelines or where the crude oil tanks loading ramps are being located.

The tangible assets also include the oil operating product, evaluated in the statement of the financial standing at the cost determined from re-evaluation, retreated by the application of IAS 29 "The financial reporting in Hyper inflationary Economies". On 31.12.2024, the accounting value of the operating oil product remained unchanged compared to the beginning of the year, being in amount of 39,541,805 RON.

Tangible assets in progress

On December 31, 2024, the value of the assets in progress is 35,350,791 RON and includes investment projects provided in "2024 Investment Program", which are mainly composed of: replacement of pipeline portions on various lengths and routes, tanks modernizations, loading ramps modernizations, pumping stations modernizations, SCADA works, cathodic protection modernization systems etc.

Re-evaluation of tangible assets

After initial recognition, the tangible assets are being reappraised.

The tangible assets for which the company has adopted the allowed alternative treatment, namely those submitted to re-evaluation, are being presented in the financial statements at the re-evaluated value (the fair value at the re-evaluation value), less the ulterior depreciation cumulated and the ulterior losses from depreciation. The re-evaluations have been performed with sufficient regularity, at least once at 3 years, the most recent being on 31.12.2023. On December 31st, 2023 there were re-evaluated, by the ANEVAR authorized appraiser, the lands and goods from Group I represent "special buildings and constructions."

The tangible assets re-evaluated at fair value less depreciation, at 31.12.2024, compared to 31.12.2023, reveal the following:

- RON-				
Crt. No.	Class	Value on 31.12.2023	Value at 31.12.2024	Amendment during the year 2024
1	Lands	29,999,240	30,050,103	50,863
2	constructions;	429,276,229	431,641,810	2,365,581
TOTAL		459,275,469	461,691,913	2,416,444

6. Intangible assets

In 2024, compared to 2023, the intangible assets evolved as follows:

- RON-			
Name	Licenses and software	Other intangible assets	Total intangible assets
Gross accounting value on January 1, 2024	11,088,077	3,584,901	14,672,978
Cumulated depreciation on January 1, 2024	(6,183,962)	(2,929,443)	(9,113,405)
Net accounting value on January 1, 2024	4,904,115	655,458	5,559,573
Inputs of intangible assets	34,229	51,008	85,237
Outputs of tangible assets in gross value	(1,860)	-	(1,860)
Outputs cumulated depreciation	1,860	-	1,860
Depreciation registered during the period	(2,182,442)	(424,370)	(2,606,812)
Gross accounting value on December 31, 2024	11,120,446	3,635,909	14,756,355
Cumulated depreciation on December 31, 2024	(8,364,544)	(3,353,813)	(11,718,357)
Net accounting value on December 31, 2024	2,755,902	282,096	3,037,998

- RON-			
Name	Licenses and software	Other intangible assets	Total intangible assets
Gross accounting value on January 1, 2023	12,470,814	3,313,099	15,783,913
Cumulated depreciation on January 1, 2023	(6,739,288)	(2,189,832)	(8,929,120)
Net accounting value on January 1, 2023	5,731,526	1,123,267	6,854,793
Inputs of intangible assets	1,512,200	271,802	1,784,002
Outputs of intangible assets in gross value	(2,894,937)	-	(2,894,937)
Outputs cumulated depreciation	2,894,937	-	2,894,937
Depreciation registered during the period	(2,339,611)	(739,611)	(3,079,222)
Gross accounting value on December 31, 2023	11,088,077	3,584,901	14,672,978
Cumulated depreciation on December 31, 2023	(6,183,962)	(2,929,443)	(9,113,405)
Net accounting value on December 31, 2023	4,904,115	655,458	5,559,573

On 31.12.2024 the net value of the intangible assets has decreased as compared to the end of 2023, by the amount of 2,521,575 RON.

In 2024 there were registered intangible assets inputs of 85,237 RON and depreciation in amount of 2,606,812 RON.

The depreciation method used is the linear one.

The intangible assets include IT programs, soft licenses, electricity connection costs, water network and district heating network, borne by the company and recognized in intangible assets as the rights of use.

Research and development-related expenses are not capitalized.

7. Financial Assets

Comparative statement of the financial assets for the two reporting periods reveals the following:

- RON-			
Name	Other non-current securities	Fixed receivables	Total financial assets
Gross accounting value on January 1, 2024	5,100	2,837,892	2,842,992

Impairment on January 1, 2024	-	(320,189)	(320,189)
Net accounting value on January 1, 2024	5,100	2,517,703	2,522,803
Inputs	-	31,476	31,476
Outputs	-	(2,100,794)	(2,100,794)
Gross accounting value on December 31, 2024	5,100	768,574	773,674
Impairment on December 31, 2024	-	(238,300)	(238,300)
Net accounting value on December 31, 2024	5,100	530,274	535,374

- RON-			
Name	Other non-current securities	Fixed receivables	Total financial assets
Gross accounting value on January 1, 2023	5,100	2,852,134	2,857,234
Impairments for depreciation on January 1, 2023	-	(320,189)	(320,189)
Net accounting value on January 1, 2023	5,100	2,531,945	2,537,045
Inputs	-	36,590	36,590
Outputs	-	(50,832)	(50,832)
Gross accounting value on December 31, 2023	5,100	2,837,892	2,842,992
Impairments on December 31, 2023	-	(320,189)	(320,189)
Net accounting value on December 31, 2023	5,100	2,517,703	2,522,803

On 31.12.2024, the net value of the financial assets decreased compared to the end of 2023, by 1,987,429 RON, mainly due to the collection of guarantees granted to third parties.

The company owns holdings to the share capital of the Independent Monitor Registry in amount of 5,000 RON and is associate member, along with other enterprises, in the Romanian National Committee of the World Petroleum Council (Ro. CNR-CMP), participating in the formation of the CNR-CMP patrimony with contribution in the amount of 100 RON.

The long-term receivables, in net amount of 530.274 RON, represent guarantees granted to third parties and consist mainly of: returnable guarantees paid by the Company to the Ministry of Agriculture and Rural Development and the Ministry of Environment, Waters and Forests for the temporary removal of land from the agricultural circuit and the forest fund for the achievement of various investment objectives, including, as well as guarantees related to land and premises leases for the performance of production and administrative activities in different locations in the country and guarantees for the telecommunications equipment.

8. Inventories

- RON-				
Name	Materials and Consumables	Services in progress	Waste products	Total stocks
Gross accounting value on January 1, 2024	6,467,315	872,224	33,332	7,372,871
Impairments for depreciation of inventories	(853,307)	-	-	(853,307)
Net accounting value on January 1, 2024	5,614,008	872,224	33,332	6,519,564
Stock input during the period	5,931,870	10,034,299	350,525	16,316,694
Consumption/outputs of stocks during the period	(6,298,097)	(10,245,432)	(306,334)	(16,849,863)
Revenues from (Expense with) impairment for depreciation of stocks	29,146	-	-	29,146
Gross accounting value on December 31, 2024	6,101,088	661,091	77,523	6,839,702
Impairments of inventories	(824,161)	-	-	(824,161)
Net accounting value on December 31, 2024	5,276,927	661,091	77,523	6,015,541

- RON-				
Name	Materials and Consumables	Services in progress	Waste products	Total stocks
Gross accounting value on January 1, 2023	6,444,829	1,403,434	469	7,848,732
Impairments for depreciation of inventories	(981,649)	-	-	(981,649)
Net accounting value on January 1, 2023	5,463,180	1,403,434	469	6,867,083
Stock input during the period	6,859,181	9,020,306	536,770	16,416,257
Consumption/outputs of stocks during the period	(6,836,695)	(9,551,516)	(503,907)	(16,892,118)
Revenues from (Expense with) impairment for depreciation of stocks	128,342	-	-	128,342
Gross accounting value on December 31, 2023	6,467,315	872,224	33,332	7,372,871
Impairments for depreciation of inventories	(853,307)	-	-	(853,307)
Net accounting value on December 31, 2023	5,614,008	872,224	33,332	6,519,564

The stocks are made up of materials, spare parts and other materials that are to be used when performing the company's business, including the ones comprising security and intervention stocks meant for the likely provoked and technical breakdowns.

The company recognizes in "revenues from ongoing services" and in the inventories the cost of supplied and unreceived services by the beneficiaries until the end of the period.

9. Trade receivables and other receivables

On December 31, 2024 and December 31, 2023, the trade receivables and other receivables reveal the following:

- RON-		
Name	December 31, 2024	December 31, 2023
Clients	34,369,148	48,321,481
Impairments for receivables	(206,618)	(208,618)
Other trade receivables	286,806	280,366
Impairments for the loss of value of other short-term intangible receivables	(1,404)	(1,404)
Subtotal trade receivables (net value)	34,447,932	48,391,825
Other receivables	14,446,624	6,288,206
Impairments for other receivables	(9,452,427)	(1,698,699)
Subtotal other receivables (net value)	4,994,197	4,589,507
Total receivables	39,442,129	52,981,332

The clients' structure per activity is the following:

- RON-		
Name	December 31 st , 2024	December 31 st , 2023
Clients- transport activity	33,176,229	47,617,013
Other clients - auxiliary activities	1,192,919	704,468
Total	34,369,148	48,321,481

Trade receivables are no interest bearer and have an average day collection of 28 days.

The main trade receivables in balance on December 31, 2024, are to be received from: OMV PETROM S.A.– 26,620,231 RON (December 31, 2023: 40,006,967 RON), Petrotel Lukoil S.A. - 6,535,041 RON (December 31, 2023: 6,551,650 RON), Rompetrol Rafinare SA– 765,868 RON (December 31, 2023: 1,072,969 RON).

The revenues from the transport services supplies performed to the clients hold a significant share (over 99 %) in the Company's turnover.

The Company's client, OMV PETROM SA, holds approximately 68% of the total short-term receivables registered on December 31, 2024.

Other receivables, amounting to 14,446,624 RON, mainly include: amounts to be recovered from various natural and legal persons, amounts recorded on the basis of sentences handed down by the courts of law (9,449,927 RON, respectively 65.4 %), amounts to be recovered from the budget representing allowances for medical leave (968,126 lei, respectively 6.7 %), amounts to be recovered from the State budget from the capitalization of goods belonging to the public domain/private state (2,775,267 RON, 19.2% respectively) and non-exigible VAT related to the invoices unarrived until 31.12,2024 (595,612 lei, respectively 4.1%).

Impairments for trade receivables are recorded for the doubtful clients, involved in litigation or insolvency, presenting default of collection. On December 31, 2024 the value of these impairments amounts to 206,618 RON.

The impairments of other receivables are registered for the debits to be recovered related to the final sentences pronounced in the legal files. On December 31, 2024 the value of these impairments amounts to 9,452,427 RON, decreasing by 7,753,728 RON as compared to December 31st, 2021, following the passing on the accounting records of such debits.

The Company registers impairments for loss of value, in quantum of 100% of the value of the receivables, for clients facing litigation, clients in insolvency and for other debits related to the established legal files or for fines received and disputed.

Statement on receivables seniority

Trade receivables

	- RON-	
Name	December 31st, 2024	December 31st, 2023
Clients, o/w:	34,369,148	48,321,481
<i>Depreciated receivables</i>	206,618	208,618
<i>Non-depreciated receivables, o/w:</i>	34,162,530	48,112,863
- seniority less than 30 days	34,129,909	48,007,876
- seniority between 30 days and 60 days	33	98,106
- seniority between 60 days and 90 days	-	2,098
- seniority between 90 days and 270 days	26,780	4,782
- seniority between 270 days and 1 year	2,051	-
- seniority over 1 year	3,757	-
Other trade receivables, out of which:	286,806	280,366
<i>Depreciated receivables</i>	1,404	1,404
<i>Non-depreciated receivables, o/w:</i>	285,402	278,962
- seniority less than 30 days	4,485	1,597
- seniority between 30 days and 60 days	-	-
- seniority between 90 days and 270 days	-	277,365
- seniority between 270 days and 1 year	-	-
- seniority over 1 year	280,917	-

Other receivables

	- RON-	
Name	December 31st, 2024	December 31st, 2023
<i>Depreciated receivables</i>	9,452,427	1,698,699
<i>Non-depreciated receivables, o/w:</i>	4,994,197	4,589,507

- seniority less than 30 days	2,086,664	2,282,700
- seniority between 30 days and 60 days	874,423	196,453
- seniority between 60 days and 90 days	-	334,117
- seniority between 90 days and 270 days	788,551	1,111,809
- seniority between 270 days and 1 year	-	307,091
- seniority over 1 year	1,244,559	357,336
Total	14,446,624	6,288,206

10. Cash and cash equivalents

On December 31, 2024 and December 31, 2023 the cash and cash equivalents are revealed as follows:

Name	- RON-	
	December 31 st , 2024	December 31 st , 2023
Current bank accounts	2,626,831	2,020,616
Bank deposits with maturity ≤ 3 months	133,546,037	105,716,195
Cash on hand	3,962	5,362
Total	136,176,830	107,742,173

The cash and cash equivalents on December 31, 2024 are increasing by 26.4% (28.5 million RON), compared to December 31, 2023 due to the increase of cash from the modernization quota, cash existing in bank accounts on 31.12.2024, increase by 4.9 mRON compared to 31.12.2023, but also to the collection, prior to maturity, of the exchange value of some invoices issued in the month of December 2024.

The liquid assets representing the modernization quota (in amount of 36,936,443 RON on 31.12.2024) has a special use regime provided by GD no.168/1998, being destined exclusively to the financing of the modernization works and development works related to the goods belonging to the public domain.

The company does not have restricted numbers.

11. Equities

The Share capital

During the reporting period, the share capital of the company has not changed, remaining at the value of 28,569,842 RON, divided into 8,657,528 ordinary shares with a nominal value of 3.3 RON/share and corresponds to the one registered at the Trade Register Office.

