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POLICY NO. 10 BUSINESS-COMPLIANCE

Replaces Group Regulations Nos. 01/2015 and 02/2015

Version 2.0

Valid from: 09 June 2021

Valid until: revoked

Area of application:

This Policy applies to all corporate bodies, employees of Österreichische Post AG and its majority shareholdings in Austria and abroad (hereinafter referred to as the "Post Group"), with local laws and regulations taking precedence if they contain stricter provisions than this Policy.



PREAMBLE

The Post Group aims to act in accordance with the highest standards of ethical conduct and integrity. This claim is the basis of our Code of Conduct and Ethics. The Code thus forms the basis for our business activities and decisions.

The standards of conduct laid down in the Code of Conduct and Ethics are now specified in more detail in topic-specific policies. The "Business Compliance" policy contains guidelines and processes on the following topics:

- Prohibition of corruption
- Dealing with donations and sponsorship
- What to do in the event of conflicts of interest
- Dealing with company resources

Furthermore, this Policy contains a brief description of the Compliance Management System.



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CONTENT OF THE POLICY

The Post Group aims at a reputation as a trustworthy business partner. We are committed to the highest standards of ethical conduct and integrity. We therefore strongly disapprove of unfair business practices, corruption and bribery. Likewise, the Post Group expects its business partners to adhere to these principles.

The aim of this Policy is to ensure that all relevant statutory anti-corruption provisions are observed in order to avoid financial loss or damage to the reputation of the Post Group's management, its employees or the Post Group as a whole and to create a working environment that meets the Post Group's high standards of integrity. In order to achieve this goal, it is of fundamental importance not only to comply with this policy but also to observe the regulations and processes otherwise defined within the Group, such as the Group Procurement Policy, the Group Regulation on Consistent Communication and Dealing with the Media, the catalogue of approval or the guidelines governing signatures.

Violations of the Policy will be punished consistently and irrespective of the rank and position of the persons involved.

Every manager therefore has a special responsibility for establishing a positive culture of compliance and should regularly point out the importance of integrity and demonstrate this through their personal conduct. Leadership commitment is an essential factor in creating a culture of integrity, transparency and openness.

I REGULATION FOR POST AG

1. Prohibition of corruption

Corruption is the abuse of entrusted power for personal gain. Forms of corruption include corruptibility, bribery, the granting and acceptance of undue advantages.

An advantage for the purposes of this Policy is

- any donation or gift of a material or immaterial nature,
- which is free of charge for the recipient or for which the consideration is disproportionate to the advantage, and
- to which the recipient has no legal claim.

Advantages are considered to be:

- Money (e.g. cash, bank transfers, interest-free or low-interest loans),
- Benefits of monetary value (e.g. meals/entertainment, vouchers, discounts, free admission to or tickets for events, waiver of a claim, exclusive licenses for computer programs),
- Tangible assets (e.g. valuable books, spirits, CDs),
- Social and professional advantages (e.g. arranging for an award to be granted, supporting a job application, invitations to hunting trips/parties, sports or cultural events, job offers, arranging a holiday job for children).

Mutual invitations to business lunches/dinners in the course of long-term business relationships during which business-related topics are discussed are not regarded as undue advantages. The restaurant must be appropriate to the occasion and the participants of the meal (socially appropriate).



1.1 Prohibition on accepting bribes and undue advantages

We make our business decisions exclusively for factual reasons in the interests of the Post Group; private interests shall not play a role in this. We do not permit ourselves any undue advantages and, in particular, do not allow ourselves to be influenced in our business decisions. Demanding advantages is forbidden without exception. If we observe such actions within the company, we report them to the central Compliance Office.

The employees of the Post Group are considered public officials and, as such, must comply with special legal requirements. We therefore strive to avoid any impression of being influenced in business decisions by undue advantages. If we are not sure whether we can accept a gift, an invitation to a business lunch or to an event hosted by a business partner, we can check by looking at the diagram in Annex A and the case studies in Annex B. In case of questions we can contact the central Compliance Office, the regional Compliance Officers or the Compliance Helpdesk (by email: compliance.helpdesk@post.at; by telephone: 0800 202224 or via the intranet).

