

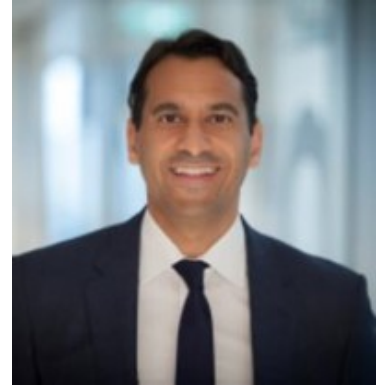
# CODE OF CONDUCT



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# 1. Preface by the CEO



*Dear Colleagues,*

*As an international commercial bank with a growing footprint, we carry a special responsibility: our goal is not only to achieve economic success but to also uphold the high ethical standards expected of us by our customers, partners, natural environment, local communities, and shareholders. In a rapidly evolving banking landscape defined by change and innovation; integrity, exceptional commitment, mutual respect, and trust remain the bedrock of our culture.*

*Our Code of Conduct serves as a guide to these values, providing direction in our daily decisions and various challenges we face. Together, with laws and international regulations, it outlines the ethical principles and expectations that shape our collective actions. During periods of change and growth, it is essential that we operate responsibly and remain true to our core values, building and sustaining trust for the long term.*

*I encourage you to read this Code of Conduct carefully and incorporate it into your daily work. Only together can we ensure that our bank not only grows dynamically but is also recognized as a model of integrity and accountability.*

*Thank you for your steadfast commitment and contributions to the success of our company.*

*Sincerely*

*Anas Abuzaakouk*

## 2. Introduction

This Code of Conduct sets forth the understanding of banking and conduct ethics that BAWAG Group applies. It defines the standards of conduct that we expect of every member of BAWAG Group and characterizes our responsibility towards people and the environment. Our Code of Conduct is regularly reviewed to determine any need for revision and is published on the BAWAG Group website in German and English.

## 3. Scope of Application/Basic Obligation

It is indispensable to the proper functioning and the maintenance of trust in BAWAG Group that the principles set out in this Code of Conduct must be adhered to by employees as well as by members of the Managing and Supervisory Boards of BAWAG Group. This Code of Conduct applies in all countries in which BAWAG Group operates in consideration of additional national requirements. An employee who needs assistance in interpreting the provisions of the Code or who desires additional information should reach out to the BAWAG Group's Chief Compliance Office.

## 4. Responsibility for implementation

It is the responsibility of every BAWAG Group employee to live up to the values set out in this Code of Conduct. To facilitate this, it is included in the onboarding process for new employees as well as in the training plan for all employees in order to reiterate the Code of Conduct and its importance at least every two years.

The responsibility for implementation lies with our Management Board as well as the respective direct supervisors, as they serve as ethical role models.

## 5. Corporate culture

Our mission is a reminder of why we promote a culture in which everyone can grow, create impact and is empowered to bring in new ideas. In order to facilitate initiative, trust, performance and resilience, we have established appropriate conditions. The organizational structure of BAWAG Group is deliberately flat with the objective of facilitating streamlined decision-making processes. Additionally, guidelines for assessing the suitability of officers and holders of key functions ("Fit and Proper guidelines") apply to the Managing Board and the Supervisory Board. We embrace change through continuous improvement in the mindset and by placing a strong emphasis on the development and empowerment of our employees. Furthermore, open communication helps to identify areas which require improvement. We are mindful of our obligation to society and giving

back to our communities. By fostering a culture of volunteerism, we aim to harness the diverse skills and talents of our staff to address societal challenges and create lasting positive change.

The following sections further illustrate the core values and principles that shape our corporate culture.

## 6. Principles for working together

It's simple: We care. How we work is just as important as the work we do. With this Code of Conduct we set the ground rules for interacting with people within and outside of BAWAG. Furthermore, it defines the measures we take to create a safe and positive working environment.

### 6.1. Respect: We are committed to fairness and trust

Respect is a basic prerequisite for mutual trust, a good working atmosphere, and the willingness to make decisions. We consider the respectful interaction among employees as well as among supervisors and employees a given way of working together and consequently an integral part of our modern management training. We expect open and fair interaction among all employees. Furthermore, we conduct ourselves respectfully, appreciatively, and fairly towards our customers, business partners, and competitors, as well as towards the media and the financial community.

### 6.2. Teamwork: We work together to achieve our objectives

We join our expertise and work together to develop new ideas and build the BAWAG Group of tomorrow. A culture of solidarity is vital for the well-being of our employees and the ability to provide optimal customer service.

