



Code of Conduct

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1.1 Foreword

Dear employees, dear clients, dear business partners,

Due to our strong brands UNIQA and Raiffeisen Versicherung we are among the most successful insurers on the market - both in Austria as well as in Central and Eastern Europe. UNIQA's most important task is to provide security to our clients and to support them in designing their future in the best possible way. This social responsibility we would like to take on accordingly.

Our work as insurer is based to the highest degree on trust. Therefore, diligent and lawful behaviour is a given prerequisite for our sustainable success and has an essential influence on our company's reputation.

On this basis, we have created our Code of Conduct. It reflects our Guiding Principles and our corporate culture. Consequently, the Code of Conduct provides the necessary framework for our daily behaviour towards our clients, business partners, suppliers and employees.

Our Code of Conduct is in many respects more precise than the legal obligations. Thus, we set clear and trend-setting standards for a modern and ethically exemplary behaviour. The Code of Conduct protects us, all employees and the UNIQA Group itself, against potential fines/legal consequences, the loss of client confidence and the loss of reputation.

The entire Management Board supports the Code of Conduct unconditionally. Hence, it applies equally to us as well as to all employees in the Group, including the Supervisory Board. In the sense of personal responsibility, everyone is personally accountable for the own actions and contributes therefore actively to the sustainable reputation of UNIQA.

We expect our business partners and suppliers to also adhere to the principles of the UNIQA Code of Conduct and to conduct themselves accordingly.

Let us continue together our successful way in accordance with this Code of Conduct.

All regulations of this Code of Conduct were enacted by the Group Management Board and shall apply from April 1st, 2025.

Vienna, March 2024

Andreas Brandstetter

Chairman of the Management Board
UNIQA Insurance Group AG

Wolf Christoph Gerlach

Member of the Management Board
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1.2 Guiding Principles

Customer first

Simplicity

Responsibility

Integrity

Community

1. Customer First

In our processes, products and services, we always put the customer in the centre of everything we do. We organize ourselves and report along the retail, bank and corporate & affinity customer segments. We focus on the needs and demands of our customers and ask them for their opinion. The customer feedback in a 5-star rating shows us whether we live up to this principle.

2. Simplicity

In an increasingly complex world, it is our goal to offer our customers easily understandable and useful services and products that offer tangible added value for their lives. We put the benefits of simple solutions above those of "best in class" solutions. In our collaboration, we prefer the personal conversation to the written message and reduce the addressee group to those recipients from whom an action is expected. We always respond promptly and to the point.

3. Responsibility

Our employees act competently and independently; this is the only way they can support our customers quickly and accompany them in a good way. We all take corporate responsibility and look for the best and fastest solution for our customers. We act neither bureaucratically nor politically, but entrepreneurially and customer-centred. We make decisions and also give our colleagues this space. In our actions, we are increasingly taking over more responsibility for our neighbours and society (sustainability).

4. Integrity

A community is only as strong as the trust it is built on. That is why we stand by our values and guidelines in all our actions, live transparent communication and do everything we can to keep our promises.

5. Community

We are a diverse community of 21,000 employees who provide service to 17 million customers in 17 countries. The power of this community is the source of our achievements and the inspiration of our work, which should enable the people in our community to have better life. We support each other beyond defined responsibilities to serve our customers in the best way possible. We are committed to continuously improve our collaboration. We live diversity – intolerance and exclusion have no place.

1.3 Ethical management and legal compliance

We care and work hard for our clients and colleagues. We know and understand their needs and we inspire them. As UNIQA community, we motivate and support each other. We are proactive and set industry standards by introducing intelligent, new solutions. Our attitude within the company and towards third parties is honest and explicit. We provide our services reliably as we value our clients and colleagues. We keep our promises. What we have in common as employees of UNIQA is that we want to be in the lead. We are successful because we deliver top services to our clients which are better than those of our competitors.

With this attitude we commit to our clients so that they can design their lives with confidence and joy. We want to achieve our goals to be the leading insurance company in the heart of Europe. Although we are a European insurance group, local presence is of great importance to us.

On this basis we set internal standards for ethical behaviour which partially exceed applicable laws. We use the freedom of discretion only to the extent that it is in line with legislation as well as with our values and as long as it does not harm the reputation of UNIQA.

If perceived in connection with UNIQA, also our private behaviour must correspond with legal and social standards. Actions which may damage the reputation of UNIQA are not acceptable.