The structure of CONPET S.A. share capital and shareholding on December 31, 2024 is exposed as follows:

Shareholders	December 31, 2024			December 31, 2023		
	Number of shares	Amount (RON)	(%)	Number of shares	Amount (RON)	(%)
Romanian State by the Ministry of Energy	5,083,372	16,775,128	58.7162	5,083,372	16,775,128	58.7162
Legal persons	2,083,424	6,875,299	24.0649	2,029,972	6,698,907	23.4475
Natural Persons	1,490,732	4,919,415	17.2189	1,544,184	5,095,807	17.8363
Total	8,657,528	28,569,842	100%	8,657,528	28,569,842	100%

Legal reserves

On December 31, 2024 the value of the legal reserve is 5,713,968 RON and represents the reserve constituted at the level of 20% of the share capital, as per the Law no.31/1990 and the Articles of Incorporation.

Other reserves

Other reserves are in amount of 558,422,603 RON.

Other reserves have increased by the amount of 10,837,126 RON in the year 2024, made up of: 7,844,065 RON, growth of reserves representing the modernization quota and 2,993,062 RON growth from the reserve constituted for the reinvested profit.

The reserve related to the modernization quota is in amount of 504,511,205 RON and holds the highest share in total other reserves (90.35%).

Revaluation reserves

In the statement of the financial standing, the revaluation reserves are presented at the net value of 43,539,329 RON, resulting after the diminution of the gross value by the related deferred tax directly recognized in the equities, as per IAS 12.

Retained earnings

The retained earnings is in the amount of 45,124,461 RON and contain:

- The retained earnings representing actuarial loss from the discount of benefits granted upon retirement: 1,760,616 RON;
- The retained earnings representing surplus achieved out of revaluation reserves: 6,298,971 RON
- The retained earnings derived from the first adoption of IAS 29 related to fixed assets representing oil operating product recognized in tangible assets, in amount of 39,301,668 RON;
- Other elements of the equities - retained earnings: 755,268 RON

The retained earnings are diminished by the amount of the reinvested profit in 2024, in amount of 2,993,062 RON, for which one has benefited from an exemption from the corporate tax, as per the provisions of Art.22 of Law no.227/2015 on the Fiscal Code, the amount being registered in the "Allocation of Profit" profit distributed to other reserves.

Profit for the year

The year's profit of the year 2024 is 49,323,047 RON, decreasing by 20% compared to the year's profit of the year 2023 (61,616,539 RON).

The proposal to distribute the accounting profit left following the deduction of the corporate tax on December 31, 2024:

Along 2024, there have not been distributed dividends based on the interim financial statements. The accounting profit left after the deduction of the income tax, on December 31, 2024 is in amount of 49,323,047 RON.

The distribution proposal on legal destinations of the remaining accounting profit after the deduction of the corporate tax to be distributed, to which was added the provision for the employees' share of profit in amount of 5,057,858 RON, resulting in a total amount to be distributed of 54,380,905 RON, is the following:

- RON-			
Crt. No.	Element	GD provision no. 64/2001	Amount
1	The net profit for the year 2024, reported based on the audited annual financial statements	-	49,323,047
2	The employee share of profit up to a limit of 10% of net profit: but no more than the level of a monthly average basic salary at the level of the company in the financial year 2024, recognized in the provisions account	-	5,057,858
3	The net profit reinstated with the provision for the employees' share of profit (1+2):	-	54,380,905
a	Other allocations stipulated by law - exemption from the payment of the reinvested corporate tax (account 1068), Art 22 of Law no. 227/2015 on the fiscal code	Art. 1, para. (1), letter b)	2,993,062
b	Employees' share of profit within the limit of 10% of the net profit but not more than the monthly average base salary achieved at the level of the economic operator reported in the financial reference year	art. 1, para. (1), letter e)	5,057,858
c	Dividends due to shareholders	art. 1, para. (1), letter f)	46,329,985

The retained earnings that may be allocated, in the amount of 8,814,854 RON, is proposed to be distributed as dividends. The statement of retained earnings distributable and the distribution thereof is the following:

- RON-		
Crt. No.	Destination	Amount
1.1.	The retained earnings representing surplus achieved out of revaluation reserves	6,298,970
1.2.	The retained earnings represent actuarial loss from discount of benefits granted upon retirement	1,760,616
1.3.	Retained earnings from the correction of various elements that have affected the profit of the previous years	755,268
1	Total retained earnings, distributed for:	8,814,854
a	Dividends due to shareholders	8,814,854

Other reserves in the amount of 3,407,439 RON, representing prescribed dividends, unclaimed within three years from the due date (prescribed dividends), are proposed to be allocated for the distribution as dividends due to shareholders.

- RON-		
Crt. No.	Destination	Amount
1	Other reserves representing distributions to owners, unclaimed within three years from the maturity date (prescribed dividends)	3,407,439
1	Total other reserves, distributed for:	3,407,439
a	Dividends due to shareholders	3,407,439

12. Trade Liabilities and Other Liabilities

On December 31, 2024 and December 31, 2023, the trade liabilities and other liabilities look as follows:

- RON-

Liabilities	December 31, 2023	December 31, 2024	Maturity date for the balance on December 31, 2024		
			Under 1 year	1-5 years	Over 5 years
Trade liabilities	33,091,805	26,574,075	26,574,075	-	-
Liabilities to the employees	39,908,276	44,513,101	14,276,429	4,763,532	25,473,140
Deferred Tax Liabilities	901,503	-	-	-	-
Liabilities-provisions	9,293,146	16,321,002	16,321,002	-	-
Other liabilities	33,364,459	35,450,624	33,027,370	1,717,012	706,242
Total	116,559,189	122,858,802	90,198,876	6,480,544	26,179,382

The trade liabilities related to the purchase of goods and services for the operating activity have a share of 73.9% in total trade liabilities, while those representing the procurement of assets have a share of 26.1%.

The liabilities to employees, in balance on the date of 31.03.2024, also include the future liabilities for the benefits granted to employees on retirement or death, for the employees' share of profit, for the untaken leaves of the employees, debts that are recognized as provisions.

The statement of the employee-related liabilities, fiscal liabilities and other maturity date liabilities look as follows:

- RON-

Liabilities	December 31, 2023	December 31, 2024	Maturity date for the balance on December 31, 2024		
			Under 1 year	1-5 years	Over 5 years
Salaries contributions	6,221,902	6,689,289	6,689,289	-	-
Current corporate tax	1,807,695	-	-	-	-
Royalty due to the State Budget	10,270,414	11,681,659	11,681,659	-	-
VAT payable	4,111,198	5,060,670	5,060,670	-	-
Other interests and debts– State Budget	1,221,041	1,909,707	1,909,707	-	-
Dividends Payable	5,444,333	5,717,931	5,717,931	-	-
Leasing related debts	3,346,757	3,620,927	1,741,696	1,380,297	498,934
Accrued revenues	695,643	613,523	81,977	324,238	207,308
Other liabilities	245,476	156,918	144,441	12,477	-
Total	33,364,459	35,450,624	33,027,370	1,717,012	706,242

On 31.12.2024, the debts related to the leasing contain the rights of use recognized for the lease and concession contracts of some lands, buildings and tank cars (note 5).

The liabilities related to the rights of use recognized for the lease and concession contracts of some lands, buildings and wagons have been assessed at the value of rent fees/royalties along the remaining contractual period, discounted with the loan rate for real estate loans.

The statement of liabilities to the employees on maturity terms reveals the following:

- RON-

Liabilities	December 31, 2023	December 31, 2024	Maturity date for the balance on December 31, 2024		
			Under 1 year	1-5 years	Over 5 years
Salaries and assimilated debts	7,140,257	8,043,908	8,043,908	-	-
Liabilities for benefits granted on retirement	22,089,977	26,478,421	581,129	4,564,389	21,332,903
Liabilities for the benefits granted in case of death	4,155,542	4,339,380	-	199,143	4,140,237
Liabilities for employees' share of profit	6,002,879	5,064,129	5,064,129	-	-
Debts for untaken leaves	519,621	432,937	432,937	-	-
Liabilities for other benefits granted to the employees	-	154,326	154,326	-	-
Total	39,908,276	44,513,101	14,276,429	4,763,532	25,473,140

On December 31, 2024, the Company mainly comprises at this chapter the salaries and assimilated liabilities, as well as future liabilities for benefits granted upon retirement or death and for the employees' share of profit, recognized as provisions.

The largest share in the liabilities to the employees is held by the liability for the benefits granted upon retirement in the amount of 26,478,421 RON, out of which 25,897,292 RON represent long-term liabilities, and 581,129 RON represent short-term liabilities and the liability for benefits in case of death, in amount of 4,339,380 RON, representing long-term liabilities.

These liabilities were recorded based on the Actuarial Report on the evaluation of the obligations related to the benefit on retirement and death provided by the CLA for Conpet S.A. employees, drawn up on 31.12.204 by Ovidiu-Virgil Racoveanu, certified actuary based on the service contract concluded with CONPET S.A.

As per the Labor Contract in force, the company must pay the employees, upon retirement, a benefit equals to a certain number of salaries, according to the seniority and company job history, and in case of the death of the employee it is awarded equal help for a certain number of salaries.

The present value of the liability related to the benefits granted upon retirement was determined by using the projected unit credit Method (IAS 19). This method starts with the principle that the benefit payable upon retirement is built up for each year of service to the employer, so that each employee be compensated at the appropriate time.

The benefit upon retirement received by an employee at the legal retirement age has been updated considering the discount factor for the period remaining until the employee's retirement, the proportion of the benefit related to the elapsed period and the probability that the employee remain with the company until the retirement age (and retire at that age), given that the person could die, leave the company or suffer an invalidity.

The benefit granted in the event of the death of an employee was determined as product of the projected death benefit up to retirement age, the present value of the death obligation during the service to the employer and the share of the benefit for the elapsed period.

The main actuarial hypotheses used for the calculation on December 31, 2024 were the following:

- **The discount rate.** The discount rate was set at the risk-free rate investments, less adjustments of the variations (risk free rate spot no volatility adjustment) published by EIOPA at the end of December 2024.
- **Rate of Inflation.** At the time of the evaluation, according to the National Institute of Statistics, the annual inflation rate in December 2024 compared to December 2023 was 5.1%. An estimate of the evolution of the consumer price index is published by the National Commission for Strategy and Prognosis. These estimates are like those of the International Monetary Fund. Similar projections are to be found also on the official site of the European Union.
- **The rate of increase of the monthly gross average salary per company.** To achieve the long-term projection, the average wage increase was estimated to be equal to inflation, to which a percentage of 0.15% per year was added. For the year 2024 the percentage of salary increase was taken into consideration, of 8%.
- **The statutory retirement age** was 65 years for men and for women, in accordance with Law no. 360/2023, on the unitary pension system. These data were corroborated with the information on the retirement age communicated by the employer.
- The mortality **rate among the employees** is based on the Life Table of the Romanian population men/women 2022.
- **Migration of the workforce.** To model departures from the company, an average workforce migration in percentage of 5.5% was estimated annually, with a progressive downward trend toward zero according to age.
- **Duties and Taxes.** All duties valid on 31.12.2022 were included in the calculation of retirement obligations. Since the benefits in the event of the death of the employee are paid from the employer's social security fund, it results that these benefits do not involve the payment of duties and taxes.

During 2024, the movement in the liabilities for the benefits upon retirement and death granted to the employees is exposed in the table below:

Name	Benefits on retirement	Death-related benefit	Total benefits
Present value of the obligation on 01.01.2024	22,089,977	4,155,542	26,245,519
Cost of the interest	1,402,289	195,444	1,597,733
Cost of the current service	4,055,471	1,214,177	5,269,648
Payments from provisions during the year	(596,895)	(234,545)	(831,440)
Actuarial gain/loss	(472,421)	(991,238)	(1,463,659)
Present value of the obligation on 31.12.2024	26,478,421	4,339,380	30,817,801
Variation from the beginning of the year	4,388,444	183,838	4,572,282
Percentage variation	20%	4%	17%

The analysis of the sensitivity of the liability for the benefits on retirement due to the employees on the date of 31.12.2024 is presented in the following table:

- RON-

Hypotheses	Benefits granted upon Retirement	Death-related benefit	Total benefits
December 31, 2024	26,478,421	4,339,380	30,817,801
The discount rate +1%	24,377,692	4,123,480	28,501,172
The discount rate -1%	28,846,481	4,567,160	33,413,641
Salaries increase rate +1%	28,825,710	4,564,688	33,390,398
Salaries increase rate -1%	24,356,770	4,121,805	28,478,575
Attrition rate +1%	25,823,148	4,319,213	30,142,361
Attrition rate -1%	27,226,373	4,317,852	31,544,225
The increase of life expectancy at birth with 1 year	26,849,022	4,040,890	30,889,912

The liability for the employees' share of profit is constituted in compliance with the Ordinance no.64/2001 and Order of the Ministry of Public Finances no.144/2005. Ordinance no. 64 from August 30, 2001 establishes that the accounting profit remaining after the deduction of the corporate tax and other distributions provided by law to companies with full or majority state capital to be distributed within 10% of the net profit, but not more than the level of an average monthly basic salary realized at the level of the economic agent, in the financial year of reference.

On 31.12.2024, of the total value of 5.064.129 RON, 5.057.858 RON represent a liability constituted in the period, for the employees share of profit of the 2024, within the legal limits.

Within the liabilities to employees is included also the liability for the untaken leaves, which, on 31.12.2024, is in the amount of 432.937 RON.

The company does not register overdue payments at the end of 2024.

13. Provisions

Name	- RON-	
	December 31, 2024	December 31, 2023
Provisions for litigations	7,683,828	7,156,937
Provisions related to mandate contracts	4,805,545	1,824,068
Other provisions for risks and expenses	3,831,629	312,141
Total provisions	16,321,002	9,293,146

Provisions for litigations

In detail, the provisions for litigations are:

Name	- RON-	
	December 31, 2024	December 31, 2023
Litigations for civil compensations	5,867,819	5,458,971
Litigations for third parties' failure to respect certain contractual clauses	47,100	70,609
Other litigations	1,768,909	1,627,357
Total	7,683,828	7,156,937

The company is involved in various litigations for compensation and annuities requested by various owners, natural and legal persons, following the exercise by the company of the right to legal right of way on their lands.