All supervisors are familiar with the strategy and the purpose of the bank, communicate them to their employees on a regular basis and clearly formulate the corresponding performance expectations. Through embedding a continuous feedback culture, assessing individual training needs, and team development, supervisors support the employees in their professional growth and on the path to achieving their and the bank's goals.

Each supervisor also continuously develops his or her own skills – as a supervisor and as a source of expertise in the areas for which he or she is responsible.

Mistakes are an inevitable part of the work environment. It is therefore crucial for us to foster an open and transparent approach when addressing these. It is the responsibility of our supervisors to create an environment where individuals feel comfortable reporting mistakes. When a mistake is made, employees should communicate it openly with their supervisor to ensure a collaborative effort in finding a solution.

### 6.3. Employee Retention: We attract, motivate and retain talents

Our goal is to attract, motivate and retain talents who are passionate about continuous improvement, both personally and for our organization. They should be adaptable to change and dedicated to accomplishing tangible goals. In return, we offer a broad landscape of employee

benefits and development opportunities within the group which allow talents to grow and take on further responsibilities.

We support our employees in developing their talents and skills according to their career level. While offering specific programs, we provide a wide range of training opportunities to help develop their personal as well as professional skills. The Mentoring program, for example, facilitates the professional and personal development of mentees through a combination of workshops, networking events and extensive further trainings as part of the BAWAG Academy.

#### **6.4. Inclusion: We see diversity as a strength**

It is our policy to offer equal opportunities for all and to foster an open-minded workplace. Furthermore, we recognize the value of our diversity as a means of enhancing our ability to meet our customers' needs. Our workforce, comprising individuals from various nations, across all age groups, with disabilities, with diverse sexual orientations and faiths, therefore is a valuable resource for us.

All employees, whether full-time or part-time, are to be treated fairly and equally. We will not tolerate discrimination based on age, gender, gender identity, nationality, race, color, sexual orientation, marital status, family obligations, religion, social background, political opinion, disability, sensitive medical conditions, trade union memberships/activities or any other reason. We take a strong stance against all forms of mobbing, sexual harassment, intimidation, and violence. Our Human Resources division is responsible for investigating any reasonable grounds for suspicion and taking appropriate measures in response.

#### **6.5. Health: We provide a safe working environment**

We have a comprehensive management system for occupational health and safety that applies to all our employees. Our Safety Manual covers key issues such as dealing with environmental hazards, fire regulations, behavior in hazardous situations, security technology in branches, access to office buildings, house rules and key management. We have preventive specialists that advise us on workplace design based on the applicable legal provisions. To raise awareness to this topic we also have mandatory self-learning programs in place.

#### **6.6. Employee satisfaction: We value internal feedback**

In order to receive our employees' feedback and to gauge employees' satisfaction we conduct an employee survey. This instrument enables us to identify potential areas for improvement at an early stage.

We promote an open communication between our supervisors and employees. We encourage our employees to address concerns or complaints directly to their supervisor. If necessary, our Human Resources division is there to provide assistance. To this end, we have established a structured procedure for investigating justified complaints. In the event that an employee grievance is substantiated, the division will take appropriate action. When dealing with conflicts, we offer support through independent bodies, while preserving our employees' right to anonymity.

## 7. Principles for providing our services

Our value proposition is to provide simple, transparent and affordable financial products and services to meet our customers' needs. We therefore ensure that our stakeholders have access to all the information they require in a clear and concise manner. We also foster a culture of continuous improvement to further develop our financial products and services.

### 7.1. Accessibility: We provide digital and personal services

As defined in our business strategy, we want to provide our customers 24/7 banking access through a multi-channel and multi-brand commercial banking platform. We want to achieve this by striking the right balance between digital and personal services: combining the personal character of traditional advisory with the advantages of modern technology.

We strive for accessibility of our financial products and services by ensuring that our branches and websites are accessible without restriction, regardless of one's physical or technical capabilities, continuously enhancing our online/digital access (e.g. fully automated on-boarding) and by offering online appointments.

For all questions about products, services and much more, we have set up a separate section on our websites (e.g. <https://www.bawag.at/bawag/faq>, <https://hilfe.easybank.at/faq-easybank/>) where customers can find information in "self-service". Providing the information online increases the number of customers who are able to access the content 24/7 at home.