We expect our business partners and suppliers to have similarly high moral and ethical standards as we have and to behave in the same legally compliant manner as UNIQA.

The behaviour of colleagues in leading positions serves as role model for employees and the entire UNIQA Group. These colleagues must ensure that their employees are familiar with the Code of Conduct and that they comply with the implied principles of behaviour.

In our working environment we do not allow anybody to get involved in illegal activities nor do we tolerate unlawful actions. This applies to all countries in which UNIQA has business activities. In this context, we pay particular attention to the following topics:

Prevention of corruption

Corruption includes demanding, offering or accepting a dishonest advantage (mostly referred to as bribery, bribe money or grooming).

Certain kinds of immoral behaviour are difficult to capture by law so that it is not always obvious whether a behaviour is illegal. Therefore, every one of us needs to make sure to always refrain from corruption and "grey areas" and to report related incidents as well as well-founded suspicions to the responsible supervisor and to the Local Compliance-Function. It is one of our most important tasks to protect the company's reputation.



Anti-money laundering

UNIQA takes all measures required by law to prevent money laundering and terrorist financing. According to this, we follow the "Know-Your-Customer" principle which effectively prevents anonymous transactions.

Whistleblowing Reports

If we become aware of a violation of laws or of ongoing violations of the Code of Conduct, we inform the Local Compliance-Function. The notification may be provided personally, by phone, e-mail (whistleblowing@uniqa.at), letter or via the Whistleblowing Platform which was created especially for this purpose. All notifications may be given either personally or anonymously. Reports are treated strictly confidential and are verified with due care.

As long as we do not knowingly provide false information, our identity will be protected and we do not have to fear any negative consequences from UNIQA.

If someone informs us about a violation or provides information about a violation to us, we treat the information itself including any mentioned person as well as the identity of the whistleblower strictly confidential and immediately pass the received information on to the Local Compliance-Function.

Sanctions

Sanctions provisions affect all business areas of UNIQA. Touch points can arise, for example, when a customer, business partner or supplier originates from a country where there is an increased likelihood for sanctions (such as currently Russia) or if a business case itself has a reference to such a country.

At UNIQA, we check regularly and system-based all our customers for sanctions. If there are business cases that do not involve customers directly (e.g. business partners, suppliers, goods, services), we conduct sanction checks independently in case of a suspicion or we involve the Local Compliance-Function.

Consequences in case of violations

Violation of legal regulations and generally accepted ethical rules may result in a lasting damage to UNIQA. Amongst other things, this might lead to claims for damages, administrative and corporate penalties or to the revocation of permits and licences.

UNIQA reacts without exception to every violation. It is up to the company's discretion to determine enforcing measures which might also lead to the termination of employment or claims for damages.



1.4 Etiquette

The straight-forward way of dealing with people on a trustful basis is closely linked to our business model. Therefore, the right way of dealing with clients and partners as well as with colleagues is very important to us. The way how people interact with each other creates an image of the company which is clearly visible inwards and outwards.

A polite and respectful tone is a prerequisite, both in conversations among employees as well as with clients and partners. We avoid degradation of any kind. Both internally and externally, we tolerate no discrimination whatsoever on grounds of ethnic origin, race, sex, religion, ideology, disability, age or sexual orientation.

Respectful, straight-forward, collaborative and reliable behaviour is part of our attitude when interacting with clients, business partners, suppliers, public authorities, colleagues, employees, supervisors and others.

Interaction with clients

We handle transactions in a correct, competent, friendly and timely manner.

We meet our clients on a basis of trust. The focus of our daily work is to create solutions for our clients and to reinforce our trustworthiness.

We provide best possible advice to our clients. regarding long-term, asset-creating personal protection policies we are aware of our responsibility and advise our clients with utmost care to meet their long-term needs.

Despite acting with integrity and sense of responsibility, clients, business partners and suppliers may feel that they are not treated in the best possible way. To live up to our fundamental principles we have established a request and complaint management system especially designed for that purpose.

We handle complaints from present or former clients, business partners and suppliers reliably, friendly, competently and promptly in accordance with applicable laws and regulations. Client orientation is the key to our success.

All our work-related acting and thinking is focused on the clients.

Our clients expect security from us. We provide support in cases of emergency and act in a thoughtful and helpful manner. Prevention of dangers begins with noticing problems. Instead of looking away, tackle the issue!

