

Black Sea AI Gigafactory - Clarification Questions and Answers

Clarification Responses based on the published Expression of Interest (Eol)

This document provides responses to clarification questions received in relation to the Expression of Interest for the selection of a Consortium Leader for the Romania Black Sea AI Gigafactory. The responses are intended to support a common understanding of the Eol requirements and should be read together with the Eol documentation. These clarifications do not amend the Eol or create any binding commitment by the Coordinating Authority or the Government. Matters not finally defined at Eol stage will be assessed and refined in subsequent phases with the selected Consortium Leader, in accordance with applicable Romanian and EU legal requirements.

Q1. Given the recent changes within the Romanian Government, could you kindly confirm whether the submission deadline remains 14.06.2026, 17:00 Romania time?

A1 The submission deadline remains unchanged. EOLs must be submitted by 14.06.2026, 17:00 Romania time, in accordance with the Eol.

The decision reflects the nature of the Eol as an initial market engagement and pre-selection process, rather than a final tender or binding implementation-stage submission. The Eol does not require final technical design, final site confirmation, final consortium composition, binding financing commitments, bank term sheets, final vendor selection, final EPC contracts, final permitting approvals, or final transaction documentation. Applicants are expected to provide an indicative concept and evidence of capability, experience, financial strength, partner strategy, and preliminary investment and financing approach, based on reasonable assumptions and subject to refinement in subsequent phases.

The current deadline is therefore considered proportionate to the level of information required at this stage. Maintaining the published deadline also preserves the predictability, momentum, and equal treatment of the process, particularly as all potential applicants have been working against the same published timeline and all detailed technical, financial, contractual, permitting, and implementation arrangements will be refined in later phases with the selected Consortium Leader.

Q2 Is the Black Sea AI Gigafactory intended to be part of the upcoming EU AI Gigafactory call/tender framework, or is it expected to proceed as a separate initiative?

A2. This Eol is a standalone national market engagement and pre-selection process for a private-led Project. It is not structured as a submission under a EuroHPC call for proposals. The Eol is designed to identify and select a Consortium Leader capable of developing, structuring, financing, delivering, and operating the Project in Romania. The Project is expected to be privately financed and operated, with any Government support limited to enabling and de-risking measures, subject to applicable rules. At the same time, the Eol preserves flexibility for future alignment with the European AI infrastructure framework. It provides that, based on strategic alignment and economic viability, the selected Consortium Leader and the Government

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may jointly assess whether to participate in the emerging EU federated network of AI Gigafactories and/or pursue the EuroHPC AI and Compute Infrastructure Seal or any equivalent recognition mechanism.

Q3. Could you also kindly share whether there is already a preferred or defined direction regarding the technology stack and platform architecture, or whether this is expected to be proposed by the consortium applicants?

A3. The EoI does not prescribe a fixed technology stack or platform architecture at this stage. Applicants are expected to propose an indicative high-level platform approach as part of their submission, including the proposed compute, storage, networking, and orchestration strategy. Vendor-neutral solutions are acceptable. The proposed approach should be credible, scalable, and aligned with the Project objectives, including secure and resilient AI compute capability, phased deployment, and future scalability. Detailed technical design, vendor selection, site-specific engineering, and final architecture will be refined in subsequent phases with the selected Consortium Leader, once the relevant project interfaces, site conditions, demand assumptions, and implementation pathway are further confirmed.

Q4. Commercial Access Model and International Offtake. Will the AIGF operate as an open commercial cloud platform for European and international enterprise clients, or are significant restrictions envisaged on access by non-EU clients? The flexibility to serve international enterprise and hyperscale clients in the initial phase is important for rapid utilization, commercial sustainability, and ecosystem development.

A4. The EoI envisages the Black Sea AI Gigafactory as trusted AI compute infrastructure located in Romania, operating in compliance with applicable Romanian and EU legal, security, cybersecurity, data protection, AI governance, and other regulatory requirements. Within that framework, the Project is expected to remain open to commercially operated capacity serving regional, EU, and international users. The EoI also asks applicants to describe the intended service model and target user segments, expressly including Romania, the Black Sea region, the EU, and global demand. Accordingly, international commercial offtake is not excluded by the EoI and may form part of the proposed demand and utilization strategy, subject to applicable legal, security, and compliance requirements.

Q5. Sovereign AI Framework and GPU-as-a-Service. Will GPU-as-a-Service and sovereign AI cloud service offerings be considered fully aligned with the Project objectives? Will multi-tenant AI cloud environments be allowed, combining sovereign workloads with commercial AI compute services for enterprises?

A5. Yes. GPU-as-a-Service, sovereign AI cloud services, and multi-tenant AI cloud environments may be aligned with the Project objectives, provided they are designed and operated in compliance with applicable Romanian and EU legal, security, cybersecurity, data protection, AI governance, and resilience requirements. The EoI describes the Project as involving a facility layer, a compute/platform layer, and a demand/offtake layer. The compute/platform layer may include accelerator/GPU deployment and, where applicable, platform or service provision. Applicants are therefore expected to propose the intended service model, platform approach, target user segments, and demand/utilization strategy as part of their submission. Final operational, governance, access-control, and compliance arrangements will be refined in subsequent phases with the selected Consortium Leader.

Q6. Power Allocation, Expansion Rights, and Long-Term Scalability. Will the selected consortium receive long-term expansion rights beyond the initial area? Can additional reserved grid capacity be secured at the

start of the Project for future phases? Are there any anticipated limitations on phased scaling of GPU deployments over time?

A6. The EoI envisages the Black Sea AI Gigafactory as a phased and scalable project. It requests an initial deployment at the Phase 1 scale described in the EoI and encourages scalability to approximately 100,000 GPUs or equivalent accelerators, or more. The EoI also notes the potential for the Project to scale and expand to 1 GW or more of total facility power, subject to demand, economic and financing viability, technical feasibility, environmental compliance, grid requirements, and permitting. Specific expansion rights, site arrangements, grid connection pathways, power allocation, and any reserved capacity for future phases are not predetermined at the EoI stage. These matters will be assessed and structured in subsequent phases with the selected Consortium Leader, in coordination with the relevant authorities and infrastructure stakeholders. Applicants are encouraged to present an indicative phasing and scalability approach, including power, grid, cooling, connectivity, permitting, and critical-path assumptions.

Q7. Cross-Border Connectivity and Export Potential of AI Services. What is Romania's long-term strategic vision for positioning the AIGF as a regional AI hub serving South-Eastern Europe and international markets?

A7. The EoI positions the Black Sea AI Gigafactory as strategic AI compute and trusted data infrastructure intended to serve Romania, the Black Sea region, the European Union, and global demand. Romania's strategic location at the Black Sea, its role as an EU Member State bordering the Union's eastern neighbourhood, and its position as an energy and connectivity corridor are identified as key advantages for developing a regional and European AI infrastructure hub. The EoI also highlights Romania's dense fibre infrastructure, access to multiple routes and carriers, and fast connectivity with core EU networks such as GEANT. Applicants are expected to describe their intended service model, target user segments, and demand/utilization strategy, including how the Project can serve regional, EU, and international users. Detailed commercial and operational arrangements for cross-border service delivery will be refined in subsequent phases with the selected Consortium Leader.

Q8. Vendor Neutrality and GPU Architecture. Is there a specific hardware architecture, vendor restriction, or sovereign-grade security protocol required, or is the technology choice fully vendor-neutral?

A8. The EoI does not prescribe a specific hardware architecture or vendor. Capacity is expressed in terms of GPUs or equivalent accelerators, and the EoI expressly states that vendor-neutral solutions are acceptable for the high-level platform approach. Applicants are expected to propose a credible compute, storage, networking, and orchestration strategy, aligned with the Project's objectives, including scalability, resilience, security, and compliance with applicable Romanian and EU legal, cybersecurity, data protection, AI governance, and security requirements. Any proposed technology architecture will be assessed in that context and refined in subsequent phases.

Q9. Locations in the EoI. Is the Consortium Leader strictly required to use the proposed locations, such as Cernavodă or Doicești SMR, or may it propose alternative locations in Romania offering optimal fibre connectivity and network infrastructure?

A9. The Project's physical infrastructure must be located in Romania. The EoI identifies the Cernavodă-Constanța corridor as a potential location, given its relevant energy, connectivity, land, and cooling attributes. However, the EoI does not impose a final site at this stage. The final site and phasing configuration will be

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identified and confirmed in the next stage by the Government and the selected Consortium Leader, taking into account grid connection feasibility, cooling and water solutions, digital infrastructure, available land, environmental considerations, permitting requirements, and project delivery schedules. Applicants may therefore present their site assumptions and rationale, including relevant connectivity and infrastructure considerations, as part of their indicative concept.

