Oesterreichische
Kontrollbank
Aktiengesellschaft

Let's make
it possible.

Code of Conduct
OeKB bank group

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Table of Contents

Table of Contents 2

1. Foreword 4

2. Long-standing Expertise and Strong Values 5

Our Values 5

2.0 Obligation 6

2.0.1 Application of the Code of Conduct 6

2.0.2 Violation / sanctions 8

3. Clients 9

3.0 Our clients are at the centre of our activities 9

3.1 Confidentiality, data protection and data security for personal data 9

3.2 Exclusive and future-oriented products and services 9

3.3 Our role: independent, competitively neutral, responsible 9

3.4 Handling complaints 10

3.5 Prevention of conflicts of interest 10

4. Governance 11

4.0 Compliance with laws and regulations 11

4.1 Responsibility of the Management Boards and Managing Directors 11

4.2 Internal procedures and controls 11

4.3 Whistleblowing 12

4.4 Digital Responsibility: Technology, Artificial Intelligence & Communication 13

4.5 Prevention of corruption (gifts and benefits) 14

4.6 Prevention of Money laundering and Terrorist Financing 14

4.7 Fit-&-Proper 15

4.8 Tax Compliance Management System 15

4.9 Antitrust and Competition law 16

4.10 Sanctions and Embargoes 16

4.11 Third Parties and Supply Chain (Supplier Code of Conduct) 16

5. Employees 17

5.0 Market abuse - Insider trading rules ... 17
5.1 Fair employment practices and work-life balance ... 17
5.2 Diversity, equal opportunities and integration ... 17
5.3 Zero-Tolerance Principle Regarding Inappropriate Conduct in the Workplace and Sexual Harassment ... 18
5.4 Health and safety at work ... 18
5.5 Freedom of association and free expression on labour issues ... 18
5.6 Employee development ... 18
5.7 Dealing with feedback, mistakes and conflicts ... 19
5.8 Leadership behaviour ... 19
5.9 Competence development and mandatory training ... 19

6. Shareholders and investors ... 20

6.0 Transparency ... 20
6.1 Protection of reputation ... 20

7. Sustainability & ESG ... 21

7.0 Principle of our Sustainability and ESG Orientation ... 21
7.1 Relevant Contribution to the Austrian economy and society ... 21
7.2 Corporate responsibility: Know your impact! ... 21
7.3 Sustainable action and risk management ... 22
7.4 Contribution to the implementation of the SDGs ... 22
7.5 Human Rights ... 22

1. Foreword

Dear colleagues,

The success of the OeKB bank group is based not only on its unique products and services of relevance to the national economy, but also on its strong reputation and the trust that stakeholders place in its institutions. It is therefore essential that principals, clients, shareholders, policymakers, colleagues and other stakeholders, including the general public, consistently perceive us as reliable, law-abiding and diligent.

The Code of Conduct of OeKB bank group describes our basic values and standards for ethical business conduct. We expect all of our employees to know them and to comply with these principles. For this reason, mandatory annual training on the contents of the Code is provided. Although the institutions of the OeKB bank group are not publicly listed companies, they voluntarily adhere to the principles of good and responsible corporate governance set out in the Austrian Corporate Governance Code.

The Code of Conduct is intended to serve as a guideline for us in our day-to-day business and in our dealings with internal and external stakeholders, supporting independent action and promoting an open, respectful and responsible working atmosphere. The following rules of conduct provide an overview of these standards, on the basis of which we operate in different markets in different countries and regions and under changing conditions. Further details, where required, are set out in supplementary documents and are managed by the respective subject matter experts or responsible functions.

The Code of Conduct formulates not only the demands we make on ourselves, but also those we expect of others. We therefore refrain from doing business that violates the Code of Conduct and welcome it if our stakeholders act according to comparable rules.

Each and every one of us is responsible for complying with the Code of Conduct within the scope of our business activities. If you have any questions regarding implementation, you can contact your manager or the person responsible for the respective topic. In case you become aware of facts that violate our code of conduct or pose a risk to the OeKB bank group, please report this in accordance with our whistleblower system. Managers carry particular responsibility for addressing reported concerns promptly, fairly and confidentially and for acting as role models for integrity.

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2. Long-standing Expertise and Strong Values

Since 1946, the OeKB Group has strengthened Austria as a business location through a wide range of services for small, medium-sized and large enterprises as well as for the Republic of Austria. It fulfils its responsibilities both as a private-sector company and through mandates carried out on behalf and for the account of the Republic of Austria. With its broad range of competencies, it concentrates on five major service areas: Export Services, Capital Market Services, Energy Market Services, Development Financing and Tourism Services.

Its services for the Republic of Austria and the economy are of significant relevance to the national economy. For this reason, the OeKB Group's business success and reputation in the marketplace have always been based on forward-looking business and responsible action. The OeKB Group consists of the OeKB bank group and equity holdings. The OeKB bank group comprises those companies of the OeKB Group that hold a banking licence, i.e. Oesterreichische Kontrollbank AG (OeKB), Oesterreichische Entwicklungsbank AG (OeEB), OeKB CSD GmbH (OeKB CSD) and Österreichische Hotel- und Tourismusbank GmbH (OeHT).

