

# Code of Conduct

RAIFFEISEN INFORMATIK GROUP



**Code of Conduct**

**Raiffeisen Informatik GmbH & Co KG**

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# Introduction

## BASIC VALUES

The Raiffeisen Informatik Group is an integral part of the Austrian Raiffeisen Banking Group. The basic principles of this large cooperative are based on the ideas of Friedrich Wilhelm Raiffeisen. For F. W. Raiffeisen, social solidarity and self-help as well as sustainability were fundamental guidelines for successful economic activity. By embedding Raiffeisen values in its corporate strategy,

Raiffeisen Informatik commits itself to sustainable corporate governance and value management (Good Corporate Governance) and assumes responsibility for people and the environment.

Compliance with F.W. Raiffeisen values and defined corporate values is a matter of course for Raiffeisen Informatik Group.

## COMPLIANCE WITH THE CODE OF CONDUCT (CoC)



The Raiffeisen Informatik Code of Conduct (CoC) is a binding set of rules for all employees in daily business. "Employees" means all employees in Austria and in foreign branches, including members of management and senior staff as well as persons acting on behalf of the Raiffeisen Informatik Group, e.g. consultants and authorized representatives.

The provisions of the Raiffeisen Informatik Code of Conduct (CoC) apply worldwide to the parent company of Raiffeisen Informatik Group and all directly or indirectly affiliated (>50 %) subsidiaries. ■



# Basic Informations

## REGARDING THE R-IT CoC

**Striving for advantages for the Raiffeisen Informatik Group does not justify any violation of the law or the Raiffeisen Informatik CoC.**

Raiffeisen Informatik refrains from business which can only come about through such violations. The fact that such practices are used by competitors or other market participants shall also not be considered justification. ■

### LOCAL LAWS AND THE RAIFFEISEN INFORMATICS STANDARD



Raiffeisen Informatik respects the laws, rules and regulations of the countries in which it operates. Raiffeisen Informatik endeavors to maintain the highest possible standard in the execution of its business activities. In the case of differences between local law and the Raiffeisen Informatik CoC, the stricter and more far-reaching regulation applies.

### RESPONSIBILITY



Ultimate responsibility for compliance with Raiffeisen Informatik CoC lies with Raiffeisen Informatik management. Managers in the Raiffeisen Informatik Group are responsible for application and adherence to Raiffeisen Informatik CoC in their area of responsibility. All managers are obliged to act as role models.

### COMPLIANCE MANUAL



This Raiffeisen Informatik CoC is supplemented by the detailed Raiffeisen Informatik compliance program - described in the compliance manual. This substantiates the basic principles contained in the Raiffeisen Informatik CoC and provides detailed information on how the Raiffeisen Informatik CoC is implemented in practice and everyday business. In case of doubt the approval of the responsible manager must be obtained.

### REPORTING OBLIGATION IN CASE OF NON-COMPLIANCE



If employees become aware of violations of the Raiffeisen Informatik CoC, this should be reported to their direct superior or to the Legal & Compliance department (compliance@r-it.at). Any form of communication is possible for reporting, including anonymous written reports.

### SANCTIONS FOR VIOLATION OF THE RAIFFEISEN INFORMATIK CODE OF CONDUCT



The Raiffeisen Informatik CoC forms an integral part of the general terms of employment. Violations of Raiffeisen Informatik CoC therefore have consequences under labor law and may be punished with disciplinary measures up to dismissal. Violations of the law may result in additional fines, imprisonment and claims for damages.






# Use of the CoC

## IMPORTANT QUESTIONS

When applying Raiffeisen Informatik CoC, the risk of damage to reputation must also be taken into account and avoided. It is the responsibility of the respective employee to consider the risk of potential damage to reputation by a transaction in every decision.