Q10. Telecommunications and Dark Fiber Backhaul. Regarding integration with the future Black Sea submarine fiber-optic cable, will the Romanian authorities provide dark fiber backhaul networks to the facility boundary, or will the cost and implementation of regional connectivity fall within the Consortium's responsibilities?

A10. The EoI highlights Romania's strong connectivity profile, including dense fibre infrastructure, multiple routes and carriers, and fast connectivity with core EU networks. It also provides that the Government may facilitate coordination with connectivity and other essential infrastructure stakeholders where relevant. The EoI does not predetermine the technical, commercial, or cost-allocation arrangements for dark fibre backhaul or specific regional connectivity links, including any future submarine cable integration. These matters will be assessed and structured in subsequent phases with the selected Consortium Leader and relevant connectivity stakeholders. Applicants are encouraged to describe their proposed connectivity and carrier strategy, including assumptions on redundancy, backhaul, regional connectivity, implementation responsibilities, and any related support needs.

Q11. Energy Supply and PPAs. Is there a possibility of accelerating supply or of PPAs securing state-backed zero-carbon energy producers, such as Nuclearelectrica?

A11. The EoI recognizes Romania's nuclear and low-carbon energy context, including the strategic relevance of the Cernavodă nuclear platform and future nuclear developments, as part of the country's suitability for large-scale AI infrastructure. At this stage, the EoI does not prescribe a specific power supplier, PPA structure, accelerated supply arrangement, or commitment by any particular producer. Applicants are expected to describe their indicative power sourcing strategy for large continuous loads, including relevant experience with long-term power supply arrangements. The Government may support coordination with relevant grid and power-sector stakeholders, consistent with applicable rules, grid requirements, and project timelines. Any specific PPA, supply acceleration, or power-sourcing arrangement would be assessed and structured in subsequent phases with the selected Consortium Leader and relevant counterparties.

Q12. Grid Connection Fees and Capacity. Will Transelectrica prioritize the allocation of grid capacity and waive or subsidize connection/reinforcement fees specifically for the AIGF Project, given its national and European strategic importance?

A12. The EoI provides that the Government may coordinate engagement with relevant grid and power-sector stakeholders to support planning of connection and energization pathways, consistent with grid requirements and timelines. The EoI does not predetermine any priority allocation of grid capacity, waiver, subsidy, or specific treatment of grid connection or reinforcement fees. Any such matters would need to be assessed in accordance with the applicable regulatory framework, grid procedures, technical feasibility, EU State aid rules where relevant, and subsequent Government decisions. Applicants should identify any grid-related assumptions, constraints, timing considerations, or support needs as part of their indicative concept and financing approach.

Q13. Independent Offers by Technology Providers. Can a specialized technology provider/manufacturer participate in the Eol and submit an independent response without designating or indicating a consortium leader, for the purpose of registering technology, GPU capacity, or an operational concept?

A13. The Eol is open to single legal entities, and an applicant may submit individually without presenting a final consortium composition at this stage. The applicant may, at its discretion, indicate members or categories of partners it intends to involve in a future consortium. However, the Eol is designed to identify and pre-select a Consortium Leader capable of coordinating the development, structuring, financing, delivery, and operation of the Project. It is not a technology-registration process. A specialized technology provider or manufacturer may participate individually only if it submits as the applicant/Consortium Leader and demonstrates the capability, credibility, and role required under the Eol, or otherwise participates as a consortium member, partner, or counterparty within another applicant's submission.

Q14. Liability of the Consortium Leader at the Eol Stage. What explicit legal and financial obligations are assigned to the designated Consortium Leader at this pre-selection stage, as compared with the final binding implementation phase?

A14. The Eol is an initial market engagement and pre-selection process. It does not create a binding obligation on the Coordinating Authority to proceed with any transaction, award, or procurement, nor does it create any entitlement for any applicant. At this stage, applicants are not required to provide final design, final consortium composition, binding financing commitments, bank term sheets, final vendor selection, final EPC contracts, final permitting approvals, or a final SPV/shareholding structure. The Consortium Leader remains the single point of accountability and coordination for the submission and, if selected, for the subsequent development process. Any binding legal, financial, implementation, or risk-allocation obligations would be defined in later phases through the relevant agreements, approvals, and transaction documentation.

Q15. Participation and Replacement of Non-Leader Members. (a) May leader/non-leader members participate in multiple competing consortia at the Eol stage? (b) Will the selected Consortium Leader be able to modify the consortium structure by adding, removing, or replacing members between the Eol stage and the final binding phase, without disqualification?

A15. The Eol does not require a final consortium composition at this stage. Applicants may submit as single legal entities, and the partner map may identify categories of partners rather than final named entities, where partners have not yet been confirmed. The Eol also provides that, following selection, the selected Consortium Leader will build the desired Consortium and continue structured development of the Project. The Eol does not expressly regulate participation by the same non-leader entity in multiple submissions at the Eol stage. Any such participation should comply with the Eol requirements on integrity, transparency, confidentiality, conflicts of interest, and fair competition. Changes to the consortium structure after the Eol stage are not prohibited by the Eol, provided that the Consortium Leader remains accountable and that any changes are consistent with the Eol requirements, the capabilities relied upon in the submission, and the requirements of the subsequent phase. Material changes may be subject to review by the Coordinating Authority, including confirming that the proposal continues to satisfy eligibility, capability, integrity, and evaluation requirements.

Q16. Evaluation of Non-EU Reference Projects. Will successfully implemented reference projects outside the EU, including in the United States, United Kingdom, or OECD countries, be evaluated and considered with the same weight as projects executed in the EU?

A16. Yes. The EoI provides that relevant reference projects may be located in any jurisdiction and are not limited to prior AI gigafactory projects or to projects in Europe. Accordingly, reference projects from non-EU jurisdictions may be submitted and will be considered where they are relevant to the capabilities and workstreams assessed under the EoI. All reference projects will be considered on the same basis, namely their relevance, scale, complexity, role performed, delivery status, and comparability to the Project requirements, rather than on whether they were implemented inside or outside the EU.

Q17. Financing Models / Risk-Mitigation Instruments. Can additional details be provided on the nature of the instruments mentioned in the EoI, such as targeted and limited risk-mitigation instruments or co-financing? Could these include state guarantees, soft loans, or equity participation?

A17. The EoI states that the Project is expected to be privately financed and operated. Government support, if any, would be limited and focused on enabling and de-risking the Project and may include targeted risk-mitigation and/or co-financing instruments where justified, subject to applicable EU State aid rules and subsequent Government decisions. The EoI does not predetermine the form, amount, or timing of any such instruments. Applicants are requested to identify any potential financing gap and possible instruments to address it, such as blended finance, guarantees, anchor offtake, IFI participation, or other mechanisms. Any specific instrument, including guarantees, concessional financing, equity participation, or other support, would be assessed in subsequent phases based on necessity, proportionality, value-for-money, legal feasibility, and compliance with applicable rules.

Q18. Alignment with EU State Aid Rules. Are the Romanian authorities taking steps to notify or ensure that proposed tax incentives, land concessions, or subsidized infrastructure support are fully aligned with European State aid guidelines?

A18. The EoI makes clear that any Government support or contribution must be consistent with applicable EU State aid rules and relevant legal requirements. It also provides that any requested Government contribution or support will be assessed for necessity, proportionality, value-for-money, and consistency with applicable EU State aid rules. At the EoI stage, no specific tax incentive, land concession, subsidized infrastructure support, or other Government measures are committed. Any potential support measures identified during subsequent phases would be reviewed and structured in accordance with applicable national and EU legal requirements, including State aid requirements where relevant.

Q19. Sovereign Security and Data Governance. Are data hosted and processed within the AIGF subject to any sovereign access restrictions, such as exclusive use by EU/NATO entities, or will the facility operate as a fully commercial cloud open to global enterprise clients?

A19. The EoI envisages the Project as trusted AI compute and data infrastructure, designed and operated in compliance with applicable Romanian and EU legal, security, cybersecurity, data protection, AI governance, and resilience requirements. The EoI also states that the Project should remain open to commercially operated capacity serving regional, EU, and international users. The EoI does not impose an exclusive EU/NATO-only access model. Applicants are expected to propose an intended service model, target user segments, governance approach, access-control framework, and demand/utilization strategy. Final

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arrangements for sovereign workloads, commercial workloads, access controls, data governance, and compliance will be refined in subsequent phases with the selected Consortium Leader.

Q20. Physical Security of AIGF Infrastructure

Given the strategic and geopolitical importance of the Black Sea region, what national security elements or physical critical-infrastructure defense guarantees will the Romanian State provide for the AIGF?

