Transilvania Investments

Valuation rules for
Transilvania Investments Alliance portfolio – July 2025

This extcerpt from the *Rules of Transilvania Investments Alliance as a Retail Investor Alternative Investment Fund (R.I.A.I.F.)* describes the financial assets valuation rules used for each type of asset in which the Company may invest in compliance with the applicable legal provisions. For the assets for which a market price is available, the market prices and relevant market prices shall be taken into consideration.

In the case of joint-stock companies admitted to trading on a regulated market or multilateral trading system with a liquidity considered by Transilvania Investments Alliance, based on a prudential value judgement regarding the active market as defined by I.F.R.S. 13 - *Fair value measurement*, as being irrelevant for the application of the mark-to-market measurement approach, Transilvania Investments Alliance may decide for the shares of the concerned companies to be measured in accordance with the valuation standards in force, according to the law, based on a valuation report. In case the Company decides to apply this measurement approach, it shall maintain it for at least one calendar year, for the concerned shares considered illiquid.

As general rules:

1. The shares held in companies listed on a regulated market in Romania are assimilated to the financial instruments traded on an active market, as long as they record transactions in the last 30 trading days. Any exception to this rule, i.e. including the shares held in a company listed on the Romanian regulated market in the category of financial instruments traded on a market with a liquidity considered by Transilvania Investments Alliance as being irrelevant for the application of the mark-to-market method, shall be made based on a prudential value judgment regarding the active market defined by the International Financial Reporting Standard 13 - Fair value measurement (I.F.R.S. 13).

2. The shares held in companies listed on an alternative/multilateral trading system in Romania are assimilated to the financial instruments traded on an inactive market, even though they record transactions in the last 30 trading days. Any exception to this rule, i.e. including the shares held in a company listed on an alternative/multilateral trading system in Romania in the category of financial instruments traded on a market with a liquidity considered by Transilvania Investments Alliance as being irrelevant for the application of the mark-to-market method, shall be made based on a prudential value judgment regarding the active market defined by the International Financial Reporting Standard 13 - Fair value measurement (I.F.R.S. 13).

3. The shares held in companies listed on any trading system in a Member State or Third State are assimilated to the financial instruments traded on an active market, as long as they record transactions in the last 30 trading days. Any exception to this rule, i.e. including the shares held in a company listed on the Romanian regulated market in the category of financial instruments traded on a market with a liquidity considered by Transilvania Investments Alliance as being

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Autorizată A.F.I.A.: Autorizație ASF nr. 40/15.02.2018
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Cod LEI (Legal Entity Identifier): 254900E2IL36VM93H128
Capital social: 216 244 379,70 lei
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Societate administrată în sistem dualist

irrelevant for the application of the mark-to-market method, shall be made based on a prudential value judgment regarding the active market defined by the International Financial Reporting Standard 13 - Fair value measurement (I.F.R.S. 13).

In order to calculate the value of the net assets of the Company, the portfolio holdings are measured and reflected into the net asset value at the values established in accordance with the regulations in force:

	Asset category	Measurement methods
1.	**Financial instruments admitted to trading and traded in the last 30 trading days (business days) on a regulated market or in trading systems other than regulated markets, from a Member State, including alternative trading system in Romania, and also those admitted to the official listing of a stock exchange or an alternative trading system in a Third State**	
1.1	**Shares and any other negotiable securities which give the right to acquire the respective securities through subscription or exchange**	They shall be measured as follows: I. shares traded on a market with a liquidity considered by Transilvania Investments Alliance as being relevant for the application of the mark-to-market method, according to the aforementioned general rules I.1 at the closing price of the market section deemed as main market, afferent to the day for which the calculation is done – in the case of shares admitted to trading on the respective regulated market in the Member State/stock exchange in the Member State, which records a liquidity considered relevant; or I.2 at the reference price afferent to the day for which the calculation is done, in the case of shares traded in trading systems other than regulated markets, including in other alternative trading systems, price provided by the operator of the respective trading system for each of the segments of the respective system. The price used as reference price is calculated based on the trading activity on the day for which the asset calculation is done, being used as landmark at the opening of the trading session on the next day. II. shares traded on a market with liquidity considered by Transilvania Investments Alliance as being irrelevant for the application of the mark-to-market method, according to the aforementioned general rules - at the value determined in accordance to the international valuation standards, based on a valuation report updated at least on an annual basis.