### 7.2. Financial literacy: We actively promote financial literacy

We equip individuals with the financial literacy required to make informed decisions through a range of educational resources, including workshops, seminars and virtual training materials (e.g. "stock market driving license"). We also work on establishing scholarship programs to support students from low-income backgrounds in pursuing higher education and collaborate with educational institutions to enhance access to quality education.

### 7.3. Marketing: We advertise responsibly

We are committed to providing our marketing and product information in a comprehensive, balanced, non-misleading, clearly understandable and easily comparable manner. We present the advantages and disadvantages of financial products in a balanced and fair manner in order to highlight the associated potential risks as well as realistic opportunities. A marketing manual is available for all employees to use as a reference guide to ensure compliance with the relevant regulations.

Furthermore, we have set up a group-wide "Responsible Marketing and Sales Policy". These guidelines include a commitment to transparent and clear language in communication measures, fair



pricing, diversity in advertising and a respectful approach to all customer groups. Our marketing campaigns only proactively address customers whose financial situation allows them to use the advertised financial services product.

#### **7.4. Communication: We foster an open communication culture**

BAWAG Group has the target to ensure that all stakeholders are informed appropriately, and any public communication is consistent, accurate and in compliance with legal requirements. The objectives of all communication activities are to enhance and protect the reputation of BAWAG Group and the individual companies belonging to the Group and to motivate key internal and external stakeholders to beliefs, actions, or behaviors which help delivering upon our targets as a group.

Our established Communication Policy makes sure the following objectives are adhered to:

- ▶ To provide guidelines for disseminating information to, and for dealing with stakeholders, including media, employees and the public in general.
- ▶ To build good external communications with media/journalists and the public to ensure trust and confidence.
- ▶ To build good internal communications with employees to ensure trust and confidence.
- ▶ To protect confidential information from unauthorized disclosure.

#### **7.5. Publications: We share relevant information**

We provide all relevant stakeholders (including shareholders, employees, customers and the general public) with key information necessary to inform them about the financial performance of the Group. For that purpose, we publish the results on a quarterly basis, which is beyond legal requirements. These reports, along with additional information, are available on our website [www.bawaggroup.com](http://www.bawaggroup.com). Shareholders are also able to exercise their right to information at the Annual General Meeting, in accordance with legal requirements. In order to build relationships beyond regular information, we perform roadshows and attend conferences.

#### **7.6. Feedback culture: We analyze external feedback on a regular basis**

As part of our continuous improvement culture, we are working to capture the voices of our stakeholders. Therefore, our customers have the opportunity to submit inquiries and feedback via various channels. In addition to the employees who work directly with customers at the branches, the customer service center, complaints department and social media are key feedback platforms. We analyze that feedback on a regular basis and initiate measures to improve products and processes where necessary.

#### **7.7. Complaint Management: We deal with complaints responsibly**

Our Complaint Management Guideline defines how customer complaints are handled and how this is set up in an organizational and legally compliant manner. Our goal is to deal with complaints responsibly and in accordance with the regulations, to restore customer satisfaction and to improve our service quality. We strive to handle every customer complaint as quickly and efficiently as

possible and to find satisfactory solutions. Regardless of the method of submission, all complaints are registered, and customers receive written confirmation of receipt with an individual complaint number if the matter is not resolved immediately. Our Complaint Management division handles the examination and coordination of the matters and, if necessary, contacts specialist departments to obtain additional documents.

## 8. Principles for Integrity & Compliance

Compliant conduct regarding internal and external provisions is of primary concern to us. It is our aim to identify possible risks at an early stage and to communicate appropriate measures in a transparent way. We have internal control measures, such as the four-eyes principle in place to ensure the regulated workflow of our processes and to enable our people to speak up whenever they feel the need to do so without having to fear any form of reprisal.

### 8.1. Conflicts of interest: We ensure that our customers interests are protected

A conflict of interest may arise if personal interests prevail over the interests of BAWAG Group or its customers. We must therefore ensure that personal self-interests do not conflict with our obligations to BAWAG Group and to our customers. It is expected that our employees will refrain from engaging in any activity that may result in a conflict of interest, or even the perception of such a conflict.

Where the circumstances might cause a reasonable person to question the employee's impartiality or otherwise give rise to an appearance of a conflict of interest, the employee should not participate in a matter unless the employee has informed the Securities Compliance Office. The Securities Compliance Office decides whether the concerns are justified and initiates further measures, if necessary. If an identified conflict of interest cannot be eliminated by appropriate measures, it must be disclosed.

