



# CODE OF CONDUCT

RAIFFEISEN  
INFORMATIK  
GROUP

# COC

CODE OF CONDUCT

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## INTRODUCTION

### BASIC VALUES OF RAIFFEISEN

The Raiffeisen Informatik Group is an integral part of the Austrian Raiffeisen Banking Group. Its basic principles go back to the ideas of F. W. Raiffeisen, who believed that all economic activity must be guided by social solidarity, self-help and sustainability.

We are committed to sustainable corporate management and to the social responsibility that comes with it. Our role in the business world is defined by the responsibility we have towards our customers, employees, shareholders and towards society as a whole. This includes good corporate governance as well. Furthermore, adhering to these values serves to uphold the reputation of the Raiffeisen Informatik Group.

### TARGET GROUP

The provisions of the Raiffeisen Informatik Code of Conduct (CoC) are applicable worldwide to all employees of the Raiffeisen Informatik Group - i.e. to all employees in foreign branches, indirectly or directly controlled subsidiaries as well as majority participations - and must be observed by them.

### COMPLIANCE WITH THE RAIFFEISEN INFORMATIK CODE OF CONDUCT

The Raiffeisen Informatik CoC is a binding set of rules that govern everyday business. Pursuit of business advances do not justify any breaches of the law or of the Raiffeisen Informatik CoC. We forgo any business that can only be obtained by such practices. Neither can the fact that such practices are applied by competitors nor other market participants serve as justification.

### LOCAL LAWS AND RAIFFEISEN INFORMATIK STANDARDS

We respect the laws, rules and regulations of the countries we do business in. As we conduct our business, we strive to abide by the highest possible standards. Whenever local law and the Raiffeisen Informatik CoC are inconsistent, the stricter and farther-reaching of the two shall be applicable.

### RESPONSIBILITY

Ultimate responsibility for the application of the Raiffeisen Informatik CoC lies with the Management Board of Raiffeisen Informatik. The executives of the Raiffeisen Informatik Group are responsible for the application and adherence to the Raiffeisen Informatik CoC in their respective areas of responsibility. All company executives, including the members of the Management Board, must serve as role models.

### APPLICATION

This Raiffeisen Informatik CoC is supplemented by the extensive Raiffeisen Informatik Compliance Programme described in the Compliance Manual. This programme lays out the basic principles of the Raiffeisen Informatik CoC and provides detailed information on how Raiffeisen Informatik CoC is to be put into practice and implemented in everyday business. In case of doubt, clarification should be sought from the responsible executive.

When applying the Raiffeisen Informatik CoC, any risk of damage to the reputation of the company must likewise be borne in mind and prevented. In every decision, the employee concerned must consider the potential risk of reputational damage that a business transaction may cause.

## QUESTIONS RELATING TO THE RAIFFEISEN INFORMATIK CODE OF CONDUCT

No code of conduct can claim to spell out appropriate behaviour for every situation, nor should it aspire to do so. Raiffeisen Informatik relies on each and every one of us to use careful and considered judgment when deciding what is right and appropriate in a given situation. When you are unsure whether a certain course of action is appropriate, you should ask yourself the following questions:

- Is, what I intend to do, legal and is it consistent with the corporate culture of Raiffeisen Informatik?
- Does my course of action “feel” right?
- Would I be able to justify my course of action within the company or to the authorities responsible for the Raiffeisen Informatik Group?
- Would I be able to defend my course of action if I were questioned about it at a later point in time?

Should you have any questions concerning the application of the Raiffeisen Informatik CoC, or if you are unsure about the direct or indirect effects of a business transaction on the ethics policy of Raiffeisen Informatik, contact your line manager or the Compliance division.

## DUTY TO REPORT BREACHES

If employees obtain knowledge of breaches against the Raiffeisen Informatik CoC, they must report the matter to their line manager or the Compliance division (compliance@r-it.at). Reports can be made using any possible form of communication, including anonymous written notifications.

## SANCTIONS IN CASE OF BREACH OF THE RAIFFEISEN INFORMATIK CODE OF CONDUCT

The Raiffeisen Informatik CoC forms an integral part of the general conditions of employment. Accordingly, any breach of the Raiffeisen Informatik CoC shall have consequences under labour law and may be punishable by disciplinary measures. Contraventions of the law may further result in fines and prison sentences as well as claims for damages.

## WORKPLACE AND EMPLOYEES

### MUTUAL RESPECT, HONEST AND INTEGRITY

We respect the opinion of others and their personal dignity, privacy and personal rights. We do not tolerate any kind of discrimination or harassment based on any grounds such as nationality, culture, religion, skin colour, gender, sexual orientation, age or physical disability.