Also, in internal processes the focus is on service, and we support our internal clients and colleagues in the best way possible.

Employees who are in permanent or occasional contact with clients, business partners and suppliers pay particularly attention to their appearance. However, also all other employees are requested to dress according to their function.

GOOD TO KNOW

Question: A client calls and expresses his anger about the fact that he is asked to provide identification before his life insurance is paid out to him. This is required by law. Do I still have to continue the communication with the client who does not recognize the legal obligation?

Answer: Yes. The client must be informed about the statutory requirements in a friendly and patient manner, even if it is time-consuming for us.

GOOD TO KNOW



Question: I work for UNIQA and enter one of our registration offices to register my new car. In the presence of clients two employees have a loud argument. What do I do?

Answer: I advise my two colleagues in a polite but determined manner not to settle internal issues in the customer area.

Interaction with business partners / suppliers / public authorities

The relationships with our business partners and suppliers are the key to success and must be the product of our principles, mutual satisfaction and cooperative collaboration. We expect the same behaviour from our business partners and suppliers, because we all benefit from a long-term and sustainable business relationship.

Our relationships with public authorities are characterized by straight-forward, team-oriented and reliable cooperation. We maintain open communication channels with all authorities at international, national and local levels. Communication with regulatory authorities is to be carried out exclusively by the relevant

Management Board Member or the employees explicitly assigned and authorised by the Management Board.

Interaction with employees

We are aware of our social responsibility and comply therefore with employment protection, legislation of labour contracts and the rights of employees' representatives.

Performance at work, capability, commitment and motivation alone are the material and decisive criteria for career and personal development.



1.5 Benefits

The giving of courtesies to business partners, suppliers or customers enjoys a long tradition in business practice.

Nevertheless, a benefit must never be misused for the purpose of gaining a dishonest or unfair advantage for oneself or others or for exerting influence. The value of each benefit must be within a reasonable and customary range. This is the case when, at no point, does it appear to an external third party that the benefit was intended to influence. Any impression of dishonesty or impropriety must be avoided. Furthermore, the reputation and integrity of the UNIQA Group must never be damaged by benefits of any kind. That is why this topic requires special attention.

Invitations

In general, we consider invitations among business partners and suppliers as an expression of mutual appreciation, which supports the establishment and maintenance of long-term business relationships. We always consider all circumstances of the individual case in both the acceptance and the issuance of invitations.

When an invitation is extended, then we take care that there is always a UNIQA employee present at the time when the invitation takes place such as when the invitation is for attending an event. Also, we make a distinction between invitations which are directed to a general group of people and invitations which are directed to individuals only and maintain a healthy sense of proportion.

Invitations from the value of 100 EUR must be reported to the Local Compliance Function. Special regulations must be observed for public officials. The Local Compliance-Function is available for advice in cases of doubt.

GOOD TO KNOW

Question: As a project manager at UNIQA, I am looking for a new IT system. The potential business partner wants to invite me, as an UNIQA representative, to a business dinner. Am I allowed to accept the invitation?

Answer: *Under the condition that business issues are discussed during the dinner and that a representative of UNIQA as well as at least one representative of the supplier is present, the invitation can be accepted. In addition, the transparency of the event must be ensured, and the public perception must be considered. Also, the value of the invitation must be considered. Invitations of this kind should be limited to joint meals.*

Question: As a customer service representative, I would like to invite my clients to a meal at the nearby inn after the conclusion of an insurance contract. May I extend this invitation?

Answer: *The invitation may be extended, provided that consideration is given to the public perception and the value of the invitation remains appropriate. Additionally, I must ensure whether my clients are public officials. In this case, special caution is required. If there is a temporal connection to an official act, the invitation is not permissible.*

GOOD TO KNOW

Question: As an UNIQA expert, I am invited as a speaker to a chargeable 2-day professional trade fair by an external organizer. An honorarium is offered to me for the lecture. Additionally, the flight and hotel costs will be covered by the organizer. May I accept this offer?

Answer: *Regarding the permissibility of accepting the flight and hotel costs by the organizer, the internal regulations for accepting benefits must be applied. In the present case, the flight and hotel costs can be covered by the organizer, as it is an external paid event where the UNIQA employee is giving a lecture. However, before accepting the invitation, the approval of the supervisor must be obtained.*

Gifts

Just as invitations, gifts represent small tokens of appreciation (such as a box of sweets for Christmas, a bouquet of flowers for a birthday) that are meant to strengthen a business relationship.