We maintain comprehensive conflict of interest guidelines that contain examples and behavioral rules. Moreover, our employees receive periodic training, at least every two years, on this subject.

Examples of potential conflicts of interest are:

- ▶ The involvement of personal interests in (securities) transactions that are carried out for our customers
- ▶ Contracts concluded with third parties from which employees themselves, their relatives, or other related parties (or companies) derive potential benefits
- ▶ Recommending products to achieve higher sales commissions

#### 8.1.1. Additional employment

Additional employment by employees must not necessarily conflict with the interests of BAWAG Group. These include but are not limited to employment relationships, consulting positions, management positions, acquisition of company shares, and joint venture participation and it will be assessed on a case-by-case basis whether a conflict of interest exists. In such a case, the respective additional employment in question will be prohibited.

### **8.1.2. Employee transactions**

Employee transactions are securities transactions conducted by employees for their own account or for the account of third parties. These transactions are continuously monitored by the Securities Compliance Office. As a rule, employees are required to maintain their securities accounts with an institution of BAWAG Group. Exceptions are decided by the Securities Compliance Office. In order to be able to ensure monitoring of securities accounts at third-party banks, employees must submit annual securities account statements. Employees in areas of confidentiality are also required to promptly report each individual transaction to the Securities Compliance Office. More information can be found in the Securities Compliance Guideline on the intranet.

### **8.1.3. Signature authority**

As a rule, our employees are not permitted to set up signatory powers for themselves for customer accounts and customer securities accounts, nor are they permitted to set up access authorization in safe deposit box rental agreements. Signatory powers for customer accounts of close family members (including spouses and life partners, parents, grandparents, children, and siblings) or collective signature authority for accounts of non-profit associations are allowed but must be reported in advance to the Securities Compliance Office.

### **8.1.4. Orders & transactions**

Employees may not enter orders (such as new product openings, standing orders, securities transactions) or transactions (such as money transfers) for themselves or close relatives in the banks' systems. It is required that these entries be made via e-banking or by a colleague in a branch.

## **8.2. Corruption, bribery and gifts: We are committed to proper business relations**

We do not tolerate financial crime and turn left long before we can come across potential illegal activities. This includes any abuse of power, position, or resources to gain a personal advantage or an advantage for third parties and to influence the behavior of the recipient in a particular direction. We therefore explicitly prohibit and despise any form of bribery or corruption.

We strongly oppose all attempts at corruption in all areas of business and in all countries in which we operate. Our employees may neither directly or indirectly offer, promise, or grant prohibited gratuities. Furthermore, we do not participate in business transactions in which we have reason to believe that bribery may be involved. We also do not support any political parties.

All attempts at bribery or other unlawful gratuities such as facilitation payments must be refused, immediately reported to the manager and additionally to the department responsible for Anti-Corruption Management.

Accepting and presenting gifts or invitations is only permitted within specified limits and every member of BAWAG is being trained about applicable rules at least every two years.

### 8.3. Banking Secrecy: We protect data entrusted to us

Our customers' information and data are subject to banking secrecy as well as European data protection regulations and must be kept confidential. The disclosure of information is only permitted in exceptional cases, strictly defined by law (for example, data disclosure to supervisory bodies and law enforcement agencies). Person-specific data of natural persons are particularly protected. We only process or disclose customer data if there is a legal basis for doing so.

All employees undertake to observe banking secrecy and data protection. The obligation to maintain banking and data secrecy remains in force even after the termination of the employment of our employees and thus applies indefinitely.

### 8.4. Confidentiality: We safeguard our own information

We possess a lot of information that is highly relevant to our business, market position and competitiveness. This information is a valuable asset that must be protected accordingly in order to prevent loss of revenue, legal sanctions, reputation and brand damage, and to maintain the trust of our customers, our shareholders, and the public.

In our daily conduct we need to avoid unintentional disclosure or use of information to prevent the above mentioned risks. Everyone needs to treat information in a prudent manner and observe ground rules like the "need to know" principle. It is the responsibility of each employee to ensure according protection of used data and information.

A means to ensure correct protection of information is data classification. We classify the confidentiality of information according to the "Group Policy on Information Classification" in 4 levels: public, internal, confidential and highly confidential. Our IT systems support these classification levels. All non-public information of BAWAG Group must be protected accordingly e.g. by using the capabilities of our IT systems / services e.g. document classification or email encryption.

