

## **STAKEHOLDER ENGAGEMENT POLICY**

### **AROBS TRANSILVANIA SOFTWARE SA**

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## **1. INTRODUCTION AND PURPOSE**

This Stakeholder Engagement Policy (the “Policy”) is developed in accordance with the Bucharest Stock Exchange (BVB) Corporate Governance Code applicable to issuers listed in the Premium Category, as well as with capital market legislation, the regulations of the Financial Supervisory Authority (ASF), and the Corporate Governance Statement of AROBS Transilvania Software S.A.

The Policy complements and details the principles assumed by the Company through the Corporate Governance Statement, without replacing them, and represents the internal framework through which AROBS operationalizes its relationship with stakeholders.

The purpose of this Policy is to establish a clear, transparent, and coherent framework for managing relationships with stakeholders, contributing to:

- the protection of shareholders’ rights and the equitable treatment of investors;
- the integration of relevant stakeholders’ interests into the Company’s objectives;
- the appropriate management of reputational, social, and governance risks;
- the creation of sustainable long-term value.

In the context of alignment with the ESRS (European Sustainability Reporting Standards), AROBS Transilvania Software reaffirms its commitment to actively engaging all relevant stakeholders in its sustainability strategy and practices. Accordingly, the engagement policy addresses both internal needs (employees, Board of Directors, etc.) and external stakeholders (customers, investors, authorities, civil society, etc.). AROBS considers regular stakeholder engagement to be

fundamental to the way it conducts its business and believes that transparency and open dialogue with stakeholders strengthen long-term sustainability.

## 2. SCOPE OF APPLICATION

This Policy applies to all entities within the AROBS Group and is mandatory for the Company's governing bodies, employees, and collaborators. It governs the identification, consultation, and response to the concerns of all Company stakeholders, in line with the principles of the BVB Corporate Governance Code regarding transparency, corporate responsibility, and equitable treatment, as well as ESRS and CSRD requirements. Any department or individual within the organization managing stakeholder relationships must comply with this Policy.

## 3. GENERAL PRINCIPLES GOVERNING THIS POLICY

- **Transparency and fair disclosure** – The Company commits to communicating in an accurate, complete, and timely manner with stakeholders, integrating their feedback into decision-making processes.
- **Equitable treatment of shareholders** – Respect for the rights of all shareholders, including minority shareholders;
- **Responsibility of the Board of Directors** – The Board ensures oversight of stakeholder relationships;
- **Separation of management and control responsibilities** – In accordance with the governance structure described in the Corporate Governance Statement;
- **Trust and integrity** – In line with best practices, the Company commits to maintaining positive and trust-based relationships with all stakeholders, protecting AROBS's reputation and values;
- **Strategic alignment** – Stakeholder engagement is treated as a key component in strategic and operational decision-making. Collected feedback is analyzed and integrated into business plans and the Company's ESG objectives.

## 4. ROLES AND RESPONSIBILITIES

The Board of Directors has ultimate responsibility for the Company's corporate governance framework and:

- approves this Policy and any amendments thereto;
- oversees the development and approval of the Company's strategy and ensures that it integrates sustainability aspects, including environmental and social (E&S) considerations and climate-related risks and opportunities;
- monitors significant risks associated with stakeholder relationships;
- receives periodic reports on the implementation of the Policy.

### **Executive Management**

- Executive Management is responsible for implementing the Policy, integrating the outcomes of consultation processes into operational activities, and reporting to the Board of Directors.

### **Coordinator of the Formal ESG (Sustainability) Committee**

- leads the implementation of the Policy;
- coordinates the development of consultation programs;
- reports to the Audit Committee;
- monitors compliance with ESRS requirements and the continuous adjustment of practices.

### **Human Resources Department**

- coordinates dialogue with employees (internal stakeholders);
- develops and implements internal feedback mechanisms;
- organizes organizational climate surveys and development programs to enhance employee engagement.

### **Investor Relations Consultant**

- manages communication with investors and financial analysts;
- collects feedback during meetings, gathers shareholders' requests and suggestions, and integrates them into reporting to the Board and strategic plans.