1.2	**Equity securities issued by Collective Investment Undertakings (C.I.U.)**	They shall be measured as follows: I. equity securities issued by C.I.U. traded on a market with liquidity considered by Transilvania Investments Alliance as being relevant for the application of the mark-to-market method, according to the aforementioned general rules I.1 at the closing price of the market section deemed as main market, afferent to the day for which the calculation is done, in the case of equity securities admitted to trading on the respective regulated market in the Member State/stock exchange in the Member State; or I.2 at the reference price afferent to the day for which the calculation is done, in the case of equity securities traded in trading systems other than regulated markets, including in other alternative trading systems, price provided by the operator of the respective trading system for each of the segments of the respective system. The price used as reference price is calculated based on the trading activity on the day for which the asset calculation is done, being used as landmark at the opening of the trading session on the next day. II. equity securities issued by C.I.U. traded on a market with liquidity considered by Transilvania Investments Alliance as being irrelevant for the application of the mark-to-market method, according to the aforementioned general rules - at the last net asset value per unit calculated and published/communicated by their manager or published by internationally recognized private companies.
1.3	**Fixed-income financial instruments**	According to one of the following methods: at closing price/reference price, depending on the trading venue of the instrument, the method based on the daily recognition of the interest and the discount/premium amortization for the period elapsed from the investment date, by using mid/bid prices that include relevant composite price benchmarks published by Bloomberg, through a method of determining the value of the instrument based on well-established valuation techniques;

		If the principal and/or coupons of the instrument are not paid within 10 working days of the deadline set out in the prospectus, it shall be included in the net asset at zero value.
1.4	**Financial derivative instruments**	The latest information available for the day for which the calculation is done, i.e. the closing price / reference price of the market section deemed as main market.
1.5	**Money market instruments**	At the value determined through the method based on daily interest recognition and amortization of the discount/premium afferent to the period elapsed from the date the investment is made until the day the net asset is calculated, inclusively.
2.	**Financial instruments not admitted to trading on a regulated market or in trading systems other than regulated markets, including alternative trading systems in Romania, in a Member State or a Third State**	
2.1	**Shares**	At the value determined in accordance to the international valuation standards, based on a valuation report updated at least on an annual basis.
2.2	**Fixed-income financial instruments**	According to one of the methods set out in point 1.3, exclusively the closing price/reference price; If the principal and/or coupons of the instrument are not paid within 10 working days of the deadline set out in the prospectus, it shall be included in the net asset at zero value.
2.3	**Money market instruments**	At the value determined through the method based on daily interest recognition and amortization of the discount/premium afferent to the period elapsed from the date the investment is made until the day the net asset is calculated, inclusively.
2.4	**Equity securities issued by Collective Investment Undertakings (C.I.U.), capital holdings according to the documents and investment policy of the respective entity**	At the last net asset value per unit or net asset value attributable to the capital holding, calculated and published/communicated by their manager or published by internationally recognized private companies.
2.5	**Equity interests in limited liability companies (S.R.L.) according to Law no. 31/1990**	At the value determined in accordance to the international valuation standards, based on a valuation report updated at least on an annual basis.
3.	**Financial instruments admitted to trading on a regulated market, in an alternative trading system or in systems other than regulated markets, in a Member State, including an alternative**	