Gifts from a value of 100 EUR, as well as gifts where refusing the gift would seem inappropriate (as always, attention must be paid to the individual case), we hand it over to the Local Compliance Function. In case of doubt, it must be assumed that the value is 100 EUR or more.

In general, both the acceptance and the giving of direct or indirect financial benefits (such as a voucher for gastronomy) are prohibited.



GOOD TO KNOW



Question: I would like to thank a business partner for the good cooperation and send him/her two opera tickets. However, I will not be attending the event. Am I allowed to give this gift to the business partner?

Answer: No, since invitations serve to maintain business relationships and not for improper influence, it is important that I, as a UNIQA employee, am present at the invitation.

Question: I am a customer service representative and would like to invite my client, who is also the divisional manager for insurance matters at the chamber of commerce, to dine at an inn. May I invite my client?

Answer: The client, as the divisional manager of the chamber of commerce, is a public official. An invitation of this client is only possible if comparable clients are also invited to dine and if there is no temporal proximity to an official act with the chamber of commerce.

Donations and sponsoring

As a responsible member of society, UNIQA grants benefits in cash or in kind for education, science, arts, culture, sports as well as for social and humanitarian projects by means of donations and sponsoring.

Donations

Donations are voluntary benefits for charitable purposes which are given without consideration.

All donations must be transparent. The identity of the recipient and the intended use of the donation must be known and legally justifiable, as well as conform to the ethical values of UNIQA-Group.

No donations are allowed to:

- political parties and their affiliated organizations,
- parties campaigning for elections,
- profit-oriented organizations,
- organizations whose aims are not consistent with the company principles and/or values of UNIQA,
- organizations that could harm UNIQA's reputation.

Sponsoring

Sponsoring is the contractually agreed allocation of money, goods or services for advertising purposes.

When it comes to sponsoring, we pay attention to legal requirements, the principle of proportionality, economic feasibility and our socio political and social responsibility.

The goal of every sponsorship must be to present the UNIQA-Group to the largest possible group of existing or potential customers. Sponsorship agreements that offer UNIQA advertising opportunities are not considered donations.

GOOD TO KNOW

Question: The managing director of a major client requests a donation of UNIQA to a non-profit association, of which he is also a board member. Is there a way to help?

Answer: Donations for non-profit organizations, whose purpose is compatible with the values of UNIQA, are generally permissible. However, a donation should not create the appearance of (indirect) influence on the recipient of the donation. In specific cases, the Local Compliance Function supports the assessment of whether and how such a donation can be made.

GOOD TO KNOW

Question: My son is a successful goalkeeper in a soccer club. In autumn a competition for young teams will be held and for that event they look for a sponsor for trophies. Can UNIQA act as a sponsor?

Answer: In principle, sponsoring in such cases is allowed in exchange for an appropriate consideration (such as installation of UNIQA banners at the football field). For more detailed information about the possibilities in a specific case, please contact the local marketing function.

Donations and other benefits to political parties

Donations and other benefits to or from political parties and their affiliated companies as well as parties campaigning for elections are not permitted.

The only exceptions from this prohibition are

- the sponsoring of events that are organized by political parties, campaigning parties or their affiliated organizations, but at which no party-political content is discussed, and which are open to the general public. We make sure that any appearance of influence (of a public official) is avoided.
- advertisements in media, whose media owners are political parties or their affiliated organizations, but which do not predominantly contain party-political content and are directed at the general public. Furthermore, the advertisement must be appropriate according to its advertising value and promote a specific UNIQA product. Also in this case, it must be ensured that any appearance of influence (of a public official) is avoided.



GOOD TO KNOW

Question: An organization which does not directly belong to a political party but has a close link to a political party asks for a donation for their summer event. Is this considered as a benefit to political parties?

Answer: Yes, and therefore the requested support is not permitted.

Special regarding benefits for public officials:

Special caution is required when accepting and giving benefits to or from public officials. Before giving a benefit to a public official, the (criminal) risk must be assessed by anyone who gives the benefit. We pay particular attention to compliance with the legal framework; any deviation from it is not permitted. The granting of benefits that are closely related in time to official acts is in any case impermissible.