We use our IT equipment and services in compliance with the information security guidelines to ensure secure, professional and efficient execution. This includes careful handling of login credentials, emails, Intranet services incl. MS Teams and the legally compliant use of internet access. More information can be found in the "Group Policy for Acceptable Use of Information Systems".

Potential or actual security incidents must be reported immediately to the IT helpdesk or the Information Security department (CISO Office).

## 8.5. Know Your customer: We aim to prevent money laundering and other illegal activities

We make every effort to ensure that we are not misused for illegal or dubious business practices (such as money laundering, terrorist financing, or financial crime). That is why we employ all means available to us to support international efforts to combat such crimes as well as the efforts of the authorities to prevent money laundering and terrorist financing. We therefore clearly establish the identity of our customers and obtain sufficient information about their source of funds, business activities and use of funds. Furthermore, we ensure that we comply with applicable sanctions regulations. For that reason, we regularly screen our customers and transactions. We report suspicious transactions and suspicious customers to the appropriate authorities. To do this, our employees must report suspicious transactions and activities to the department responsible for Anti-Money Laundering, which decides on further steps to be taken. Under no circumstances are the persons/customers involved to be informed of these reports.

Furthermore, we have implemented fraud prevention measures across all business areas. It is the duty of all employees to report any conduct that violates the law or guidelines to their immediate supervisor. If necessary, the employees shall also report to Fraud Management (regarding external suspicions of fraud) or Internal Audit (regarding internal suspicions of fraud). These offices are responsible for conducting further investigations and coordinating any measures. In the event that the investigations conclude that fraudulent activities have been perpetrated, the necessary measures will be taken. The results of any investigations will not be shared beyond the relevant personnel. Under no circumstances may alleged perpetrators be informed of the suspicion or investigations be carried out on their own initiative.

## 8.6. Whistle-blowing: We are committed to an open dialogue

An open dialogue between supervisors and employees is very important to us. Employees can report well-founded information about suspicious circumstances to their supervisors at any time. If they prefer, employees can also submit such reports anonymously and confidentially using the whistle-blowing system. Through the whistle-blowing system reports on the following topics can be made: fraud, infidelity/embezzlement, theft, corruption, violations of legal or regulatory provisions/regulations, violation of data protection regulations, violation against network and information systems security or abuses in a company in the supply chain.

We see our whistleblowing-system as a basis and important vehicle for sustainable corporate governance and an important component of our compliance management system. Detailed information on the process can be found in the Group-wide whistleblowing policy, which is available to employees in German and English on the intranet. The regulations are intended to ensure that all reports of legal violations in BAWAG Group AG companies are followed up in accordance with the Whistleblower Protection Act applicable in Austria (HSchG), the Whistleblower Protection Act applicable in Germany (HinSchG) and other laws that provide for whistleblowing, as well as violations of the Code of Conduct for Suppliers.

Entitled to report are in Austria and Germany:

- ▶ Employees of a BAWAG Group AG company or workers seconded to one of the BAWAG Group AG companies,
- ▶ Applicants from a BAWAG Group AG company
- ▶ Persons employed in companies within the BAWAG Group supply chain

In addition, the following are entitled to report in Austria:

- ▶ Self-employed business partners and their employees, suppliers and subcontractors of a BAWAG Group AG company or
- ▶ Members of the Managing Board, the Supervisory Board and shareholders of a company of BAWAG Group AG

External stakeholders, such as suppliers and business partners, have the possibility to express concerns about business conduct and tax implications also via the email address [csr@bawaggroup.com](mailto:csr@bawaggroup.com). This contact option is referred to on the website [www.bawaggroup.com](http://www.bawaggroup.com).

## 8.7. Market abuse: We play fair

Market abuse includes insider trading and market manipulation. Insider trading occurs when a person acquires or sells financial instruments for him or herself or for a third party using inside information. Even an attempt or a recommendation to a third party to engage in insider trading is prohibited. Market manipulation refers to all fraudulent practices relating to the supply of, demand for or price of financial instruments. Such actions are likely to jeopardize the integrity of the financial markets and counteract anonymous price formation on the stock exchanges. Market participants can thus be misled. Such influencing is prohibited by law, and even the attempt is punishable. We do not tolerate any conduct of this kind under any circumstances.

## 8.8. Risk Culture: We are mindful of risks

The risk culture provides employees guidance on how to handle risks within their responsibility. A healthy group-wide risk culture is the key to an effective risk management. It enables employees not only to identify but to make well-informed decisions regarding these risks. The foundation of our risk culture is built on internal provisions and, most importantly, an open and transparent communication strategy. This ensures that all employees have a comprehensive understanding of the risks that BAWAG Group faces.