	trading system in Romania, and also those admitted to the official listing of a stock exchange or of an alternative trading system in a Third State, but not traded in the last 30 trading days	
3.1	**Shares and any other negotiable securities which give the right to acquire the respective securities through subscription or exchange, equity securities issued by Collective Investment Undertakings (C.I.U.)**	The shares are measured at the value determined in accordance with the international valuation standards, based on a valuation report updated at least on an annual basis; The equity securities issued by C.I.U. are measured at the last net asset value per unit calculated and published/communicated by their manager or published by internationally recognized private companies.
3.2	**Fixed-income financial instruments**	According to one of the methods set out in point 1.3, exclusively the closing price/reference price; If the principal and/or coupons of the instrument are not paid within 10 working days of the deadline set out in the prospectus, it shall be included in the net asset at zero value.
3.3	**Financial derivative instruments**	By using financial markets established techniques (e.g. reporting to the current value of another similar financial instrument, models for cash flow analysis and options valuation, etc.), so that the fair value principle is observed.
3.4	**Money market instruments**	At the value determined through the method based on daily interest recognition and amortization of the discount/premium afferent to the period elapsed from the date the investment is made until the day the net asset is calculated, inclusively.
4.	**Amounts held in current accounts**	By considering the available balance reflected in the account statement on the date for which the calculation is done, being taken from the balance sheet. The amounts in the current accounts opened by the company with credit institutions undergoing the bankruptcy procedure on the date of calculating the net asset shall be included in the net asset at zero value.
5.	**Bank deposits**	At the value determined through the method based on daily interest recognition afferent to the period elapsed from the date the investment is made.
6.	**Shares suspended from trading for a period of at least 30 trading days (business days) as a result of the decision of the market or system**	At the value determined in accordance with the international valuation standards, based on a valuation report prepared by a third-party valuator and updated at least on an annual basis.

	operator made in order to provide the investors with information which could determine changes of the issuer's share price	
7.	**Shares not admitted to trading, including those issued by credit institutions or admitted to trading and not traded within the last 30 trading days (business days), whose financial statements are not obtained within 90 days as of the legal dates for submission**	At zero value or at the value determined in accordance with the international valuation standards, based on a valuation report updated at least on an annual basis.
8.	**Shares of companies regulated under Law no. 31/1990, admitted or not admitted to trading, undergoing the insolvency or reorganisation procedure**	They are included in the net asset as of the date the announcement is made public on the website of the regulated market or alternative trading system on which they are traded, or from other sources, at zero value or at the value determined in accordance with the international valuation standards, based on a valuation report prepared by a third-party valuator and updated at least on an annual basis.
9.	**Shares of companies regulated by Law no. 31/1990, undergoing judicial winding-up procedure or other forms of winding-up and shares of companies with temporary or definitive discontinuation of activity, as of the date the announcement is published on the website of the regulated market, or of the alternative trading system on which they are traded**	They are included in the net asset at zero value as of the date the announcement is published on the website of the regulated market or alternative trading system on which they are traded.
10.	**Shares of companies regulated under Law no. 31/1990 or under the applicable laws of the Member States or Third States, from Transilvania Investments Alliance's portfolio, not admitted to trading or admitted to trading on a regulated market, in an alternative system or other trading systems in a Member State, including in an alternative trading system in Romania, and those admitted at the official listing of a stock exchange or an alternative trading system in a Third State, but not traded in the last**	At zero value.