Benefits to public officials with a value of 30 EUR or more must be reported to the Local Compliance Function. Special attention must be paid to whether these are locally customary and whether there is a risk or appearance of a conflict of interest. Gifts or invitations to public officials with a value of 100 EUR or more are generally not permitted. Exceptions require prior approval from the Local Compliance Function.

A precise definition of the term 'public official' can be found in the Group Compliance Policy. The Local Compliance Function is available for consultation in case of doubt.

Incentives

As a reward for successful activity and special target achievement of internal or external (re)insurance intermediaries, we grant incentives, such as travel events. The value of incentives is determined by the personal benefit to the recipient (and their companion). It is measured by the sum of all services provided

to the recipient (and their companion) (e.g. travel expenses, accommodation, meals, each individual program item of the event).

When awarding incentives, we respect the locally applicable legal regulations as well as the EU regulations. Incentives must be designed in such a way that they always safeguard the image and reputation of UNIQA-Group.

Approval and reporting obligations

For both internal and external benefits, we respect the obligation to obtain approval from the supervisor. For certain benefits, the supervisor can issue a blanket approval. Excluded from this are benefits to public officials and political contributions.

GOOD TO KNOW

Question: I would like to invite my UNIQA-team to dinner to celebrate the completion of a challenging project. Do I need to report this invitation to the Local Compliance Function?

Answer: No, because it exclusively concerns UNIQA employees and is therefore an internal benefit. For internal benefits, the approval of my supervisor is sufficient.

Question: As a sales manager, I would like to invite customer service representatives, general agents, and retired UNIQA employees in my region to a Christmas party. Do I need to report this invitation to the Local Compliance Function?

Answer: Yes, because general agents and retired UNIQA-employees are considered "external third parties".

1.6 Dealing with property and confidential information

Information that is especially worth protecting is processed on our premises. On the one hand, we have detailed information about the life situation of our clients and on the other hand our procedures and methods are an asset which, if disclosed, could be used to our disadvantage.

Company equipment and company property

As a rule, company property may be used for business purposes only. We protect the company's property against misuse, loss and theft. Besides material assets such as operating resources, the company's property also includes immaterial assets such as intellectual property including software licenses.

We respect the internal regulations regarding the use of operating resources and the companies' resources (including but not limited to telephone, computers, internet and other information technologies).

Data protection / Protection of business secrets

The right to privacy is considered a human right and must therefore be protected. We comply with data protection provisions and ensure that personal data (for example data which is clearly attributable to a specific person) is protected reliably against unauthorised access and that all necessary measures to combat cyber-attacks are implemented in the company. Personal data may be passed on only in cases provided by law.

When personal data is collected and processed, the fundamental rights, freedom and the dignity of the persons concerned are safeguarded.

We are obliged to maintain secrecy regarding all internal confidential matters as well as regarding confidential information which concerns business part-

ners, suppliers and clients. In addition, operational and business secrets must explicitly be considered confidential.

The obligation to maintain confidentiality must be complied with also after termination of the employment. In case of violations, UNIQA reserves the right to take appropriate measures.

GOOD TO KNOW

Question: I would like to make a data analysis on my home computer in the evening. For that purpose, I would like to save the relevant client data on a USB stick and take it home with me. Is this in line with our security requirements?

Answer: No. Storing client data on external media is not allowed. The data analysis must either be done in the office or at home using the company notebook.

Insider information

Inside information is a precise information about companies listed on stock exchange, like UNIQA, that is not publicly available and which might have a significant influence on the stock exchange price if it were made public. Such knowledge provides an advantage over other market participants and therefore puts the functioning of the organised capital market at risk. Abuse of such information is subject to very strict sanctions – monetary fines as well as prison sentence in particularly severe cases.

It is prohibited to use information to achieve personal financial benefit or financial benefit for another person by disclosing such information or by trading with financial securities, that such inside information relates to. Further, it is prohibited to recommend to third parties to trade with such financial instruments. Also, disclosure of inside information and confidential price-sensitive information to other UNIQA employ-

GOOD TO KNOW

Question: I am working on an important, highly confidential project and I obtained information that is price sensitive. Therefore, I am not allowed to trade with UNIQA shares while I'm working on this project, but I can surely recommend to my brother to purchase UNIQA shares.

Answer: No, it is prohibited to give trading recommendations to third parties, if you have knowledge of inside information.

ees is prohibited, unless they require such information for fulfilling their work-related tasks (“need-to-know”).