A20. The EoI requires the Project to be designed and operated as secure and resilient infrastructure, including governance, access controls, auditability, and business continuity principles. It also recognizes the strategic importance of the Project and the need for compliance with applicable Romanian and EU legal, security, cybersecurity, data protection, AI governance, environmental, permitting, and other requirements. The EoI does not predetermine specific national security arrangements, physical security guarantees, or critical-infrastructure defense measures to be provided by the Romanian State. These matters would be assessed and structured in subsequent phases with the selected Consortium Leader and the relevant Romanian authorities, taking into account the final site, operational model, applicable legal framework, risk profile, and critical-infrastructure requirements.

Q21. Prior Permits / Endorsements for the AIGF

Are prior permits or endorsements already available from the Ministry of Environment, Romanian Waters, etc., as well as agreements on the use of water reserves, including the Black Sea, and possible wastewater uses, given the AIGF's significant impact on water resources for server cooling and microchip production?

A21. The EoI does not state that prior environmental, water-use, wastewater, or other permitting endorsements have already been obtained for the Project. The EoI provides that any water-based cooling or heat-reuse concept will be subject to detailed technical studies, environmental and social impact assessment, and all required permits and approvals. The EoI also indicates a preference for closed-loop or hybrid cooling solutions, where technically feasible, to minimize water withdrawal and improve resilience. Applicants are expected to describe their high-level cooling and infrastructure approach, including relevant assumptions. Final water, cooling, wastewater, environmental and permitting arrangements will be assessed and confirmed in subsequent phases with the selected Consortium Leader and the relevant competent authorities. For clarity, the EoI concerns the Black Sea AI Gigafactory as AI compute and data infrastructure. It does not prescribe microchip production as part of the Project scope.

Q22. Communication for the EoI

How will anonymized access be ensured to the clarification responses received, as well as during evaluation of EoI responses?

A22. The EoI provides that clarification questions must be submitted to the official email address by the clarification deadline and that responses may be shared with all applicants without attribution. This means that clarification responses may be circulated in anonymized form, without identifying the applicant that submitted the question. The EoI does not provide for anonymized evaluation of submissions. Evaluation of EoI responses will be conducted by the Steering Committee (composed from ministers of energy, finance and chairman of the Romanian Authority for Digitalization) supported by a technical committee composed from representatives from Ministry of Energy, Ministry of Finance, Romanian Authority for Digitalization and Investment and Development Bank, in accordance with the EoI, including the principles of transparency, fairness, and equal treatment applicable to the process.

Q23. Pass/Fail Threshold Criteria - Consortium Leader or Consortium Level

Could you please clarify whether the Pass/Fail threshold criteria, financial strength and delivered CAPEX, must be met exclusively by the Consortium Leader or its ultimate parent company, or whether such criteria may be fulfilled cumulatively at Consortium level, including affiliates, subsidiaries or other consortium members, considering that certain capabilities may be demonstrated by the Consortium collectively?

A23. A distinction should be made between technical and delivery experience, which may be demonstrated collectively by the Consortium where relevant, and the separate Pass/Fail threshold criteria in Section 9.2. The financial strength threshold is expressly attributed to the Consortium Leader or its ultimate parent company, based on audited consolidated financial statements or equivalent public filings. Where the Consortium Leader is a subsidiary or affiliate, a signed parent support letter or guarantee is required. The delivered CAPEX threshold is also formulated by reference to the Consortium Leader, which must demonstrate at least EUR 1 billion in aggregate CAPEX across comparable projects delivered and/or financed, directly or through subsidiaries, in the roles listed in the EoI. Accordingly, the Pass/Fail thresholds may not be met by simply aggregating the financial strength or project CAPEX of all Consortium Members. The capabilities and reference projects of Consortium Members may nevertheless be considered for the relevant technical, operational, implementation, partner strategy, and qualitative criteria, in accordance with the EoI.

Q24. Internally Financed Investments and Own-Use Projects

Could you please confirm whether the requirement to demonstrate at least EUR 1 billion in aggregate CAPEX across comparable projects delivered and/or financed may include internally financed investments, such as projects developed and funded for own use, or whether only projects financed and/or delivered for third parties are considered eligible?

A24. The EoI does not limit the delivered CAPEX threshold to projects delivered or financed for third parties. The requirement refers to aggregate CAPEX across comparable projects delivered and/or financed by the Consortium Leader, directly or through subsidiaries, in any of the listed roles, including developer, EPC/DB contractor, integrator, operator, or sponsor. Accordingly, internally financed investments, including projects developed, financed, integrated, operated, or sponsored for the applicant's own use, may be considered, provided that they are comparable to the Project and that the applicant can demonstrate the relevant CAPEX, role performed, delivery or operational status, scale, timing, and supporting evidence. The Coordinating Authority may request clarifications or supporting documentation to verify the information submitted.

Q25. Requirement to Designate a Consortium Leader at Submission Stage

Considering that the EoI represents an initial market engagement stage, where final consortium composition and binding arrangements are explicitly not required, could you please clarify whether it is mandatory to designate a specific Consortium Leader at the submission stage, or whether applicants may submit an indicative consortium structure without formally identifying the Consortium Leader at this stage, with such designation to be confirmed in subsequent phases?

A25. The EoI is specifically designed to identify and pre-select a Consortium Leader for the Black Sea AI Gigafactory. Therefore, a specific Consortium Leader must be identified at the submission stage. The EoI does not require the final consortium composition, final consortium agreement, SPV/shareholding structure, or binding financing arrangements at this stage. Applicants may submit as a single legal entity and may indicate, where relevant, the consortium members or categories of partners they intend to involve. However, the

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submission must identify the applicant/Consortium Leader that will act as the prime applicant and single point of accountability and coordination for the EoI process and subsequent development phase.

Q26. Potential Sources of Financing and Government Support

We kindly request clarification, to the extent possible, on the potential sources of financing available for the Project, including any EU-level instruments, national public funding mechanisms, grants or loans, or other forms of Government support that may be envisaged at subsequent stages, in addition to private investment from the Consortium.

A26. The EoI provides that the Project is expected to be privately financed and operated. Any Government support, if applicable, would be focused on enabling and de-risking the Project and may include targeted and limited risk-mitigation and/or co-financing instruments where justified, subject to applicable EU State aid rules and subsequent Government decisions. At this stage, the EoI does not commit any specific EU-level instrument, national grant, loan, guarantee, equity participation, tax incentive, or other public funding mechanism. Applicants are requested to describe their indicative funding approach, including potential equity, debt, strategic investors, or other funding sources, and to identify any potential financing gap and possible instruments to address it, such as blended finance, guarantees, anchor offtake, IFI participation, or other mechanisms. Any public support or financing instrument would be assessed in subsequent phases based on necessity, proportionality, value-for-money, legal feasibility, and compliance with applicable national and EU rules.

Q27. Definition of "Delivery" of the 20,000 GPUs in Phase 1

How is the "delivery" of approximately 20,000 GPUs in Phase 1 defined and verified in practice: installation and power-up only, or also production readiness with availability, customer onboarding, security, and orchestration?

A27. The EoI requests an indicative first phase at the scale described in the EoI, namely approximately 20,000 GPUs or equivalent accelerators, and asks applicants to describe the proposed deployment plan, platform approach, phasing, and critical-path assumptions. At this stage, the EoI does not prescribe a detailed operational definition of "delivery" or a specific verification protocol. Applicants should therefore describe their proposed interpretation of deployment readiness, including relevant assumptions on installation, commissioning, power availability, platform operations, security, orchestration, resilience, availability, and customer onboarding, where applicable. The detailed milestones, acceptance criteria, verification process, and operational-readiness requirements for Phase 1 will be defined in subsequent phases with the selected Consortium Leader.

Q28. Government Support for Land and Permits

What does Government support include: (i) making land available or reserving land and assistance with permitting; (ii) coordination of the interface for connection to Nuclearelectrica power and discussions with relevant authorities; and (iii) facilitation in obtaining construction approvals? What are the Consortium's responsibilities?

A28. The EoI provides that the Government's role is to enable and de-risk the Project and to support public-sector interfaces material to timely delivery. This may include strategic coordination, facilitating access to relevant site information, supporting coordination of permitting pathways with competent authorities,

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coordinating engagement with relevant grid and power-sector stakeholders, and facilitating coordination with connectivity and other essential infrastructure stakeholders where relevant. Such support does not replace formal permitting, regulatory, grid-connection, environmental, or other approval processes, nor does the EoI commit any specific land, power supplier, approval, incentive, or public contribution at this stage. The Consortium Leader is expected to coordinate the development, structuring, financing, delivery, and operation of the Project, including the indicative technical concept, site and infrastructure coordination, commercial structuring, partner engagement, implementation pathway, and identification of any required Government support. The detailed allocation of responsibilities will be refined in subsequent phases with the selected Consortium Leader and relevant authorities.