1.2 Prohibition of bribery and the granting of undue advantage

When dealing with third parties - whether private individuals, representatives of private-sector companies or public officials - we are prohibited without exception from directly or indirectly offering, promising, granting or approving advantages, if this is intended to result in an act or omission of the recipient in breach of their duty. Any attempt to unfairly influence third parties by granting undue advantages is also prohibited. We strictly avoid conveying any impression of acting inappropriately or dishonestly in any way.

Furthermore, granting any undue advantages to public officials is subject to particularly strict rules. Here, advantages are only permissible to a very limited extent, even within the scope of official duties. If you have any questions about whether a particular person is a public official, the Compliance Office will be happy to assist. Low-value gifts and benefits customary in the region or country are permitted in the context of an event in which the public official has an objectively justified interest to participate. For further details, see the illustration in Annex A and the case studies in Annex B. If we have any questions, we can also contact the Compliance Office, the regional Compliance Officers or the Compliance Helpdesk (by email: compliance.helpdesk@post.at; by telephone: 0800 202224 or via the intranet).

If the advantage is to be granted in exchange for speeding up an official act or achieving that an official act is performed, this is a case of breach of duty. The payment of such "facility payments" is prohibited. There is no breach of duty if non-payment would endanger the personal health of employees or close relatives. Such incidents must be reported immediately to the central Compliance Office.

If we are requested by third parties to grant unfair advantages or if we engage in acts of bribery within the company, we must also inform the central Compliance Office.

1.3 Special provision

Employees of the Post Group's Corporate Procurement department are prohibited from accepting and granting advantages of any kind. The same applies to Post Group employees from mandated business units (=organisational units outside Corporate Procurement which are authorised to make purchases) who are responsible for purchasing in these units. The mandated units are:

- Purchasing of merchandise
- Group-Real Estate of the Post Group for the rental and acquisition of properties and buildings

This special provision also applies to those Post Group employees who handle purchasing transactions in the amount of more than EUR 100,000 in the respective operational areas on the following topics:

- purchase of parcel delivery freighters
- Banking transactions/treasury



In special cases, the Compliance Office may grant an exception to this special provision.

2. Dealing with donations and sponsorship

2.1 Principles

Group-wide guidelines on sponsorship and donations help us to ensure that our internal and external conduct and presentation are harmonised and well-coordinated. Those guidelines support us in our efforts to be perceived as a reliable, fair and transparent partner by our customers, business partners, shareholders and the public. With the principles laid down in this Policy, we aim to ensure that sponsorship projects or donations do not cause any financial loss or damage to the reputation of the management, employees or the Post Group as a whole.

The group-wide sponsorship strategy and its objectives are determined by Corporate Communications. All sponsorship activities must therefore be examined in advance by Corporate Communications.

Donations, charitable contributions and sponsorships may not be used to circumvent the aforementioned anti-corruption provisions and must comply with the values and principles laid down in the Post Group's Code of Conduct and Ethics.

Additionally, the provisions of the Media Transparency Policy must be observed.

2.2 What do we mean by sponsorship and donations?

Sponsorship is an integral part of the Post Group's public relations work. Sponsorship in the narrower sense refers to the special form of marketing in which the marketing effect is to be achieved through advertising campaigns within the framework of an event organised by a third party (e.g. sports, culture). Sponsorship in the broader sense means all forms of cooperation with companies and organisations for the purpose of achieving marketing effects. Sponsorship projects can take place in particular in the fields of culture, education, sports, the promotion of environmental protection, and social affairs. The provisions of this Policy also apply to all projects in which the Post Group acts as a sponsorship recipient.

Donations can be made in the form of donations of money, goods or services. Unlike sponsorship, the donor does not expect any business service or transaction in return.

2.3 Dealing with sponsorship

Our sponsorship commitment is based on our values and the resulting mission statement and serves the purpose of promoting the sustainable development of the Post Group.

With our sponsorship strategy we pursue an economic and a social approach with the following objectives:

- Strengthening customer loyalty and customer acquisition
- Intensifying contact with relevant stakeholder groups
- Taking social responsibility
- Promoting the Post Group as an integral part of all living environments
- Increasing employee identification

In addition, there are large-scale events with a particularly broad impact throughout Austria with above-average communicative value as well as experimental pilot projects for regional commitment.



Sponsorships which trigger or might trigger a conflict of interest must be disclosed. Additionally an assessment by Compliance is required. A conflict of interest exists, for example, if a sponsorship agreement is to be entered with an association with whom there is a close personal relationship or if a sales agreement has been concluded with that association recently.

