



Code of Conduct

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**„Rootedness“, „Diversity“,
„Future strength“ and „Solidarity“**

are the core values of our corporate culture. Our actions are characterized by an approach to people and our environment that is always fair, respectful and sustainable. For this reason, “compliance” defined as conduct in line with these values and in strict accordance with the law represents an important basis for our daily work. In the Code of Conduct we have set out all the important points on the subject of compliance to provide our employees with a clear framework for orientation.



Preface

In its mission statement, RWA Raiffeisen Ware Austria is committed to the core values of rootedness, diversity, future strength and solidarity. These are in the tradition of F. W. Raiffeisen, constitute an essential part of our corporate culture and apply without restriction to all Group companies – in Austria and in the CEE region.

The term „compliance“ stands for the legally compliant, ethical behaviour of all employees in line with our values. It thus forms the basis of our daily work. This Code of Conduct sets out all the important points on the subject of compliance. It governs key aspects of professional cooperation characterized by fairness and trust and provides a clear framework for orientation. Compliance with these values protects the reputation of our company and thus also of all our employees.

In an internationally operating company with agricultural roots, our employees are used to adopting an open, tolerant and appreciative manner towards each other and to ensuring a sustainable approach to our environment. We trust them that in their day-to-day work they autonomously take informed and balanced decisions.

Each and every person is personally responsible for his or her own actions and the consequences resulting for the RWA Group. After all, no code can claim to prescribe the right and appropriate conduct for every situation.

However, it summarizes practical guidelines for concrete situations that frequently occur in practice.

Often it will suffice to ask simple questions which will lead to the right decisions in case of doubt:

- Is my action permitted by law?
- Does it comply with our values, the principles contained in the Code of Conduct, and our internal guidelines and behavioral instructions?
- Do I myself feel that my decision is the right one?
- Could I justify my behavior within the RWA Group or before authorities?
- Should I not immediately seek advice for sentences such as „Everyone does it this way“ – „It’s just this once“ – „No one will ever know“?

Your respective superior, the Head of Legal Affairs/Executive Board Office as Chief Compliance Officer, and the members of the Works Council or comparable bodies within the framework of co-determination at the company are available at all times to answer questions and provide information.

The Executive Board fully supports this Code of Conduct. It has the same effect for us as it does for every employee in the RWA Group. The values on which it is based unite us all and create trust.



A handwritten signature in black ink, appearing to read 'Johannes Schuster'.

Johannes Schuster
CEO

A handwritten signature in black ink, appearing to read 'Christoph Metzker'.

Christoph Metzker
Member of the Executive Board



1. Fundamentals

Target group

The provisions of the Code of Conduct apply to all employees of the RWA Group worldwide and must be observed by them. The Code of Conduct is a binding set of rules in everyday business. The Group includes all companies in which RWA AG directly or indirectly holds an interest of more than 50 % or over which it exercises sole control in any other way. All other companies in which RWA AG directly or indirectly holds an interest of at least 25 % are informed of the Code of Conduct with the recommendation to also apply it through autonomous recognition within the framework of their corporate decision-making structures.

Compliance

We respect the laws and regulations of the countries in which we operate. We strive to maintain the highest possible standard in conducting our business operations. In the event of differences between local law and the Code of Conduct, the stricter and more extensive regulation will apply. The pursuit of profit does not justify violations of the law or the Code of Conduct. We refrain from doing business that can only come about through such practices. Nor is the use of any such practices by competitors or other market participants considered a justification.

Competence

The ultimate competence for the uniform introduction and application of the Code of Conduct throughout the Group lies with the Management Board of RWA AG. Operational competence for the complete introduction and control of the application in all Group companies in accordance with the above group of addressees lies with the Chief Compliance Officer. The managers in the RWA Group are responsible for the application of the Code of Conduct in their area of competence. Each employee shall reasonably acquire the necessary knowledge in the respective operational area.

Whistleblower system / notifications

If we become aware of a serious violation of laws or the serious ongoing disregard of the RWA Group's internal rules of conduct, we inform our superiors or the Chief Compliance Officer. In addition, our employees and business partners can use our whistleblowing system - including anonymously - to report violations of our Code of Conduct, any other corporate or legal regulations, or statutory regulations. Misuse of the system is prohibited.

All reports are treated with strict confidence. Company sanctions are excluded. Anyone knowingly spreading false reports about others is guilty of misconduct.

Consequences of violations

Serious or ongoing non-compliance with the principles contained in the Code of Conduct can damage the reputation and competitiveness of the RWA Group and will therefore always have the necessary consequences under labour law.

2. Fundamental behaviour



Mutual respect, honesty and integrity We respect the personal dignity, privacy and personal rights of every person. We ensure equal opportunities and avoid unequal treatment, especially on the basis of ethical origin, skin colour, gender, sexual orientation, disability, ideology, religion, nationality, social origin and political orientation.

We are neutral towards political groups.

In our day-to-day business, we stand by our responsibilities and are reliable and honest partners. We only use freedom of action to the extent that and as long as this is compatible with the legal systems and our values.

Personal responsibility of managers and employees

The reputation of the RWA Group is significantly shaped by the actions of its employees. We therefore act responsibly. Managers should act as role models through their actions. Fulfilment of this responsibility serves to protect and ensure the safety of the RWA Group, its employees, customers and business partners.

Conflicts of interest

Our actions are aimed at avoiding any kind of conflict of interest that could have a negative impact on the RWA Group. We avoid situations in which personal or economic interests conflict or may conflict with the interests of RWA. This applies in particular to contracts and negotiations from which we ourselves or related parties may derive advantages.

