



Code of Conduct

for Suppliers and Business Partners of Oberbank AG

As a universal, dynamic regional bank located in the heart of Europe, Oberbank provides financial services of the highest quality. Security, stability, and sustainability are at the foundation of everything we do. They are fundamental to our business model, which is centered around our customers and our interaction with them. Our continuous improvement is guided by these values. We always serve our customers' interests by adapting to changing conditions, without neglecting our timeless values. Oberbank conserves resources wherever possible in the name of environmental responsibility, and is known for equality of opportunity regardless of gender. Respect and consideration for colleagues, customers, and partners are central values we live by.

Ethics and laws

We act according to ethical principles and oppose discrimination, corruption, and sexual harassment in all their forms. We work in accordance with applicable laws and internal guidelines. This underscores our sustainable, trustworthy and collaborative ways of working. As such, Oberbank also expects our suppliers and business partners to follow and comply with the requirements and provisions of the law. This includes advertising campaigns and messages, which must be truthful and accurate.

Corruption and bribery

Oberbank is committed to fighting corruption using all means at its disposal. We absolutely reject corruption, and will never tolerate it. Breaches of anticorruption laws may lead to criminal charges and liability for compensation.

The supplier/business partner undertakes to ensure that no personal dependence, obligation, or influence arises from gifts, services, or other benefits. This includes not only benefits which are directly offered or accepted, but also indirect bribery via third parties, such as agents, intermediaries, subsidiaries, and advisors. 'Facilitation payments', (small payments to officials so that applications or similar will be expedited) are also prohibited.

Our suppliers and business partner are liable to compensate Oberbank for any damages - and bear any costs - resulting from breach of this Code of Conduct and resulting cancellation of contracts.



Money laundering

Oberbank assiduously complies with laws to prevent money laundering and the financing of terrorism. If Oberbank suspects or has reason to believe that a supplier or business partner is implicated in money laundering or financing terrorism, Oberbank shall immediately terminate the business relationship and report the case to the authorities. We assume that our suppliers and business partners handle their taxes honestly.

Conflicts of interest

Our suppliers and business partners are obliged to avoid all conflicts of interest, and even the appearance of a possible conflict of interest. A conflict of interest arises if the supplier/business partner primarily pursues their personal interest, or the interests of a friend or family member.

Human rights

Oberbank expects its suppliers and business partners to treat their employees fairly and accord them equal rights. They must ensure equality of opportunity and equal treatment regardless of gender, skin colour, race, nationality, religion, sexual orientation, age, or disability. The personal value, privacy, and rights of personality of all employees must be respected, and harassment and discrimination must be prevented.

Forced labour, child labour, and undeclared work

Our suppliers and business partners may not force anyone to work, or employ them against their will. Forced or compulsory labour must never be used as a punishment for political views or participation in strikes, or as a form of discrimination.

The suppliers and business partners undertake never to employ any form of child labour. Children are persons under the age of 15 or persons who are below the minimum age for leaving school in the relevant country. Minors under the age of 18 may only be employed for work which is compliant with the legal requirements. Our suppliers and business partners shall refrain from employing people illegally, to avoid employee contributions and taxes, or to make use of undeclared work.



Pay and working hours; health and safety

Suppliers and business partners must also ensure that employees are paid appropriately, at no less than the collectively agreed or legally mandated minimum wage, including granting legally mandated social security benefits, and must undertake to comply with the applicable laws governing working hours.

Suppliers and business partners are also responsible for their employees' health and safety. They must therefore guarantee a healthy and safe work environment and take appropriate risk reduction measures, avoid using dangerous substances, tools etc., and take the best possible measures to prevent accidents and occupational illnesses.

Freedom of association

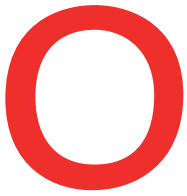
Suppliers and business partners may not obstruct the election of workers' representation, working for such representative bodies, the right to belong to a trade union, or the holding of works meetings.

Data protection and confidentiality

Our suppliers and business partners must ensure that information and data regarding Oberbank is protected during and even after the termination of the business relationship, and is protected from third-party access. They must also ensure that their employees can anonymously report concerns about legal violations without obstruction and without fear of reprisal.

Environment

Oberbank places high importance on protecting the environment and conserving resources. We therefore expect our suppliers and business partners to comply with applicable environmental requirements and standards. They must deploy systems to ensure that wastewater, other waste, and emissions are handled, transported, stored, removed, and recycled safely. They must ensure responsible use of materials and resources, and economical energy consumption.



Scope of application of the Code of Conduct in the supply chain and service chain

This Code of Conduct can be found on the Oberbank website. A reference to the Code of Conduct and where it can be found is included in the Terms and Conditions of Purchase (Purchasing department) and in the preliminary remarks (Construction department).

By accepting an order, our suppliers and business partners agree that this Code of Conduct has a binding effect on them and their subcontractors.

Status: 10/05/2023