Q29. Phase 1 - End-to-End Integration vs. Modular Development

Please confirm that the first implementation stage does not require the solution to be end-to-end integrated at a minimum functional level, including facility, compute/platform, connectivity, demand and onboarding, and that, depending on the agreed plan, availability of GPU capacity is acceptable while the remaining modules mature in parallel.

A29. The EoI envisages the Project as phased and scalable. It requests an indicative first phase at the scale described in the EoI, namely approximately 20,000 GPUs or equivalent accelerators, scalable in subsequent phases based on demand, infrastructure readiness, technical feasibility, and commercial viability. Capacity may be deployed in phases aligned with demand, technological opportunity, grid readiness, supply-chain availability, and commercial ramp-up. At the EoI stage, applicants are expected to propose an indicative concept, including the deployment plan, platform approach, phasing, demand/utilization strategy, and critical-path assumptions. The EoI does not prescribe a single mandatory model for Phase 1 integration or a fixed operational-readiness definition. The detailed phasing, integration milestones, dependencies, acceptance criteria, and operational-readiness requirements will be defined in subsequent phases with the selected Consortium Leader.

Q30. Aggregate CAPEX of at least EUR 1 billion evidenced through the balance sheet / fixed assets

Considering the specification in Section 9.2 of the EoI, please confirm that aggregate CAPEX of at least EUR 1 billion may also be evidenced through the Consortium Leader's balance sheet, where the value of fixed assets is shown, noting that these assets represent the company's investment effort in projects in the roles of developer, integrator, and operator.

A30. The EoI defines the relevant pass/fail criterion in Section 9.2 as follows: the Consortium Leader "shall demonstrate at least EUR 1 billion in aggregate CAPEX across comparable projects delivered and/or financed, in any role as developer, EPC/DB contractor, integrator, operator, sponsor (directly or through subsidiaries)." Accordingly, the requirement is oriented toward CAPEX associated with comparable projects delivered and/or financed by the Consortium Leader, directly or through subsidiaries, in one or more of the roles listed in the EoI. It is not based solely on the book value of fixed assets recorded on the balance sheet.

The value of fixed assets shown in audited financial statements may be submitted as supporting evidence to the extent that those fixed assets correspond to the applicant's investment effort in comparable projects delivered and/or financed in the relevant roles. In such case, the applicant should provide a clear mapping between the relevant fixed assets and the comparable projects relied upon, including the role performed, approximate CAPEX amount, timing/status of delivery or operation, and why the projects are comparable.

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For clarity, this CAPEX threshold is separate from the financial-strength threshold based on net worth/shareholders' equity. SPVs or newly formed bid vehicles may not be used to meet the CAPEX threshold. Where audited statements are not public, they may be submitted under confidentiality. The Coordinating Authority reserves the right to request clarifications and supporting documentation to verify compliance with the EoI requirements.

Q31. Applicability of collective demonstration under Section 5 to the CAPEX threshold in Section 9.2

Considering that Section 5 provides that the Consortium Leader is not required to individually meet all technical and implementation experience requirements, please confirm whether the EUR 1 billion aggregate CAPEX threshold may be calculated by taking into account the value of projects of all consortium members.

A31. A distinction should be made between the technical and implementation experience referred to in Section 5 and the pass/fail financial thresholds set out in Section 9.2. Section 5 provides that the Consortium Leader is not required to individually meet all technical and delivery experience requirements and that, where relevant, such experience may be demonstrated by the Consortium collectively. This provision applies to technical and implementation experience and allows the capabilities of Consortium Members or proposed key subcontractors to be taken into account where the relevant scope, role and commitment are clearly identified. However, the pass/fail threshold in Section 9.2 is formulated specifically by reference to the Consortium Leader. Section 9.2 states that "the Consortium Leader shall demonstrate at least EUR 1 billion in aggregate CAPEX across comparable projects delivered and/or financed, in any role as developer, EPC/DB contractor, integrator, operator, sponsor (directly or through subsidiaries)." Accordingly, for purposes of meeting the Section 9.2 pass/fail CAPEX threshold, the aggregate CAPEX must be demonstrated by the Consortium Leader, directly or through its subsidiaries. The value of projects delivered or financed by other Consortium Members cannot be aggregated with the Consortium Leader's CAPEX solely in order to meet this pass/fail threshold. The experience and project references of Consortium Members may nevertheless be taken into account, where relevant, for the assessment of technical and implementation capability, partner strategy, operational capability, and other qualitative criteria under Section 9.3, provided that the submission identifies the relevant entity, role, scope, and supporting evidence in accordance with the EoI.

Q32. Reference Projects - Consortium Leader vs. Consortium Members

Please confirm whether the up to three reference projects relevant for demonstrating similar experience must be provided exclusively by the Consortium Leader, while the experience of Consortium Members may be presented only as complementary or demonstrative support.

A32. The EoI should be read as a whole. Section 8.2 refers to "up to three relevant reference projects (from the Consortium Leader)" evidencing capability in at least two of the listed workstreams. However, Annex 4 expressly states that applicants may use up to three reference projects from the Consortium Leader and/or Consortium Members. In addition, Section 5 provides that the Consortium Leader is not required to individually meet all technical and delivery experience requirements and that, where relevant, required experience may be demonstrated by the Consortium collectively, provided that the responsible Consortium Member or proposed key subcontractor is clearly identified and provides the required commitment evidence if the Consortium is shortlisted/selected. Accordingly, the interpretation that reference projects must be provided exclusively by the Consortium Leader, with Consortium Members' experience only as complementary or illustrative support, is not confirmed by the EoI. Reference projects may be provided by

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the Consortium Leader and/or Consortium Members, where they are relied upon to demonstrate relevant technical, delivery, operational, integration, or implementation capability for the relevant workstreams. For clarity, this interpretation concerns reference projects and technical/implementation capability. It does not modify the separate pass/fail financial thresholds in Section 9.2, which are attributed to the Consortium Leader in accordance with the wording of that section.

Q33. Section D - Indicative Investment Envelope and Financing Approach

Must the information requested in Section D be provided exclusively at Consortium Leader level, or is such information also expected from all Consortium Members?

A33. Section 8.5 of the EoI provides that "Applicants shall provide" the indicative investment envelope and financing approach, including indicative CAPEX, high-level OPEX drivers, indicative funding approach, O&M approach, power sourcing approach, and any indicative financing gap. This requirement is formulated at the applicant/submission level and relates to the proposed Project as a whole. It is not formulated as a requirement for each Consortium Member to submit a separate investment package or separate financing approach. Read together with Section 5, under which the Consortium Leader remains the single point of accountability and coordination, the information requested under Section D should be presented on a consolidated basis at the applicant/proposal level, under the coordination of the Consortium Leader. Where Consortium Members, strategic investors, financing partners, or other counterparties are expected to contribute to the investment envelope, funding structure, O&M model, power sourcing approach, or other relevant elements, their proposed roles and contributions should be described at an appropriate level of detail, to the extent known at EoI stage. However, the EoI does not require individual Section D submissions from all Consortium Members.

Q34. Section 9.3 - Qualitative Evaluation Criteria

Must the information relating to the qualitative criteria in Section 9.3 be provided exclusively for the Consortium Leader, or is detailed information also expected for all consortium members?

A34. The information required under Section 9.3 should be provided depending on the nature of each qualitative criterion. Some criteria are formulated by reference to the Consortium Leader, including financial strength and creditworthiness beyond the pass/fail threshold, institutional capital access and capital mobilization track record, and the relevant commercial and operational track record of the Consortium Leader. For these criteria, information should be provided at Consortium Leader level, as applicable under the EoI. Other criteria may rely on the capabilities or roles of Consortium Members, partners, or other relevant counterparties, including operational capability for mission-critical facilities, technical and implementation experience, reference projects, and partner strategy. This is consistent with Section 5, which allows technical and delivery experience to be demonstrated collectively by the Consortium, provided that the responsible entity, scope, role, and required commitment evidence are clearly identified. Accordingly, information under Section 9.3 is not required exclusively for the Consortium Leader, nor is detailed information automatically required for every Consortium Member. The submission should provide information on Consortium Members or partners where their capabilities, experience, or roles are relied upon for the relevant qualitative criterion, with a level of detail proportionate to their proposed role in the Project.