The acceptance of secondary employment, consulting assignments, functions in legal entities or political offices, as well as shareholdings in other legal entities may also lead to conflicts of interest under certain circumstances. We disclose any potential conflict of interest to our supervisor in full and without being asked to do so.

Company equipment and company assets

The property of the respective Group company is only used by us for operational purposes. We protect the property of the respective Group company against misuse, loss or theft. The property of the respective Group company includes not only tangible assets such as operating equipment, but also intangible assets such as intellectual property, e.g. brands. We observe the internal regulations for the use of resources of the respective Group company (e.g. telephone, computer, internet and other information technologies).



3. Corruption

Corruption

Corruption is the misuse of authority granted and includes, in particular, demanding, offering or accepting an undue advantage (usually called a bribe, kickback or gratuity). We do not tolerate any form of corruption. We do not accept or provide undue advantages of any kind, regardless of whether the person offering or demanding them is active in the public or private sector.

Offering and granting of benefits

We regard small gifts between external business partners as an expression of mutual appreciation, which can in principle serve to build and maintain long-term business relationships. However, the value of the gifts must be within a reasonable range. This is the case when there is no possibility of influence through the value or the type of the gift. We avoid any appearance of dishonesty or impropriety. All invitations to events, such as evening functions, theatres, balls, conferences, sporting events, etc., must be considered individually and in relation to the position and function of the invitee. There is an obligation to obtain approval from superiors. The Chief Compliance Officer must be informed in advance in important matters and cases of doubt.

Benefits to employees of public institutions, state-owned companies or public officials are a special case. We refrain from granting benefits to this group of persons. Wherever the invitation of a public official to events is deemed necessary out of respect for the office and the state, this must be approved by the responsible board member. We do not offer or grant monetary gifts to anyone.

Requesting and accepting benefits

Under no circumstances do we demand benefits from third parties in connection with our business activities, nor do we allow ourselves to be promised such benefits or accept them. If the refusal of a gift seems inappropriate in a specific case, the gift must be given to the supervisor so that he or she can make it available to the general public. If the refusal of an invitation appears inappropriate in a specific case, the above-mentioned principles regarding the offering and granting of benefits shall apply mutatis mutandis. A distinction must be made as to whether the invitation is directed at a general group of persons or is individual. In the case of individual invitations, a sense of proportion must prevail, caution must be exercised, the situation must be examined more closely and, if necessary, the Chief Compliance Officer must be consulted. The acceptance of direct or indirect financial benefits is generally prohibited.

The above principles and standards also apply mutatis mutandis between Group companies.

Expenses, donations, charitable contributions and sponsorship Benefits in the form of expenses, donations, charitable contributions and sponsorship must not be used to circumvent the above principles or other provisions of the Code of Conduct.

4. Competitive behaviour

As market participants, we benefit from a functioning market. We are convinced that it is essential for competition to be autonomous, fair and quality-oriented.

We therefore do not tolerate any agreements or concerted practices between companies for the purpose of restricting competition, in particular price fixing, sharing customers, dividing markets or market shares, price fixing or exchanging information on competitively sensitive data. We oppose the abuse of market power to limit competition and observe the legal standards aimed at maintaining functioning, unhindered competition that is as diverse as possible.

5. Environment, safety and health

Environment

Protecting the environment and conserving its resources are high priorities for us. We all actively contribute to the implementation of these goals to the best of our ability and strive to make our business concepts ecologically sustainable and climate-neutral.

We therefore strive to always consider the economic, social and ecological impact of our work and to act in an environmentally and socially responsible manner. We pay attention to the efficient and careful use of natural resources and continuously try to minimize the environmental impact of products and processes in a variety of ways. Unavoidable impacts in business areas that are necessary to maintain economic as well as social life are minimized in particular through our commitment to new technologies and increased awareness among employees compensating for unavoidable impacts in business areas that are necessary to maintain economic and social life. As an internationally operating company, we also attach importance to regional procurement in the respective countries in order to avoid long transport routes wherever possible. When selecting our suppliers, we take care to ensure compliance with ecological and social standards and regulations (such as those relating to environmental protection or human rights).

Safety and health

Responsibility toward employees requires precautions to be taken against the risk of accidents and other hazards to mental or physical integrity. This applies to the technical planning of workplaces, facilities and processes as well as to safety management and personal behaviour in everyday work. We respect human rights and the applicable laws to ensure fair working conditions, in particular with regard to wage payments and working hours.





6. Prevention of money laundering, foreign trade and tax law

We comply with the applicable regulations on combating money laundering and terrorist financing. In our international operations and the development of new markets, we also comply in particular with the various statutory regulations applicable to us relating to foreign trade, customs and tax law.



7. Data protection, handling of confidential information

We are aware of the trust that business partners and employees have in the RWA Group. Some of the data entrusted to us or created by us are highly sensitive. Therefore, we protect the personal data and trade secrets of our business partners as well as those of the RWA Group and its employees.

We comply with data protection regulations and ensure that personal data is protected against unauthorized access. Personal data may only be disclosed if this is done for a permissible purpose. Personal data is processed in compliance with the legal rights of the persons concerned.

We are bound to secrecy in internal confidential matters as well as in confidential information concerning business partners and customers.

Company and business secrets are also explicitly considered confidential. We are committed to maintaining legitimate confidentiality interests even after termination of the employment relationship.