

CODE OF CONDUCT
OF THE BANK FÜR TIROL UND VORARLBERG AKTIENGESELLSCHAFT
AS OF OCTOBER 2024

Code of Conduct

for Suppliers

Code of Conduct for Suppliers of the Bank für Tirol und Vorarlberg Aktiengesellschaft

“Create. Values. Sustainably.”

This mission statement expresses the positioning of the BTV. We are motivated and driven by our customers' needs and wishes. We find the best possible answers for their concerns. And we always focus on their key requirement: create, manage, secure, and pass on real values.

BTV is a company with mind & attitude. It acts independently and responsibly. 'Mind' means recognizing what's right. 'Attitude' means doing what's right. From this attitude and inward conviction, we work intensively with topics concerning the future, develop sustainable solutions, and take bold steps. We're responsible for social, economic, and ecological concerns.

This code defines our principles and explains what the BTV expects from organizations – including their representatives, employees, and affiliated companies – who provide our goods and services. We expect our suppliers to fully comply with all applicable legal statutes and regulations and internationally recognized standards, not least in corporate governance and in environmental and social areas.

All suppliers must obviously comply with all applicable national and international legal statutes and regulations. The BTV also expects its suppliers to comply with all the generally recognized international standards listed here. If any individual national regulations are less strict than those set out in this Code of Conduct, the BTV expects the supplier to comply with the higher standards set out in this code.

As far as reasonable, the suppliers must impose these minimum standards on any affiliated third parties (such as vicarious agents, upstream suppliers, and subcontractors) and ensure compliance.

Business integrity

Fair competition

The BTV supports the regulations to protect the free market and fair competition. This means the supplier must transact its business in accordance with all the applicable legal statutes and regulations of competition and antitrust law.

Anticorruption and antibribery

The supplier must not participate in or tolerate any type of corruption, extortion, embezzlement, or bribery, and must strictly comply with all applicable anticorruption and antibribery regulations, including principle 10 (anticorruption) of the UN Global Compact. The supplier must not offer the employees of BTV any inappropriate gifts, favours, invitations, or other incentives to obtain an undue advantage for themselves or anyone else. Nonetheless, the relevant compliance regulations of the BTV apply to any acceptance of a gift by an employee.

Combatting money laundering and the financing of terrorism

The supplier must transact its business in accordance with all the applicable regulations on combatting money laundering and the financing of terrorism.

Avoiding conflicts of interest

If there are any possible conflicts of interest, such as relationships between the supplier and BTV employees (such as family relationships, business relationships, or investments), the supplier must notify the BTV of those conflicts without undue delay and without being asked.

Data protection and intellectual property

Each time the supplier uses confidential information of which it becomes aware, that use must be appropriate and comply with the law and the supplier must ensure that the privacy of all BTV employees and any existing rights to intellectual property are strictly protected. The supplier must ensure that no processing is performed on personal data of which it becomes aware unless that processing complies with applicable legal statutes and regulations, including the General Data Protection Regulation (EU 2016/679) and relevant national regulations. Apart from that, the relevant provisions of any relevant nondisclosure agreement entered into with the BTV will apply.

Human rights and working principles

Compliance with human rights

The BTV expects their suppliers to respect internationally recognized human rights and working conditions without limitation. The supplier must support and respect the human rights principles (principles 1 and 2) and labour principles (principles 3, 4, 5, and 6) of the UN Global Compact and the conventions of the International Labour Organisation (ILO).

No forced or child labour

The BTV obviously tolerates no slavery or forced or compulsory labour (including debt bondage and voluntary prison labour) in its supply chain. The same goes for child labour. The supplier must comply with the prohibition of forced labour and the minimum age for a work permit as regulated by the ILO and the applicable legal statutes and provisions.

Nondiscrimination and fair treatment

The BTV insists on the equal treatment of its employees. Suppliers must not discriminate in hiring and employment practices, such as applications, promotions, remuneration, access to training, dismissals, or retirement (principle 6 of the UN Global Compact). Illegitimate grounds for discrimination include among other things: race, skin colour, gender, age, language, assets, nationality or origin, religion, ethnic or social origin, impediment, pregnancy, union membership, political opinions, and sexual orientation. The supplier shall ensure that its employees are not threatened or harassed in any way. Verbally or physically violating a person's dignity is forbidden.

Minimum wage and working hours

The supplier must comply with all applicable legal statutes and regulations regarding minimum wage, working hours, and overtime. Suppliers are expected to offer their employees fair and competitive remuneration.

Health and safety

The supplier must choose a safe and healthy workplace or another location in which the work can be performed in accordance with all applicable legal statutes and regulations and reasonable access to drinking water and sanitary facilities, fire protection, and adequate lighting and ventilation is guaranteed. The supplier must implement suitable controls, secure procedures, and protocols for providing suitable protective equipment in accordance with applicable legal statutes and regulations. The supplier must take all suitable measures to protect its employees from health hazards and ensure that the employees working in a facility are properly trained.

Freedom of association

The supplier acknowledges and respects the employees' right to associate freely, to organize and negotiate collectively, and to establish or join unions and representative organizations if they wish.

Environment

Environmental policy

The BTV continually works at assessing the environmental impacts of their actions and avoiding or at least reducing negative effects. We aim to avoid environmental damage and minimize our use of energy and resources. Suppliers must comply with all applicable environmental laws and regulations that apply for the workplace, the manufactured products, and the production methods. Additionally, suppliers must use no materials that are deemed hazardous for the environment, but strictly advocate the use of environmentally friendly and resource-conserving processes and materials. We expect our suppliers not to contaminate the environment or waste natural resources. The supplier must respect and support the environmental principles (principles 7, 8, and 9) of the UN Global Compact.

Conflict minerals

The supplier must comply with all applicable legal statutes and regulations on conflict minerals.

Miscellaneous

Inspection of and noncompliance with this Code of Conduct

On request, the supplier must give the BTV all necessary and/or requested documents that verify compliance with this Code of Conduct. The supplier must take suitable measures against infringements of this Code of Conduct or equivalent standards of which it becomes aware, but must inform the BTV thoroughly thereof in any case.

The BTV may cancel individual orders and/or the contractual relationship with the supplier if the supplier and/or a third party affiliated with the supplier infringe the provisions of this Code of Conduct and fail to effectively remedy that infringement within a reasonable period set by the BTV.

Severe infringements, but in any case infringements against anticorruption and antibribery regulations and regulations on combatting money laundering and the financing of terrorism, entitle the BTV to extraordinarily terminate the agreement with the supplier without notice, without prejudice to other rights of withdrawal and termination.

The BTV reserves the right to amend this Code of Conduct at all times if necessary, in which case the amended version will apply toward the supplier for any orders issued by the BTV as soon as it is received. The Code of Conduct as amended will be deemed received when it has been transmitted to the contact specified to the BTV via the normal communication channels used in the business relationship.

Declaration to be signed by the supplier:

The declaration may be signed only by a person authorized to represent the company.

I hereby confirm that I have received the BTV Supplier Code of Conduct and shall comply with its applicable version in doing business with the BTV.

Company: (supplier's company stamp)

Title:

Name:

Date:

Signature: