

Version 02 / 10.2026.

Human Rights Policy

Raiffeisenlandesbank Niederösterreich-Wien



Table of Contents

Introduction	3
Values Orientation and Corporate Culture	3
Scope and Field of Application	3
Understanding of Human Rights	3
Implementation	5
Working Conditions	5
Equal Treatment and Equal Opportunities	6
Other Labour-Related Rights	6
Economic, Social, and Cultural Rights of Communities	6
Civil and Political Rights of Communities	7
Rights of Indigenous Peoples	7
Information-Related Impacts on Consumers and/or End Users	7
Personal Safety of Consumers and/or End Users	7
Social Inclusion of Consumers and/or End Users	7
Other Affected Stakeholders	8
Risk Assessment for Compliance with Minimum Social Standards	8
Human Rights Due Diligence	8
Supplier Risk Assessment	8
Customer Risk Assessment	9
Remedial Measures	10
Grievance Mechanisms	10
Reporting	11
Final Provisions	11
Contact	11

Introduction

For more than 130 years, Raiffeisen has stood for economic success combined with socially responsible action. At Raiffeisenlandesbank NÖ-Wien, sustainability is part of our identity and a key element of our corporate development. Our primary banks are deeply rooted in the region, understand the needs of our customers, and serve as reliable partners to the economy. Today, we implement this value in a contemporary manner, knowing that only ecologically and socially responsible solutions create real added value for people, society, the environment, and institutions.

Values Orientation and Corporate Culture

At Raiffeisenlandesbank NÖ-Wien, corporate social responsibility is an integral part of our strategic direction. It encompasses a social, economic, climate-, and environment-focused sustainability strategy, alongside responsible corporate governance. A central focus is placed on respecting human rights. Through this statement, we wish to express our commitment to human rights within our daily activities.

This human rights policy serves two key purposes: it creates the foundation for responsible, legally compliant business activities while ensuring that the interests of all stakeholders are taken into account. The various governance elements form an essential tool for implementing the Code of Conduct. All employees, executives, and corporate officers are obligated to uphold the highest standards of good corporate governance. These standards are continuously reviewed and further developed as necessary.

Scope and Field of Application

This human rights position paper protects all employees, customers, and suppliers of Raiffeisenlandesbank NÖ-Wien.

Understanding of Human Rights

As early as spring 2019, the parent entity, Raiffeisenlandesbank NÖ-Wien*, signed the commitment declaration to the UN Global Compact. In doing so, it officially committed to implementing the ten principles regarding human rights, anti-corruption, labour standards, and environmental protection. While simultaneously considering the OECD Guidelines, this includes the following fundamental principles in particular:

1. Child labour is firmly rejected.
2. Forced and compulsory labour is strictly prohibited.
3. Health and safety in the workplace are ensured through a safe and adequate working environment, the provision of medical care, and regular, targeted training.
4. We reaffirm the right of our employees to freedom of assembly and collective association, maintaining constant and open communication.
5. We prohibit any form of discrimination and actively combat it.

*The commitment to the UN Global Compact was originally made by Raiffeisen-Holding NÖ-Wien. Following the consolidation of operational business and investment activities into Raiffeisenlandesbank NÖ-Wien in 2026, this commitment is now carried forward by Raiffeisenlandesbank NÖ-Wien as part of its business operations.

6. Fair working conditions are important to us. We commit to complying with all statutory regulations on remuneration and working hours, promoting an appropriate work-life balance for our employees.
7. We uphold the highest standards towards all our stakeholders. Through clear and open channels of communication, we aim to address potential concerns promptly and exert a positive influence on surrounding communities.
8. We combat every form of corruption and financial crime.
9. In our business relationships, we respect all principles of fair and free competition.
10. We refuse to conduct business in a manner that facilitates or encourages tax evasion.