The OeKB bank group sees its role in promoting economic growth and strengthening Austria's competitiveness in a global environment. We enable companies and individuals to succeed. It thus holds a special position and responsibility as a central financial services provider. We fulfil this role with economically relevant services in the interest of Austrian foreign trade, the domestic capital market, commercial banks, and the Republic of Austria. We provide our services in a competition-neutral and cross-sectoral manner.

Due to this special responsibility for the Austrian economy and towards our stakeholders, the OeKB bank group is therefore constantly dealing with global and local trends and interrelations. In doing so, we jointly contribute to creating a future worth living for generations to come. One of our mission statements reflects our commitment to balancing economic success with social benefit while ensuring long-term environmental sustainability. Only in this way can we ensure that our economic activities have a positive impact on the economy, the environment and society. This also requires us to be constantly prepared to further develop our business models, services and processes. Compliance with legal requirements is a matter of course for us. Beyond legal obligations, our actions are guided by internationally recognized standards, including the ten principles of the UN Global Compact and the Sustainable Development Goals (SDGs). Sustainability is an integral part of our business models and shapes both our decisions and the way we build partnerships.

Our Values

Five core values define our corporate culture and our actions:

Responsibility: We are responsible and reliable with regard to the tasks and resources entrusted to us.

Respect: We treat one another with respect and attentiveness towards ourselves and others.

Passion: We are passionate about what we do, striving for performance and excellent solutions.

Trust: We trust each other and the good intentions of our actions. Transparency and traceability have a strengthening effect.

Curiosity: We are oriented towards the future and want to help shape it. Our thinking is characterized by curiosity and the spirit of innovation.

2.0 Obligation

This Code of Conduct applies to all employees of the OeKB bank group, who are personally responsible for compliance within their sphere of influence. The Code of Conduct also applies to the members of the managing board and the management, as well as to the employees entrusted to OeKB bank group. It is also welcomed that all people providing services for or on behalf of the OeKB bank group as well as all its other business partners apply rules and standards in accordance with this Code of Conduct. Managers have a special role model effect. However, the personal responsibility of each individual employee is not limited either by the responsibility of managers or by delegating tasks to colleagues. The respective managers are responsible for violations in their area of responsibility that could have been prevented by the performance of their duties.

2.0.1 Application of the Code of Conduct

The Code of Conduct is intended to support independent action, serve as a guideline and also promote an open, respectful and responsible working atmosphere.

The following questions are intended to help you make decisions in increasingly complex situations:

Decision Checklist (Do's):

— **Review applicable policies before taking action** (e.g. Anti-Corruption, Data Protection and subject-specific policies) and apply them consistently to the relevant case.

— **Make decisions based on reliable and sufficient information** and ensure that the factual basis is appropriately documented.

— **Use AI-generated information responsibly** and critically assess its quality, plausibility and timeliness.

— **Act in accordance with the values of the OeKB bank group** and strengthen integrity, transparency and fairness through your decisions.

— **Identify, assess and document material risks at an early stage,** including legal, regulatory, financial, ESG and reputational risks.

— **Actively consider ESG impacts in your decision-making** and contribute to sustainable and responsible conduct.

— **Disclose potential conflicts of interest** and implement suitable measures to avoid or effectively manage them (e.g., mitigation measures or delegation of responsibilities).

— **Seek expert advice in a timely manner when dealing with uncertainties or sensitive matters.** (e. g., from supervisors, Compliance/Legal, Data Protection, Antitrust Law, or Group Communications & ESG).

— **Consistently comply with established processes, controls and approval procedures,** even under time pressure, performance pressure or external pressure.

— **Use only approved and transparent decision-making and communication channels** and ensure appropriate documentation.

— **Handle confidential, market-related, and personal information carefully and in accordance with the rules** and protect it from unauthorized use or disclosure.

— **When it comes to gifts, invitations, or other benefits, be mindful of your independence** and avoid any actual or perceived influence.

— **Comply strictly with sanctions, embargoes and anti-money laundering requirements** and initiate the necessary reviews or measures whenever concerns arise.

— **Raise risks, concerns or potential breaches openly** and escalate them through the designated channels where necessary.

— **Ensure transparency and traceability** and consider whether you can clearly justify your decision to internal and external stakeholders, including regulators.

— **Apply the „Press Test“:** Make only those decisions that you would be comfortable defending publicly.

Stop Signals (Don’ts):

Pause and carefully re-evaluate your decision if…

— important information is missing.

— time pressure or performance pressure encourages shortcuts.

— you are unsure whether policies are being followed.

— a potential conflict of interest exists.

— legal or reputational risks may be underestimated.

If you have any doubts or uncertainties regarding the rules of the Code of Conduct, seek guidance from management, the staff delegates, or the relevant subject matter experts. As employees of the OeKB bank group, we are committed to acting responsibly. Intentionally or deliberately disregarding or violating the Code of Conduct, or encouraging others to violate it, is a breach of that very commitment.