## 8.9. Taxes: We follow our tax strategy

We are committed to acting with integrity and transparency in all tax matters. We ensure that all taxes are paid promptly in accordance with all applicable laws and regulations in the countries in which we operate. We file timely and accurate tax returns that reflect our fiscal obligations to Governments. To ensure that we have correctly interpreted tax law and its spirit, we seek advice from tax advisors when appropriate. We support initiatives to improve international transparency on taxation matters, including OECD measures on country-by-country reporting and automatic exchange of information. Wherever we operate, we seek to establish and maintain an open and constructive dialogue with local tax authorities and other government bodies, based on the disclosure of all

relevant facts and circumstances. To guarantee the ongoing development of our employees' knowledge and expertise in tax matters, we provide them with access to a range of internal and external training courses.

## **8.10. Sustainability: We take responsibility for our environmental, social, and corporate footprint**

For us, acting sustainably means achieving the right balance between economic, ecological, social and ethical objectives. Fundamental cornerstones of our sustainability-strategy are measures to combat climate change, protect human rights, the ten Principles of the UN Global Compact, the seven UN Global Compact Women's Empowerment Principles, the UN Sustainable Development Goals as well as the OECD guidelines. In order to mitigate our carbon footprint, we are assessing a transition plan in addition to having established lending criteria for selected industries with elevated ESG risks.

More information about our ESG approach can be found on our website:

<https://www.bawaggroup.com/en/esg>

### **8.10.1. Environment**

While our environmental footprint through own operations is limited, we want to lead by example for our stakeholders. It is our objective to keep negative impacts of our business activities as low as possible. As our highest impact results out of our lending activities, we ensure we limit the negative impact and are assessing a transition plan for the largest asset classes.

### **8.10.2. Social**

Our priority as financial institution is to provide access to finance, following a multi-channel approach to broaden the reach of customers.

We fulfil our social responsibility as a "good corporate citizen" by acting as a partner for non-profit organizations and numerous charitable organizations with which we have had a long-standing banking relationship. In accordance with our policies, we support these organizations without the intention of influencing decisions or public officials.

Furthermore, we encourage our employees to engage in personal social and charitable activities and facilitate this through our "Volunteer Days" initiative. This initiative enables our employees to use a couple of days per year during worktime to volunteer for charitable organizations and projects. We provide a broad variety of opportunities for corporate volunteering and encourage our employees to contribute their suggestions. We often also support these organizations with donations.

### **8.10.3. Corporate Governance**

The internal organizational structure has been expanded in order to manage and monitor the progress in the area of sustainability and ESG. On Management Board level, sustainability topics have the same priority as financial reporting and is at least quarterly in a regular Management Board



meeting. On Supervisory Board level, we have a dedicated ESG Committee. Furthermore, we have established a Group Sustainability Office that leads the implementation of ESG requirements and strategy execution across BAWAG Group. This office reports directly to the Management Board. In addition, an ESG steering team with representatives of business and central functions drive the execution of the ESG priorities in their relevant functions.

### **8.11. Austrian Code of Corporate Governance: We apply applicable provisions**

The Austrian Code of Corporate Governance provides Austrian public limited companies with a regulatory framework for the management and monitoring of the company. It contains internationally accepted standards of sound corporate governance along with the rules of Austrian stock corporation law that are significant in this context. We have made the commitment to apply the applicable provisions of the Austrian Code of Corporate Governance.

### **8.12. Supplier Code of Conduct: We have expectations towards business partners**

The Supplier Code of Conduct defines the standards and expectations that we have of our business partners. These expectations cover, in particular, ethically correct and legally compliant behavior, environmental protection and human rights. All suppliers entering into a business relationship with us are obligated to commit to the principles set out in our Supplier Code of Conduct. The requirement to sign the Supplier Code of Conduct is stipulated in the group-wide Corporate Procurement Policy and accordingly applies to all entities of BAWAG Group.

## 9. Violations

Employees are encouraged to report violations of this Code to the BAWAG Group's Chief Compliance Office. Non-compliance with the regulations contained in this Code of Conduct may lead to disciplinary consequences. Each individual case will be reviewed to determine which consequences are adequate to sanction the violation. Any employee who violates any legally required provision of this Code is subject to disciplinary action up to and including termination of employment.

## 10. Owner and Publisher

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