1.7 Competition-compliant behavior

As UNIQA we are market participants and thus rely on a functioning market. Due to our excellent performance, we are in the position to design the market by innovation and quality.

We manage our business in full compliance with applicable laws and regulations within an open and honest framework based on integrity and good faith. Therefore, we reject practices that violate the principles of competition and of a free market.

We are convinced that it is indispensable for competition that we act fairly and in a quality-oriented manner.

Actions that are unfair and anti-competitive are not permitted. Our behaviour in competition must be such that the market is not adversely affected by market-sharing agreements, misuse of market power or concentration of market power. This includes agreements on prices, agreements on terms and conditions, allocation of the market (territories, clients, ratios), joint marketing with competitors, exchange of market-relevant information, etc.

GOOD TO KNOW

Question: During my long-lasting employment as a sales representative of UNIQA I have built up a large client portfolio. I am highly recognized in my area of work and a competitor is offering me a position as area manager. May I take the client portfolio data with me?

Answer: No. Taking client portfolio data with you is not in line with the rules of competition and it is even chargeable.

Question: During lunch a colleague of the claims department tells me about a new and serious liability case of industrial client. As UNIQA employee I am however not involved in key account business activities, and I have nothing to do with the client in terms of business. Is it permitted to pass on such information?

Answer: My colleague's conduct was incorrect because such client information must be treated confidentially.

1.8 Conflicts of interest

As employees we must ensure that private interests are not in conflict with our obligations to UNIQA. An intertwining of company and private interests at the expense of UNIQA is not permitted.

This includes for example contracts and negotiations from which we or persons close to us (for example relatives, friends, etc.) may benefit from. This does not apply to commission payments in connection with intermediary activities. Also, taking on secondary employments, consulting jobs, functions in legal entities or political offices may lead to conflicts of interests.

Every potential conflict of interest and any secondary employment, regardless of whether it can lead to a conflict of interest or not, must be brought to the attention of and assessed by the direct supervisor.

The documentation of the conflicts of interest identified within the company, as well as the handling thereof, is carried out by the Local Compliance Function. For this reason, every identified conflict of interest, especially those involving employees, members of the Management Board or the Supervisory Board, must be reported to the Local Compliance Function.

GOOD TO KNOW

Question: I have been offered the opportunity to run for district councilor on a safe list spot. May I accept the candidacy?

Answer: *The supervisor must be informed about the candidacy. After the supervisor has given consent to accept the candidacy, the request along with the consent must be forwarded to the Local People Function for further review. If the Local People Function concludes that the secondary employment poses a reputation risk, the Local Compliance Function will be informed in writing. Otherwise, the approval or rejection will be communicated to the employee and the supervisor.*

1.9 Sustainability

In addition to the ambition for economic success, we aim as insurance company also for the creation of ecological and social values. Our specific rules of conduct are largely derived from the regulations of the membership we have entered. We advocate these principles of conduct to our customers and our employees.

Our rules of conduct in accordance with 10 principles of the UN Global Compact (UNGC)

Compliance with the principles of the UN Global Compact (UNGC) is particularly relevant for us in the context of investment, underwriting, own operations, in the interactions with our employees and in the selection of our suppliers (<https://unglobalcompact.org/>):

Human Rights

- **Principle 1:** We support and respect the protection of internationally proclaimed human rights.
- **Principle 2:** We make sure that we are not complicit in human rights abuses.

Labour

- **Principle 3:** *We uphold the freedom of association and the effective recognition of the right to collective bargaining.*
- **Principle 4:** We are committed to the elimination of all forms of forced and compulsory labour.
- **Principle 5:** We are committed to the abolition of child labour.
- **Principle 6:** We advocate the elimination of discrimination in respect of employment and occupation.

Environment

- **Principle 7:** We support a precautionary approach to environmental challenges.
- **Principle 8:** We undertake initiatives to promote greater environmental responsibility.
- **Principle 9:** We encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

- **Principle 10:** We work against corruption in all its forms, including extortion and bribery.

We are convinced that the adherence to these principles in combination with the consideration of the UN Sustainable Development Goals (SDGs) is essential for fair competition and for safeguarding our reputation.

For this reason, UNIQA has also publicly declared its commitment to these principles in a letter from the UNIQA CEO to the United Nations.