Q35. Technical Architecture & Scale

Q35.1 Should proposals be evaluated primarily against the initial deployment target or against the credibility of the long-term scale-out path beyond the first deployment phase, including compute, networking, storage, and control-plane?

A35.1. The EoI requires applicants to address both the initial deployment and the longer-term scalability pathway. Applicants are requested to outline an indicative first phase at the scale described in the EoI, namely approximately 20,000 GPUs or equivalent accelerators, while also demonstrating how the Project can scale in subsequent phases toward approximately 100,000 GPUs or more, subject to demand validation, technical feasibility, infrastructure readiness, and commercial viability. The qualitative evaluation criteria include "technical concept credibility and scalability," which assesses the coherence and realism of the indicative technical concept and phasing approach, including the pathway to targeted capacity and the scalability logic toward larger expansion. Accordingly, the credibility of the long-term scale-out path is an important part of the evaluation, alongside the robustness of the initial deployment concept.

Q35.2 Should the solution architecture support multiple AI accelerator types and evolving silicon roadmaps over the program life, or is evaluation focused on a single accelerator family at launch?

A35.2. The EoI does not require a single accelerator family or prescribe a specific hardware architecture. Capacity is expressed in terms of GPUs "or equivalent accelerators," and vendor-neutral solutions are expressly acceptable for the high-level platform approach. Applicants are expected to propose a credible compute, storage, networking, and orchestration strategy aligned with the Project's objectives, including scalability, resilience, security, and compliance with applicable Romanian and EU requirements. Support for multiple accelerator types and evolving technology roadmaps may therefore be proposed where it strengthens scalability, flexibility, and long-term technical credibility, but the EoI does not prescribe a mandatory multi-accelerator architecture at this stage.

Q35.3 How will the balance between raw compute capacity and the availability of mature platform services, such as orchestration, workload scheduling, observability, and lifecycle management, be assessed across training and inference?

A35.3. The EoI treats the Project as more than physical GPU capacity alone. It identifies a compute/platform layer, including accelerator/GPU deployment and, where applicable, platform or service provision, and requires applicants to provide a high-level platform approach covering compute, storage, networking, and orchestration strategy. At the same time, the EoI does not prescribe a fixed scoring formula for the balance between raw compute capacity and platform-service maturity across training and inference workloads. Applicants should therefore explain how their proposed architecture will support scalable and reliable AI services, including relevant assumptions on orchestration, workload management, observability, lifecycle management, security, availability, and target use cases. The detailed platform architecture, service model, operating model, and performance/availability requirements will be refined in subsequent phases with the selected Consortium Leader.

Q36. Data Sovereignty & Compliance

Q36.1 What is the required data residency model for training data, model artifacts, telemetry, security logs and administrative metadata - all in Romania or EU-only boundary acceptable for some control functions?

A36.1. The EoI requires the Project's physical infrastructure to be located in Romania and frames the Project as trusted AI compute and data infrastructure operating in compliance with applicable Romanian and EU legal, security, cybersecurity, data protection, AI governance, and resilience requirements. At this stage, the EoI does not prescribe a granular data-residency model for each category of data, such as training data, model artifacts, telemetry, security logs, or administrative metadata, nor does it define whether certain control functions may operate within a broader EU-only boundary. Applicants should describe their proposed data governance, access-control, security, and compliance approach. The detailed data-residency and control requirements will be refined in subsequent phases with the selected Consortium Leader, in accordance with applicable legal and security requirements.

Q36.2 How are bidders expected to demonstrate compliance readiness across GDPR, EU AI Act, NIS2, sectoral cybersecurity obligations, and future Romanian transposition measures for critical digital infrastructure?

A36.2. The EoI requires the Project to be designed and operated in compliance with applicable EU and Romanian legal requirements, including, as applicable, data protection, cybersecurity obligations, AI ethical and governance requirements, environmental and permitting rules, and other relevant regulatory requirements. At the EoI stage, applicants are expected to present a credible high-level approach to secure and resilient operation, including governance, access controls, auditability, business continuity, cybersecurity and operational security arrangements. The EoI does not prescribe a detailed compliance-evidence checklist for each regulatory regime. Applicants should therefore describe the compliance readiness measures relevant to their proposed service model and architecture, while detailed compliance documentation, certifications, implementation controls, and regulatory assurance arrangements will be refined in subsequent phases.

Q36.3 Will confidential computing, customer-controlled encryption, tamper-evident logging, and granular audit trails be considered relevant evidence for sovereignty, legal control, and operational trustworthiness?

A36.3. The EoI does not mandate specific technologies such as confidential computing, customer-controlled encryption, tamper-evident logging, or granular audit trails. However, it expressly requires credible plans for secure and resilient operation, including governance, access controls, auditability, and business continuity principles. Accordingly, such capabilities may be relevant to demonstrate sovereignty, legal control, cybersecurity, auditability, and operational trustworthiness, where they are appropriate to the proposed architecture and service model. Applicants should explain how any proposed technical controls support compliance with applicable Romanian and EU legal, security, cybersecurity, data protection, and AI governance requirements.

Q37. AI Platform & Ecosystem

Q37.1 Is the future solution expected to support a broad portfolio of models, including open-source, European, frontier, and domain-specific models, and will model choice flexibility be considered in evaluation?

A37.1. The EoI does not prescribe a specific model family, vendor, or AI software stack. It requires applicants to describe the intended service model, target user segments, and high-level platform approach, including

compute, storage, networking, and orchestration strategy. Vendor-neutral solutions are expressly acceptable. Support for a broad portfolio of models, including open-source, European, frontier, and domain-specific models, may therefore be proposed where it strengthens the credibility, scalability, usability, and commercial relevance of the platform. The EoI does not set a separate scoring formula for model-choice flexibility, but the proposed platform and service model will be assessed as part of the overall technical concept, scalability, partner strategy, and demand/utilization approach.

Q37.2 How will capabilities for model governance, safety controls, dataset management, fine-tuning, RAG, and responsible AI oversight be assessed across the full lifecycle?

A37.2. The EoI requires compliance with applicable AI ethical and governance requirements and asks applicants to present a credible approach to secure and resilient operation. It does not prescribe detailed lifecycle requirements for model governance, safety controls, dataset management, fine-tuning, retrieval-augmented generation, or responsible AI oversight at this stage. Applicants should describe, at an appropriate level of detail, how their proposed platform and operating model would support responsible, secure, and compliant AI services across the lifecycle, particularly where such capabilities are relevant to the intended service model and target users. Detailed governance, safety, dataset, lifecycle-management, and responsible-AI arrangements will be refined in subsequent phases with the selected Consortium Leader.

Q37.3 Should proposals assume interoperability requirements with academic, startup, and public-sector ecosystems through open standards, developer frameworks, and API-driven integration?

A37.3. The EoI positions the Project as enabling AI infrastructure for Romania, the Black Sea region, the EU, and global demand, and links it to Romania's National AI Strategy objective of developing AI-specific hardware infrastructure and ensuring transparent and equitable access. The EoI also recognizes the Project's potential to support research, workforce development, industrial modernization, and public-sector use cases. The EoI does not prescribe specific interoperability standards, developer frameworks, or API requirements at this stage. However, applicants may propose interoperability, open standards, developer tools, and API-driven integration where these support ecosystem development, access, utilization, and service scalability. Such elements should be described as part of the intended service model, platform approach, partner strategy, and demand/utilization strategy.

Q38. Security & Identity

Q38.1 Is a zero-trust architecture with unified identity, conditional access, privileged access controls, and tenant-level separation for government, academia, and commercial users expected?

A38.1. The EoI requires credible plans for secure and resilient operation, including governance, access controls, auditability, and business continuity principles. It also requires compliance with applicable Romanian and EU security, cybersecurity, data protection, AI governance, and related legal requirements. The EoI does not mandate a specific zero-trust architecture, identity model, or tenant-separation structure at this stage. However, zero-trust principles, unified identity, conditional access, privileged access controls, and tenant-level separation may be relevant where they support secure, resilient, auditable, and compliant operation of the proposed service model. Applicants should describe the security and identity architecture appropriate to their proposed platform and target user segments.

Q38.2 How will embedded threat detection, security analytics, vulnerability management, and incident response be evaluated across infrastructure, platform services, identities, and AI workloads?

A38.2. The EoI identifies cybersecurity, SOC and operational security model as relevant partner-strategy areas, and the qualitative evaluation criteria include operational capability for mission-critical facilities and services, including reliability, continuity, maintenance discipline, and incident management maturity.