International agreements play a critical role not only in international relations but also carry great significance for companies. These concern inalienable fundamental rights to which every individual is entitled, regardless of ethnic or social origin, race, skin colour, gender, age, language, religion, ethnic affiliation, sexual orientation, disability, worldview, wealth, or any other status, belief, or attitude. This policy refers specifically to the following internationally recognised human rights standards:

- Universal Declaration of Human Rights;
- International Covenant on Civil and Political Rights;
- International Covenant on Economic, Social and Cultural Rights;
- Core Labour Standards of the International Labour Organization (ILO): freedom of association, right to collective bargaining, abolition of child and forced labour, equal remuneration, non-discrimination in respect of employment and occupation;
- European Convention on Human Rights;
- OECD Guidelines;
- UN Guiding Principles on Business and Human Rights.

Implementation

Within its sphere of influence, Raiffeisenlandesbank NÖ-Wien promotes the active implementation of human rights standards. Potential and actual adverse impacts on human rights are regularly and systematically identified and assessed from a nuanced perspective—through annual reviews during the preparation of the consolidated non-financial statement and through reports via the whistleblowing system. If a human rights violation is threatened or has occurred, remedial measures are analysed.

Responsibility for the implementation and enforcement of this human rights policy lies with the Managing Board, compliance officers, and the Human Rights Officer. Notifications, concerns, and inquiries can be submitted directly to the Human Rights Officer or through the anonymous whistleblowing system.

A group-wide corporate governance structure ensures effective implementation: the Managing Board approves strategic goals and measures; the Compliance, Human Resources, Procurement, and Legal departments support implementation through risk analyses, control measures, and training sessions.

Awareness and capacity building regarding human rights are promoted group-wide through various measures: all employees are required to read and confirm adherence to internal regulations concerning human rights, anti-discrimination, data protection, workplace safety, and whistleblowing. Where relevant or necessary, supplementary training is mandatory upon joining the company and at regular intervals thereafter. Managers receive training on inclusive leadership and anti-discrimination during leadership development programmes. In the event of regulatory updates, focused training sessions or information events are held for executives.

In the supply chain, suppliers are integrated via the Supplier Code of Conduct. For affected communities, stakeholder dialogues are conducted during the preparation of the non-financial statement. Consumers are protected through transparent communication and accessible digital offerings.

Working Conditions

Raiffeisenlandesbank NÖ-Wien is committed to fair working conditions and a safe, healthy working environment. This includes fair wages, reasonable working hours, work-life balance, and respect for freedom of association and collective bargaining. Discrimination, harassment, and all forms of forced or child labour are strictly prohibited. Working time models and compensation follow legal requirements and collective agreements; flexible working arrangements are encouraged wherever possible.

Health and safety are top priorities: Raiffeisenlandesbank NÖ-Wien is ISO 45001 certified. It complies with all occupational health and safety regulations and continuously improves its performance through targeted measures, including risk factor awareness, health lectures, stress management offerings, as well as medical and psychological advice. These measures support early detection, awareness-raising, and general stress reduction. Furthermore, the company offers psychological support services, including anonymous counselling by occupational psychologists and external partners. Mental stress and physical risks are systematically addressed. Managers are trained to identify stress early and implement appropriate solutions in coordination with HR.

Compliance with fundamental labour and human rights standards—including the prohibition of child and forced labour, reasonable working hours, safe working conditions, and fair wages—is expected from all suppliers and business partners. Our Supplier Code of Conduct is mandatory and incorporates all human rights requirements mentioned herein.

Equal Treatment and Equal Opportunities

Diversity and inclusion are core values of the corporate culture and ESG strategy of Raiffeisenlandesbank NÖ-Wien. The diversity strategy supports these values through measurable targets, such as female representation in leadership roles, generational management, and accessibility training. Recruitment, promotion, and compensation decisions follow objective, non-discriminatory criteria. Managers receive annual training on inclusive leadership and anti-discrimination. Any form of discrimination (including based on gender, age, disability, origin, religion, sexual orientation, or gender identity) is prohibited.

For grievances, Equal Opportunity Officers, Human Resources, the Works Council, an Ombudsman office, the Human Rights Officer, and the Whistleblowing Platform are available. Confidentiality, protection against retaliation, prompt investigation, transparent feedback, and appropriate remediation are guaranteed.