### CONFLICTS OF INTEREST

Employees must ensure that their personal interests do not conflict with their duties towards the Raiffeisen Informatik Group or its customers. Potential conflicts of interest may arise particularly in connection with gifts, invitations, awards of contracts, corruption, and fraud or market abuse. Such conflicts must be reported to the responsible line manager, who then decides whether a conflict of interest actually exists and what action needs to be taken.

### DATA PROTECTION

We act with care and diligence when receiving, processing and storing information (financial data, technical data, operational data, customer information, memoranda, etc.). In so doing, we adhere to the specified data security standards and procedures and prevent unauthorised access, use, modification or destruction of such information. In this regard, reference is likewise made to our data protection directive and trainings.

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## BRIBERY AND CORRUPTION

### BRIBERY

We do not tolerate any form of bribery or corruption. We do not accept or give any improper advantage of any kind, irrespective of whether the person offering or demanding such advantage works in the public or private sector.

### FACILITATION PAYMENTS

Neither employees nor other persons working for the Raiffeisen Informatik Group make facilitation payments. Facilitation payments are minor amounts of money given to public officials in order to obtain or accelerate services provided by such persons to which one has a legal right (e.g. passport control, customs clearance).

### DIRECT AND INDIRECT BRIBERY BY THIRD PARTIES

We set particular store by the careful and meticulous selection of our business brokers, advisors, intermediaries and all other third parties supporting us in conducting our business or acting on our behalf. We also ensure that such third parties do not pay or accept bribes or facilitation payments within the scope of their business relationship with companies of the Raiffeisen Informatik Group.

### GIFTS AND INVITATIONS

The exchange of modest gifts and/or invitations may constitute socially accepted components of successful business relationships. However, accepting and offering gifts and invitations is prone to have an improper impact on business relationship. As a matter of principle, accepting and offering cash gifts are prohibited. All other gifts and invitations are subject to strict rules (Anti-corruption Directive).

## DEALING WITH CUSTOMERS AND BUSINESS PARTNERS

### CUSTOMER SERVICE

Raiffeisen Informatik is committed to a strong service culture that consistently endeavours to exceed customer expectations. This includes only offering a service or a product where we have the relevant license, expertise and the required infrastructure and consistently providing the best possible service in the interests of our customers. When providing recommendations, we ensure that they are honest and fair and that customers are duly informed about the risks involved. False or misleading advertising is unacceptable to us.

### CONFIDENTIALITY

Raiffeisen Informatik is obliged to keep customer information strictly confidential. As a matter of principle, we do not disclose any customer data to third parties. Exceptions to this rule are permitted only if customers have given their prior written consent or if we are under the obligation to disclose information on account of a recognised exemption, particularly to supervisory and prosecuting authorities.

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## MARKET ABUSE

### INSIDER TRADING

Insider trading involves the undue use of unpublished price-sensitive information for personal benefit or the benefit of third parties when dealing in securities. Insider trading has direct consequences under criminal law and disciplinary consequences.

### FAIR COMPETITION

Any abuse of position by professional market participants diminishes confidence in functioning markets and has serious consequences both for Raiffeisen Informatik and for any employees involved in such activities. Integrity is also an imperative in the battle for market share. We do not enter into any prohibited verbal arrangements, and we abide by the rules of fair competition.

### ANTITRUST LAW

Antitrust law prohibits agreements or concerted practices that result in a restriction or seek to restrict competition (e.g. price agreements, market segregation arrangements). We make sure we identify any cooperation potential with competitors before exchanging data with these competitors or launching talks. We make decision on prices, delivery terms and the markets we wish to become active in independently and based on conclusive and documented criteria. Exclusivity agreements with customers and suppliers are always subject to a legal review before they are signed. We therefore avoid any discussions, general exchange of information, agreements or any other form of arrangement with competitors regarding prices, the segregation of the market (by customer, product, region or other type) as well as market strategies under any circumstances. Any contravention of antitrust law has direct legal consequences.

## BOOKKEEPING AND FINANCE

### ACCOUNTING AND REPORTING

In its decision-making, Raiffeisen Informatik relies on the accuracy and correctness of its accounting records. In this respect, the confidential handling of security and HR data as well as accounting and financial data is of particular importance. All business transactions must be recorded in our books in accordance with specified procedures, auditing standards and generally accepted principles of accounting. These records contain the required information on the respective transactions.

# COC

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RESPONSIBLE FOR CONTENT:  
Compliance division

CONTACT:  
Mathias Happenhofer, MBL

[www.raiffeiseninformatik.at](http://www.raiffeiseninformatik.at)