Procedure for the implementation of sponsorships:

The detailed process we must follow when carrying out sponsorships is described in Annex C. The model contracts for sponsorship agreements can be found in Annexes E, F and I and for sponsorships within the framework of raffles in Annex G. The sample contracts for sponsorship agreements can be found in Annex E, F and I and for sponsorships in the context of competitions in Annex G. For sponsorships in the context of raffles, we also observe the guidelines for raffles.

2.4 Dealing with donations

We may not donate money, goods or services in anticipation of any kind of consideration and only for sustainable

- Educational and scientific purposes
- Cultural and social purposes
- Environmental projects
- charitable and humanitarian projects

Furthermore, we may not exert any decisive influence on the use of the donation and the donation may not serve to circumvent the provisions on the granting of advantages (see section I.1 above). This would be the case, for example, if - instead of granting a direct advantage to a public official - a donation is made to an organisation headed by that public official.

We may not make donations of money or goods to organisations that are not compatible with our Code of Conduct and Ethics or to political parties or organisations that have a close relationship with political parties. In individual cases, exceptions may be granted in coordination with Compliance. This also applies to organisations that could harm the interests or reputation of the Post Group.

Donations which trigger or might trigger a conflict of interest must be disclosed and require an assessment by Compliance. A conflict of interest exists, for example, if the donation is to be made to an association whose management body includes an employee of the Post Group.

Furthermore, Post Group must not accept any donations.

The detailed process to be followed when making donations is described in Annex D.

3. What to do in the event of conflicts of interest

Our professional activities are geared exclusively to the interests of the company. We always try to separate professional and private interests in order to avoid any conflict that would have a negative effect on the Post Group. We try to avoid situations in which our personal, family, political or financial interests could conflict with the interests of the Post Group. Any impression that our business decisions are influenced by personal interests should be avoided. Should we nevertheless wish to conduct business with persons with whom we have a personal relationship, we disclose this conflict of interest and coordinate this in advance with Compliance.

In addition, the following requirements apply:

3.1 Conflicts of interest related to procurement

If we influence an assignment, or are able to do so, employees are required to disclose to Corporate



Procurement prior to the assignment if:

- they hold an equity interest in a potential business partner and if this shareholding exceeds 5%. This also applies to holdings of close relatives (spouses, life partners, registered partners, children, siblings, parents),
- there is a personal close relationship (next of kin, close friend) with the potential business partner,
- the procurement and sales aspects of the potential business relationship cannot be separated (customer becomes supplier).

In the event of such a conflict of interest, Group-Purchasing is responsible for the procurement process, irrespective of the order volume and the associated requirements of the Group Procurement Policy.

3.2 Conflicts of interest in the workplace

Human Resources (HR) must be informed if a personal close relationship (spouse, life partner, children, siblings, parents) exists with an employee or superior in the relevant organisational unit or with indirect superiors in the superordinate organisational unit (e.g. team leader – department head) and, as a result,

- there is a power of instruction or supervision of one party vis-à-vis the other,
- there is collaboration on accounting and settlement processes or on cash or material management, or
- it leads to collaboration in decisions related to the selection of staff.

3.3 Conflicts of interest due to secondary employment

We report all types of secondary employment to HR. Secondary employment includes, without limitation, any employment relationships, quasi-freelance employment relationships, self-employed work under a business licence, freelance work, memberships in supervisory boards and positions in bodies corporate as well as (unpaid) time-consuming voluntary activities. A conflict of interest can arise not only with regard to employment with a competing company or secondary employment detrimental to the Post Group's reputation but also due to the amount of time taken up by the secondary employment.

4. Dealing with company resources

The Post Group provides us with the necessary resources for business use. We handle these resources (e.g. staff, buildings, equipment, operating and auxiliary materials) appropriately and sustainably. We do not use company property for private use or for activities that do not serve the company's purpose. However, this does not apply to the contractually agreed private use of company property (e.g. company vehicles).

Intellectual property is a valuable asset that must be protected from unauthorized use. It includes copyrights, trademark rights and patent rights.

II REGULATIONS FOR SUBSIDIARIES

The above principles also apply to majority shareholdings of the Post Group in Austria and abroad. Therefore this guideline has to be confirmed by the management board of each majority shareholding.