The Supplier Code of Conduct obligates suppliers to comply with these standards and promote diversity within the supply chain.

Other Labour-Related Rights

The bank commits to respecting and promoting other labour-related human rights throughout its operations and value chain. This policy outlines the bank's position on respecting internationally recognized human rights. A specific focus is placed on labour rights, particularly a firm commitment against child and forced labour. The bank tolerates neither child labour nor any form of forced or compulsory labour and incorporates these principles into its business relationships—supported by the Supplier Code of Conduct—as well as within its due diligence and risk management processes. Likewise, the bank is committed to upholding data protection and safeguarding personal data.

Protecting the personal data of our employees, customers, and partners is a fundamental right and a key element of our corporate responsibility. The legal foundation consists of the GDPR, the Austrian Data Protection Act, the Internal Data Protection Directive, and our Data Protection Management System (DPMS). The Data Protection Directive governs data processing, data subject rights, and the management of data breaches.

In addition, information security and cyber resilience are strengthened through technical protective measures and an awareness concept that includes training, awareness activities, and regular phishing simulations. This helps prevent impairments to customer privacy and trust caused by inadequate data security (such as data misuse or cyberattacks).

Economic, Social, and Cultural Rights of Communities

As a financial institution and group with diverse business fields, we recognise that our financing, investments, products, and services can have indirect impacts on communities—near operational sites, assets, and along supply chains. We commit to identifying significant risks early, meaningfully engaging affected stakeholders, and respecting their rights. We avoid adverse impacts such as displacement, deterioration of living conditions, or unfair treatment of vulnerable groups. Typical risks concern land rights, resettlement, livelihoods, water/biodiversity, security (use of private/public security forces), digital exclusion, and data misuse. We expect customers to apply international standards and—depending on risk levels—require human rights impact assessments and credible remediation plans.

Civil and Political Rights of Communities

We respect freedom of expression, information, assembly, and the right to lodge complaints. Intimidation or retaliation against individuals expressing concerns—including whistleblowers, NGOs, or community representatives—will not be tolerated. Communication and stakeholder dialogues are conducted in an objective, accessible, culturally sensitive, and respectful manner.

Rights of Indigenous Peoples

We respect the rights of indigenous peoples and apply the principle of Free, Prior, and Informed Consent (FPIC) to projects affecting their livelihoods, culture, or territories. Provisions concerning the rights of indigenous peoples are bindingly embedded in the Supplier Code of Conduct and align with the UN Declaration on the Rights of Indigenous Peoples and relevant ILO standards. We ensure engagement is culturally sensitive, inclusive, and—where necessary—multilingual. Due to the bank's regional business focus in the DACH region and EU, specific assessments of impacts on indigenous peoples are currently not performed separately. Should existing review, due diligence, or control processes indicate potential impacts on indigenous communities, these will be evaluated in accordance with applicable guidelines. Intimidation, retaliation, or violence against representatives of indigenous communities will not be tolerated.

Information-Related Impacts on Consumers and/or End Users

Respectful, competent, and fair engagement with our customers is a core element of Raiffeisenlandesbank NÖ-Wien's business activities across all segments. Compliance with human rights and environmental standards is supported by corresponding governance, compliance, and control frameworks. The bank accepts responsibility for the impacts of its products and services on consumers and end users.

Raiffeisenlandesbank NÖ-Wien ensures transparency, fair treatment, compliance with data protection principles, as well as access and encryption standards. Accessibility is integrated into digital offerings. Product development follows the "Do No Significant Harm" principle, placing customer interests at the centre. Security incidents are managed under emergency response plans, affected parties are notified, and root causes are analysed. Third-party vendor risks are managed via contractual and technical controls.

Personal Safety of Consumers and/or End Users

Product safety—including digital channels—is ensured. Particularly vulnerable groups are protected through extra mechanisms, such as ensuring accessible access options. All products and services are assessed for safety risks; IT security standards and continuous updates mitigate digital risks.