Further Memberships

We consider the exchange of knowledge, improved transparency, jointly developed solutions and best-practice principles to be essential and are therefore a signatory and member of several global sustainability initiatives.





Focus: Human Rights

Suppliers

Our suppliers are obliged to respect human rights and to ensure that they are not involved in human rights violations or violations of social and labor laws.

Investments

The consideration of human rights in our investments is anchored in the UNIQA Responsible Investment Guidelines. UNIQA participates in standards-based engagement to counteract violations of human rights by companies. In addition, as part of our due diligence in managing our Principle Adverse Impacts, we also have a negative standards-based screening criterion for new on-balance sheet direct investments in issuers involved in serious social and environmental violations, based on the international standards of the UNGG and the OECD.

Corporate Clients

We have integrated the ESG risk evaluation into the underwriting process for our corporate clients. The exposure of corporate customers to social risks, including human rights, is evaluated directly upon offer creation. Clients operating in sectors with a high risk of human rights violations are referred to our ESG advisor and checked for relevant policies. In addition, listed companies are individually assessed for compliance with necessary human rights obligations based on publicly available data.

Employees

As an employer, we consider certain human rights to be fundamental and universally applicable for our employees. These include the right to freedom of association and collective bargaining as well as protection against sexual, religious, political and national or social discrimination. We do not tolerate child or forced labour, (modern) slavery or human trafficking in the course of our business activities. The UNIQA Group supports freedom of association and collective bargaining and has entered into collective agreements in Austria. The actual implementation of the right to freedom of association varies from country to country. We comply with local laws and regulations in the markets in which we operate. We follow international standards for employees to ensure fair labour practices, respect human rights, promote equal opportunities, guarantee equal pay and support diverse thinking. Our commitment to diversity and inclusion is set out in the Diversity & Inclusion Policy. We, the employees of UNIQA, are just as diverse as our customers.

Together, we form a community in which we value and respect each other - regardless of gender, age, origin, physical/mental ability, sexual orientation, religion, ideology or other characteristics. The UNIQA Group is actively committed to equality and inclusion and recognizes the importance of a workforce that reflects the diversity of the markets in which we operate.

Further links regarding sustainability

- **Sustainability strategy & ESG governance**

<https://www.uniqagroup.com/grp/sustainability/strategy-governance/strategy-esg-governance.en.html>

- **Sustainability reporting**

<https://www.uniqagroup.com/grp/sustainability/reporting-disclosure/sustainability-report.en.html>

- **Memberships & ratings**

<https://www.uniqagroup.com/grp/sustainability/reporting-disclosure/memberships-ratings.en.html>

- **Sustainability downloads**

<https://www.uniqagroup.com/grp/sustainability/reporting-disclosure/downloads.en.html>

1.10 Communication

We emphasize complete, honest, accurate, timely and understandable reporting in every area. Everyone who acts for UNIQA as employee, supervisor, Management Board Member or Supervisory Board Member ensures this.

We support honest and true reporting both inside and outside the company which makes us credible.

Communication with the media, our shareholders and supervisory authorities must be carried out exclusively by the relevant Management Board Member or the employees explicitly assigned and authorised by the

relevant Management Board Member. Every communication with the media or shareholders is aligned in advance with UNIQA Group Communication.



1.11 Contact

Every report of Compliance-relevant incidents will be treated confidentially and upon request also anonymously. UNIQA guarantees special protection and support to everyone who turns in a well-founded complaint or report with a good conscience and in good faith. The following persons are at your disposal for reports of illegal acts or breaches of the Code of Conduct:

General contact
compliance@uniqa.at

Management Board Member CFO / CRO

Kurt Svoboda

Phone: +43 1 21175-3368

E-mail: kurt.svoboda@uniqa.at

Head of Legal & Compliance / Compliance Officer

Rita Wittmann

Phone: + 43 1 21175-3690

E-mail: rita.wittmann@uniqa.at

GOOD TO KNOW

If you face a difficult decision it helps to ask yourself the following questions:

- *Is my behaviour in conformity with the law and in line with UNIQA's internal regulations?*
- *What do others think about my actions?*
- *Is there a risk that my behaviour casts a shadow on UNIQA and that I risk the company's reputation?*
- *Would my family and my friends consider my behaviour as ethical?*
- *Would it be fine with me if my actions would be covered by the media?*

In the case of doubt the Local Compliance-Function will be happy to support you.