### **Department representatives and other managers**

- facilitate dialogue with relevant stakeholders within their area of responsibility (e.g. Marketing Director – customers; Chief Financial Officer – investors, etc.);
- ensure the implementation of measures resulting from consultations relevant to their activities.

### **All employees**

- are encouraged to inform executive management of feedback received from stakeholders (e.g. investors, customers, partners, community) and to proactively participate in engagement initiatives.

### **Identification and mapping of stakeholders**

The Company periodically identifies and updates the main categories of stakeholders, including, without limitation: shareholders, investors, employees, customers, business partners, authorities, and relevant communities.

**Main identified categories:**

Stakeholder type	Concrete examples	Main engagement methods
<b>Internal</b>	Employees, Board, Formal ESG Committee	internal surveys, ESG training, townhalls
<b>Investors</b>	EBRD, Allianz SE, BVB shareholders	periodic meetings, ESG reports, investor conferences
<b>BVB</b>	–	reports, annual report including the sustainability report, annual session with institutional investors
<b>Corporate customers</b>	International customers	evaluation questionnaires requested by corporate customers, NPS
<b>SME customers and end consumers</b>	TrackGPS, Optimall users, etc.	user panels (selected groups of end users/customers participating regularly or occasionally in feedback, testing, or strategic consultation sessions); NPS surveys, market research
<b>Local communities</b>	NGOs, universities, authorities	educational partnerships, events, consultations
<b>Business partners</b>	contractors, suppliers, collaborators	ESG self-assessment questionnaires
<b>Regulators</b>	ANSPDCP, DNSC, Ministry of Environment, AFM, ANPM, ASF, Ministry of Finance, ONAC, Labour Inspectorate, CNCD, ADR, MCID	participation in public consultations or regulatory working groups

## 5. ENGAGEMENT OBJECTIVES

- **Reputation and risk management:** Actively collecting stakeholder views to prevent and provide early warning of potential reputational and regulatory risks.
- **Opportunity identification:** Gathering external perspectives to identify new business opportunities, innovation, or partnerships. Stakeholder engagement provides access to additional knowledge that can enhance AROBS products and processes.
- **Operational performance improvement:** Engagement aims to optimize internal processes and service quality by understanding stakeholders' specific needs.
- **Trust-building:** Strengthening confidence in AROBS's strategy and actions through clear communication and accountability towards stakeholder requests.
- **Promotion of transparency and strategic dialogue:** Ensuring that the Company's development and ESG objectives are formulated taking stakeholder feedback into account, and that consultation outcomes are communicated back to stakeholders. AROBS aims for all engagement objectives to be clearly defined, measurable, and linked to performance indicators.

## 6. CONSULTATION MECHANISMS

AROBS will use a variety of tools to collect stakeholders' opinions and recommendations:

- **Surveys and questionnaires:** regular internal surveys (e.g. annual employee satisfaction survey, partner self-assessment questionnaires, customer NPS, etc.) and ESG-specific questions.
- **Formal and informal meetings:** forums and working groups, investor meetings, and town-hall meetings with the entire team, ensuring employee inclusion in Q&A sessions with management.
- **Consultations with regulators / BVB / NGOs / universities:** consultation panels and forums with industry representatives, NGOs, academia, and relevant public authorities, including participation in conferences and multi-stakeholder initiatives.
- **Digital and media platforms:** use of online dialogue channels (interactive webpages, dedicated email for double materiality feedback, online forms for sustainability-related requests, newsletters and online forms for investors, double materiality questionnaires, etc.). AROBS monitors social media and customer communication channels to respond to digitally expressed requests and opinions.

## **7. REPORTING AND TRANSPARENCY**

The implementation of this Policy is consistently reflected in the Company's public reporting, including the annual Corporate Governance Statement, the Annual Report, and, where applicable, the Sustainability Report.

The information presented is coherent, consistent, and aligned across governance documents, ensuring a unified view of how AROBS manages stakeholder relationships.

## **8. POLICY REVIEW**

This Policy is reviewed periodically or whenever necessary, in order to reflect legislative changes, the requirements of the BVB Corporate Governance Code, or the Company's strategic developments.

## **9. POLICY APPROVAL**

This Policy is approved by the Board of Directors of AROBS Transilvania Software S.A.