

Code of Conduct

VOLKSBANK WIEN AG

Hermann Schulze-Delitzsch

“Anyone who rejects responsibility also rejects freedom.”

As of April 2024

1. Our core values

Trust

By recognising our professional responsibility to the greatest possible extent, we create the trust that we need from our customers and owners.

Integrity

We behave with integrity at all times, both inside and outside of VOLKSBANK WIEN AG (“bank”). The conduct of employees always reflects on the bank; it is therefore a special requirement to avoid any behaviour inside and outside the bank that has an unfavourable impact on the bank, on our customers, on other employees and/or on the public.

We explicitly respect human rights and oppose child labour.

Within the scope of his or her duties, each employee is responsible for knowing and complying with applicable legal provisions and official requirements and, in particular, with local requirements. The bank will take the necessary measures to ensure this.

We expect our customers and business partners to act in accordance with our high ethical standards as well as with legal requirements and official regulations.

Respect

We encourage mutual respect and expect the same from our customers, business partners and competitors. We firmly oppose any manifestation of bullying, sexual harassment or violence, regardless of whether the act is directed against employees, customers or business partners. Appropriate protection shall be afforded to victims, and all necessary measures shall be taken against offenders.

We reject any discrimination, for example on the grounds of nationality, marital status, ethnic origin, skin colour, gender, religion, ideology or political opinions, disability, medical conditions, age, sexual orientation and identity or membership in a trade union or works council.

We appreciate the dignity and diversity of people, their rights and their privacy.

It is a basic rule of decency that hidden discussions about inadequacies or misconduct of colleagues have to be avoided. We do not tolerate false and malicious insinuations or similar conduct that harms our customers, employees, the bank’s shareholders/owners or the company itself.

Third-party property must be handled with care and respect.

Discretion, data protection and data security

We observe the confidentiality of confidential information. It is part of the zeitgeist that any information about a thing is almost as important as the thing itself. The bank takes all necessary steps to ensure that information is handled in a restrictive manner and that personal and confidential data are kept secret in an appropriate way. All employees are obliged to comply with the requirements of the data protection law and to observe banking secrecy.

Leadership, responsibility and supervision

All supervisors are responsible for the employees entrusted to them. They must earn the latter's recognition through exemplary personal conduct, performance, reliability and social skills.

They set clear, ambitious and realistic goals, leading through trust and giving employees as much personal responsibility and freedom as possible. They or the HR department also act as contact persons for employees in case of professional and personal concerns.

Each supervisor has organisational and supervisory responsibilities. They are responsible for ensuring that no violations of laws and/or official publications occur in their respective area of responsibility that can be prevented or impeded by proper supervision. Even in the case of delegation, the main responsibility will remain with the supervisor.

All supervisors shall ensure a working environment based on equality with regard to working conditions, performance appraisal and career opportunities for the employees entrusted to them, and shall deploy the employees in a goal-oriented and opportunity-oriented manner.

Risk culture

Our business is based on taking risks in a disciplined and prudent manner. We place great emphasis on independent risk management, compliance and audit systems with clear management responsibility.

2. Prevention of money laundering

The bank has taken appropriate measures to prevent money laundering, it complies with applicable legal provisions and official requirements, follows applicable international standards and cooperates with the relevant authorities.

Any suspicion of money laundering is investigated at the bank.

3. Prevention of terrorist financing and implementation of sanctions & embargoes

Terrorist groups and various crises around the world pose considerable threats. The withdrawal of financial resources from individuals, groups of individuals or entire countries is essential to minimising these threats and is managed through credit and financial institutions.

The bank ensures that all applicable legal provisions and regulatory requirements, and hence all national and international sanctions, are complied with and takes measures to identify financial flows for the financing of any manifestation of terrorist activity.

4. Tax honesty

We only accept funds whose tax honesty is proven or for which there is no evidence of tax evasion. We do not assist in the evasion of tax laws and refer clients to specialised tax advisors and accountants for proper tax disclosure.

5. Dealing with conflicts of interest

Wherever there are conflicting business interests, this can lead to conflicts of interest. The bank aims to identify any conflicts of interest and to avoid them as far as possible. If a conflict of interest cannot be avoided, the bank's top priority is to resolve this conflict in the client's interest. The bank has implemented organisational and administrative measures to safeguard the interests of all stakeholders and has documented these in relevant guidelines, including the Compliance Rules. Compliance monitors adherence to these guidelines and decides on a case-by-case basis whether a conflict of interest exists and what measures are to be taken.

Employee transactions

Employee transactions must not conflict with the interests of our clients or any interests of the bank. If a collision is unavoidable, the interests of the customer and the bank take precedence. Potential conflicts of interest must be disclosed by the employee to Compliance.

Secondary employment or association activities outside the bank

All employees must obtain the bank's approval before taking up any secondary employment (if they intend to take up an office involving an election, this applies to candidacy, e.g. for any municipal council) or before assuming a position on the governing body of any association (e.g. board, treasurer). It is irrelevant whether the secondary employment or the function as a member of the governing body of an association is remunerated or not. The bank will make a decision based on an assessment of all the

circumstances. Similarly, the bank will revoke consent already granted if it becomes apparent that secondary employment or a position on the governing body of an association is contrary to the interests of the bank.