Social Inclusion of Consumers and/or End Users

Raiffeisenlandesbank NÖ-Wien ensures social inclusion across all business operations. Equal access to products and services is promoted through accessible, clear communication, service, and feedback channels. Financial inclusion is protected through measures preventing over-indebtedness (e.g., creditworthiness checks, debt advice references, ombudsman support) and via financial literacy programmes (Raiffeisen JUNIOR) as well as SME support initiatives. Anonymous complaints can be submitted via the whistleblowing system; prompt handling and effective remediation are guaranteed.

Other Affected Stakeholders

In order to engage with other stakeholders who do not fall within the primary stakeholder groups of Raiffeisenlandesbank NÖ-Wien, open and clear lines of communication are always encouraged. Principles of conduct are upheld in all stakeholder interactions. Confidential reporting channels, including anonymous whistleblowing, are available to all stakeholders; retaliation is strictly prohibited.

Risk Assessment for Compliance with Minimum Social Standards

Through human rights risk assessments conducted at least annually in accordance with the 10 UN Global Compact Principles, Raiffeisenlandesbank NÖ-Wien implements a central preventive measure within its own business activities and across upstream and downstream value chains. This encompasses both supplier due diligence based on the Supplier Code of Conduct and customer evaluations via ESG scoring during the credit granting process. Potential human rights risks are specifically evaluated based on country-, sector-, and business-specific risk profiles. Depending on the risk profile, appropriate measures are taken, such as obtaining additional information, carrying out in-depth reviews, or executing risk-mitigating measures. The objective is to identify, prevent, or minimise potential adverse human rights impacts early.

Human Rights Due Diligence

Human rights due diligence is assured by integrating relevant requirements into the bank's existing governance, compliance, risk, and control processes. Human rights-related risks and potential negative impacts are evaluated within these respective review and control workflows. If indicators of human rights risks or violations are identified, they feed into the assessment of the specific case or business relationship and are factored into the overall evaluation. Identification, assessment, and monitoring of human rights risks follow a risk-oriented approach within established frameworks; an independent, standalone enterprise-wide or customer-specific human rights risk analysis is currently not established.

Based on risk analyses, preventive and remedial actions are taken as necessary to avoid or minimise negative impacts. To maintain compliance, policies, internal processes, and control mechanisms exist in the areas of human rights, employee rights, anti-corruption, fair competition, and responsible business practices.

The bank fosters dialogue with relevant stakeholders and considers their perspectives when refining its processes. Furthermore, appropriate grievance and whistleblowing channels are available to report and investigate potential violations.

The effectiveness of measures is continuously monitored and reviewed by responsible departments and independent control functions. This ensures the ongoing implementation of human rights due diligence in line with international standards.

Supplier Risk Assessment

Compliance with human rights and labour standards in the supply chain is a central component of Raiffeisenlandesbank NÖ-Wien's due diligence duties. Suppliers are classified using a risk-based approach considering country and sector risks.

Suppliers are expected to comply with human rights, social, and environmental standards set out in the Supplier Code of Conduct, particularly regarding international human rights, the prohibition of child/forced labour, and compliance with labour, social, and safety regulations.

To verify compliance, measures such as requesting information or—in cases of elevated risk—audits may be conducted. In the event of identified violations, dialogue is initiated with the supplier, and corrective actions are required. In cases of material non-compliance, this may lead to the termination of the business relationship.

To further strengthen human rights due diligence, Raiffeisenlandesbank NÖ-Wien is currently preparing the implementation of a specialised due diligence tool. This tool specifically supports the systematic assessment of human rights risks in the supply chain and among business partners.

Customer Risk Assessment

Raiffeisenlandesbank NÖ-Wien also considers human rights risks within customer relationships, particularly during the credit granting process.

Assessment takes place via ESG scoring, which integrates environmental, social, and governance risks. Potential human rights risks are specifically identified and evaluated based on country, sector, and business models. A systematic assessment of ownership structures regarding potential human rights risks is currently not conducted.