The EoI does not prescribe a detailed scoring framework for threat detection, security analytics, vulnerability management, or incident response across each technical layer. Applicants should therefore describe their proposed cybersecurity and operational security approach, including how it addresses infrastructure, platform services, identities, AI workloads, monitoring, incident response, and business continuity. Detailed security assurance, monitoring, reporting, and incident-response requirements will be refined in subsequent phases.

Q38.3 Are there requirements for sovereign key management, segregated administrative access, resilient logging, and support for highly sensitive workloads with strictly minimized operator access?

A38.3. The EoI does not prescribe specific controls such as sovereign key management, segregated administrative access, resilient logging, or minimized operator access as mandatory requirements at this stage. However, these controls may be relevant to demonstrate secure and trusted operation, particularly where the proposed service model includes sovereign, public-sector, regulated, or highly sensitive workloads. Applicants should explain how their proposed controls support governance, access control, auditability, cybersecurity, data protection, operational resilience, and compliance with applicable Romanian and EU requirements. The final requirements for sensitive workloads, key management, administrative access, logging, and operator-access controls will be refined in subsequent phases with the selected Consortium Leader.

Q39. Sustainability & Energy Efficiency

Q39.1 Will proposals be evaluated against explicit PUE, water efficiency, cooling design, and energy-efficiency metrics for both initial and future scale-out phases?

A39.1. The EoI requires applicants to describe the high-level infrastructure approach, including site concept, power strategy, cooling approach, and connectivity redundancy. It also states a preference for closed-loop or hybrid cooling solutions, where technically feasible, to minimize water withdrawal and improve resilience, while allowing justified alternatives subject to site constraints, technical feasibility, environmental assessment, and permitting. At this EoI stage, no specific PUE, WUE, water-withdrawal, or energy-efficiency thresholds are prescribed. However, the credibility of the technical concept, infrastructure approach, scalability, cooling solution, sustainability assumptions, and permitting pathway will be relevant to the assessment. Applicants are encouraged to provide clear assumptions and indicative efficiency metrics for both the initial phase and future scale-out, where available. Detailed performance targets and verification requirements will be refined in subsequent phases with the selected Consortium Leader.

Q39.2 How will the use of low-carbon energy sources, carbon accounting, and time-based energy matching for AI workloads be assessed in light of Romania's nuclear and renewable strategy?

A39.2. The EoI highlights Romania's low-carbon and renewable energy context, including nuclear generation, renewable expansion, and the national objective of reaching net-zero emissions by 2050. It also asks

applicants to describe their indicative power sourcing strategy for large continuous loads, including relevant experience with long-term power supply arrangements. At this stage, the EoI does not prescribe a specific carbon-accounting methodology, time-based energy matching requirement, or mandatory energy procurement model. Applicants should explain how their proposed power sourcing strategy supports reliability, sustainability, scalability, and compliance with applicable rules. Use of low-carbon energy sources, credible contracting structures, and transparent sustainability assumptions may strengthen the overall plausibility of the proposed concept and financing approach. Detailed energy, carbon, and reporting arrangements will be refined in subsequent phases.

Q39.3 Would platform capabilities to optimize workload placement, scheduling, and throttling based on energy availability or grid constraints be valued in the design?

A39.3. The EoI does not mandate specific workload-optimization capabilities linked to energy availability or grid constraints. However, it requires applicants to describe the high-level platform approach, including compute, storage, networking, and orchestration strategy, as well as the critical-path assumptions for grid connection, equipment delivery, and other implementation factors. Accordingly, platform capabilities that improve energy efficiency, operational resilience, demand management, and alignment with grid constraints may be relevant where they strengthen the credibility, scalability, and sustainability of the proposed design. Applicants should describe such capabilities where they are part of the proposed architecture or operating model.

Q40. Operational Model & SLAs

Q40.1 What service levels for availability, incident response, maintenance windows, and recovery objectives are expected across infrastructure, platform, model services, and end-user access?

A40.1. The EoI requests an indicative, non-binding O&M approach for mission-critical availability, including whether operations would be in-house or outsourced, governance/SLAs, incident response, and availability assurance instruments that could be considered at later stages. It also provides that operational capability for mission-critical facilities and services will be assessed, including reliability, continuity, maintenance discipline, and incident management maturity. The EoI does not prescribe specific SLA values, availability percentages, recovery time objectives, recovery point objectives, or maintenance-window requirements at this stage. Applicants should set out their proposed operating model and indicative service-level assumptions, proportionate to the intended service model and user segments. Detailed SLAs and performance obligations will be defined in subsequent phases.

Q40.2 How should bidders address business continuity and DR, including backup, control-plane resilience, cyber recovery, and support continuity under regional disruption?

A40.2. The EoI requires credible plans for secure and resilient operation, including governance, access controls, auditability, and business continuity principles. It also assesses operational reliability, continuity, and incident management maturity as part of the qualitative evaluation. Applicants should therefore describe, at an appropriate level for the EoI stage, their proposed approach to business continuity and disaster recovery, including assumptions on backup, control-plane resilience, cyber recovery, incident response, redundancy, and continuity of support. The EoI does not prescribe detailed DR architecture or

recovery metrics at this stage; these will be refined in subsequent phases with the selected Consortium Leader.

Q40.3 Is a long-term operating model expected, covering local staffing, skills transfer, managed services boundaries, and escalation between Romanian operators and international tech partners?

A40.3. The EoI expects applicants to describe an indicative O&M model for mission-critical availability and recognizes the Project's potential to support workforce development, research, industrial modernization, and ecosystem growth. At this stage, the EoI does not prescribe specific requirements for local staffing levels, skills transfer, managed-services boundaries, or escalation arrangements between Romanian operators and international technology partners. However, applicants should describe the proposed long-term operating model where relevant, including how responsibilities would be allocated among the Consortium Leader, Consortium Members, operators, technology partners, and service providers. Detailed operational roles, staffing, skills-development commitments, and escalation arrangements will be refined in later phases.

Q41. EU Funding & Economic Impact

Q41.1 What is the expected public sector contribution - Ministry of Energy, Ministry of Finance, ADR, or others - and how does it align with the EU-level AI Gigafactories framework? Is it limited to facilitation or could it include potential financial participation? How will it be structured under EU State aid rules?

A41.1. The EoI describes the Government's role primarily as enabling and de-risking the Project. This may include strategic coordination, site and permitting facilitation, coordination of grid/power and connectivity interfaces, demand anchoring where applicable, and targeted risk-mitigation and/or co-financing instruments in a limited way where appropriate. The EoI does not commit any specific financial contribution, public funding instrument, or form of participation at this stage. Any Government support or contribution would be defined in subsequent phases, subject to applicable EU State aid rules, national legal requirements, necessity, proportionality, value-for-money, and subsequent Government decisions. The EoI also preserves flexibility for the selected Consortium Leader and Government to assess possible alignment with the emerging EU federated network of AI Gigafactories and/or the EuroHPC AI and Compute Infrastructure Seal or equivalent recognition mechanism, where strategically and economically justified.

Q41.2 How will local economic impact be evaluated, including Romanian jobs, university collaboration, SME participation, startup access, skills development, and AI ecosystem creation?

A41.2. The EoI frames the Project as a strategic investment intended to support national competitiveness, productivity growth, innovation, workforce development, industrial modernization, research, and public-sector use cases. It also links the Project to Romania's National AI Strategy objective of developing AI-specific hardware infrastructure and ensuring transparent and equitable access. The EoI does not prescribe a separate quantitative scoring formula for local economic impact at this stage. However, applicants may strengthen their submission by describing how the proposed service model, partner strategy, demand strategy, and ecosystem approach would support Romanian jobs, universities, SMEs, startups, public institutions, research users, skills development, and wider AI ecosystem creation. Detailed public-value or ecosystem commitments may be refined in subsequent phases with the selected Consortium Leader.

Q41.3 Will bidders be expected to evidence demand aggregation and utilization planning across public institutions, research, startups, and enterprise users?

A41.3. Yes. The EoI requests an indicative demand/utilization strategy at the EoI stage. Applicants are expected to describe the intended service model and target user segments, including Romania, the Black Sea region, the EU, and global demand. The qualitative evaluation criteria also assess partner strategy and commercial credibility, including demand/utilization strategy, route-to-market, target user segments, and anchor user categories or partners. At the EoI stage, such evidence is indicative and non-binding. Applicants should nevertheless explain how they intend to build utilization across relevant user groups, which may include public institutions, research organizations, universities, startups, SMEs, enterprise users, and international customers, depending on the proposed service model.

Q41.4 Is there a possibility for public sector commitment mechanisms supporting baseline utilization, such as anchor demand, off-take, framework agreements, preferential access, or coordinated demand aggregation?