If you have any concerns or become aware of any circumstances that violate our Code, constitute a potential violation of laws or regulatory requirements, or pose a risk to the OeKB bank group, you may use the whistleblower system (see 4.3).

The OeKB bank group, in order to strengthen its responsibility in the areas of environmental, social and human rights matters, provides a dedicated ESG grievance mechanism (*note: using already implemented reporting channels, namely the Integrity Line of the OeKB bank group Oesterreichische Kontrollbank AG (OEKB) | Home)*. This mechanism enables external stakeholders to report potential breaches or risks in connection with transactions involving the OeKB bank group. The procedure ensures a clearly structured and transparent handling of incoming complaints. The mechanism is guided by international standards, in particular the UN Guiding Principles on Business and Human Rights and complements existing policies and systems. The OeKB bank group ensures that all complaints are handled confidentially and in compliance with the applicable data protection requirements.

2.0.2 Violation / sanctions

In the event of a violation of the rules and regulations contained in the Code of Conduct, every Employee must expect disciplinary and/or employment-related consequences, irrespective of any applicable legal sanctions and further legal consequences.

3. Clients

3.0 Our clients are at the centre of our activities

The OeKB bank group endeavours to avoid negative effects on the reputation and thus on the earnings situation and, if applicable, the refinancing ability of the OeKB bank group. Such damage may arise if employees or the organisation provide incorrect advice to clients or principals, manipulate them or become involved in conflicts of interest.

The OeKB bank group therefore commits itself to the following principles:

— In the sale of products and services, the interests of the clients take precedence, i.e. clients are treated fairly and in their interests and are provided with transparent information about products and services, thereby enabling companies and individuals to be successful.
— In its role as an agent, the OeKB bank group acts in the interests of the principals and provides transparent information to them or, where advisory services are provided, advises them transparently and objectively.

3.1 Confidentiality, data protection and data security for personal data

Data protection is a fundamental right for companies and individuals. It primarily includes the protection of client-related data and the data of our own employees.

Within the OeKB bank group, we handle the data of all individuals and companies with due care when receiving, processing, storing and deleting such data. The principle applies that data are transparent within the OeKB bank group only to the extent that they are essential for the execution of business activities and the assessment of risk. Data may not be transferred from the company to third parties unless there is a legal and business basis for doing so.

In day-to-day business, the protection of trade secrets and confidentiality is ensured in particular through the provisions contained in the Export Guarantee Act, the Austrian Banking Act (BWG) and the General Data Protection Regulation (GDPR).

3.2 Exclusive and future-oriented products and services

Our products and solutions are primarily oriented towards our clients and are aligned with global as well as national developments. We take these needs into account in the development of our products and services and fulfil our obligations towards our clients and principals.

3.3 Our role: independent, competitively neutral, responsible

We see our role as promoting economic growth and strengthening Austria's competitiveness in a global environment. The OeKB bank group therefore holds a special position and responsibility as a central financial

services provider. We fulfil this role by providing services of national economic relevance in support of Austria's foreign trade, Capital Market Services, Energy Market Services, the Austrian tourism industry, commercial banks and the Republic of Austria. We provide our services in a competitively neutral manner and across all sectors.

We are committed to fair competition and compliance with antitrust and competition law. Agreements with competitors, the exchange of sensitive market information or market-sharing arrangements are strictly prohibited.

3.4 Handling complaints

We respond appropriately, transparently and effectively to complaints and feedback from our clients and from all persons with whom a business relationship exists. In accordance with Section 39e of the Austrian Banking Act (BWG), we have established a transparent and appropriate procedure for handling complaints. The objective is to identify, analyse and remedy recurring as well as potential legal and operational risks.

In doing so, the OeKB bank group follows the Joint Committee Guidelines on complaint-handling for the securities sector (ESMA) and the banking sector (EBA).

3.5 Prevention of conflicts of interest

We strive to identify and avoid potential conflicts of interest in the course of our business activities. Conflicts of interest are situations in which the interests of employees conflict with and are detrimental to the interests of the OeKB bank group, its clients or its business contacts. Conflicts of interest may arise for operational, organisational, or ethical reasons, or due to personal close relationships between employees and business contacts or persons representing them. Conflicts of interest may also arise among employees, between individual investee companies and the OeKB bank group itself.

Existing and potential conflicts of interest, in particular those resulting from private relationships, must be reported to the respective department head in the interests of employees. Within the framework of the applicable legal possibilities, the department head will take the measures required in the individual case to ensure that the reported conflicts of interest do not adversely affect employees or the business activities of the OeKB bank group.

In the case of private relationships in the workplace, employees must not perform a supervisory, superior/subordinate or controlling function in relation to the related person. If such a relationship arises in a supervisory, superior/subordinate or controlling constellation, the responsible manager and People & Culture must be informed immediately in order to resolve the conflict of interest, for example through organisational measures.

Each company within the OeKB bank group maintains a confidential conflict register. The conflict register is based, on the one hand, on the analysis of the actual business areas and the resulting potential conflicts of interest and, on the other hand, on the recording of circumstances that may give rise to relevant conflicts of interest as well as important business relationships and well-known investments.