Situations are sometimes complex. If in a specific situation the decision making process is not clear, i.e. employees do not know how best to proceed in the given case, they should ask the following questions:

- Do I have sufficient information to make the right decision in the current situation?
- Does my action correspond to Raiffeisen Informatik culture?
- Are there other possibilities and alternatives - and have I considered them?
- Is my action permitted by law and does it comply with the code of conduct and other applicable guidelines?
- Are there clear and objective arguments or justifications for a certain course of action or is there a biased motivation behind it?
- Could I justify my actions to others in the Raiffeisen Informatik Group or to the responsible authorities?
- Would it be okay for me if my actions or the circumstances were discussed in public or in the press?
- Could I explain my actions and defend them in good conscience if I am later questioned about them? 

For questions regarding the application of the Raiffeisen Informatik CoC and in case of uncertainty regarding the direct or indirect effects of a business transaction on Raiffeisen Informatik ethical objectives, contact your direct supervisor or the Legal & Compliance department.



**Respect**

**Sincerity**

**Integrity**

# Employee Relations

## PEOPLE IN FOCUS



### MUTUAL RESPECT, HONESTY AND INTEGRITY

Raiffeisen Informatik fosters an environment in to enable employees to meet each other with mutual respect and values and supports diversity as it can reveal different perspectives. The aim is to maximize diversity in their team and ensure that diversity prevails even at the highest management levels.

Raiffeisen Informatik respects the opinions of others and their personal dignity, privacy and personal rights. It does not tolerate discrimination and harassment of any kind, for example due to nationality, culture, religion, skin color, gender, sexual orientation, age or physical disability. ■

## Fairness

For Raiffeisen and in particular the Raiffeisen Informatik Group, fair employment practices mean more than mere compliance with applicable labor and social laws. It contributes to a culture of respect. Raiffeisen Informatik wants to be a group of companies for which the best people want to work, which hires and promotes people according to their aptitude (performance and professional experience), which offers its employees the opportunity for further development and allows them a good balance between working hours and private life. Raiffeisen Informatik values teamwork within and between the individual business units, divisions and countries and helps its employees to develop their full potential. Raiffeisen Informatik encourages them to act proactively and deal constructively with changes by recognizing them in advance wherever possible. ■

## Equal opportunities

Raiffeisen Informatik respects the laws, regulations, and rules of the countries in which it operates and meets international standards regarding human rights, freedom of assembly, equal employment opportunities. Raiffeisen Informatik adheres to competitive remuneration standards which support the business strategy, values and long-term goals of the company and takes measures to avoid conflicts of interest. ■

# Conflicts of interest

## MAKING THE RIGHT DECISIONS

Employees are obligated to act in the best interests of the Raiffeisen Informatik group. They must ensure that their own interests do not conflict with their obligations to the Raiffeisen Informatik group or its customers.

The personal interests of employees should not impair their judgment in business matters. Potential conflicts of interest may arise in particular in connection with gifts, invitations, commissioning, corruption, fraud or market abuse.

If employees identify a conflict of interest in themselves or believe it to be reasonably likely that a

conflict of interest could arise, the conflict must be disclosed as early as possible and written approval obtained. The conflict must be reported to the relevant direct supervisor. Subsequently the existence of an actual conflict of interest and the necessary measures are decided by Raiffeisen Informatik management. ■

### **Conflicts of interest usually occur in the following situations:**

#### **Personal relationships at the working place**

As a manager of a close-related person (spouse, life partner, relatives, ...), a conflict of interest exists. The leadership of a related person is generally prohibited. Leadership is only permitted if the relationship has been disclosed and written approval has been obtained.

#### **Do-it-yourself transactions**

A conflict of interest exists if employees approve or promote a business relationship between Raiffeisen Informatik group and a company in which these employees have a significant interest. A significant interest exists if the employee receives a not insignificant asset allocation from this company.

#### **Secondary activities**

In the case of secondary employment there is a risk that employees do not devote enough time and attention to their activities at the Raiffeisen Informatik group during their working hours. Secondary employment must always be disclosed and approved (Service Instruction Secondary Employment)

#### **Use of business opportunities and resources**

There is a conflict of interest if employees use business opportunities, property of the Raiffeisen Informatik group or information disclosed through their employment with the Raiffeisen Informatik group for their personal benefit or for the benefit of a related party. ■

## Health

### AND PROTECTION

Protecting the health and security of its staff is a central issue for Raiffeisen Informatik. Comprehensive measures and offers provide the basis for a healthy and safe working environment. A wealth of information provides assistance in maintaining security. Compliance with work instructions and corresponding regulations is therefore absolutely essential.