III COMPLIANCE-MANAGEMENT-SYSTEM

1. Compliance structures within Post Group

The Compliance Management System at the Post Group is based on the corporate mission statement. The goals are:

- Protection of employees and company bodies,
- Support in complying with entrepreneurial duties of due diligence,
- Avoiding reputational and liability risks as well as other legal disadvantages,
- Strengthening the positive reputation of the Post Group.

A risk-oriented approach is taken in achieving our objectives. We identify the risks and address them pro-actively. Awareness raising and training are a central element of the preventive measures.

In addition to the central Compliance Office headed by the Group Compliance Officer, regional Compliance Officers have been implemented in the individual business areas/divisions and subsidiaries, additionally the Compliance Committee was established to ensure group-wide implementation and support for continuously enhancing the Compliance Management System. The contact details of the regional Compliance Officers can be found on the intranet on the Compliance Services page.

2. Group Compliance Officer

The Group Compliance Officer of the Post Group is Dr. Judith Pilles, MBL (+43 664 6246827, email: judith.pilles@post.at).

The Compliance Officer is responsible for implementing, rolling out, implementing and continuously improving the group-wide Compliance Management System and heads the central Compliance Office. The Compliance Office's assessments and recommendations are independent and objective.

In particular, the tasks and powers of those responsible for compliance are:

- Drawing up guidelines and implementing compliance processes
- Providing advice, support and recommendations on business compliance issues for all corporate bodies and employees of the Post Group
- Monitoring:
 - Ongoing random checks to ensure compliance with business compliance regulations
 - Notification of the department responsible for taking the necessary steps under labour law if the Compliance Officer becomes aware of violations of Compliance Policies
- Chair of the Compliance Committee
- Training and information of corporate bodies and employees and implementation of communication measures within the Post Group and support for training and communication initiatives

3. Compliance Committee

The Compliance Committee is an independent body set up to advise and support the Group-Executive Board and the management of affiliated companies within the meaning of sec. 244 in conjunction with sec. 228 of the Austrian Commercial Code (Unternehmensgesetzbuch, UGB), in particular to examine cases of possible compliance violations and provide recommendations on action to be taken.



4. Compliance Helpdesk

The Post Group attaches great importance to being perceived as a trustworthy partner. The compliance provisions laid down in this Policy serve this purpose. Compliance with the provisions preserves and protects the reputation of the Post Group.

If we have any questions or are aware of a potential case of violation of the provisions set out in this Policy, we will contact the Compliance Helpdesk at any time:

- compliance.helpdesk@post.at
- Hotline Austria 0800 202224; Hotline international 00800 20222426; Hotline Serbia +43(0) 57767 24317
- or via the intranet (in the quick links section)

Reports and information can be submitted either giving one's name or anonymously and will be treated in strict confidence. The Compliance Helpdesk of the Post Group meets any and all statutory data protection requirements.

Even if our suspicions turn out to be unfounded, we need not fear any direct or indirect disadvantages if we have given our information to the best of our knowledge and in good faith.

CONSEQUENCES OF FAILING TO COMPLY WITH THE POLICY

Violation of this Policy may result in consequences under employment law and, in the case of civil servants, in disciplinary or other measures specified in public sector employment law.

This Policy is based on the relevant criminal law regulations. A violation of the provisions contained in this Policy can consequently also constitute a violation of criminal law and therefore entail sanctions or penalties under criminal law for the employee concerned or for the Post Group or one of its Austrian subsidiaries. Civil servants must additionally observe the provisions of sec. 59 of the Austrian Civil Service Act (Beamten-Dienstrechtsgesetz, BDG) 1979 prohibiting the acceptance of gifts.

In addition, civil law claims for damages by third parties against the Post Group (which may hold itself harmless against the employee causing the loss/damage) and civil servants may be subject to directors' liability (Organhaftung).

CONTACT PERSONS IN MATTERS RELATING TO THIS POLICY

The Compliance Officer, the Compliance Office and the Compliance Helpdesk are available to answer all questions in connection with the provisions of this Group Policy and to provide advice in cases of doubt.

COMPLIANCE HELPDESK:

Email: compliance.helpdesk@post.at
Hotline international: 00800 202 22426
Hotline Austria: 0800 202 224
Hotline Serbia: +43 (0) 57767 24317

ANNEXES