On 31.12.2024, there are registered provisions for such litigations amounting to 5,867,819 RON, increasing with 408,848 RON compared to 31.12.2023.

The position "Other litigations", amounting to 1,768,909 RON, represents the value of the provision constituted for the litigation opened in the course of 2018 by Fondul Proprietatea, requesting the payment of net dividends distributed from the profit of the financial year 2006, related to a share of 6% held by the plaintiff in the share capital of CONPET S.A., as well as the legal interest calculated for the requested amount starting with the due date.

Provisions related to the contracts of mandate

Debts were set up for the allowances granted to the directors, according to the mandate contracts and provisions of the Government Ordinance no.109/2011 on corporate governance, including the related contributions, as follows:

- 128,700 RON represents liability for rest leave not performed by the directors with mandate contract;
- 4,676,845 RON represents liability for the variable component related to 2024, of which 1,837,874 RON liability for the allowances granted to the members of the Board of Administrators and
- 2,838,971 RON liability for the allowances granted to the directors.

Other provisions

On December 31, 2024 the balance of the position "Other provisions" in amount of 3,831,629 RON is composed of:

- provision for environmental expenses (160,000 RON);
- provision for the lack of use related to 2024 of the land on which is being located Voința Sports Base, land owned by the municipality of Ploiesti (402,716 RON);
- provision for tariffs f use of the public domain, in view of crossing/overcrossing of goods managed by the Romanian Waters National Administration, due based on the Emergency Ordinance no.52 from 31.05.2023 for the amendment and completion of some water normative acts, between July 2023 - December 2024 (3,268,913 RON).

14. Current and Deferred Corporate Tax

The expense with the current and deferred corporate tax of the company in 2024 and 2023 is determined by a statutory rate of 16%.

- RON-		
Name	December 31, 2024	December 31, 2023
Expenses with current corporate tax	10,227,235	10,586,561
The expense with /(revenues from) deferred corporate tax	(4,012,030)	590,956
Total	6,215,205	11,177,517

Reconciliation of the effective rate of taxation:

- RON-		
Name	December 31, 2024	December 31, 2023
Profit before taxation	55,538,252	72,794,056
- Corporate tax at a statutory rate of 16%	8,886,120	11,647,049
Effect on the corporate tax of:		
- Non-deductible expenses	5,602,540	3,465,398
- Non-taxable revenues	(2,427,162)	(3,173,270)
- Elements like the revenues	1,199,769	1,586,576
- Elements like the expenses	(250,935)	(245,677)
- Spared corporate tax	(478,890)	(596,064)
- Amounts representing sponsorship falling under the limits provided by law	(776,000)	(789,000)
- Corporate tax reduction as per GEO 153/2020	(1,528,207)	(1,308,451)
Expenses with current corporate tax	10,227,235	10,586,561

The deferred corporate tax

The deferred corporate tax payable and recoverable was calculated based on the temporary taxable and/or deductible differences determined for assets and debts as differences between the accounting value of the asset and/or the debt and the amount attributable for fiscal purposes. The company recognizes the deferred taxes on the account of an expense or an income except for the tax generated by an event directly accounted for in the equities.

The statement of the movements related to the receivable/debt with the deferred tax during the year 2024 reveals the following:

- RON-					
2024	Net value on the 1 st of January	Deferred corporate tax recognized in the profit and loss account	Deferred corporate tax recognized in the equity	Net value on December 31, 2024	
				Receivable related to the deferred corporate tax	Debt related to the deferred corporate tax
Re-evaluation of tangible assets	(6,923,808)	546,529	1,198,704	2,875,258	(8,053,833)
Provisions	5,584,626	1,398,208	234,185	7,217,019	-
Impairments of current assets	437,679	400,219	-	837,898	-
Deferred corporate tax before compensation	(901,503)	2,344,956	1,432,889	10,930,175	(8,053,833)
Compensation receivable/debt				(8,053,833)	8,053,833
Deferred net corporate tax - to be recovered					2,876,342

The debt representing the deferred tax, in the balance on 31.12.2022, is in the amount of 8,053,833 RON and is recognized on the expense of equities, and the deferred tax receivable recognized in the statement of global result, in balance on the same date, is 0,930,175 RON. The net amount of the deferred tax represents deferred corporate tax to be recovered, in amount of 2,876,342 RON.

15. Result per Share

The results per share for the last two years are:

- RON-		
Name	December 31, 2024	December 31, 2023
Profits of the Financial Year	49,323,047	61,616,539
The number of ordinary shares at the beginning and the end of the period	8,657,528	8,657,528
Basic and diluted earnings per share (RON/share)	5.70	7.12

16. Operating Revenues

a) Revenues from contracts

- RON-		
Name	December 31, 2024	December 31, 2023
Revenues from transport service, of which:	531,391,168	482,872,798
<i>Revenues from transport services domestic subsystem*</i>	358,670,022	343,751,792
<i>Revenues from transport services import subsystem*</i>	167,786,041	130,095,692
<i>Other revenues associated with the transport operations</i>	4,935,105	9,025,314
Revenues from rents	1,906,210	2,078,272
Other revenues from contracts	321,031	162,539
Total contracts revenues	533,618,409	485,113,609

*) Transported quantities for which tariffs are being applied regulated by NAMR.

The transport revenues are achieved out of the services supplied to clients for the transport of the crude oil, rich gas and condensate volumes, at the tariffs approved by Order of the President of the National Agency for Mineral Resources.

In 2024, the quantities transported on subsystems, compared to the previous years:

Name	December 31, 2024	December 31, 2023
Quantities transported on the Domestic subsystem*	2,802,110	2,914,386
Quantities transported on the import subsystem*	4,206,142	3,072,090
Other transport operations	123,169	307,065
Total quantities (tons)	7,131,421	6,293,541

The total quantity of transported products has increased by 13.3% in 2024 compared to the previous year, given the increase of the quantities transported on the import subsystem by 36.9% and the decrease of the quantities transported on the domestic transport subsystem by 3.9% and of those related to other transport operations by 59.9%.

The tariffs for the supply of crude oil, rich gas, condensate and ethane are regulated and approved by the NAMR and are distinguished for each transport subsystem.

The tariffs applied for the import transport subsystem vary according to the installment of transported quantity, being practiced the bracketing tariff model and the refinery- the hand-over site.

In the reporting period, the following tariffs were applied:

Tariffs from transport services on domestic subsystem:

Period	Transport tariff (RON/ton)	Approved by NAMR Order no.
January 1, 2023 - December 31, 2023	117.95	364/2022
starting January 1, 2024	128.00	340/2023

Tariffs for transport services on import subsystem:

Period	Batches	Arpechim Refinery	Ploiesti Basin (Petrobraz and Petrotel Lukoil refineries)	Petromidia Refinery	Approved by NAMR Order no.
	thousand tons/month	RON/ton	RON/ton	RON/ton	
	up to 80	52.25	51.60	20.73	364/2022

January 1 st , 2023 - December 31, 2023	80 -120	41.80	41.28	16.59	
	120 -160	31.35	30.96	12.44	
	Over 160	23.51	23.22	9.33	
starting January 1, 2024	up to 80	55.00	39.85	26.50	340/2023
	80 -120	54.79	39.70	26.40	
	120 -160	54.59	39.55	26.30	
	Over 160	54.38	39.40	26.20	

b) Other Operating Revenues

- RON-

Name	December 31, 2024	December 31, 2023
Revenues out of modernization quota consumption	59,600,480	51,226,184
Earnings from disposal of assets	-	612,108
Other revenues	13,062,874	3,982,250
Total other operating expenses	72,663,354	55,820,542

The revenues representing the modernization quota hold 82% of other operating revenues, registering an increase by 16.4% in the year 2024, as compared to the previous year, due to the increase of the revenues from the reserve related to the modernization quota, revenues registered at the level of amortization of fixed assets financed out of this quota.

17. Operating Expenses

a) Stocks and Utilities Expenses

- RON-

Name	December 31, 2024	December 31, 2023
Expenses with consumables	5,382,297	5,591,136
Other material expenses	762,620	952,110
Other Expenses with Energy and Water	20,915,838	18,596,747
Total Stocks and Utilities related Expenses	27,060,755	25,139,993

b) Personnel expenses

The personnel expenses include salary expenses, bonuses granted to the employees, other personnel expenses, allowances related to mandate contracts of the members of the Board of Directors and the directors with mandate contracts and expenses related to contributions due by the employer.

- RON-

Name	December 31, 2024	December 31, 2023	December 31, 2022
Salary expenses	164,820,510	155,824,484	143,346,066
Obligations for employees' bonuses	28,281,535	25,284,285	21,171,116
Other personnel expenses	2,640,630	39,600	3,912,090
Expenses with the remuneration of the directors with mandate contract and of the administrators	6,211,903	5,251,280	4,848,193
Expenses with contributions due by the employer	8,231,622	7,995,343	7,645,268
Total personnel expenses	210,186,200	194,394,992	180,922,733

The personnel expenses are detailed as follows:

Salary expenses

- RON-			
Name	December 31, 2024	December 31, 2023	December 31, 2022
Salary and related contributions expenses	162,824,465	152,998,317	139,049,643
Premiums	1,298,137	1,450,000	3,129,119
Retirement supports	596,895	1,294,737	1,115,588
Marriage support	101,013	81,430	51,716
Total salary related expenses	164,820,510	155,824,484	143,346,066

Expenditure with basic personnel salaries and the related bonuses have increased in 2024, compared to 2023 due to the salaries indexation, following the negotiations, with the Syndicate for the compliance with the provisions of the Collective Labor Agreement, related to salaries increases by the rate of inflation.

According to the provisions of the Collective Labor Agreement in force, the Company has also provided its employees with the following benefits: bonuses, retirement support, marriage support.

Obligations regarding employees' bonuses

- RON-			
Name	December 31, 2024	December 31, 2023	December 31, 2022
Employees share of profit	5,996,608	6,384,812	5,517,801
Meal vouchers	12,118,640	9,137,465	6,474,030
Social expenditure under art. 25 of Law no. 227/2015 on the Fiscal Code, further amendments and completions	6,979,523	6,871,405	6,442,781
Other expenses as per the Collective Labor Agreement	3,186,764	2,890,603	2,736,504
Total	28,281,535	25,284,285	21,171,116

The value of the bonuses granted to the employees has a growth of 2,997,250 RON in 2024, compared to 2023, growth that is mainly due to the increase of the meal vouchers from 30 RON in 2023 up to 40 RON as of 01.01.2024.

In compliance with the provisions from the Collective Labor Agreement, the Company has granted to its employees bonuses as social expenses provided at Art.25 from Law no.277/2015 on the Fiscal Code, consisting of leisure and treatment vouchers, here included the transport, gifts offered to the employees, birth aids, funeral aids, serious diseases, humanitarian and other social expenses as per the Collective Labor Agreement.

Other personnel expenses

- RON-			
Name	December 31, 2024	December 31, 2023	December 31, 2022
Expenditure on compensatory payments relating to personnel layoffs	2,640,630	39,600	3,912,090
Expenditure with the rights of the personnel due base on certain court orders.	-	-	-
Total	2,640,630	39,600	3,912,090

The position "Other personnel expenses" includes severance indemnities, provided under CLA, related to personnel layoffs conducted during the year.

Expenses on remuneration of directors with mandate contracts and of the administrators
- RON-

Name	December 31, 2024	December 31, 2023	December 31, 2022
Allowance of the directors with mandate	3,767,006	3,283,560	2,785,516
Allowances of the members of the Board of Directors	2,444,897	1,967,720	2,062,677
Total	6,211,903	5,251,280	4,848,193

The expenditure related to allowances for the mandate contracts of the directors and administrators are higher in 2024, by 960,623 RON representing fix allowance of the Deputy Director General 3.

Expenses with contributions due by the Employer

- RON-

Name	December 31, 2024	December 31, 2023	December 31, 2022
Company's contribution to voluntary pension funds	2,722,063	2,774,495	2,871,425
Company's contribution to voluntary health insurance	1,395,666	1,383,314	1,188,747
Labor insurance contribution and other contributions	4,113,893	3,837,534	3,585,096
Total	8,231,622	7,995,343	7,645,268

The company's contribution to voluntary pension funds and voluntary health insurance is similar in 2024 compared to 2023.

In 2024, because of salary growth, the labor insurance contribution has increased proportionally.

Employees

During 2024, 2023 and 2022, the average number of employees evolved as follows:

Name	December 31, 2024	December 31, 2023	December 31, 2022
Employees with leading positions	79	80	81
Employees with execution positions	1,308	1,334	1,386
Total	1,387	1,414	1,467

c) Expenses related to External Services

- RON-

Name	December 31, 2024	December 31, 2023
Rail transport expenses	78,209,040	71,644,555
Expenses with royalties and rentals	48,897,991	39,836,266
Third-party pumping expenses	5,004,680	4,901,236
Maintenance and repair expenses	3,103,983	2,532,439
Expenses with the decontaminations, monitoring of the environmental factors	563,195	296,301
Travel, secondment and transfer expenses	691,367	703,619
Expenses related to the transport of goods and personnel	10,083	5,238
Postal and telecommunication expenses	687,196	699,305
Other expenses with services performed by third parties	6,873,758	6,316,584

Total expenses related to external services	144,041,293	126,935,543

The expenses with royalties and rents mainly include the oil royalty due to the State budget by the company, as holder of the petroleum agreement, for the use of state public property assets in petroleum operations.