A41.4. The EoI provides that Government support may include demand anchoring where applicable, including support for identifying potential public-sector and strategic anchor use cases and demand channels. However, it expressly states that this does not guarantee volumes or revenues at the EoI stage. Accordingly, public-sector commitment mechanisms such as anchor demand, off-take, framework agreements, preferential access, or coordinated demand aggregation may be explored in subsequent phases where legally, commercially, and operationally appropriate. Any such mechanism would need to be structured in compliance with applicable Romanian and EU legal requirements, including procurement, competition, State aid, and budgetary rules where relevant.

Q42. Evaluation Criteria & Process

Q42.1 Can additional detail be provided on the relative weighting of technical architecture, sovereignty/compliance, security, financial strength, energy strategy, ecosystem impact, and demand aggregation?

A42.1. The EoI establishes two stages of assessment: pass/fail threshold criteria under Section 9.2 and qualitative comparative evaluation criteria under Section 9.3. The pass/fail criteria cover financial strength and delivered CAPEX. The qualitative criteria cover legal standing, financial strength and creditworthiness beyond the minimum threshold, capital access and mobilization track record, complex infrastructure delivery, mission-critical operational capability, scale and relevance of comparable facilities, technical concept credibility and scalability, plausibility of the investment and financing approach, any Government support requested, and partner strategy and commercial credibility, including demand/utilization strategy. The EoI does not assign numerical weights or percentages to the qualitative criteria. Submissions that meet the pass/fail thresholds will be assessed comparatively against the full set of qualitative criteria listed in Section 9.3, in accordance with the EoI.

Q42.2 What reference evidence is most relevant: hyperscale cloud, sovereign/regulated deployments, AI platform references, critical infrastructure security operations, energy-linked digital infrastructure?

A42.2. The EoI requests up to three relevant reference projects evidencing capability in at least two of the following workstreams: delivery and/or operation of high-availability mission-critical large-scale digital or

technology infrastructure; AI/HPC/cloud platform operations and managed services; and integration of power, cooling and connectivity for large-scale industrial or digital assets. Accordingly, hyperscale cloud or data center references, AI/HPC/platform references, mission-critical operations, security operations, and energy-linked digital infrastructure may all be relevant where they demonstrate the required capabilities, scale, role performed, complexity, and delivery or operational status. Sovereign or regulated-sector deployments may also be relevant where they evidence governance, security, compliance, resilience, or trusted operational capability. Reference projects may be located in any jurisdiction and are not limited to prior AI gigafactory projects or to Europe.

Q42.3 Will clarification responses be treated as interpretive guidance for all bidders? Is the authority open to phased, hybrid, or variant delivery models?

A42.3. The EoI provides that clarification responses may be shared with all applicants without attribution. Where shared, such responses are intended to provide common clarification to all applicants in the process. The EoI is open to phased and scalable approaches. It expressly envisages deployment in phases aligned with demand, infrastructure readiness, technology opportunity, supply-chain availability, grid readiness, and commercial ramp-up. Applicants are expected to present an indicative concept and phasing approach. Hybrid or variant delivery models may be proposed where consistent with the EoI requirements, the Project objectives, and applicable legal and regulatory constraints. Any detailed delivery model will be further assessed and refined in subsequent phases.

Q42.4 How will the formal selection and procurement process be structured post-EoI? Will it evolve into formal public procurement, concession, or PPP? Which legal framework, such as GEO 39/2018 PPP or EU procurement rules, will apply? Will competitive dialogue or negotiation be formally regulated?

A42.4. The EoI is an initial market engagement and pre-selection process. It does not determine at this stage the final legal, procurement, concession, PPP, contractual, or transaction structure for the Project. Section 9.4 provides that, following evaluation, the Coordinating Authority may select a preferred Consortium Leader and/or establish a shortlist to advance to the next phase. That phase may include presentations, clarification meetings, and structured competitive dialogue, conducted in accordance with the principles of transparency, fairness, and equal treatment. Section 11 also reserves the Coordinating Authority's right to determine the subsequent selection or negotiation approach. Accordingly, the applicable legal framework and formal structure of any subsequent process will be determined in later phases, depending on the selected transaction model, the role of Government, any public support or contribution, and applicable Romanian and EU legal requirements.

Q43. Consortium - Aggregate-Level Capabilities

If a complete consortium, with its constituent members, is presented at this initial stage, is it permitted for the financial, technical, development, and operational requirements to be met by the consortium, rather than individually by members, with a nominated Consortium Leader as the single point of coordination?

A43. The EoI distinguishes between technical/delivery capabilities and the financial pass/fail thresholds. For technical and implementation experience, the EoI allows collective demonstration by the Consortium. Section 5 provides that the Consortium Leader is not required to individually meet all technical and delivery experience requirements and that, where relevant, required experience may be demonstrated by the Consortium collectively, provided that the submission clearly identifies the Consortium Member or proposed

key subcontractor responsible for each relevant scope area and the required commitment evidence is provided if the Consortium is shortlisted/selected.

For the pass/fail thresholds in Section 9.2, the position is different. The financial strength threshold is attributed to the Consortium Leader or its ultimate parent company, based on audited consolidated financial statements or equivalent public filings. Where the Consortium Leader is a subsidiary or affiliate, a signed parent support letter or guarantee is required. The delivered CAPEX threshold is also formulated by reference to the Consortium Leader, which must demonstrate at least EUR 1 billion in aggregate CAPEX across comparable projects delivered and/or financed, directly or through subsidiaries, in the roles listed in the EoI. Accordingly, technical, development, implementation, operational, and partner-related capabilities may be demonstrated at consortium level where relevant and properly evidenced. However, the Section 9.2 pass/fail financial thresholds may not be satisfied by simply aggregating the financial strength or delivered CAPEX of all Consortium Members. The Consortium Leader remains the single point of accountability and coordination for the submission and, if selected, for the subsequent development process.

Q44. Definition of Shareholders' Funds

Is the requirement "shareholders' funds >= EUR 500 million" interpreted as "shareholder equity + shareholder loans >= EUR 500 million" in accordance with international accounting practices? Is this interpretation correct?

A44. The EoI does not use the formulation "shareholders' funds" for this pass/fail threshold. Section 9.2 refers to "net worth / shareholders' equity of at least EUR 500 million," based on audited consolidated financial statements or equivalent public filings for the last three available fiscal years. Accordingly, the relevant measure is net worth / shareholders' equity as reflected in the audited consolidated financial statements of the Consortium Leader or, where applicable, its ultimate parent company. The EoI does not provide that shareholder loans may be added to shareholders' equity for purposes of meeting this threshold. Shareholder loans may be considered only to the extent that they are classified as equity, or otherwise form part of net worth/shareholders' equity, under the applicable accounting standards and are reflected as such in the audited consolidated financial statements. Ordinary shareholder loans recorded as liabilities cannot be added to shareholders' equity solely for purposes of meeting the EUR 500 million pass/fail threshold.

Q45. Government Offtake Guarantees

Will the Romanian Government or Government entities provide offtake guarantees for data-center capacity?

A45. The EoI provides that Government support may include demand anchoring where applicable, including support for identifying potential public-sector and strategic anchor use cases and demand channels. However, the EoI expressly states that this does not guarantee volumes or revenues at the EoI stage. Accordingly, Government offtake guarantees are not offered or committed at this stage. Any potential public-sector demand, anchor use cases, offtake arrangements, framework agreements, or other demand-support mechanisms would be assessed and structured in subsequent phases with the selected Consortium Leader, subject to applicable legal, budgetary, procurement, competition, and State aid requirements.

Q46. End Customers

Who are the end customers of the data center? Will it be prioritized for specific Government needs beyond offtake contracts? Will it be limited to Romania, open to the whole EU, or allowed to sell on the open market in the EU and outside the EU?

A46. The EoI envisages the Project as trusted AI compute and data infrastructure serving Romania, the Black Sea region, the European Union, and global demand. It also states that the Project should remain open to commercially operated capacity serving regional, EU, and international users, while complying with applicable Romanian and EU legal, security, cybersecurity, data protection, AI governance, and other requirements. The EoI therefore does not limit the Project to Romanian users only, nor does it impose an exclusive EU/NATO-only access model. Applicants are expected to describe their intended service model, target user segments, and indicative demand/utilization strategy. Any prioritization of specific Government, public-sector, strategic, or sovereign workloads would be refined in subsequent phases with the selected Consortium Leader.

Q47. Project Financing

Is the expectation that the Project will be fully privately financed, or does the Government intend to inject equity as well for shared ownership?