4. Governance

4.0 Compliance with laws and regulations

All employees of the OeKB bank group shall at all times act in accordance with applicable laws, rules and regulations. They are required to be familiar with the regulatory requirements relevant to their responsibilities and to know how these requirements are to be applied.

4.1 Responsibility of the Management Boards and Managing Directors

The Management Boards and Managing Directors of the OeKB bank group bear overall responsibility for ensuring integrity, compliance with the law and responsible corporate management. They establish the “tone from the top” and, through their own conduct, ensure that the values and principles enshrined in this Code of Conduct are practiced throughout the organisation. This includes, in particular, fostering a culture of transparency, responsible conduct and an open approach to concerns and complaints.

Furthermore, the Management Boards and Managing Directors ensure that appropriate structures, resources and processes are in place to adequately fulfil and continuously develop compliance, risk management and sustainability requirements.

4.2 Internal procedures and controls

The OeKB bank group has established appropriate principles and procedures which are updated on a regular basis. These are designed to identify risks arising from any failure by management bodies, supervisory board members and employees to comply with the banking regulations listed in Section 69 (1) of the Austrian Banking Act (BWG), as well as the related risks, and to minimise such risks.

In addition, the OeKB bank group has established an organisational structure and ongoing application of decision-making processes under which reporting obligations and assigned functions and responsibilities are documented (organisational charts, organisational structure, job descriptions, responsibilities, reporting lines, Internal Control System).

Legal risks are minimised through continuous monitoring and coordination by the units dealing with legal matters in cooperation with the respective business areas, as well as through the involvement of experts and legal advisers.

Appropriate internal control mechanisms are in place (four-eyes principle, approval and authorisation systems, segregation of duties and functions, and physical access restrictions), which must be observed by all employees.

As a credit institution of significant importance, OeKB has established a dedicated BWG Compliance Function pursuant to Section 39 (6) BWG.

4.3 Whistleblowing

The OeKB bank group places great importance on integrity and ethical conduct in business operations, aligning with the behaviour and value standards set in the Code of Conduct, applicable laws and regulations, as well as internal company policies and guidelines. However, it acknowledges that intentional or unintentional violations of laws, regulations, and rules may occur.

The purpose of whistleblowing systems is to report legal violations under the relevant laws, in particular Section 99g (1) of the Austrian Banking Act (BWG) and Section 40 of the Financial Markets Anti-Money Laundering Act (FM-GwG). The whistleblowing system is generally available to all people professionally connected with the OeKB bank group (for example suppliers, contractors or other contractually connected third parties, as well as current and former employees).

In addition, the whistleblowing system of the OeKB bank group also covers observed misconduct (internal breaches, such as non-compliance with the Code of Conduct). All employees of the OeKB bank group are free to submit reports relating to misconduct through the respective whistleblowing systems. However, there is no obligation to report.

Irrespective of the established whistleblowing system, issues between employees may of course also be addressed through direct dialogue within the respective organisational unit or with the involvement of the staff delegates of OeKB/OeEB/OeKB CSD. Exerting pressure on persons who report misconduct is prohibited. Documents and information are treated confidentially in accordance with the legal framework and the guidelines of the Code of Conduct.

With the implementation of the EU Whistleblowing Directive 2019/1937 into the "HinweisgeberInnenschutzgesetz " (BGBl. I No. 6/2023 - "HSchG"), additional legal provisions for confidential, anonymous reporting have been established to protect whistleblowers from potential reprisals (e.g., termination, negative evaluations). The OeKB bank group has implemented the requirements of the HSchG throughout the OeKB bank group.

The OeKB bank group has established an internal reporting office in accordance with the HSchG. Through the externally hosted platform OeKB bank group Integrity Line (https://oekb-ki-gruppe.integrityline.app/?lang=en) reporting persons may submit reports while maintaining the confidentiality of their identity. When recording and processing reports, the requirements of the General Data Protection Regulation (GDPR) regarding the protection of personal data are observed.

With the support of the external law firm Dr. Anton Ehm, Dr.in Simone Metz LL.M. & Mag. Thomas Mödlagl Rechtsanwälte (GbR) acting as the internal reporting office pursuant to the HSchG, every report is investigated, provided it is not manifestly unfounded, and written confirmation of receipt is provided. Where requested by the reporting person, a meeting may be arranged between the reporting person and the internal reporting office to discuss the submitted concerns.

Further information and specific features of the whistleblowing systems can be found on the websites of the OeKB bank group and are additionally defined in the respective Employee information documents of the companies within the OeKB bank group.

Misuse of the whistleblower system with evidently false reports is to be omitted.

Besides the whistleblower system, there is also the option to report to external entities such as the Financial Market Authority (FMA), Money Laundering Reporting Office of the Federal Criminal Police Office, Federal Competition Authority, or the Public Prosecutor's Office.