In cases of elevated risk, additional information is requested and in-depth reviews are conducted. Depending on the results, risk-mitigating measures are required, and decision-making processes are adjusted accordingly.

- Integration of ESG Scoring into the Credit Granting Process (Elevated Risk):
 - Mandatory in-depth review
 - Requirement of remedial actions from customers
 - Escalation to higher decision-making levels
 - Potential exclusion from financing
- The scoring tool classifies risks according to Environmental (E), Social (S), and Governance (G) criteria. Individual results are combined using specific weightings into a comprehensive ESG Score, serving as an indicator of the borrower's ESG risk.
- In 2024, ESG scoring was successfully integrated into the credit granting process for corporate and SME customers. For loans above a defined Risk Relevance Threshold (RRG), relationship managers generate an ESG Score that feeds into the formal ESG statement.
- Depending on the ESG score outcome, customer evaluations specifically request risk-mitigating actions. If a high ESG risk is identified, the credit application decision is escalated to a higher authority level to ensure thorough evaluation. Exclusion from financing currently occurs particularly in cases of very poor ESG ratings (CCC or lower).

Remedial Measures

Should actual or potential adverse human rights impacts occur despite preventive measures and risk analyses, Raiffeisenlandesbank NÖ-Wien takes appropriate and proportionate remedial action. These are implemented considering the nature and severity of the incident and in close coordination with affected stakeholder groups.

Remedial measures follow a structured approach:

- Investigation and evaluation of the incident
- Engagement with affected individuals or groups
- Determination of appropriate and proportionate measures
- Monitoring of implementation and effectiveness

Allegations of discrimination are investigated, and depending on severity, appropriate measures ranging from warnings to termination of employment are taken.

Depending on the individual case, the measure catalogue specifically includes:

- Improvement measures and adjustment of internal processes
- Training sessions and disciplinary measures
- Initiation of dialogue and requirement of an improvement plan for business partners
- Restriction or termination of business relationships in cases of severe non-compliance
- Appropriate remediation / compensation

Raiffeisenlandesbank NÖ-Wien pursues a solution-oriented approach in collaboration with employees, suppliers, and customers to address root causes and prevent future violations.

Grievance Mechanisms

Great importance is placed on respectful conduct in interactions with each other as well as with customers, suppliers, and all other affected stakeholders. The bank endeavours to prevent misconduct by its staff through training and awareness initiatives aligned with human rights due diligence obligations.

A whistleblower platform and internal processes for discrimination cases are available to all stakeholders. Furthermore, Equal Opportunity Officers, a Representative for Employees with Disabilities, a Human Rights Officer, and Employee Representatives (Works Council) serve as designated bodies for staff.

Reports regarding problematic business practices of business partners can be lodged with an Ombudsman's office. Grievances can be submitted verbally, in writing, or via an electronic complaint form to a grievance office.

Reporting

Social, economic, and ecological sustainability go hand in hand. Raiffeisenlandesbank NÖ-Wien continuously works on implementing and optimizing its human rights and environmental due diligence processes. Progress is routinely discussed in Sustainability Committees and subsequently reviewed by the Managing Board. Through these efforts, Raiffeisenlandesbank NÖ-Wien actively contributes to sustainable and social development. The bank documents the fulfilment of its responsibilities annually and publishes this information on its website.

Final Provisions

This policy statement enters into force on the day of signing and supplements the Human Rights Position Paper of Raiffeisenlandesbank NÖ-Wien. This policy statement was formally adopted by the Managing Board on 20 October 2026.

Contact

Questions, suggestions, or reports regarding human rights topics can be addressed directly to our Human Rights Officer via email at: bk-menschenrechte@raiffeisenbank.at
Reports or complaints can also be submitted via our [EQS Whistleblowing Platform](#).

Vienna, 20.10.2026

Contact

Raiffeisenlandesbank Niederösterreich-Wien
Friedrich-Wilhelm-Raiffeisenplatz 1
1020 Wien
Tel.: +43 5 1700 1700
E-Mail: menschenrechte@raiffeisenbank.at
<http://www.raiffeisenbank.at>