Voluntary association activities (if they do not include any position on the respective association's governing body) and mere association memberships are not subject to registration/approval.

6. Prevention of market abuse

Market abuse includes insider trading, unlawful disclosure of inside information and market manipulation. In the event of insider trading, precise information, which is not publicly known, concerning financial instruments or their issuers is used to buy or sell, for one's own account or for the account of a third party, the financial instruments concerned directly or indirectly. The bank has taken internal measures to prevent market abuse.

7. Prevention of white-collar crime

The bank is obliged to protect itself against losses resulting from white-collar crime and opposes any such action. It is irrelevant in this respect whether the perpetrator is an employee or comes from outside. Both situations are counteracted by appropriate measures.

Internal control system

The bank attaches great importance to an appropriate, well-structured control culture. For this purpose, a guideline for establishing an effective internal control system is in place.

Implementation of a whistleblowing system

The bank provides a system through which all staff members can report any substantiated breaches of regulatory provisions, corruption, fraud, theft or embezzlement, misappropriation, anonymously, 24 hours a day.

Prohibition of bribery, corruption and extortion

The bank condemns all kinds of corruptive or extortionate behaviour; business may only be initiated without bribery, corruption in any form (material or immaterial), extortion or facilitation payments - without exception. The bank has issued its own policy on the modern and risk-oriented handling of the acceptance and granting of benefits (gifts and invitations). Based on a kind of traffic light system, this policy regulates which processes are non-critical and which are critical; always against the background of

whether a public official is involved or not. In addition, this policy also contains a catalogue of prohibited operations.

As a matter of principle, the bank is politically neutral and does not make direct donations to political parties.

The bank's donation practices are restrictive. It makes donations to properly run non-profit institutions for charitable purposes or to institutions for the promotion of science, research or culture. The bank prohibits any donations from being used as a condition, or to influence any public official or official action or decision.

8. Lobbying

The bank represents its views in various forums, but does not engage in lobbying as defined by the Lobbying Act.

9. Sponsoring

The bank regards the support of sporting, cultural, social or charitable events, organisations or groups in the form of sponsoring as a valuable contribution to social life in Austria. The bank's sponsoring activities remain within a narrow range. The values represented by the events, groups or organisations that we sponsor must not conflict with the values upheld by the bank.

10. Sustainability

A responsible attitude towards nature and the environment is an integral part of the self-image of the bank. All employees are encouraged to actively participate in environmental protection and to use resources responsibly.

The bank strives to ensure a healthy and safe working environment for its employees.

By acting sustainably, the bank contributes to making its environment fair and worth living in. This includes aligning all actions for customers, employees, owners and the regional community with long-term values and goals. Sufficient earning power and a sound cost structure are necessary to achieve the bank's objectives and to ensure its sustainable continued existence.

At the same time, the bank is arranging its organisational and operational structure in such a way that it can achieve the sustainable fulfilment of its social, economic and environmental objectives efficiently and effectively.

11. Work and family

The bank explicitly supports the reconciliation of work and family life through various measures.

12. Information, communication and public relations

By reporting on the bank's activities, we ensure transparency vis-à-vis the market and our stakeholders and ensure compliance with applicable legal provisions and regulatory requirements, in particular the Data Protection Act. We attach great importance to the accuracy and completeness of the information prepared and documented by us.

All matters that we get to know about within the scope of our activity will be treated as confidential in accordance with statutory requirements.

We regard the independence of the press as a valuable asset in a democratic constitutional state. We endeavour to ensure that information about the bank released to the press is accurate and coherent. Employees are therefore prohibited from passing on information to the media without consulting the press department. The bank is represented in its relations with the media by the Managing Board or the Press Officer; staff members are not allowed to provide information or give interviews to the media without prior consultation with the Press Office.

13. UN Global Compact

The bank is a signatory to the UN Global Compact and supports its 10 principles in the areas of human rights, labour standards, environmental protection and anti-corruption by promoting these principles within its sphere of influence.

14. Dealing with violations

All employees are encouraged to address any grievances within the bank internally. The Managing Board expressly supports open communication in this context.

The bank will take appropriate measures to counter violations of this Code of Conduct, of legal provisions and official regulations as well as of general rules of decency consistently and without regard to the person or company; this means that, in individual cases, facts will be handed over to the criminal prosecution authorities for clarification.

The protection of employees is not the only reason for the tough and uncompromising approach to violations. Every employee must know that his or her conduct will also be attributed to the bank, hence shaping our reputation both externally and internally. In

the event of misconduct, the impending damage to reputation and trust is incalculable and often cannot be compensated.

The bank reserves the right not to enter into a business relationship with selected clients or industries, or to terminate any existing business relationship if the client's conduct or business purpose is not in line with our ethical core values.

Imprint

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