4.4 Digital Responsibility: Technology, Artificial Intelligence & Communication

The advancing digitalisation and the use of new technologies create a wide range of opportunities for the OeKB bank group to further develop its services and optimise its processes. However, these opportunities also entail a special responsibility. The use of digital systems, including automation, data analysis and Artificial Intelligence (AI), must always be in line with our values, applicable legal requirements, internal policies, such as the internal AI terms of use, and the legitimate expectations of our stakeholders. Technological tools may support decision-making processes, but they cannot replace them. Ultimate responsibility always remains with human beings.

AI and automated processes may only be used where the underlying purpose is clearly defined, objectively justified and proportionate. The results generated by such systems must remain comprehensible and traceable. Decisions with legal, financial or ethical implications are subject to appropriate human review. Confidential, personal or otherwise protected information may only be processed in approved and appropriately secured systems. Entering such information into external, unauthorised applications is prohibited. Potential risks, particularly with regard to business and banking secrecy, data protection, information security, discrimination, reputational impacts and ESG matters, must be assessed and appropriately addressed in advance. In cases of uncertainty, expert advice must be sought at an early stage.

The use of social media also requires particular care. Statements made in digital communication channels can significantly influence public perception of the OeKB bank group.

Official statements on behalf of the OeKB bank group may only be made through authorised channels and in coordination with the responsible communications function. Personal contributions by employees must be clearly identifiable as such and must be communicated in an objective and respectful manner. Confidential, internal or sensitive information must not be published, commented on or otherwise disclosed. Ongoing proceedings, supervisory matters and market-related topics may only be addressed by the designated functions. Our Social Media Guidelines support the appropriate use of social media and must be complied with.

The OeKB bank group supports flexible forms of work such as mobile working and teleworking. However, these require particular diligence with regard to information security and confidentiality. The OeKB bank group maintains a certified Information Security Management System in accordance with ISO 27001. When working outside company premises, technical security measures, such as the protection of end devices, the use of secure access methods, compliance with clean desk and clean screen principles and the exclusive use of approved communication and storage tools, must be strictly observed. Confidential information must be protected against unauthorised access in every working environment. Security-related incidents, such as

suspected cyber incidents or data protection breaches, must be reported immediately through the designated reporting channels.

All employees of the OeKB bank group are responsible for complying with these principles in their daily work. Managers support their teams in complying with these requirements, promote responsible and compliant conduct and ensure that the necessary training is completed. The responsible functions, in particular IT Security, Data Protection, Compliance and Group Communications & ESG, are available as points of contact and must be involved at an early stage where required.

4.5 Prevention of corruption (gifts and benefits)

In business life, the point at which invitations or sponsorship exceed the acceptable level and move from a grey area towards corruption is not always clearly defined in practice. It is often difficult to determine on the basis of general criteria when a "benefit" exists within the meaning of anti-corruption criminal law and therefore must not be accepted.

Small invitations and the exchange of gifts or courtesy gifts may, in some cases, form part of international business practices or be culturally motivated.

Benefits that create a conflict of interest or give the appearance of seeking to influence impartiality are under no circumstances acceptable, particularly where the neutral position of the OeKB bank group or an institution within the Group could be compromised. It is sufficient that merely the appearance or expectation of a consideration is created (e.g. facilitation payments).

Any gift or invitation received by employees in the course of their duties must be regarded as a benefit to the function performed and not as a personal gift.

Employees of the OeKB bank group are not public officials within the meaning of Section 74 (1) item 4a of the Austrian Criminal Code (StGB). However, in view of the central role of the OeKB bank group in the Austrian capital market, in the Austrian export and tourism sectors and through its development bank activities, it is considered appropriate that all employees and members of management orient themselves towards the anti-corruption provisions applicable to public officials.

The OeKB bank group does not provide any donations or contributions to political parties.

Further details are set out in the Anti-Corruption Policy of the OeKB bank group and in the compliance regulations of the individual companies within the OeKB bank group.

4.6 Prevention of Money laundering and Terrorist Financing

The offence of money laundering is defined in Section 165 of the Austrian Criminal Code (StGB). It includes the safekeeping, investment, management, conversion or utilisation of assets or parts of assets originating from a criminal offence, as well as the concealment of their origin.
The offence of terrorist financing is defined in Section 278d StGB and includes the provision of assets with the intention that they be used for terrorist purposes. Unlike money laundering, funds used for terrorist financing may also originate from lawful sources.

To prevent money laundering and terrorist financing, the Austrian Financial Markets Anti-Money Laundering Act (FM-GwG) establishes specific due diligence and reporting obligations for credit institutions and financial institutions. The cornerstone of these obligations is the "Know Your Customer" principle, according to which the institutions of the OeKB bank group must establish the identity of clients for banking transactions. As a general rule, managers are responsible for ensuring compliance with legal provisions and internal regulations within their area of responsibility. Where there is a suspicion or reasonable grounds to assume that a transaction could be related to money laundering or terrorist financing, employees must report this to the Money Laundering Reporting Officer and refrain from any further processing of the transaction until the matter has been clarified or stop the transaction.