## Business activities

### PRIVATE

Employees must not engage in any activities that could be in conflict with their professional responsibilities or that might harm the reputation of the company. All employees must avoid any potential conflict of interest. In the case of a potential conflict or questions, the responsible Line Manager and the Legal & Compliance department should be consulted.

**All private business activities (paid or unpaid) require management approval.**

## Media

### AND PUBLIC STATEMENTS

Official comments to the media, in any form, may only be made by appropriately authorised personnel. Employees may not conduct any public relations activities on behalf of Raiffeisen Informatik or one of its subsidiaries with media, customers, suppliers, sales partners or third parties, neither consent to them nor participate in them without prior approval of the persons responsible for communications. Raiffeisen Informatik is aware that employees use social media for private purposes.

## Data Protection

### HAS HIGHEST PRIORITY

Raiffeisen Informatik takes care in receiving, processing and storing information (financial data, technical data, operational data, customer information, file notes etc.). In doing so the company adheres to specified data security standards and procedures and prevents unauthorized persons from viewing, using, changing or destroying this information. In this context, reference is also made to the service instructions on data protection and training courses.

# Conformity with laws and regulations

## BRIBERY AND CORRUPTION



### BRIBERY

Raiffeisen Informatik does not tolerate any form of bribery and corruption. Raiffeisen Informatik does not accept or provide undue advantages of any kind, regardless of whether the offering or demanding party is active in the public or private sector.



### FACILITATION PAYMENTS

Neither employees nor other persons working for the Raiffeisen Informatik group execute facilitation payments; this means the donation of small amounts of money to public officials to maintain or accelerate their services to which a legal claim exists, e.g. passport control, customs clearance.



### DIRECT AND INDIRECT BRIBERY BY THIRD PARTIES

Raiffeisen Informatik places special emphasis on the careful and thorough choice of its business brokers, consultants, intermediaries and all other third parties acting on behalf of the Raiffeisen Informatik group and supporting them in business transactions. Raiffeisen Informatik also ensures that such third parties do not make or accept bribes or facilitation payments in the context of their business relations with Raiffeisen Informatik group companies.



### GIFTS AND INVITATIONS

On the one hand, a moderate exchange of gifts and invitations can be a socially accepted part of successful business relationships. On the other hand, accepting and giving gifts and invitations may be likely to unduly influence a business relationship. The acceptance and giving of monetary gifts is generally prohibited, all other gifts and invitations are subject to strict rules (Anti-Corruption Directive). ■





# Customers and Business Partners

## RELATIONSHIP AND CONFIDENTIALITY

### Customer Relationship

Raiffeisen Informatik considers itself committed to a distinctive service philosophy which consistently strives to exceed customer satisfaction and expectations. This includes that Raiffeisen Informatik only offers a service or product if it is in possession of the necessary license, if it possesses the appropriate expertise and the necessary infrastructure, and if it can supply services in the best-possible interest of its customers at all times.

Raiffeisen Informatik also ensures that any recommendations made are made honestly and fairly and that customers are properly informed about risks. False or misleading advertising is not acceptable to Raiffeisen Informatik. ■

### Confidentiality

Raiffeisen Informatik is obliged to treat customer details as strictly confidential. As a matter of principle Raiffeisen Informatik does not forward customer data to third parties. Any exceptions shall only be permitted if the customer gives prior written consent or if there is a recognized exceptional circumstance for passing on information, in particular to supervisory and law enforcement authorities. ■

# Market Abuse

## INSIDER TRADING, COMPETITION, ANTITRUST LAW



### INSIDER TRADING

Insider trading means the unfair use of non-published price-relevant information to gain an advantage for oneself or third parties in trading in securities. Insider trading has direct criminal and disciplinary consequences.