It is being calculated according to the Oil Law no. 238/2004, by application of a quota of 10% up to the date of 26.10.2023, respectively of 11.5% as of 27.10.2023 on the value of gross revenues achieved out of oil transport operations via the national oil transport systems

d) Other expenses

- RON-		
Name	December 31, 2024	December 31, 2023
Taxes, fees and similar levies related expenses	5,565,359	2,953,003
Compensation, fines and penalties expenses	196,356	102,099
Donations granted (sponsorships)	776,000	789,000
Environmental protection expenses	63,391	15,544
Expenses with the establishment of the modernization quota	67,444,545	58,084,160
Other operating expenses	240,373	414,034
Other expenses	74,286,024	62,357,840

In 2024, the expenses incurred with other taxes, duties and similar payments contain, largely, the local tax expenses and the expenses with the contribution to the special handicap fund due under Law no. 448/2006 on the protection and promotion of the rights of people with disabilities.

The chapter "Other reserves" constitutes also the reserve regarding the modernization quota constituted on accounts of the operating expenses, in compliance with the provisions of GD no.168/1998 further amendments and with the provisions of the Fiscal Code approved pursuant to Law no. 227/2015, further amendments and completions.

18. Net Financial Result

- RON-		
Name	December 31, 2024	December 31, 2023
Revenues from interests	6,365,712	6,652,665
Other financial revenues	18,544	37,269
Total financial revenues	6,384,256	6,689,934
Interest expenses related to leasing contracts	237,637	175,242
Other financial expenses	93,964	83,799
Total financial expenses	331,601	259,041
Net financial result	6,052,655	6,430,893

The financial revenues have decreased by 4.6% in 2024 compared to 2023, and the financial expenses have increased by 28% this year, compared to the previous year, maintaining a much lower level than the financial revenues. Based on this evolution, the net financial result has decreased by 5.9% in 2024, compared to 2023.

19. Fiscal Legislative Framework

The tax returns are subject to revisions and corrections of fiscal authorities, generally for a period of five years after completion thereof.

The fiscal legislation in Romania is very complex and is permanently reforming according to the internal and international economic-financial context, being regulated by a multitude of normative

acts: laws, government decisions of approval of the application norms, simple ordinances and emergency ordinances, orders, instructions, circulars, clarifications etc.

One cannot talk about an easy approach thereof by taxpayers, especially since there is generally an ongoing abusive practice of the tax authorities regarding the interpretation of the legal provisions which are enshrined by the law itself.

The modernization of the fiscal legislation in Romania does not yet provide clarity and accessibility in the application of the provisions of the fiscal Code, by restructuring, on systematic basis, of the fiscal norms, as well as those on fiscal procedure and there still exists the risk that the fiscal authorities adopt different positions in connection with the interpretation of these aspects with consequence in the calculation of additional obligations and interests/penalties payment, augmentations and delay fines.

By Law no.207/2015 on the fiscal procedure code, there have been amended certain principles regarding the interpretation of law, meaning that in the interpretation of the fiscal legislation is being applied the principle "*in dubio contra fiscum*", therefore in case of doubt related to the fiscal norm it is being applied the interpretation in favor of the taxpayer.

However, before this interpretation has been given, each public servant must clarify the respective text, by appealing to the good will of the legislator and the meaning of law, verify the points of view expressed in the substantiation notes, in reasons exposures (...). Thus, it should be noticed the spirit of the law as a whole and the purpose for which this law has been created. Only if by these norms the meaning of the norm has not been clarified, will the rule of interpretation in favor of the taxpayer apply, which envisages the protection of the taxpayer against an abusive application of the law by the fiscal body, as well as for the improvement of the relation between the fiscal administration and the taxpayer, for avoiding some potential conflicts.

On 15.01.2025, the Organization of Large Taxpayer Administration within ANAF started the tax inspection aiming to verify the legality and conformity of tax returns and/or transactions relevant for tax inspection, the correctness and accuracy of the fulfillment of obligations related to the establishment of tax bases and the main tax obligations on value added tax and corporate tax, for the period 01.01.2018-31.12.2021.

The management considers having adequately registered the fiscal obligations in the financial statements.

20. Commitments and Contingencies

Capital commitments

The company does not have any granted capital commitment.

Guarantees granted to third parties

The guarantees granted to third parties are presented in the table below:

- RON-		
Name	December 31, 2024	December 31, 2023
Non-current Receivables (Note 7)	768,574	2,730,504
Other receivables (Note 9)	282,321	278,769
Total	1,050,895	3,009,273

Guarantees granted to third parties are separately presented at:

- financial assets line (Note 7)
- the line other receivables, those to be recovered within less than 12 months (Note 9)

At the end of 2024, the Company has no record of other commitments granted to third parties.

Received Guarantees

The guarantees granted to third parties are presented in the table below:

- RON-		
Name	December 31, 2024	December 31, 2023
Performance guarantees transferred to the company's accounts	20,143	20,616
Performance guarantee received from the clients	19,499,907	18,593,982
Performance guarantee received from suppliers	13,832,810	17,863,332
Performance guarantees constituted by the beneficiaries in separate accounts at CONPET disposal.	11,100,065	10,708,291
Total	44,452,925	47,186,221

Contingencies

Charges

Our company considers that all amounts due for fees and taxes have been paid and registered on the balance date.

21. Litigations

The most important litigations the company is involved in are presented below:

File no.5413/204/2017 – Prahova Tribunal (Conpet SA – defendant, NAMR – defendant, Dobrogeanu Dumitru – plaintiff, Dobrogeanu Paun Ioan – plaintiff) requesting the court to order by Court decision:

The payment of an annual rent for the land plots occupied by the two oil products pipelines (crude oil) starting 01.07.2014 and in the future for the entire lifespan of the pipelines;

Obliging the defendants to pay the losses incurred by failing to achieve economic objectives on the remaining area between the two pipelines after their restriction thereof and the area along DN1 (E60);

- Payment of legal fees.

The first head of claim was estimated by the plaintiffs in the amount of 48,000 Euro/year (220,000 RON), and the second in the amount of 25,000 RON/year.

Court hearing: First instance-retrial

Term: 22.05/22/25

File no. 5212/105/2018 – Court of Appeal Ploiesti (Conpet SA – defendant, Fondul Proprietatea SA – plaintiff) by which it is requested the payment of the net amount of dividends for the financial year 2006, related to a rate of 6% held by the plaintiff in the share capital of Conpet S.A., as well as the legal interest calculated for the requested amount, starting with its maturity.

Court hearing: First instance-retrial

Term:

File no. 32294/299/2020 – Sector 1 Bucharest District Court (Conpet S.A. – defendant - Bob Mihăiță - plaintiff-defendant, NAMR - defendant), by which the Court is asked that, by the decision that will be pronounced, order:

Obligation of Conpet SA and NAMR to divert the oil pipeline that crosses the plaintiff's property land located in Cernavoda, field 1, plot A6/2, Constanta county;

- settlement of the counter value of the lack of use, for a period of three years, prior to the sue petition, amounting to 150,000 RON;

Subsidiary, the obligation of Conpet SA to pay an annual rent for the use of the land owned by the plaintiff, from the date of the filing of the sue petition, amounting to 5 Euro/sqm/year for the area of 14,645 Sq.m, land affected by the area of protection and safety, during the existence of legal servitude;

The payment of court charges.

Procedural status: Merits

Court hearing: 05/13/25

File no.3451/108/2016, ATU, Pecica City - Arad Tribunal (Conpet S.A. – defendant, Unit of Pecica City - plaintiff), by which the instance is requested that, that by decision that will be pronounced, to order:

the obligation of Conpet to divert the oil pipeline which crosses a number of 22 parcels of built-in land for the construction of dwellings owned by the applicant, in the total area of 20,287 sqm.

the obligation of the defendant Conpet S.A. to pay the amount of 65,000 Euro representing the value of the house located in the parcel no. A141.7760/5/174, registered in C.F. no. 306869 because it can no longer be redeemed by the subscriber. According to the report of judicial expertise majoring in in evaluation carried out in question at the request of the applicant UAT Pecica, the overall amount of compensation for affecting the construction right proposed by the expert is 137,045.69 Euro.

Merits: Second appeal

Court hearing: 05/21/25

File no. 4395/270/2020 - Onești Courthouse - Municipality of Onești - plaintiff; Local Council of Onești Municipality - plaintiff, CONPET S.A. – defendant)

By which the instance is requested that, by the decision that will be pronounced, order:

Obligation of the defendant to conclude the convention for the exercise of the right of legal servitude on lands in the area of 11,474.5 sq. m., under-crossed and affected by the crude oil pipelines within the area of Onesti, against the payment of an annual rent, along the pipelines lifespan, to the local budget of Onesti municipality, determined according to the principle of the slightest infringement to the right of ownership and calculated taking into account the value of movement of the affected real estate, established under the law, at the time of damage.

The obligation of the defendant to pay material compensations, representing the equivalent value of the lack of land use of lands in the area of 11,474.5 Sq. m. sub-crossed and affected by the crude oil pipelines across the area of Onesti municipality, established according to the Market Study approved by the Local Council Decision no.199 of 29.11.2018, respectively according to the Updated Market Study approved by the Local Council Decision no.122 of 29.06.2020, calculated starting 2017 and until the date of conclusion of the convention for exercising the right of legal servitude over these lands, plus late payment increases, interest and late payment penalties in the amount provided for by the Fiscal Procedures Code applicable during this period. Forcing the defendant to pay the costs incurred by this trial.

Merits: First instance**Court hearing: 13.05.2025**

File no. 5971/2/2022 - Bucharest Court of Appeal (OMV Petrom SA- plaintiff, NAMR - defendant, CONPET - defendant) by which the instance is requested that, by decision that will be pronounced, to order:

The cancellation in part of Article 1 of Order 229/2021 regarding the tariffs set out in Annex 1 and Annex 3 and, accordingly, of Annexes 1 and 3 of Order 229/2021 and, consequently, the obligation of NAMR to issue a new order for the approval of the transport tariffs via the national transport System of crude oil, rich gas, condensate and ethane for the year 2022 including tariffs amended accordingly in respect of tariffs in the COUNTRY (Annex 1) and import tariffs for refineries in the Ploiesti Basin (Annex 3).

The cancellation in part of art. 3-8 of the Annex to Order no. 53/2008, as well as the obligation of NAMR to issue a new order to duly complete Order no. 53/2008.

Obligation to pay the court charges.

For the cause, on the deadline of 14.03.2023, the plaintiff OMV PETROM has requested, in proving the claims, the documentary evidence and the judicial accounting expertise.

On the deadline of 25.04.2023, Conpet has opposed to the documentary evidence with documents and the judicial accounting expertise, both requested by the plaintiff OMV Petrom SA.

On the deadline of 09.05.2023, the Court approved for the plaintiff and for the defendants the documentary evidence.

Orders the obligation of the defendant ANRM to submit to the case file the administrative documentation related to the ANRM Order no. 229/2021 amending the ANRM Order no. 13/2010 and Order no. 13/2010 and the ANRM Order no.53/2008, under the conditions provided by Law no.182/2002 on the protection of classified information. Rejects as useless the case resolution the consent of the evidence with technical accounting expertise.

On 31.05.2023, the defendant NAMR submitted to the Classified Documents Department of the Court of Appeal of Bucharest the documentation requested by the Court with the mention that some documents are confidential according to Art.4, Para.4, of the Petroleum Law no.238/2004 and others have the character „secret service”.

On the deadline of 06.06.2024, the Court ordered that the defendant the NATIONAL AGENCY FOR MINERAL RESOURCES, submit a written opinion on the application for the administration of the evidence formulated by the plaintiff, on the legal nature of the confidential documents provided by the Petroleum Law no.238/2004 on how to consult these documents and on the declassification thereby of documents constituting State secret, respectively service secret, according to the provisions contained in Law no. 182 of April 12, 2002. That the defendant CONPET SA submits a written opinion on the application for admission of evidence made by the applicant, on the legal nature of the confidential documents provided for by the Petroleum Law no. 238/2004, on how to consult these documents.

The plaintiffs CONPET and NAMR have submitted to the court instance the points of view requested for the term dated 05.09.2023. The court has postponed the ruling.

By the Resolution of 14.09.2023, the Court of justice finds that the unclassified documents submitted by the defendant NAMR to the Classified Information Department of the Bucharest Court of Appeal are not confidential and do not fall within the scope of the provisions of Article 4 of Petroleum Law no. 238/2004 of June 7, 2004, with the related legal consequences regarding the evidentiary matters of these documents.

Grant the parties' access to the content of confidential, non-classified information submitted by the NAMR defendant to the Classified Information Department of the Court.

On the deadline of 14.11.2023, the plaintiff OMV Petrom applied for access of OMV Petrom to classified documents and additional evidence. The Court was requested the obligation of CONPET to issue access permits to classified information in this case for Mr. Marius Davitoiu and Mr. Marian Nita (employees of OMV PETROM who benefit from authorizations for access to secret service documents within the Company, also in relation to NAMR) as well as the completion of the probation with new documents and with Conpet interrogation.

The Court has ordered the adjournment of the case so that the defendants of NAMR and Conpet formulate a point of view on the request made by the plaintiff, related to the access of its legal representatives to the contents of the classified information "Secret of Service" and concerning the on the evidence of interrogating the defendants requested by the plaintiff.

Conpet has submitted to the case file the point of view requested by the Court.

On the deadline of 12.03.2024, the Court rejects as unfounded the applicant's request to grant access to its employees, Marius Davitoiu and Marian Nita, to classify secret service documents filed with the classified information department of the Court. Approves for the plaintiff the evidence with documents and asks the parties to submit to the case file the documents that substantiated the issuance of the administrative act whose annulment is requested, other than those submitted to the case file and to the classified information department of the court, regarding the structure of operational costs, the modernization quota, as well as any other financial-accounting documents that justified the issuance of the challenged administrative act. Rejects as useless the resolution of the case the consent of the evidence with the interrogation of the defendant Conpet. By decision no.898/ 28.05.2024, the Bucharest Court of Appeal rejects the request. Rejects as unfounded the exception of the plaintiff's lack of interest. Rejects as unfounded the exception of the lack of the capacity to be sued of the defendant CONPET SA. Rejects as unfounded sue petition, as it was amended. Rejects as unfounded the plaintiff's request for the obligation of the defendants to pay the costs of the trial. With appeal after communication.