A Group policy applies to the institutions of the OeKB bank group defining strategies and procedures for the prevention of money laundering and terrorist financing. Risk assessments and operating instructions for employees have been established for each institution of the OeKB bank group. Specific information is also available on our website.

4.7 Fit-&-Proper

The Fit & Proper Policy of the OeKB bank group, based on the relevant guideline of the European Banking Authority (EBA) and the circular issued by the Austrian Financial Market Authority (FMA), defines a process for conducting suitability assessments of nominated and existing members of the Supervisory Board, management bodies and holders of key functions. The policy also defines responsibilities and criteria for assessing suitability and personal reliability. A dedicated Fit & Proper Office has been established for the operational collection, preparation and retention of documentation and for providing general support to management and the responsible committee.

Fit & Proper assessments of management body members and Supervisory Board members are conducted with regard to their professional competence and skills, required experience, personal reliability, sufficient availability of time, independence of mind and suitability both individually and collectively.

Management Board members, Supervisory Board members and holders of key functions are subject to regular Fit & Proper reassessments.

4.8 Tax Compliance Management System

Each company of the OeKB bank group is aware of its social responsibility towards the economy, the environment and society, including in tax matters, and is committed to fulfilling this responsibility.

Tax integrity is understood as legally compliant conduct within the framework of statutory obligations and duties. The legally permissible tax optimisation with the aim of minimising risks under tax law and criminal tax law is not a violation of the tax honesty requirement. An abuse exists, if a legal structure or a sequence of legal structures is inappropriate with regard to the economic objective.

The Tax Compliance Management System (TCMS) of the OeKB bank group comprises all measures (processes and process steps) that ensure that the tax bases relevant to the respective type of tax are stated in the correct amount and that the taxes payable thereon are remitted on time and in the correct amount. The TCMS must meet the requirements of the respective company and forms part of the respective internal

control system. Each individual employee contributes to ensuring that taxes and duties are paid in accordance with the applicable legal requirements. For this reason, employees of the OeKB bank group continuously keep themselves informed about possible changes and comply with the defined tax processes.

4.9 Antitrust and Competition law

The OeKB bank group is committed to open and fair markets. We conduct all activities in compliance with antitrust and competition law and reject any anti-competitive practices. This includes, in particular, participation in collusive arrangements or boycotts as well as the unlawful exchange of market-related, price-related, strategic or other sensitive information with competitors. Business decisions must be made independently. Market-sharing arrangements, coordinated practices or informal understandings are not permitted. Employees are required to exercise particular care when interacting with market participants and must seek expert advice where there is any doubt. Compliance with the relevant legal requirements is supported through regular training. Breaches are investigated thoroughly and may result in employment-related consequences irrespective of any measures taken by authorities.

4.10 Sanctions and Embargoes

The OeKB bank group complies with all applicable sanctions and embargo regulations. Before entering into business relationships and throughout the duration of business relationships, assessments are conducted to determine whether relevant sanctions regimes, in particular those of the European Union and the United Nations, apply to the respective business relationship. Business activities involving sanctioned persons, companies or regions are prohibited; this also applies to activities that could result in or facilitate the circumvention of relevant requirements. If indications of sanctions-related concerns arise during the initiation or execution of a business transaction, the responsible function must be involved immediately. Suspicious cases must be reported without delay through the designated reporting channels. Decisions regarding necessary measures, including the possible suspension of transactions, are taken on the basis of the applicable internal processes and in coordination with the responsible specialist functions.

4.11 Third Parties and Supply Chain (Supplier Code of Conduct)

The OeKB bank group expects its suppliers and business partners to share the principles of responsible conduct and to act in compliance with applicable laws. The basis for this expectation is the Supplier Code of Conduct of the OeKB bank group, which defines the minimum standards for compliance with economic sanctions, the prevention of money laundering, terrorist financing and corruption, integrity, compliance with human rights and labour rights, environmental protection and compliance, and forms an integral part of our business relationships. The selection and monitoring of third parties are carried out on a risk-based approach and, where appropriate, are implemented by means of specific policies or guidelines within the respective institution of the OeKB bank group. Where elevated risks exist, enhanced due diligence and review processes (Due Diligence) are applied. The OeKB bank group reserves the right to verify compliance with the requirements set out in the Supplier Code of Conduct and, in the event of violations, to take appropriate measures, up to and including the termination of the business relationship. The objective is to establish long-term, trust-based cooperation throughout the entire value chain and financing chain.

5. Employees

5.0 Market abuse - Insider trading rules

Insider information must not be exploited. Therefore, in order to prevent insider trading, OeKB bank group has informed its employees and other people working for the group about the prohibition on the misuse of insider information and has issued internal guidelines for the dissemination of information within the company. In addition, appropriate organisational measures have been taken to prevent the misuse and disclosure of insider information.

Any misuse in this regard has consequences under criminal and employment law. In addition to the legal provisions, all employees must also adhere to the compliance regulations of the respective OeKB bank group institution.

