

Action plan of UniCredit Bulbank AD in case of a material change or termination of the provision of the benchmarks/ indices used by the Bank.

Article 1. This plan defines the activities that UniCredit Bulbank AD shall undertake in accordance with the requirements of the regulations in the cases of a material change or termination of the provision of the benchmarks/ indices used by the Bank.

Article 2. The plan was prepared in accordance with the requirements of the Credit Institutions Act and Regulation (EU) No 2016/1011 of the European Parliament and of the Council of 8. June 2016 on indices used as benchmarks for the purposes of 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. Pursuant to art. 28, para. 2 of Regulation (EU) 2016/1011, supervised entities that use a benchmark shall produce and maintain robust written plans setting out the actions that they would take in the event that a benchmark materially changes or ceases to be provided. The complete wording of Regulation (EU) 2016/1011 is available on the following Internet address: <https://publications.europa.eu/bg/publication-detail/-/publication/5f55dd2e-3dbb-11e6-a82501aa75ed71a1/language-bg>.

Article 3. For defining the due and payable amounts under Loan Agreements and agreements for financial instruments (hereinafter referred to as agreements) the Bank uses pricing methods in which different by its specifics and methodology benchmarks/ indices were set as components, the list not being exhaustive:

Article 3.1. The applicable ADI shall be calculated by the Bank as the average interest rate of the whole volume of deposits in EUR of Non-financial Corporations and Households sectors in the Bulgarian banking system, presented in the following tables from the Interest Rate Statistics of the Bulgarian National Bank (BNB): Interest Rates and Volumes of Outstanding Amounts on Time Deposits of Non-financial Corporations Sector, Interest Rates and Volumes of Outstanding Amounts on Time Deposits of Households Sector, Interest Rates and Volumes of Outstanding Amounts on Overnight Deposits and Deposits Redeemable at Notice of Nonfinancial Corporations Sector, Interest Rates and Volumes of Outstanding Amounts on Overnight Deposits and Deposits Redeemable at Notice of Household Sector, published on the website of the BNB: <http://bnb.bg/Statistics/StMonetaryInterestRate/StInterestRate/StIRInterestRate/index.htm> (the Tables), received by weighing the directly taken by the Tables values of the effective annual rate for all categories of clients and kinds of EUR deposits presented in the Tables by their volumes for the respective month.

Article 3.2. **The Base Interest Rate (BIR)**, revoked as of 01.01.2026, in accordance with Art. 4 of this Plan.

Article 3.3. One-week/one-month/three-month/six-month/twelve-month or for another period **EURIBOR** (Euro Interbank Offered Rate) defined and published by the European Money Market Institute (EMMI).

Article 3.4. The applicable Household Term Deposits Index (HTDI) shall be calculated by the Bank as the average interest rate of the volume of term deposits in EUR of Households in the Bulgarian banking system, presented in the following table from the Interest Rate Statistics of the Bulgarian National Bank (BNB): „Interest Rates and Volumes of Outstanding Amounts on Time Deposits of Households Sector“ published at

<http://bnb.bg/Statistics/StMonetaryInterestRate/StInterestRate/StIRInterestRate/index.htm> (“The Table”), calculated by weighing the effective interest rates of the EUR term deposits of Households sector in the Table and their corresponding volumes for the month.

Article **3.5.** One-month/three-month/six-month and twelve-month **Term SOFR Reference Rates** administered by CME Group Benchmark Administration Limited - for the loans and agreements denominated in USD.

Article **3.6.** One-month and three-month **SARON** Compound Rate with spread administered by SIX Swiss Exchange Financial Information AG (SIX), for existing loans and agreements denominated in Swiss francs.

Article **4.** Given the introduction of the Euro in the Republic of Bulgaria and the cessation of the publication of the Base Interest Rate (BIR) published by the BNB, as of 01.01.2026 on granted lev loans based on the BIR reference interest rate index, the BIR will be replaced with one-month/three-month EURIBOR.

Three-month EURIBOR will be applied to non-revolving loans/limits and one-month EURIBOR will be applied to revolving loans/limits, in accordance with the Funds Transfer Pricing (FTP) methodology of the Bank.