Merits Court of first instance

Court hearing: -

File no.7035/2/2022 - Bucharest Court of Appeal (OMV Petrom SA- plaintiff, NAMR. - plaintiff, CONPET, - plaintiff), by which is requested the instance that by the decision that will be pronounced, to order:

Partial cancellation of the Addenda no.2-9 to the transport contract no.BC OMV 108/25.03.2020 concluded between OMV Petrom and CONPET, respectively of the articles regarding the tariffs on the DOMESTIC subsystem and the IMPORT subsystem, charged for transport services provided by CONPET and settled by NAMR no.229/2021, within the limit of the tariffs to be established following the contentious administrative endeavors carried out by OMV Petrom regarding the tariffs with NAMR and, consequently, the obligation of CONPET to pay compensation to OMV Petrom representing the difference between the amount of the tariffs adopted by the order of NAMR no. 229/2021, paid by OMV Petrom during 01.01.2022-31.08.2022 and the amount of tariffs to be established in file no.5971/2/2022, updated with the inflation index, as well as the related legal interest.

Payment to OMV Petrom of the difference between the number of tariffs paid by OMV Petrom for the transport of marine oil, through the DOMESTIC subsystem, from the Midia Terminal, and the amount of tariffs through the IMPORT subsystem depending on the subsystem used, updated with the inflation index, as well as the related legal interest.

Obliging CONPET to pay any other amounts representing civil fruits that CONPET has acquired or could have acquired in connection with the amounts charged from the OMV PETROM based on the tariffs.

Obligation to pay the Court costs.

Merits: Court of first instance – suspended until the final settlement of the case forming the object of the file no.5971/2/2022 of the Court of Appeal of Bucharest, section IX of the fiscal and Contentious Administrative.

File no.4988/2/2023– Court of Appeal Bucharest (OMV Petrom SA - plaintiff, NAMR - defendant, Conpet S.A defendant), by which is requested the instance that, by decision that will be pronounced, order:

Partial annulment of Articles 1 and 3 of the Additional Acts no. 10, no.11 and no.13, respectively of Articles 1 and 4 of the Addendum no.12, by which was extended the duration of the Transport Contract.

Obligation of Conpet to pay to OMV Petrom, as damages, of the amounts representing:

- i. the difference between the quantum of tariffs provided in the Additional Act No 2 to the transport contract and the number of tariffs to be determined as legal, as well as the related statutory interest calculated from the date of payment of the difference in tariff;
- ii. difference between the quantum of tariffs paid by OMV Petrom for the transport of crude oil and the quantum of the tariffs settled proportionally, by reference to the domestic and import tariffs depending on the effectively used subsystem, as well as the legal interest;
- lii. any other amounts of civil fruit that Conpet has acquired or may have acquired in relation to the amounts unlawfully collected from OMV Petrom based on the tariffs;

Obligation to pay the court costs

Merits: Court of first instance - suspended until the final resolution of the final settlement of the case subject to file no.7035 of the Court of Appeal of Bucharest.

File no. 5559/2/2023– Court of Appeal Bucharest (OMV Petrom SA - plaintiff, NAMR - defendant, Conpet S.A. - defendant), by which is the Court is requested that, by the decision that will be pronounced, to dispose:

Annulment in part of Article 1 of Order no.364/2022 in respect of the tariffs set out in Annex 1 and Annex 3 and, accordingly, of Annexes 1 and 3 of Order no. 364/2022, as regards the tariffs for the domestic subsystem and the import subsystem, within the limit of the quantum of tariffs to be established as legal.

Obligation to pay the court fees.

Merits: Court of first instance - suspended until the final settlement of the case subject to file no.5971/2/2022 of the Court of Appeal of Bucharest, section IX of the fiscal and Contentious Administrative

File no. 8213/2/2023– Court of Appeal Bucharest (OMV Petrom SA - plaintiff, Conpet SA - defendant, NAMR - defendant), by which the instance is requested that, by the decision that will be pronounced dispose:

The annulment in part of art.1 and art.3 of Addendum no.14 of Addenda no.15, no.16, no.17, namely of art.1 and 5 of Addendum no.18, by which the duration of the Transport Contract was successively extended.

Partial annulment of Article 2 of the Addenda no. 14-18 for the purpose of removing some quantities transported from the Midia Terminal from the quantities transported via the domestic subsystem and the inclusion thereof in the quantities transported via the import subsystem.

Obligation of Conpet to pay to OMV Petrom, as compensation, the amounts representing:

i. The difference between the number of tariffs provided for in the Additional Acts no. 14 - 18 to the Transport Contract and the number of tariffs to be determined as legal, as well as the related legal interest calculated from the date of payment of the difference in tariff.

ii. the difference between the number of tariffs paid by OMV Petrom for the transport of crude oil and the number of tariffs established proportionally, in relation to the domestic and import tariffs according to the subsystem actually used, as well as the legal interest;

iii. any other amounts of civil fruit that Conpet has acquired or may have acquired in relation to the amounts unlawfully collected from OMV Petrom on tariffs basis.

Obligation of the to pay the Court costs

Merits: Court of first instance - suspended until final settlement of case no. 5559/2/2023 of the Bucharest Court of Appeal.

File no. 5071/2/2024 - Bucharest Court of Appeal (OMV Petrom SA- plaintiff, CONPET S.A. - defendant, National Regulatory Authority in the Mining, Petroleum and Geological Storage of Carbon Dioxide - (Ro. A.N.R.M.P.S.G.) - defendant), by which the instance is requested that, by the decision that will be pronounced, to order:

The annulment in part of Article 1 of Order no. 340/2023 in respect of the tariffs set out in Annex 1 and Annex 3 and, accordingly, of Annexes 1 and 3 of Order no. 340/2023, as regards the tariffs for the DOMESTIC subsystem and the IMPORT subsystem, within the amount of the tariffs that will be established as legal as a result of the recalculation thereof in a transparent and non-discriminatory manner in accordance with the constitutional and primary and secondary oil and competition law provisions, as they are exposed by means of this sue petition. ;

Obligation to pay legal fees.

Merits Court of first instance - suspended until the final settlement of the case subject to file no.5971/2/2022 of Bucharest Court of Appeal.

22. Affiliated parties

In the year 2024, the Company performed the following significant transactions with related parties:

Procurement from related parties

- RON-							
Partner	Unsettled amounts on December 31, 2022	Procurements during 01.01.2023-31.12.2023	Settlements during 01.01.2023-31.12.2023	Unsettled amounts on December 31, 2023	Procurements during 01.01.2024-31.12.2023	Settlements during 01.01.2024-31.12.2023	Unsettled amounts on December 31, 2024
SPEEH HIDROELECTRICA S.A.	-	20,377,225	13,843,888	6,533,337	-	6,376,121	157,216

! The amounts are also VAT inclusive

Prepayments awarded to affiliated parties

- RON-

<i>Partner</i>	12/31/24	12/31/23
SPEEH HIDROELECTRICA S.A.	-	1,989,045
ELECTRICA FURNIZARE S.A.	282,378	277,365

23. The Audit Committee

The Company's audit for the year 2024 has been provided by the company PKF Finconta S.R.L. By the OGMS Resolution no. 6/28.10.2022, the appointment of PKF Finconta S.R.L. as financial auditor of CONPET S.A for a period of 3 years was approved (2022, 2023, 2024).

The fees are established based on the contract concluded between the two parties.

24. Risk Management

At the level of CONPET S.A., the internal management control system has been implemented and is being developed, which includes the 16 standards contained in the Code of internal management control of public entities. Implementation of Standard 8 requirements "Risk Management" was a priority in the organization by documentation and application of provisions of PS-MI-18 "Risk management" system procedure (sheet process, flow diagram and system procedure). During 2024, there were identified, assessed/re-assessed and documented the risks that can affect the achievement of the settled objectives. At the level of CONPET, a Register of significant risk was elaborated and an Annual Plan including measures to control significant risks, responsibilities and deadlines for the implementation of measures.

The comprehensive processes and activities carried out within CONPET S.A. may generate risks from various areas, such as:

(a) Exchange Rate Risk

The company may be exposed to currency exchange rate fluctuations through cash and cash equivalents, receivables, short-term investments, long-term loans or trade debts denominated in foreign currency.

The functional currency of the company is the Romanian Leu. Currently, the Company is being exposed to currency risk through cash and cash equivalents, as well as through purchases made in a currency other than the functional one. The currencies exposing the Company to such a risk are mainly EUR, USD and GBP. The foreign currency debts are subsequently expressed in Lei, at the exchange rate on the balance sheet date, communicated by the National Bank of Romania. The resulting differences are included in the profit and loss account, but do not affect the cash flow up to the moment of the liquidation of the debt.

The Company's exposure to the currency risk expressed in RON was insignificant, as shown in the following statements:

December 31, 2024	Value	RON	EUR	USD	- RON- GBP
Monetary Assets					
Cash and cash equivalents	136,176,830	136,158,157	8,838	8,422	1,413
Trade receivables and other receivables in the short and long term	39,972,403	39,972,403	-	-	-
Monetary debts					
Various suppliers/creditors	(30,351,892)	(27,230,145)	(3,011,731)	(110,016)	-
Net exposure in the statement of the financial standing	145,797,341	148,900,415	(3,002,893)	(101,594)	1,413

					- RON- GBP
December 31, 2023	Value	RON	EUR	USD	
Monetary Assets					
Cash and cash equivalents	107,742,173	107,712,907	22,135	6,082	1,049
Trade receivables and other receivables in the short and long term	55,499,035	55,499,035	-	-	-
Monetary debts					
Various suppliers/creditors	(36,664,385)	(33,815,517)	(2,742,023)	(106,844)	-
Net exposure in the financial standing position	126,576,823	129,396,425	(2,719,888)	(100,762)	1,049

(b) Credit risk

The credit risk is the risk that the Company may incur a financial loss because of a default by a client or a counterpart to a financial instrument, and this risk results mainly from the Company's trade receivables, cash and cash equivalents and short-term investments.

Maximum exposure to the collection risk at the reporting date was:

		- RON-
Name	December 31, 2024	December 31, 2023
Trade receivables and other receivables for short and long term (net value)	39,972,403	55,499,035
Total	39,972,402	55,499,035

The company carries out trade relations only on a contractual basis with recognized third parties, that justifies credit financing. The company is closely monitoring the exposure to commercial credit risk.

The financial assets that may put the Company at risk of collection are mainly trade receivable.

The company has implemented a series of policies that ensure that the sale of services is done to the clients with rapid collection. The value of net receivables (less impairments) represents the maximum amount at risk of collection.

On December 31, 2024 the Company holds cash and cash equivalents in amount of 136,176,830 RON (on December 31, 2023: 107,742,173 RON). The liquid assets are held in banks, among which we list BCR, Banca Transilvania. Raiffeisen Bank, BRD Groupe Societe Generale, CEC Bank, Unicredit Bank, Exim Bank, Garanti Bank, Credit Europe Bank, Vista Bank etc.)

The credit risk related to trade receivables is reduced due to the regular collection of transport services. Even though there is significant concentration, the clients base being extremely low, the management considers that the commercial credit risk is reduced.

the statement of the seniority of **clients'** receivables on the date of preparation of the statements of financial standing is the following:

			- RON-
Name	Gross value December 31, 2024	Adjustment December 31, 2024	Net value on December 31, 2021 December 31, 2024
Seniority less than 30 days	2,086,664	-	2,086,664

Seniority between 30-60 days	874,423	-	874,423
Seniority between 60-90 days	-	-	-
Seniority between 90 days -270 days	788,551	-	788,551
Seniority between 270 days -1 year	7,735,781	7,735,781	-
More than 1 year	2,961,205	1,716,646	1,244,559
Total	14,446,624	9,452,427	4,994,197

- RON-

Name	Gross value December 31, 2023	Adjustment December 31, 2023	Net value on December 31, 2023
Seniority less than 30 days	48,007,876	-	48,007,876
Seniority between 30-60 days	98,106	-	98,106
Seniority between 60-90 days	4,062	1,964	2,098
Seniority between 90-270 days	7,092	2,309	4,783
Seniority between 270 days -1 year	3,845	3,845	-
More than 1 year	200,500	200,500	-
Total	48,321,481	208,618	48,112,863

The statement of seniority of **other receivables** on the date of drawing up the statement of financial standing is:

- RON-

Name	Gross value on December 31, 2024	Adjustment December 31, 2024	Gross value on December 31, 2023	Net value on December 31, 2023
Seniority less than 30 days	2,086,664	-	2,282,700	-
Seniority between 30-60 days	874,423	-	196,453	-
Seniority between 60-90 days	-	-	334,117	-
Seniority between 90-270 days	788,551	-	1,111,809	-
Seniority between 270 days -1 year	7,735,781	7,735,781	312,836	5,744
More than 1 year	2,961,205	1,716,646	2,050,291	1,692,955
Total	14,446,624	9,452,427	6,288,206	1,698,699

Name	Gross value on December 31, 202e	Adjustment December 31, 2023	Net value on December 31, 2023
Seniority less than 30 days	2,282,700	-	2,282,700
Seniority between 30-60 days	196,453	-	196,453
Seniority between 60-90 days	334,117	-	334,117
Seniority between 90-270 days	1,111,809	-	1,111,809
Seniority between 270 days -1 year	312,836	5,744	307,092
More than 1 year	2,050,291	1,692,955	357,336
Total	6,288,206	1,698,699	4,589,507

The statement of seniority of **long-term receivables and other trade receivables** on the date of preparation of the financial statements is:

