

Code of Conduct of UniCredit Bank Austria AG

pursuant to Article 7 Lobbying Act

Lobbying is a legitimate element of democratic systems. The Austrian legislative authority has set up with the *Lobbying- und Interessenvertretungs-Transparenz-Gesetz* (“Lobbying Act”) a legal framework for lobbying activities and established inter alia a public Lobbying Register and the obligation for companies which employ Corporate lobbyists to create a Code of Conduct for lobbying activities.

The terms of the Lobbying Act (in German language) are available on the following website:
http://www.ris.bka.gv.at/Dokumente/BgblAuth/BGBLA_2012_I_64/BGBLA_2012_I_64.pdf

The present Code of Conduct contains six basic principles for lobbying activities. All employees of UniCredit Bank Austria AG who perform lobbying activities are committed to this Code of Conduct.

BASIC PRINCIPLES

Corporate lobbyists have to respect the following when communicating with function owners¹:

- They call themselves by name and indicate UniCredit Bank Austria AG as their employer for whom they act as well as the specific concern of the employer;
- they make sure that the provided information is to the best of knowledge without distortion, is complete, up to date and not misleading;
- they provide information solely in a proper manner or obtain decisions in a proper manner and do not attempt to do anything contradicting;
- they have to brief themselves on issued limitations of activities and rules of violations of the function owners and respect these limitations;
- they do not tempt function owners to breach the rules and behavioral norms which apply for them;
- they have to abstain from any improper or inadequate influence on function owners.

Furthermore, UniCredit Bank Austria AG is committed on a voluntary basis to comply with the principles as laid down in the “Code of Conduct” adopted by UniCredit Group.

The “Code of Conduct” of UniCredit Group is available under the following link:
https://www.bankaustria.at/files/Code_of_Conduct_EN.pdf

¹ Function owners mean officials when acting in the framework of legislation, national administration or private-sector administration activities for the public sector, for example members of the Federal Government, members of regional governments, civil servants or contractual employees of the State, of a region or of a municipality, members of the Austrian Parliament, members of regional parliaments or of municipalities.