5.1 Fair employment practices and work-life balance

Compliance with the applicable labour and social laws is a matter of course for us. Respectful cooperation regardless of position, ethical conduct and personal integrity in all our activities, and the ability to achieve a healthy balance between working life and private life within the framework of the agreed works agreements are matters of particular importance to us. In line with the personal preferences and current life circumstances of employees, we therefore also offer flexible working time models, teleworking and sabbaticals.

We make personnel decisions exclusively on the basis of social and professional qualifications and competence. Our remuneration policy ensures strict equal treatment of all genders: equal pay for equal performance is self-evident. It is furthermore our objective to ensure that employees of the OeKB bank group receive fair and market-compliant remuneration.

5.2 Diversity, equal opportunities and integration

Diversity and the associated openness and resilience are crucial in order to be prepared for both classic entrepreneurial risks and unforeseen developments in the future. Diversity also stands for an attitude of the OeKB bank group: sincere appreciation, open-mindedness, and the conscious use of our diversity. We are committed to creating fair opportunities in relevant areas such as development opportunities, the reconciliation of professional and private life and our remuneration systems. We continuously work to reduce barriers and create conditions that support employees in the best possible way.

5.3 Zero-Tolerance Principle Regarding Inappropriate Conduct in the Workplace and Sexual Harassment

The OeKB bank group tolerates no form of inappropriate conduct or sexual harassment in the workplace. This includes unwanted physical contact, suggestive remarks, the display, posting, placing or distribution (e.g. by e-mail) of suggestive or pornographic material, or sexually motivated conduct that violates the dignity of our employees. Such behaviour is unwanted, inappropriate and offensive, irrespective of whether it was intended or not. Sexual harassment in the workplace constitutes discrimination on the grounds of sex and is expressly prohibited under the Equal Treatment Act (GlBG).

We are committed to a zero-tolerance policy. Every incident is taken seriously and treated confidentially and is reviewed promptly and impartially. Protection against retaliation is guaranteed for employees who report incidents in good faith. Inappropriate conduct in the workplace may result in employment-related consequences ranging from a warning to dismissal.

Affected individuals are entitled to advice and support through a dedicated complaints mechanism; points of contact within the OeKB bank group are managers, members of the Staff Delegates and the People & Culture team, in particular the Business Partners.

Managers regularly receive awareness training and education on inappropriate conduct in the workplace.

5.4 Health and safety at work

For many years, safety and health protection have been matters of major importance to the OeKB bank group, extending beyond the requirements prescribed by law. Accordingly, the relevant regulations must be complied with strictly. In addition, the OeKB bank group is committed to workplace health promotion to improve health and well-being at work. Employees have a wide range of offers for physical and mental health at their disposal.

5.5 Freedom of association and free expression on labour issues

The OeKB bank group respects the right of employees to freedom of assembly, freedom of expression and collective action, provided that the rights of others are not violated. The right to collective agreements in accordance with legal provisions is guaranteed, as is the non-discrimination of employees on the basis of their membership in organisations such as trade unions.

5.6 Employee development

Professionally and socially competent executives and employees are the prerequisite for sustainable management and sustainable success of the OeKB bank group. For this reason, the OeKB bank group offers its employees a wide range of opportunities and instruments for their professional and personal development.

5.7 Dealing with feedback, mistakes and conflicts

Not every mistake can be prevented. Therefore, strategies are required to deal with mistakes appropriately and to learn from them. We analyse the causes, learn from them and seek to prevent similar mistakes in the future instead of assigning blame. Providing and receiving feedback are important skills for addressing mistakes and conflicts, learning from them and achieving meaningful improvements.

5.8 Leadership behaviour

Leadership within our organisation means assuming responsibility for direction, results and cooperation while consistently focusing on client benefit and sustainable business success. Managers create clear objectives, set priorities and establish conditions that enable responsible and independent action. Decisions are made in a transparent and comprehensible manner and are based on data and values.

We expect leadership behaviour that is demonstrated in daily practice through role modelling, open communication, active feedback and consistent action where deviations occur. Managers foster trust, psychological safety and collaboration across organisational boundaries. They recognise strengths, support the targeted development of employees and clearly expect performance.

Client and market orientation form the foundation of our actions: needs are proactively addressed, solutions are continuously improved and individual contributions to overall success are consciously embraced. Innovation is supported through openness, willingness to learn and readiness to pursue new approaches and learn from mistakes.

As co-creators, employees make a significant contribution by assuming responsibility, actively contributing ideas, communicating transparently and carrying out their tasks in the interests of the organisation as a whole. In this way, leadership and cooperation become jointly effective and contribute to a performance-oriented and future-ready organisation.

5.9 Competence development and mandatory training

The OeKB bank group supports its employees through targeted education and training measures. These include, in particular, mandatory annual training on key regulations and behavioural requirements (e.g. Compliance, antitrust and competition law, data protection and information security, anti-corruption, sustainability/ESG and topic-specific policies). Participation is documented. Managers ensure the participation of their teams and provide support regarding the content of the training and its practical application in day-to-day work.