The EURIBOR values for the first business day of 2026 will be applied from the first calendar day of 2026 and for the first interest period following the date of introduction of the euro in the Republic of Bulgaria. When replacing the BIR with the EURIBOR application, Art. 7 of this plan will apply. The subsequent interest periods under each loan agreement are determined in accordance with the provisions of the general terms and conditions applicable to them.

Reasons for suitability of EURIBOR:

- European standard – EURIBOR is the primary benchmark rate used across the euro area;
- Market-based – EURIBOR reflects real money market transactions between leading European banks;
- Transparent and regulated – Administered under strict EU Benchmark regulation, with oversight by ESMA;
- Offers multiple maturities, applicable for different type of loans (revolving or medium and long-term);
- The bank's current index for euro loans;
- If the bank uses EURIBOR as the basis for its loans, the bank can effectively hedge interest rate risk through existing derivative products (a significant volume of instruments - including interest rate swaps, futures and options), without the need for expensive or non-standard solutions.

Implementing approach: 1M and 3M EURIBOR will apply with the new value of the index from the first calendar day of the year, only for the converted loans. This will be one-off act for the conversion. The next reset of the index rate will follow the standard period formalize under the General Terms and Conditions.

As of 01.01.2026, lev-denominated loans with interest based on ADI or HTDI will accrue interest based respectively on ADI or HTDI (as applicable), calculated in accordance with Article **3.1.** or Article **3.4.** The ADI/HTDI values for the first business day of 2026 will apply from the first calendar day of 2026 and for the first interest period following the date of the introduction of the euro in the Republic of Bulgaria. When implementing the change referred

to in the previous sentence, Article 7 of this plan shall apply pursuant to Article 44, Paragraph 3 of the Act on the Introduction of the Euro in the Republic of Bulgaria. The subsequent interest periods under each loan agreement shall be determined in accordance with the provisions of the applicable general terms and conditions.

Article 5. In case the BNB suspends the continuous publishing of the data from the Table with the purpose of calculation of ADI and HTDI, and in case the benchmark interest rate applicable under the Agreement materially changes or is no longer provided or ceases to exist, respectively, or cannot be used on the grounds of: an official statement made by the administrator of the relevant benchmark, the supervisory authority of such administrator, an insolvency authority, an authority with powers for restructuring of the relevant administrator, court of law or a subject competent in relation to issues of insolvency and restructuring of the respective administrator; withdrawal of the rights of an administrator to provide the relevant benchmark; prohibition according to the relevant applicable law or based on an official statement or information by a supervisory authority that the relevant benchmark is no longer representative, the Bank shall undertake the following actions:

- It shall evaluate the consequences of the occurrence of such an event in order to identify its impact on concluded agreements with clients;
- It shall evaluate the basic risk of the discrepancies in the agreements for financial instruments;
- If necessary, it shall form a workforce with a task to define the measures and actions that shall be undertaken in case a specific benchmark changes significantly or has been already not provided.

Article 6. Based on the made analysis depending on the currency of the loan and the interest accrual period, the Bank shall define the most appropriate other valid substitute of the used benchmark approved by the Management Board of UniCredit Bulbank AD and/or by an authority or person empowered by it, which:

- Has been prepared by an administrator indicated in the Public Register maintained by the European Securities and Markets Authority in accordance with art. 36 of Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 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 171/1 of 29 June 2016) or has been published by the Central Bank of an EU member state or a third country
- or is based on internal methodology that considers the specifics of the market and currency for which the materially changed or dropped-off benchmark was prepared.
- In specific circumstances until the valid benchmark substitute becomes effective, the Bank shall apply the last calculated value of the respective interest index applicable under the Agreement.

Article 7. In case of a substitution of a benchmark the new interest rate under the loan agreement shall not be higher than the amount of the interest rate under the loan agreement before that time.

Article 8. In the cases under art. 6 UniCredit Bulbank AD shall inform its clients under loan agreements and agreements for financial instruments for the change by a notification on the web page of the Bank and placed on a visible place in its offices, as well via a notification in the Bank's electronic channels or email address.

Article 9. This plan was approved by the Management Board of UniCredit Bulbank AD on 15th of October 2025 and was published on the web page of the Bank on address www.unicreditbulbank.bg and is available at the Bank's office.