- RON -

Name	Gross value on December 31, 2024	Adjustment on December 31, 2024	Net value December 31, 2024
Other long-term receivables >1 year	282,321	1,404	280,917
Long-term receivables <1 an	80,341	-	80,341
Long-term receivables >1 an	688,233	238,300	449,933

Total	1,050,895	239,704	811,191

- RON -

Name	Gross value on December 31, 2023	Adjustment December 31, 2023	Net value on December 31, 2023
Other long-term receivables >1 year	278,769	1,404	277,365
Long-term receivables >1 an	2,730,504	320,189	2,410,315
Total	3,009,273	321,593	2,687,680

The statement of the seniority of **advances for services** on the time of preparation of the financial standing statement is:

- RON -

Name	Gross value on December 31, 2024	Adjustment December 31, 2024	Net value on December 31, 2024
Seniority less than 30 days	4,485	-	4,485
Total	4,485	-	4,485

- RON -

Name	Gross value on December 31, 2024	Adjustment December 31, 2024	Net value on December 31, 2024
Seniority less than 30 days	1,597	-	1,597
Total	1,597	-	1,597

The movements in the clients receivables impairments were the following:

- RON-

Name	2024	2023
Balance on January 1	208,618	222,936
Growths during the year	-	8,118
Writebacks during the year	(2,000)	(22,436)
Balance on December 31	206,618	206,618

The movements in the other receivables impairments were the following:

- RON -

Denumire	2024	2023
Balance on January 1	1,698,699	1,674,185
Growths during the year	7,871,289	30,443
Writebacks during the year	(117,561)	(5,929)
Balance on December 31	9,452,427	1,698,699

The movements in **long-term impairments and other trade receivables** were the following:

- RON -

Denumire	2024	2023
Balance on January 1	321,593	442,906
Growths during the year	-	-
Writebacks during the year	(81,889)	(121,313)
Balance on December 31	239,704	321,593

(c) Liquidity Risk

The liquidity risk is the Company's risk to face difficulties in the achievement of the liabilities associated with the financial debts that are being settled in cash or by the transfer of another financial asset. The Company's approach in managing liquidity is to ensure, as much as possible,

that it will always have sufficient liquidity to meet its due obligations, both under normal conditions and under stress, without incurring unacceptable losses or jeopardizing the Company's reputation.

The liquidity risk is managed by the Company's management by applying a policy of permanent liquidity insurance aimed at covering the settlement of outstanding financial liabilities.

- RON-				
2024	Contractual cash flows	<1	Over 1 year	Over 5 years
Trade liabilities	26,574,075	26,574,075	-	-
Liabilities to the employees	44,513,101	14,276,429	4,763,532	25,473,140
Other liabilities	35,450,624	33,027,370	1,717,012	706,242
Total	106,537,800	73,877,874	6,480,544	26,179,382

- RON-				
2023	Contractual cash flows	<1	Over 1 year	Over 5 years
Trade liabilities	33,091,805	33,091,805	-	-
Liabilities to the employees	39,908,276	14,143,449	2,878,921	22,885,906
Other liabilities	33,364,459	30,571,853	2,007,577	785,029
Total	106,364,540	77,807,107	4,886,498	23,670,935

(d) The Personnel Risk and the Waging System

On December 31, 2024, the structure according to age is not balanced, the age categories with the highest rate ratio in the company are between 51 - 60 years old (53.65%) and between 41-50 years old (24.89%).

The average age of the company CONPET personnel is high (50.2 years old) and the advantage it brings is the work experience accumulated by employees within the company, which indicates stability and professionalism. The average age of the personnel employed in the last 2 years is 40.4 years, with an average work experience of about 14.6 years.

However, the risk of personnel in the future is the company to deal with personnel shortages due to departures of the employees reaching retirement age.

The level of this analyzed risk was low; being a high tolerability risk and for the control thereof have been set medium and long-term measures by way of the personnel policy and the monitoring of the personnel fluctuations (personnel input/output). In this respect, the immediate employment needs of the vacancies are carefully monitored, in relation to the needs requested by the organizational entities, the complexity and diversity of activities, the necessary professional skills, as well as the responsibilities related to the positions.

(e) The Risk related to the Evolution of the Global Market

The geopolitical tensions in the Middle East, amplified by conflicts between Israel and Iran, as well as groups supported by this State, such as Hamas and Hezbollah, add a significant risk to oil prices. In addition, the uncertainties generated by Donald Trump's re-election to the leadership of the United States are intensifying the volatility of the oil market. While there is no certainty as to what concrete policy measures could be implemented following his campaign speech, some of them could have conflicting effects on oil supply and prices.

Oil prices fell by about 3% in 2024, marking the second consecutive year of decline, as the return of global post-pandemic demand experienced difficulties.

The causes of the oil price decline in 2024 were due to weak global demand, mostly due to the slowdown in demand in China and the increase in oil production in the United States and other countries outside the Organization of Petroleum Exporting Countries (OPEC).

In parallel, the global transition to renewable energy sources, such as solar and wind power, is putting increasing emphasis on developing efficient energy storage solutions. These sources are intermittent and require advanced technologies to ensure a continuous and stable supply. Energy storage technologies, including batteries, hydrogen and thermal storage, will play a crucial role in balancing supply and demand, ensuring the reliability of electricity grids.

The sanctions imposed on Russia have had a profound impact on the global oil market, with significant implications for trade flows and prices.

In particular, the sanctions imposed by the G7 and other Western states in response to the conflict in Ukraine have reshaped the structure of the global energy market.

The impact of the Russia-Ukraine conflict has led to a considerable review of global energy strategies and policies, prompting states and companies to reassess their dependence on traditional energy sources and accelerate the transition to more sustainable alternatives. In Southeast and Southern Europe, the ban on the transport of oil via the Drujba pipeline did not have a significant impact on refineries in Ploiesti and Burgas, which continue to be powered exclusively through Black Sea terminals.

CONPET SA continues to carefully monitor the evolution of the conflict in Ukraine and the impact of the associated sanctions and countersanctions. The company is constantly analyzing the possible effects on its operations, considering the current volatility and geopolitical risks. Continued disruption or escalation of goods flows from Russia to Europe could generate further price increases in the European region, and this remains a major concern.

In the short term, the company's activity did not register significant disruptions and the transport and delivery infrastructure were adapted to maintain operational stability. However, the medium and long-term impact of the conflict and the sanctions imposed on Russia remains difficult to accurately estimate. Given that some of the operations of CONPET S. A. depend on the areas affected by sanctions, including activities related to Russia, the company continuously analyzes possible scenarios and risks.

At the same time, CONPET S.A. identifies factors that suggest a stable continuation of business, even in the face of external uncertainties. Adaptability and diversification of operations are key elements for maintaining stability in the face of economic and geopolitical change. In this context, the company anticipates that the impact will be minimal, and the adjustment plans will allow the continuation of the activity in an efficient and sustainable way in the long run.

(f) Capital Market Risk

The Romanian capital market registered a positive evolution during 2024, continuing the positive upward trend started at the time of the evolution to the emerging market status. The daily average liquidity for all types of financial instruments has recorded an upward trend during the period analyzed. Romania's representativity within the indexes of Emerging Markets has materially

increased every year. Given that the company CONPET S.A. is included in the composition of the FTSE Global Microcap index, the risk of reduced liquidity is reduced.

(g) Legislative-related Risks

The frequent amendment of the normative acts here included those that bear direct impact on CONPET business may trigger risks for the company.

The effort of the company CONPET to constantly adapt to changing legislative requirements may generate additional costs and possible future changes in the legislative framework could have negative effects on the activity and profitability of CONPET (increased taxes, introduction of new taxes and duties, reduction or suspension of tax concessions, etc.).

Specifically, the changes occurred at the end of 2023 in the fiscal legislation, consisting in increasing the level of the royalty paid for the use of the National Transport System and paying an additional tax on the revenues achieved by oil companies, have led to the increase of the transport tariffs and, subsequently, the consequences can also be found on the pump price of finished products resulting from the processing of crude oil.

An important risk is being represented by the loss of the facility regarding the expenses borne by the Romanian State to provide the guard and protection of the pipelines by gendarmes, regulated by GD no. 1107 dated November 14, 2012, which amends and complements GD no. 1468/2005.

(h) Risk of litigations

The risk related to litigation is one of the important risks to which the company is currently exposed, as concessionaire of the National Crude Oil, Rich gas, Ethane and Condensate Transport System, having as source the legal regime of the lands under/over crossed by the major transport pipelines established by the provisions of the Petroleum Law no. 238/2004. The number of private properties under/over crossed by pipelines is very high and there is a possibility that more and more owners bring proceedings in Court against the Company to obtain substantiated compensations based on the simple presence of the pipelines on their lands. Due to the defective way in which the legal regime of the lands under/over crossed by the transport major pipelines has been regulated, CONPET was and currently is engaged in a series of trials where the owners of those lands claim for the transport pipelines be either lifted, or moved to other sites (and the expense be borne by CONPET), or be granted annual compensations representing consisting amounts of money. Moreover, even some public authorities have laid pecuniary claims about the presence of components belonging to the NTS on the land owned or managed by them.

Within the last years, the Company has prepared various legislative proposals to amend Law no 238/2004 - Petroleum Law, hoping for a coherent and clear regulation of the legal regime of lands crossed under/over by the transport major pipelines. Essentially, these proposals are based on the following assumptions:

- Public property (of the major pipelines) must coexist with private ownership of land, which leads to the conclusion that the state must acknowledge the exercise, free of charge, of certain categories of real rights (servitudes etc.) for the presence of the pipes on the ground;
- CONPET shall compensate the owner of the land in full for any action that would involve temporary occupation of the land for the purpose of repair or damage suffered by the owners because of breakdowns.

(i) Risk related to the regulation and authorization

The risk related to the regulatory framework and authorizations is identified as the company must obtain and renew periodically a series of opinions, authorizations, obtain certificates, attestations. The company is subject to a large range of regulations in various fields, which can lead to additional expenses and delays in starting or completing work, with possible negative effects on achieving objectives.

The regulatory framework for environmental protection applicable to CONPET S.A. is complex due to the activity of transport of crude oil/condensate/rich gas via pipeline and by railway and, for good compliance, all applicable legal requirements and how to implement them in separate registers, developed by environmental factors (water, soil-basement, air, protected areas), regulations (authorizations), SEVESO, waste.

The risk related to the regulatory framework, respectively obtaining and complying with the requirements of the environmental permits and water management is significant given that the company has to obtain and renew periodically 22 environmental permits and 38 water management authorizations (in May, the authorization to manage waters for the 2nd premises was waived - the drilling was sealed by the representatives of S.G.A. Prahova, the latter being nonfunctional).

Controlling the risk related to the regulatory framework is done by closely monitoring newly emerged legal requirements or changes in applicable regulations, as well as by implementing the necessary actions to comply with them. It is also considered to develop and submit proposals for amendments appropriate to the framework in which CONPET operates, when draft regulations are under public debate.

(j) The Market Risk

The market risk comes from the fact that the company is not interconnected to other transport systems in the region, being strictly dependent on the level of crude oil processing in the refineries in Romania.

With the support of the main shareholder, the Ministry of Energy and the Regulatory Authority for Activity (National Regulatory Authority for Mining, Oil and Geological Storage of Carbon Dioxide – A.N.R.M.P.S.G.), CONPET is working to identify new opportunities to increase the use of the system, while getting involved in regional projects started in its field of activity as well as in the development of activities related to the basic activity (provision of oil/oil products storage services, provision of crude oil transport services with own tankers etc.)

(k) Operational risk

Operational risk comes from the Degradation of the National Pipeline Transport System (NTS) due to the low level of utilization (small quantities, reduced frequency) and the potential escalation of criminal acts related to pipeline attacks bearing significant impact on the National Transport System via pipelines and the environment and the impossibility to carry out railway transport schedules for reasons exclusively related to the railway operator.

To control these risks, measures were established such as: redefining the transport infrastructure according to the demand perspective, extending the implementation of the pipeline leak detection and localization system, and calculation of penalties under contract or procurement of the rail

transport service with another railway operator for routes on which the transport program is not carried out.

(I) Environmental aspects

• *Identification of environmental aspects and environmental impact assessment*

The activity of environmental impact assessment is carried out in the production sectors whenever there are changes in the system that involve activities with environmental impact, the list of aspects with significant impact identified at the level of the company being the basis of the elaboration of the Environmental management program and the Action Plan for the achievement of environmental objectives.

During 2024, environmental aspects have been reviewed at the site level, focusing on identifying environmental aspects, including how risks and opportunities related to environmental aspects are treated to prevent and limit their consequences on human health and the environment, using opportunities both for the benefit of the organization, as well as the environment. The following documents have been reviewed:

Records of the legal environmental requirements for water and air

Records of the legal environmental requirements - regulations

Records of the legal environmental requirements - waste

Records of the legal environmental requirements - protected areas.

The Environmental Management and Actions Program, which includes: environmental policy commitments, general objectives and measurable environmental targets, environmental performance indicators, functions responsible for achieving environmental targets, as well as actions to achieve environmental objectives, which took into account the significant environmental aspects identified at the level of CONPET S.A., the measures in the inspection reports/minutes-authorities on compliance with legal requirements and other applicable requirements;

- List of significant environmental aspects and associated impacts generated at the level of CONPET S.A.

Records of the environmental opportunities.

The stage of achievement of the objectives and targets set and the stage of implementation of the actions set for the achievement of the environmental objectives are analyzed annually by the executive management, in the framework of the analysis carried out by the management.

• *Assessments of compliance with legal requirements and other environmental requirements*

The assessment of compliance with the legal requirements or other applicable environmental requirements is carried out by:

- inspections carried out by the environmental authorities (representatives of central and local environmental and water management authorities),

- inspections performed by OHS officials and personnel of the Environmental Protection Department,

- external audits carried out by bodies certifying the environmental management system integrated in the company's management system.

internal audits carried out by internal auditors within the Management Systems Department and the Internal Management Control Department and the Public Internal Audit Office.