	30 trading days (business days), with negative equity value	
11.	**Shares of companies admitted to trading on a regulated market/alternative trading system, which have a negative equity value, not traded for a period of more than 30 trading days, and such period coincides with the period of suspending from trading of the respective shares**	At zero value.
12.	**Shares resulted from the splitting/consolidation of the nominal value of shares admitted to trading on a regulated market or in trading systems other than regulated markets**	The shares are measured as of the ex-date until the date of their entry into trading, by dividing the price prior to the spilt to the splitting coefficient, respectively by multiplying it by the consolidation coefficient.
13.	**Shares held as a result of share capital increases performed by cash contribution from investors, without the issuance of pre-emptive**	The due shares and the amount owed by the Company as a result of participating in the share capital increase are recorded in the Company's assets as follows: a) on the first day on which the investors buying the shares can no longer participate in the share capital increase, in case the market price is higher than the subscription price; b) on the date of the actual payment of the shares subscribed in the share capital increase, in case the market price is lower than the subscription price. and they are measured at the closing price of the market section deemed as main market or at the reference price provided under systems other than the regulated markets, including alternative trading systems by the operator of the respective trading system, afferent to the day for which the calculation is done.
14.	**Shares held as a result of share capital increases performed by cash contribution from investors, with the issuance of pre-emptive rights**	In case the capital increase is performed by issuing pre-emptive rights, they shall be recorded in the Company's assets on the first day on which the investors buying the shares can no longer participate in the share capital increase. Until the first trading day, the pre-emptive rights shall be valuated at theoretical value. The theoretical value of the pre-emptive right is calculated according to the following formula: Theoretical value of pre-emptive right = (market price of old shares - subscription price of

		the new share based on pre-emptive rights) *[number of new shares/(number of old shares + number of new shares)] *[number of old shares/number of issued pre-emptive rights], where the market price of the old shares is represented by the closing price of the last day on which the investors buying shares are entitled to participate in capital increase. Subsequent to the admission to trading, the pre-emptive rights shall be valuated at the closing price of the market section deemed as main market of the respective market on the day for which the calculation is done. In case no transaction is performed, the valuation at theoretical value shall be maintained. After the trading period of the pre-emptive rights until the exercise thereof, the pre-emptive rights shall be valuated at the last closing price recorded in the trading period, and they shall be recorded in a distinct row "Dividends or other receivable rights". Upon exercising the pre-emptive rights, the due shares shall be adequately recorded in the Company's assets. In case the pre-emptive rights are not exercised, they shall be cancelled on the date of expiring the exercising deadline.
15.	**Shares held as a result of subscription within an initial public offering of shares**	They are deemed as "newly issued securities" and measured based on the purchase price of the shares subscribed within the public offering. This modality of recording and measuring the respective subscribed shares maintains until the date of the first transaction on stock exchange.
16.	**Shares of companies not admitted to trading resulted from share capital increase with cash contribution**	They shall be measured as follows: a) until the date of registering the share capital increase with the Trade Register Office, at subscribed value; b) from the date of registering the share capital increase with the Trade Register Office, similarly to the provisions of section 2.
17.	**Shares of companies not admitted to trading resulted from share capital increase without cash contribution**	They are recorded in the Company's assets as of the date of registering the share capital increase with the Trade Register Office, based on justifying documents provided by the company certifying the new value of the equity corresponding to the new share capital.

18.	**Dividends, and also the shares distributed without consideration in cash, resulted from participation in capital increase**	They are recorded in the Company's assets on the first day on which the investors buying the shares can no longer benefit from dividends, or on the first day on which the investors buying the shares can no longer participate in the capital increase. The dividends distributed by the companies not admitted to trading are recorded in Transilvania Investments Alliance's assets on the date of the resolution of the General Meeting of Shareholders. The valuation is carried out at the closing price of the market section deemed as main market or at the reference price provided under systems other than regulated markets, including in the alternative trading systems, by the operator of the respective trading system, afferent to the day for which the calculation is done.

Whenever the valuation methods in the above table conflict with an imperative provision of the F.S.A. Regulation no. 9/2014, the provision of the F.S.A Regulation no. 9/2014 will be operatively enforced with priority. These situations shall be communicated within the respective reports.

In the case of shares/equity interests held in companies which, following the closure of a legal procedure, are transferred from the sub-portfolio of non-operational companies to the category of operational ones, and for which the fair value estimation requires the preparation of a valuation report, the zero value recorded prior to the change of company's state can be maintained for a period no longer than 3 months, starting from the last day of the month in which such change was made in the internal records of Transilvania Investments Alliance.

The values of any financial instruments included in the regular reports of the Company at any value other than the fair value shall be reconciled with the fair values, within synthetic accounts distinctly provided in the respective reports.