A47. The EoI states that the Project is expected to be privately financed and operated. Government intervention, if any, is expected to be focused on enabling and de-risking the Project, such as site and permitting facilitation, coordination of grid/power and connectivity interfaces, and, where justified, targeted and limited risk-mitigation and/or co-financing instruments, subject to applicable EU State aid rules and subsequent Government decisions. At this stage, the EoI does not commit any Government equity injection, shared ownership structure, grant, loan, guarantee, or other specific public financing instrument. Any Government contribution or support, if applicable, would be assessed and defined in subsequent phases based on necessity, proportionality, value-for-money, legal feasibility, and compliance with applicable Romanian and EU requirements.

Q48. Single Site vs. Multiple Sites

Is the Government planning to develop a data center on a single site or on multiple sites with variable capacities?

A48. The EoI does not impose a fixed single-site or multi-site configuration at this stage. It identifies the Cernavodă–Constanța corridor as a potential location and states that the final site and phasing configuration will be identified and confirmed in the next stage by the Government and the selected Consortium Leader. The EoI also envisages phased and scalable deployment, aligned with demand, grid readiness, cooling and water solutions, digital infrastructure, available land, environmental considerations, permitting requirements, commercial viability, and project delivery schedules. Accordingly, the final decision on a single-site or multi-site configuration, including any variable capacity across phases or locations, will be assessed and refined in subsequent phases with the selected Consortium Leader.

Q49. Cernavodă–Constanța Corridor — Exclusive or Flexible

Is the Cernavodă–Constanța corridor the only location for this Project, or can it be located elsewhere? Is it feasible, in terms of existing infrastructure, to use waste heat for the city of Cernavodă or other nearby cities? Are there remuneration concepts for this heating service?

A49. The Project's physical infrastructure must be located in Romania. The EoI identifies the Cernavodă–Constanța corridor as a potential location, given its relevant energy, connectivity, land, and cooling attributes. However, the EoI does not impose a final site at this stage. The final site and phasing configuration will be identified and confirmed in the next stage by the Government and the selected Consortium Leader, taking into account grid connection feasibility, cooling and water solutions, digital infrastructure, available land, environmental considerations, permitting requirements, and project delivery schedules. Regarding heat reuse, the EoI recognizes that water-based cooling or heat-reuse concepts may be considered, but they will be subject to detailed technical studies, environmental and social impact assessment, and all required permits and approvals. The technical feasibility of supplying heat to Cernavodă or other nearby cities, as well as any commercial or remuneration model for such service, is not predetermined in the EoI and would need to be assessed in subsequent phases with the selected Consortium Leader and relevant local and sector authorities.

Q50. Modular Development of the Data Center

Is it an option to start with fewer than 20,000 GPUs and then develop the data center modularly? For example: an immediate phase for 10,000 GPUs of white space, with the core and shell developed immediately to allow scaling to 20,000 GPUs?

A50. The EoI envisages a phased and scalable Project. It requests an initial deployment at the Phase 1 scale described in the EoI (20,000 GPUs) and encourages scalability toward approximately 100,000 GPUs or more, subject to demand validation, technical feasibility, infrastructure readiness, and commercial viability. The EoI also recognizes that capacity may be deployed in phases aligned with demand, technological opportunity, grid readiness, supply-chain availability, and commercial ramp-up, and that deployment may include multiple build stages. Applicants may therefore propose a modular deployment concept, including phased fit-out or progressive capacity activation, provided that the proposal credibly explains how the EoI's initial capacity expectation will be met and how subsequent scalability would be achieved. The detailed phasing configuration, including any core-and-shell approach, white-space fit-out strategy, commissioning sequence, and operational-readiness milestones, will be assessed and refined in subsequent phases with the selected Consortium Leader.

Q51. Government Platform / Empowered Committee / Focal Agency

Will there be an enabling platform on the Government side through an empowered committee or focal agency with the authority to approve requirements and make rapid decisions during the project development phase?

A51. The EoI identifies the Ministry of Energy as the Coordinating Authority, in partnership with the Ministry of Finance and with technical support from the Authority for the Digitalization of Romania. The Romanian Government has approved anyway a specific governance for this project which will be involved in the selection process and further in all the interactions with the Consortium leader across various stages. This Governance includes a Steering Committee (composed from ministers of energy, finance and President of the Romanian Authority for Digitalization) supported by a technical committee composed from representatives from Ministry of Energy, Ministry of Finance, Romanian Authority for Digitalization and Investment and Development Bank. It also provides that the Government's role may include strategic direction and governance, coordination across relevant public authorities, site and permitting facilitation, grid/power interface coordination, connectivity coordination, and other public-sector interfaces relevant to

timely delivery. The coordination arrangements for the subsequent development phase will be structured after the EoI process, in accordance with the Project's needs, the role of the selected Consortium Leader, and applicable Romanian legal and institutional requirements.

Q52. Security Standards — Government Offtake

In the context of possible or planned Government offtake, what are the standards for security, including physical infrastructure, data protection, compliance, and AI cybersecurity?

A52. The EoI requires the Project to be designed and operated in compliance with applicable Romanian and EU legal, security, cybersecurity, data protection, AI governance, and resilience requirements. It also requires credible plans for secure and resilient operation, including governance, access controls, auditability, and business continuity principles. At this stage, the EoI does not prescribe a separate set of security standards specifically for Government offtake. Applicants should describe their proposed security, cybersecurity, operational security, data protection, access-control, auditability, and resilience approach in line with the intended service model and target users. Any specific requirements for Government, public-sector, sovereign, regulated, or highly sensitive workloads would be refined in subsequent phases with the selected Consortium Leader and relevant competent authorities.

Q53. Energy Price

What is the energy price for data-center operations at the proposed location(s)?

A53. The EoI does not provide or commit an energy price for data-center operations at any proposed location. Applicants are expected to describe their indicative power sourcing strategy for large continuous loads, including relevant experience with long-term power supply arrangements, but no pricing, term sheets, or final power-supply commitments are required at the EoI stage. Any specific energy price, PPA structure, supply arrangement, or allocation of power-related risks would be assessed and structured in subsequent phases with the selected Consortium Leader and relevant counterparties, subject to applicable legal, regulatory, market, and grid requirements.

Q54. Duration of Energy Price Guarantees

What is the duration of these energy price guarantees, in years?

A54. The EoI does not provide or commit any energy price guarantee, nor does it specify a duration for such a guarantee. Applicants are expected to describe their indicative power sourcing strategy for large continuous loads, including relevant experience with long-term power supply arrangements. However, no pricing, term sheets, fixed duration, or final power-supply commitments are required or provided at the EoI stage. Any specific energy price, PPA structure, duration, indexation, risk allocation, or support mechanism would be assessed and structured in subsequent phases with the selected Consortium Leader and relevant counterparties, subject to applicable legal, regulatory, market, and grid requirements.

Q55. Insurance / Risk Coverage from the Government

Does the Government offer any form of insurance, guarantee, or risk-mitigation instrument to the private consortium for this Project?

A55. The EoI states that the Project is expected to be privately financed and operated. Government support, if any, would be focused on enabling and de-risking the Project and may include targeted and limited risk-mitigation and/or co-financing instruments where justified, subject to applicable EU State aid rules and

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subsequent Government decisions. The EoI does not commit any specific insurance, guarantee, indemnity, compensation mechanism, grant, loan, equity contribution, or other risk-coverage instrument at this stage. Applicants are requested to identify any potential financing gap and possible instruments to address it, such as blended finance, guarantees, anchor offtake, IFI participation, or other mechanisms. Any specific instrument would be assessed in subsequent phases based on necessity, proportionality, value-for-money, legal feasibility, and compliance with applicable Romanian and EU requirements.

Q56. EuroHPC AI and Compute Infrastructure Seal

What is the purpose and what are the implications of the EuroHPC AI and Compute Infrastructure Seal mentioned in the documentation? Does this Seal also serve as a financing mechanism, unlocking grants or EU-level financing, or as a qualification/certification standard for the facility?

A56. The EoI provides that, based on strategic alignment and economic viability, the selected Consortium Leader and the Government may jointly assess whether to participate in the emerging EU federated network of AI Gigafactories and pursue the EuroHPC AI and Compute Infrastructure Seal, or any equivalent recognition mechanism. The EoI refers to the Seal as a potential future recognition or alignment mechanism in the context of the European AI infrastructure framework. It does not present the Seal as a committed financing mechanism, nor does it state that obtaining the Seal would automatically unlock EU grants or other EU-level financing for the Project. Accordingly, participation in the EuroHPC framework or pursuit of the Seal is not a condition of this EoI process and would be assessed at a later stage with the selected Consortium Leader, taking into account strategic alignment, economic viability, applicable EuroHPC requirements, and any relevant EU-level rules or procedures.