Regulatory and control authorities in the field of environment and water management perform scheduled, unexpected and thematic controls at CONPET S. A. on compliance with legal

requirements and other environmental regulations, no major non-conformities being found.

To verify the compliance with the legal requirements, at the level of 2024, 48 external inspections of the environmental authorities from the counties in which CONPET S. A. performs its activity were registered.

The personnel of the sectors, respectively the OSH managers, carry out scheduled inspections according to the annual inspection chart on compliance with the applicable legal requirements and other requirements, as well as unscheduled inspections, according to the duties of the job description.

During 2024, an external audit was carried out by the BUREAU VERITAS certification body to verify compliance with the requirements of ISO 14001:2015 referring to the environmental management system. No non-conformities/deviations were found, and no comments were made regarding the compliance obligations in this field.

Following the internal audits established in the annual internal audit program, the nonconformities identified in the environmental management system were identified and corrected in time.

- ***Pollution is having a significant impact on the environment***

During the pumping of crude oil, accidental pollution can occur on the transport pipelines, from internal or external causes, generating pollution of the geological environment that can have a significant impact. Therefore, in 2024 there have been reported accidental pollutions in the areas: Lukoil, Tatarani, Lipanesti (county of Prahova), Ciresu (county of Braila), Lumina - 46 (county of Constanta), Malul Spart (county of Giurgiu), Hurezani (county of Gorj), Corbu, Milcov (county of Olt), overcrossing left bank of Cateasca, Oarja (county of Arges)

In 2024, the expenses incurred with the remediation of the affected areas amounted to 374.55 thousand le RON.

25. Subsequent events and other mentions

Starting 19.02.2025, by the Order of the President of the National Regulatory Authority for Mining, Oil and Geological Storage of Carbon Dioxide no. 99/14.02.2025 regarding the modification of the transport tariffs, published in the Official Gazette of Romania, Part I, no. 146 of 19.02.2025, the new transport tariffs via the National System of crude oil, gas, condensate and ethane transport have been approved.

In the Revenues and Expenditure Budget for 2025 a reduction of the number of employees by 75 was provided through the individual dismissal procedure. The layoffs will be made in three stages after their approval by the Board of Directors.

Both the change in tariffs and the measures to reduce personnel planned for 2025 do not have an impact on the amounts recognized in these financial statements.

These financial statements and the related notes, from page 1 to page 65, have been authorized for release by the company's management on March 25, 2025.

**Director General,
Eng. Dorin Tudora**

**Economic Director,
Econ. Sanda Toader**

STATEMENT OF THE PERSONS IN CHARGE of CONPET SA

in compliance with the provisions of
**Art. 30 of the Accountancy Law no. 82/1991 and Art. 65 of Law no. 24/2017 on the issuers of
financial instruments and market operations**

There were drafted the financial statements at the date and for the year ended on 31 December 2024 for:

Entity	CONPET SA
County	PRAHOVA
Address	1-3 Anul 1848 Street, Ploiești
Trade Registry Number	J1991000006291
Type of ownership	26 - Publicly and privately owned companies with domestic and foreign capital
Core business (NACE code)	4950 - Transport via pipelines
Tax Registration Number	1350020

The undersigned: **Dorin Tudora**, as **Director General** and **Sanda Toader**, as **Economic Director** are liable for the drafting of the annual financial statements on 31.12.2024 and confirm that:

- a) The accounting policies used in preparing the annual financial statements are in accordance with the accounting regulations in force on the reporting date 31.12.2024;
- b) From our point of view:
 - a. the annual financial-accounting statement that was drafted in accordance with the applicable accounting standards provides a true, fair and accurate picture of the company's assets, liabilities, financial position, profit and loss account and other information regarding the activity carried out;
 - b. the administrators report comprises a correct analysis of the development and performance of the company, as well as a description of the main risks and uncertainties particular to the activity performed; and
 - c. the annual financial statements and the Administrators' Report are prepared in accordance with the International Financial Reporting Standards (IFRS) and the sustainability reporting standards referred to in Art. 29b of Directive 2013/34/EU and with the specifications adopted pursuant to Art. 8, Para. (4) of (EU) Regulation 2020/852.
- c) The company operates under conditions of continuity;

DIRECTOR GENERAL,
Eng. TUDORA Dorin

Economic Director
Econ. Toader Sanda

Subject to endorsement in the BoD meeting dated 25.03.2025 and approval to the OGMS dated 29.04.2025

No.

NOTE

regarding the approval of discharge of CONPET SA's administrators for the financial year concluded on 31.12.2024

Throughout 2024, the Board of Directors conducted its activity in the following make-up:

- **Gheorghe Florin - Cristian**, Chairman of the Board of Directors, non-executive non-independent administrator
- **Gavrilă Florin - Daniel**, independent non-executive BoD member
- **Buică Nicușor - Marian**, independent non-executive BoD member
- **Kohalmi - Szabo Luminița**, independent non-executive BoD member
- **Zaman Andrei – Mihai**, independent non-executive BoD member
- **Tănăsică Oana - Cristina**, independent non-executive BoD member
- **Dănilă Alin - Mihael** - independent non-executive BoD member

The activity carried out as well as the economic and financial results obtained by CONPET SA in 2024 are presented in the Annual Report of the Administrators, in comparison to the activity and results in 2022 and 2023, as contained in the audited annual financial statements for the 2024 financial year.

In accordance with the provisions of Art. (111) Para. (2) Law No. 31/ 1990 *on* companies, republished, with subsequent amendments and additions, in conjunction with the provisions of Art. (15), Para. (3) letter i) from CONPET SA's Articles of Incorporation, it is required that the Ordinary General Meeting of Shareholders rule on the management of the Board of Directors of the company, for the activity conducted in 2024.

Considering the achievement of the established strategic objectives regarding operational activity, performance optimization and sustainable development of the company, respecting the



principles of good corporate governance, during the term of office, the administrators of CONPET SA fulfilled their duties with responsibility, efficiency, transparency and professionalism towards all stakeholders.

The Annual Report of the Administrators for 2024, as well as the other reports to the OGMS, presents information on the execution of the Administration Plan of the company CONPET for the period 2023 - 2027, the manner of achieving the objectives and key financial and non-financial performance indicators of the administrators, as well as data on the execution of their mandate contract and the operational activity, the financial performance of the company and the half-yearly accounting reports.

Following the approval of the audited financial statements for the year concluded on 31.12.2024, based on the Report of the independent auditor PKF FINCOTA SRL and the Annual Report of the Administrators for the year 2024

it is proposed to the Ordinary General Meeting of Shareholders to approve the discharge of the administrators of CONPET SA for the financial year concluded on 31.12.2024.

Chairman of the Board of Directors

Gheorghe Cristian - Florin

REPORT OF THE INDEPENDENT FINANCIAL AUDITOR

(free translation from romanian version¹)

To shareholders of CONPET S.A.

Report on standalone financial statements

Opinion

1. We have audited the accompanying financial statements of **CONPET S.A. ("The Company")**, with the registered office in Anul 1848 Street, no.1-3, Ploiesti, district Prahova, identified by the unique tax registration code 1350020, which include the statement of the financial position as at December 31, 2024, the statement of the profit and loss account and other comprehensive income, the statement of changes in equity and the statement of cash flows for the year ended, and a summary of significant accounting policies and explanatory notes.
2. The financial statements as at December 31, 2024 are identified as follows:
 - Net asset/Total equity: 730,693,250 lei
 - Net result of the financial year - profit: 49,323,047 lei
3. In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Company as of December 31, 2024, its financial performance for the year then ended and cash flows, in accordance with the Order of the Minister of Public Finance no. 2844/2016 for the approval of accounting regulations in accordance with the International Financial Reporting Standards, with subsequent amendments.

Basis for opinion

4. We conducted our audit in accordance with International Standards on Auditing (ISAs), European Regulation no. 537 issued by European Parliament and Council and Law no 162/2017 („Law”). Our responsibilities under those standards are further described in the Auditor’s Responsibilities for the Audit of the financial statements section of our report. We are independent of the Company in accordance with the Code of Ethics for Professional Accountants (IESBA Code) issued by the Council for International Ethics Standards for Professional Accountants as it was adopted and implemented by the Romanian Chamber of Auditors and we have fulfilled our other ethical responsibilities in accordance with the requirements of IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key audit matters

5. The key audit matters are those aspects that, based on our professional judgement, were of most significance in the audit of the financial statements of the current period. These issues have been addressed in the context of the audit of financial statements as a whole and in forming our opinion on them and we do not give a separate opinion on these key issues.
 - **Provisions for litigations.**
 - **Description.** The company is involved in numerous litigations with business partners, authorities and salaries, thus there is a risk of future economic losses. At Note 13 "Provisions" are disclosed the significant litigations in which the Company is involved. The decision to book a provision for litigation or to disclose a contingent liability in financial statements depends on the

¹ Translator’s explanatory note: The above translation of the auditor’s report is provided as a free translation from Romanian which is the official and binding version.

professional judgment and certain estimates of the Company's management. We considered whether the recognition of some provisions for litigation is significant for the audit, as it would cause the recognition of overestimated results.

- **Our response.** Our audit procedures to address the risk of material misrepresentation in relation to the recognition of provisions for litigation, which was considered as material risk, included:
 - reviewing the decisions of the General Meeting of Shareholders and of the Board of Directors;
 - obtaining and evaluating the litigations in which the Company is involved, followed by obtaining some clarifications regarding the status of certain disputes. During the audit mission, discussions were held with the management and Company's internal legal advisers on significant litigations;
 - critical assessment of the working assumptions and estimates made by the Company regarding litigations, including the amount of recognized provisions in the financial statements. We reviewed the disclosures of potential risks related to litigations in the notes to the financial statements.
- **Revenue recognition.**
 - **Description.** The revenue recognition policy is disclosed at Note 3 "*Accounting Policies*". According to international auditing standards, there is an implicit risk in the revenue recognition, due to the pressure that the management have to meet the budgeted results. The main revenue generating activities for the Company are represented by the transport service of crude oil, gasoline and condensate through the operation of the National Transport System. The transport activity is an activity of general interest, authorized and monitored by a public authority, with a natural monopoly character. The tariffs practiced by the Company for transport services are established and approved by ANRMPSG (National Regulatory Authority for Mining, Petroleum and Geological Storage of Carbon Dioxide);
 - **Our response.** Our audit procedures to address the risk of significant distortion and in relation to revenue recognition included, among others:
 - Understanding how to recognize and book the main categories of income;
 - Detailed tests on the transactions registered by the Company during the financial year;
 - Testing procedures to ensure that revenues are recorded in the correct period;
 - Procedures for confirmation of commercial receivables for a representative sample.

Other matters

6. This report is addressed exclusively to the shareholders of the Company as a whole. Our audit was carried out in order to be able to report to the Company's shareholders those aspects that we have to report to a financial audit report and not for other purposes. To the extent permitted by law, we do not accept or assume responsibility only to the Company and its shareholders, as a whole, for our audit, for this report.
7. Taxation in Romania is constantly evolving. There is the possibility of different interpretations of the legal provisions by the Ministry of Finance and by the local tax authorities. The company's management has registered in the accounts presented various taxes, penalties and fees, based on the best interpretation of the tax provisions in force, an interpretation that can be challenged by a possible fiscal control.

Other information – Administrators' Report

8. The administrators are responsible for the preparation and presentation of other information. That information includes the Administrator's Report but does not include the financial statements and the auditor's report.

Our opinion on the financial statements does not cover and these Other information and except for the case in which is explicitly mentioned in our report, does not express any kind of assurance conclusion.

In relation to the audit of the financial statements for the financial year ended on 31 December 2024, our responsibility is to read that information and, in this approach, and to assess whether that information is significantly inconsistent with the financial statements, or with the knowledge we have obtained during the audit, or whether it appears to be significantly distorted.

Regarding the Administrator's Report, we have read and report whether it has been imprinted, in all significant aspects, in accordance with the requirements of OMFP 2844/2016, Annex 1, paragraphs 15-19.

In the exclusive basis of the activities to be carried out during the audit of the financial statements, in our opinion:

- a) The information submitted in the Administrator's Report for the financial year for which the financial statements have been entered shall be consistent, in all material respects, with the financial statements.
- b) The Administrators' Report, was prepared, in all significant aspects, in accordance with the requirements of OMFP 2844/2016, Annex 1, paragraphs 15-19.

In addition, based on the knowledge and understanding of the Company and its environment, acquired during the audit of the financial statements for the financial year ended on the December 31, 2024, we are asked to report if we have identified significant distortions in the Administrator's Report. We have nothing to report on this.

Responsibilities of management and persons responsible for governance for financial statements

9. The Company's management is responsible for preparing financial statements that provide a true and fair view in accordance with OMFP 2844/2016 and for that internal control that the management deems necessary to enable them. the preparation of financial statements free of significant distortions, caused either by fraud or error.
10. In order to prepare financial statements, the management is responsible for assessing the Company's ability to continue its activity, for presenting, if applicable, the aspects related to the continuity of the activity and for the use of accounting you are based on the continuity of the activity, except for the case where the management either intends to liquidate the Company or to stop the operations, or has no other alternative realistic in outside them.
11. Persons in charge of governance are responsible for overseeing the Company's financial reporting process.

The auditor's responsibilities on audit of the financial statements

12. Our objectives are to obtain reasonable assurance on the extent to which the financial statement as a whole are free of significant distortions, caused either by fraud or error, and by the issuance of an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but it is not a guarantee that an audit carried out in accordance with the ISA will always detect significant distortion, if any. Distortions can be caused either by fraud or error and are considered material if it can reasonably be expected that they, individually or cumulatively, will influence the economic decisions of the users, taken on the basis of these financial statements.
13. As part of an audit in accordance with the ISA, we exercise professional reasoning and maintain professional skepticism throughout the audit. Also:
 - We identify and assess the risks of significant distortion of the financial statements, caused by either fraud or error, we design and execute audit procedures as a response to those risks and obtain we are providing sufficient and adequate audit evidence to provide a basis for our opinion. The risk of not detecting a significant distortion caused by fraud is higher than that of not

detecting a significant distortion caused by error, because fraud can involve secret, forgery, intentional omissions, false statements and avoiding internal control.