6. Shareholders and investors

6.0 Transparency

Transparency creates trust. Therefore, we attach great importance to providing correct, accurate, understandable, timely and complete information within the framework of legal requirements, such as the Austrian Banking Act (Bankenwesengesetz - BWG) or the General Data Protection Regulation (GDPR). The choice of the appropriate communication channel is also essential.

In our financial and non-financial reporting, we regularly provide comprehensive information to all our stakeholders, from the interested public to our shareholders and investors and the regulatory authorities. For many years, we have maintained a dialogue with non-governmental organisations and actively provide information about relevant projects, which we also publish on our website.

The reports of the OeKB bank group are available on the website of the OeKB (Annual Financial Report, Export Services Annual Report, Sustainability Report, etc.), the website of OeKB CSD (Annual Financial Statements), the website of OeEB (Annual Report and Development Report) and the website of OeHT (Activity Report).

6.1 Protection of reputation

In addition to honest and sincere communication with all our stakeholder groups, with whom we engage in dialogue, among other things through social media and active participation in events and discussion forums, we protect the reputation of the OeKB bank group by providing services to our clients in a reliable, ethical and competent manner and by making a relevant contribution to Austria's economy and society. In doing so, we create long-term positive financial, social and environmental impacts, and likewise positive impacts for our shareholders and investors.

7. Sustainability & ESG

7.0 Principle of our Sustainability and ESG Orientation

Sustainability is an integral part of the economic activities of the OeKB bank group. We combine economic performance with social responsibility and the responsible use of natural resources. ESG aspects (Environmental, Social and Governance) are an integral part of our decision-making processes and shape both our business models and our internal procedures. In doing so, we are guided by recognised international standards such as the principles of the UN Global Compact, the United Nations Sustainable Development Goals (SDGs), the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the IFC Performance Standards. In our ESG Policy, we define the objectives we intend to achieve during the respective strategy period. We report annually on the achievement of these objectives in the Sustainability Report.

7.1 Relevant Contribution to the Austrian economy and society

As its companies perform the functions of Austria's official export credit agency, the Development Bank of Austria, and provide key services for the capital market, the energy market and the tourism industry, the OeKB bank group bears a particular responsibility towards the Austrian economy and its stakeholders. The OeKB bank group therefore continuously addresses global and local trends and developments. Our products and services are aligned with global developments. Only in this way can we ensure that our economic activities have a positive impact on the economy, the environment and society. This also requires us to be continuously prepared to further develop and adapt our business models, services and processes.

7.2 Corporate responsibility: Know your impact!

As a private corporate group with a public mandate, we serve as a role model. On behalf of the Federal Government, we administer export guarantee and export financing procedures, Development Financing and the promotion of Austria's tourism and leisure industry and are obliged to assess not only the economic but also the environmental and social consequences of our business activities in order to avoid or mitigate potential negative impacts and, where possible, strengthen positive impacts. This is ensured through environmental and social assessments of projects based on international standards and incorporating the Sustainable Development Goals (SDGs), through the implementation of the guidelines of the commissioning ministry, and through recurring and transparent control processes such as monitoring and evaluation measures. For us, responsible financing and investment also means offering suitable products, such as Sustainability Bonds, various Export Invest Green products, the Sustainability Bonus and Green Tourism Loans provided by OeHT and carrying out proprietary investments responsibly. The Responsible Investment Policy includes ESG factors aimed at reducing sustainability and reputational risks and strengthening the positive contribution generated by the proprietary portfolio. For this purpose, exclusion criteria and positive criteria have been implemented. In addition, part of the proprietary portfolio is intentionally invested in Green Bonds, Social Bonds and Sustainability Bonds.

In 2007, OeKB joined the United Nations Global Compact. OeEB and OeKB CSD are also participating organisations of the network. The Global Compact is a strategic initiative for companies that commit themselves to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labour standards, environmental protection and anti-corruption. Its objective is to promote the sustainable development of markets and social engagement for a better world.

7.3 Sustainable action and risk management

ESG risks, in particular climate-related risks, are systematically integrated into our strategic management and risk management. They form part of the assessment of all relevant risk categories. At the same time, we recognise the opportunities arising from sustainable developments and take them into account in the further development of our business strategy. Our internal environmental management system supports us in identifying, reducing and continuously improving the impacts of our own activities on the environment and climate.

7.4 Contribution to the implementation of the SDGs

The business activities of the OeKB bank group contribute to numerous goals of the 2030 Agenda, in particular SDG 7 (Affordable and Clean Energy), SDG 8 (Decent Work and Economic Growth), SDG 9 (Industry, Innovation and Infrastructure) and SDG 13 (Climate Action). As the Development Bank of Austria, we furthermore contribute to the promotion of sustainable structures in emerging markets and developing countries and thereby, in particular, to SDG 1 and SDG 17.

7.5 Human Rights

The OeKB bank group respects and protects human rights in accordance with international standards (UN Guiding Principles on Business and Human Rights). In doing so, we rely on our Human Rights Policy. We have supplemented this policy with an action plan. In financing, investments and projects, we consider human rights impacts and implement measures to avoid or mitigate potential negative consequences. The involvement of relevant stakeholders and adherence to international principles form the basis of these activities.

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