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### COMPETITION

Abuse of the position as professional player on the market impairs trust in a functioning market and entails serious consequences both for Raiffeisen Informatik and the employees involved. The principle of integrity is also essential in the fight for market share. Raiffeisen Informatik does not make illegal agreements and respects the rules on fair competition.

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### ANTITRUST LAW

Antitrust legislation prohibits agreements or concerted practices which have as their objective or as their effect the restriction of competition (e.g. price fixing, market sharing). Raiffeisen Informatik informs itself about possible cooperation with competitors before sharing data with competitors or initiating talks. Raiffeisen Informatik makes decisions regarding prices, delivery terms and the markets in which it intends to operate autonomously on the basis of comprehensible and documented criteria. Exclusive agreements with customers and suppliers are at all times legally verified in the preliminary stages. Raiffeisen Informatik therefore avoids under all circumstances discussions, general information exchange, agreements or any other form of coordination with competitors regarding prices, market segmentation (by customer, product, region or any other type) and market strategies. A violation of antitrust law has an immediate legal consequence. ■

# Accounting and Finances

## ACCOUNTING AND REPORTING

Raiffeisen Informatik bases its decision processes on the correctness and accuracy of accounting records. The confidential treatment of security and personnel data as well as accounting and financial data is of particular importance. All business transactions must be reported in its books in accordance with established procedures and auditing principles and generally accepted accounting principles. These records contain the necessary information on the respective transactions.

**Economy**

**Ecology**

**Social affairs**



# Responsibility

## 3 PRINCIPLES OF SUSTAINABILITY



### CORPORATE RESPONSIBILITY

Raiffeisen Informatik is aware of the possible economic, social and ecological effects of its corporate activities. This is reflected in its four fields of action (market, employees, environment, society) of its sustainability strategy. The goal is to combine successful business with responsibility for the environment and society and thus generate competitive advantages. Raiffeisen Informatik avoids

burdens on society and environment. Instead, it wants to contribute to the improvement of environmental protection and social standards. The company aligns itself with recommendations and standards of national and international organizations and actively supports the achievement of SDGs. ■

# Nachhaltigkeit

WIR ÜBERNEHMEN VERANTWORTUNG!

## Umweltschutz

Raiffeisen Informatik pursues a policy of sustainability in all aspects of corporate management. Raiffeisen Informatik handles resources in a responsible manner. This includes on the one hand environmentally friendly handling of natural resources and on the other hand minimization of environmental pollution from own business activities. Its goal is to minimize energy and resource utilization through the use of new technologies despite increased demand for IT services and rapidly increasing processed data volumes.

Sustainability and environmental protection is an essential part of their corporate strategy and corporate values. For this reason, an environmental strategy with defined goals and measures has been established. As operator of one of the largest data centers in Austria, Raiffeisen Informatik is aware of its impact on the environment and takes into account any ecological effects and assumes ecological responsibility for its performance delivery. Raiffeisen Informatik complies with national environmental and data protection regulations.

Raiffeisen Informatik reduces the environmental impact of computer center operation as much as possible and uses raw materials, energy and water sparingly. At the same time Raiffeisen Informatik takes early action to counter rising energy consumption in line with increasing data volume. Raiffeisen Informatik invests in the use of renewable energy and employs the best available technology for new investments. Raiffeisen Informatik also expects compliance with its standards from its service providers and suppliers.

Raiffeisen Informatik also pays attention to sustainability responsibility in its business partners. ■

# Sustainability

FOCUS ON PEOPLE

## Social Commitment

Raiffeisen Informatik is aware of its role in society and also contributes to the development of society for the better outside of its business activities. Raiffeisen Informatik is committed to this considering its potential. The Company supports non-profit and charitable organizations in accordance with its guidelines on sponsoring and donations. Under no circumstances may donations for charitable purposes be used as a condition or means of influencing decisions or public officials. Raiffeisen Informatik offers an attractive working time model for employees, allowing them sufficient time to dedicate themselves to charitable causes.







**RAIFFEISEN INFORMATIK**

RESPONSIBLE FOR CONTENT:  
Function Legal

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