- We understand internal control relevant to the audit, in order to design audit procedures appropriate to the circumstances, but without having the purpose of expressing an opinion on the effectiveness of the Company's internal control.
 - We assess the adequacy of the accounting policies used and the reasonableness of the accounting estimates and of the related presentations of information made by the management.
 - We form a conclusion regarding the adequacy of the management's use of accounting based on the continuity of the activity and determine, based on the audit evidence obtained, if there is a significant uncertainty regarding events or conditions that could generate significant changes in the Company's ability to continue its activity. In the case where we conclude that there is significant uncertainty, we must draw attention in the auditor's report on the related presentations in the financial statements or, in if these presentations are inappropriate, let's change our opinion. Our conclusions are based on the audit evidence obtained up to the date of the auditor's report. However, future events or conditions may cause the Company to no longer operate based on the principle of activity continuity.
 - We assess the presentation, structure and content of financial statements, including disclosures, and the measure that financial statements reflect transactions and the events underlying them in a manner that results in a faithful presentation.
14. We communicate to the people in charge of governance, among other aspects, the planned area and the time programming of the audit, as well as the main findings of the audit, including any significant deficiencies in internal control, which we identify during the audit.
15. We also provide the persons in charge of governance with a statement regarding our compliance with the ethical requirements regarding independence and we communicate to them all the relationships and other aspects that can reasonably be considered to be it could affect our independence and, where appropriate, the related safety measures.
16. Of the aspects that we have communicated to the people who are in charge of the government, we establish those aspects that had a greater importance in the audit on the financial statements in the current period and, therefore, represent key audit aspects. We describe these aspects in our audit report, except in the case where the legislation or regulations prevent the public presentation of the respective aspect or of the case that, in extremely rare circumstances, considers m that an issue should not be communicated in our report because it is reasonably expected that the benefits of the public interest will be outweighed by the negative consequences of this communication.

Report on other legal and regulatory provisions

17. We were appointed as auditors by signing the audit contract dated 19.09.2022 to audit the financial statements of the Company, for the financial years ended on December 31, 2022, 2023 and 2024. The total uninterrupted duration of our commitment is 3 years, covering the financial year ended on December 31, 2022, 2023 and 2024.

Confirm that:

- Our audit opinion is consistent with the additional report submitted to the Company's Board of Directors, which we issued on the same date that we issued and this report. Also, in the conduct of our audit, we have maintained our independence from the audited entity.
- We have not provided for the Company the prohibited non-audit services referred to in Article 5(1) of EU Regulation No. 537/2014.

Report on compliance with the European Commission Delegated Regulation (EU) 2018/815 on the European Single Electronic Format Regulatory Technical Standard ("ESEF")

We have carried out a reasonable assurance mission on the compliance of the financial statements prepared by CONPET S.A. in accordance with article 3 of delegated regulation (EU) 2018/815, which establishes the regulatory technical standards regarding the specification of a single electronic reporting format – "ESEF".

Responsibility of the management of CONPET S.A. regarding the digital files prepared in accordance with ESEF

The Company's management is responsible for the preparation of digital files in accordance with ESEF. This responsibility includes:

- designing, implementing and maintaining an adequate internal control on ESEF reporting;
- ensuring consistency between the digitized information and the financial statements published according to the provisions of Order 2844/2016.

Auditor's responsibility

Our responsibility lies in expressing, on the basis of the audit evidence obtained, a conclusion on the compliance of the electronic labelling of the elements in the financial statements, in accordance with article 3 of the Delegated Regulation, in all material aspects. Our reasonable assurance mission has been carried out in accordance with the International Standard on Assurance Missions 3000 (revised) – *"Other assurance missions than audits or revisions of historical financial information"*, issued by the International Standards Council for Auditing and Assurance.

A reasonable assurance mission under ISAE 3000 involves carrying out procedures to obtain advice on compliance with Article 3 of the ESEF Delegated Regulation. The nature, timing and extent of the selected procedures depend on the auditor's reasoning, including in assessing the risk of significant deviations from the provisions of Article 3, caused either by fraud or error. A reasonable assurance mission involves:

- obtaining an understanding of the process of preparing the Digital File in accordance with the ESEF and relevant internal controls;
- reconciliation of the Digital Files with the audited financial statements of the Company;
- assessing whether all the financial statements that are included in the annual financial report are prepared in a valid XHTML format.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our conclusion.

Conclusion

In our opinion, the financial statements for the financial year ended December 31, 2024 included in the annual financial report and disclosed in the Digital Files comply, in all significant aspects, with the requirements of ESEF.

In this report we do not express an audit opinion, a review conclusion or any other assurance conclusion regarding the financial statements. Our audit opinion on the Company's financial statements for the financial year ended December 31, 2024 is included in the section Report on the annual financial statements above.

On behalf of: **PKF Finconta SRL**

Str. Grigore Mora, nr. 37, Sector 1, Bucharest

Registered with the Authority for Public Supervision of the Statutory Audit Activity under number FA32

Audit partner name: **Florentina Susnea**

In registered with the Authority for Public Supervision of the Statutory Audit Activity under number AF433

Bucharest, March 25, 2025

LIMITED ASSURANCE REPORT
of the independent auditor on the sustainability report
for the financial year 2024
(free translation)

To the shareholders of CONPET S.A.

Limited Assurance Conclusion

We have performed a limited assurance engagement on the Sustainability Report included in the annual report of CONPET S.A. ("the Company") as at 31 December 2024 and for the period from 1 January 2024 to 31 December 2024, prepared by the Company, having its registered office at Street Anul 1848, nr. 1-3, Ploiesti, district Prahova, registered under fiscal identification code 1350020.

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the Company's sustainability reporting as at 31 December 2024 and for the period from 1 January 2024 to 31 December 2024 is not prepared, in all material respects, in accordance with the applicable legal sustainability reporting framework provided in the Order of the Minister of Public Finance no. 2844/2016, Chapter 7¹, sections 7^{1.1} and 7^{1.1}, including:

- compliance with the European Sustainability Reporting Standards (ESRS), including the fact that the process carried out by the Company for identifying the information disclosed in the sustainability reporting (referred to as "the Process") is consistent with the description provided in Chapter 1 of the sustainability reporting, and
- compliance of the taxonomy disclosures, detailed in the Environmental Section of the sustainability reporting, Chapter 4, with the applicable reporting requirements of Article 8 of Regulation (EU) No. 852/2020 ("the Taxonomy Regulation").

Basis for the Assurance Conclusion

We conducted our limited assurance engagement in accordance with ISAE 3000 (Revised), "Assurance Engagements Other than Audits or Reviews of Historical Financial Information."

Our responsibilities under this standard are further described in the "Auditor's Responsibilities" section of our report.

We are independent of the Company in accordance with the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code), and with the relevant ethical requirements in Romania, including Law No. 162/2017 as subsequently amended, for our assurance engagement on the sustainability reporting, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the IESBA Code.

Our firm applies the International Standard on Quality Management 1 and, accordingly, maintains a comprehensive quality management system that includes documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Emphasis of Matters

We draw attention to the information disclosed in Chapter 1, point 1 "General basis for preparing the sustainability report" of the sustainability reporting, which describes the uncertainties and limitations encountered by the Company in the general context of the first-time application of the provisions of Order No. 2844/2016, Chapter 7¹, Sections 7^{1.1} and 7^{1.2}, and, specifically, the challenges faced during the 2024 financial year in collecting the necessary data for publishing certain data points identified in the same chapter. Our conclusion is not modified in respect of this matter.

We also draw attention to of the sustainability reporting, which states that for the year 2024, being the first year of reporting, the Company has not yet concretely identified the interaction between impacts, risks, and opportunities with its strategy and business model. It is also noted that, for 2024, there was no formal stakeholder engagement framework in place. Our conclusion is not modified in respect of this matter.

Other Matters – Comparative Information

Our limited assurance engagement does not extend to the information included in the sustainability reporting for prior periods. Our conclusion is not modified in respect of this matter.

Other Matters

The 2024 sustainability reporting was prepared by the Company in the context of the first-time application of the provisions of the Order of the Minister of Public Finance No. 2844/2016, Chapter 7¹, Sections 7^{1.1} and 7^{1.2}—a context characterized by uncertainties regarding legal and regulatory interpretation, use of significant estimates, absence of established practices

and frameworks, particularly for assessing double materiality, and an internal control system under development. This framework enables understanding of the Company's impacts on sustainability matters, as well as how these matters influence the Company's business development, performance, and position. Sustainability matters include environmental, social, and corporate governance issues.

Responsibilities for the Sustainability Reporting

The Company's administrators are responsible for the design, implementation, and maintenance of a process for identifying the information included in the sustainability reporting, in accordance with ESRS, and for describing this process in Chapter 1 of the sustainability report. This responsibility includes:

- understanding the context in which the Company's activities and business relationships take place and developing an understanding of affected stakeholders;
- identifying actual and potential impacts (both negative and positive) related to sustainability matters, as well as the risks and opportunities that affect or are expected to affect the entity's financial position, financial performance, cash flows, access to financing, or cost of capital in the short, medium, or long term;
- assessing the significance of identified sustainability-related impacts, risks, and opportunities, by selecting and applying appropriate thresholds; and
- developing methodologies and making assumptions that are reasonable under the circumstances.

The Company's administrators are also responsible for preparing the sustainability reporting in accordance with the sustainability reporting framework required by law, including:

- compliance with the European Sustainability Reporting Standards (ESRS);
- preparation of taxonomy disclosures in the Environmental Section, Chapter III, sub-section 2, of the sustainability reporting, in accordance with Article 8 of Regulation (EU) No. 852/2020 ("the Taxonomy Regulation");
- designing, implementing, and maintaining internal controls deemed necessary to enable the preparation of sustainability reporting free from material misstatement, whether due to fraud or error; and
- selecting and applying appropriate sustainability reporting methods and making assumptions and estimates for individual sustainability disclosures that are reasonable under the circumstances.

Those charged with governance are responsible for overseeing the sustainability reporting process at the company level.

Inherent Limitations in Sustainability Reporting

In forecasting disclosures made in accordance with the ESRS, administrators are required to base such forecasts on assumptions about future events and potential future actions of the Company. Actual results are likely to differ since anticipated events may not occur as expected.

In determining the disclosures in the sustainability reporting, administrators interpret undefined legal terms and other terminology. These may be interpreted differently, including in terms of legal compliance of their interpretation, and are therefore subject to uncertainty.

Auditor's Responsibilities

Our objectives are to plan and perform the assurance engagement to obtain limited assurance as to whether the sustainability reporting is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion.

Misstatements may result from fraud or error and are considered material if it is reasonably expected that they, individually or collectively, could influence the decisions of users based on the sustainability reporting as a whole.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised), we exercise professional judgment and maintain professional skepticism throughout the engagement.

The procedures performed in a limited assurance engagement vary in nature and timing and are less extensive than those performed in a reasonable assurance engagement. Consequently, the level of assurance obtained is substantially lower than that which would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities in respect of the sustainability reporting, related to the process, include:

- obtaining an understanding of the process, but not for the purpose of expressing a conclusion on its effectiveness, including the outcome of the process;
- designing and performing procedures to assess whether the process is consistent with its description as presented by the Company in Chapter 1 of the sustainability reporting.

Other responsibilities in respect of the sustainability reporting include:

- obtaining an understanding of the Company's control environment, processes, and information systems relevant to the preparation of the sustainability reporting, without evaluating specific control activities, obtaining evidence about their implementation, or testing their operating effectiveness;
- identifying disclosures likely to contain material misstatements, whether due to fraud or error;
- designing and performing procedures in response to disclosures likely to contain material misstatements. The risk of not detecting a material misstatement due to fraud is higher than for one due to error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or override of internal control.

Summary of Work Performed

A limited assurance engagement involves performing procedures to obtain evidence about the sustainability reporting.

The nature, timing, and extent of the selected procedures depend on our professional judgment, including identifying disclosures likely to contain material misstatements, whether due to fraud or error, in the sustainability reporting.

In conducting our limited assurance engagement on the Process, we:

- obtained an understanding of the process by:
 - conducting interviews to understand the sources of information used by management (e.g., stakeholder agreements, business plans, and strategy documents);
 - inspecting/examining the Company's internal documentation related to the process; and
- assessed whether the evidence obtained through our procedures on the Company's process is consistent with the description of the process as presented in Chapter 1.

In conducting our limited assurance engagement on the sustainability reporting, we:

- obtained an understanding of the Company's reporting processes relevant to the preparation of the sustainability reporting;
- assessed whether the material information identified through the information identification process is included in the sustainability reporting;
- evaluated whether the structure and presentation of the sustainability reporting comply with the European Sustainability Reporting Standards (ESRS);
- conducted interviews with relevant personnel and performed analytical procedures on selected disclosures in the sustainability reporting;
- performed substantive procedures on a sample of selected disclosures in the sustainability reporting;
- obtained evidence on the methods used for significant estimates and forecasts and how these methods were applied;
- obtained an understanding of the process for identifying taxonomy-eligible and taxonomy-aligned economic activities and related disclosures in the sustainability reporting;
- on a sample basis, compared information in the sustainability report with corresponding disclosures in the financial statements.

On behalf of: PKF Finconta SRL

Str. Grigore Mora, no. 37, Sector 1, Bucharest

Registered with the Public Oversight Authority for the Statutory Audit Activity under No. FA32

Audit Partner: Florentina Susnea

Registered with the Public Oversight Authority for the Statutory Audit Activity under No. AF433

Bucharest, 25 March 2025