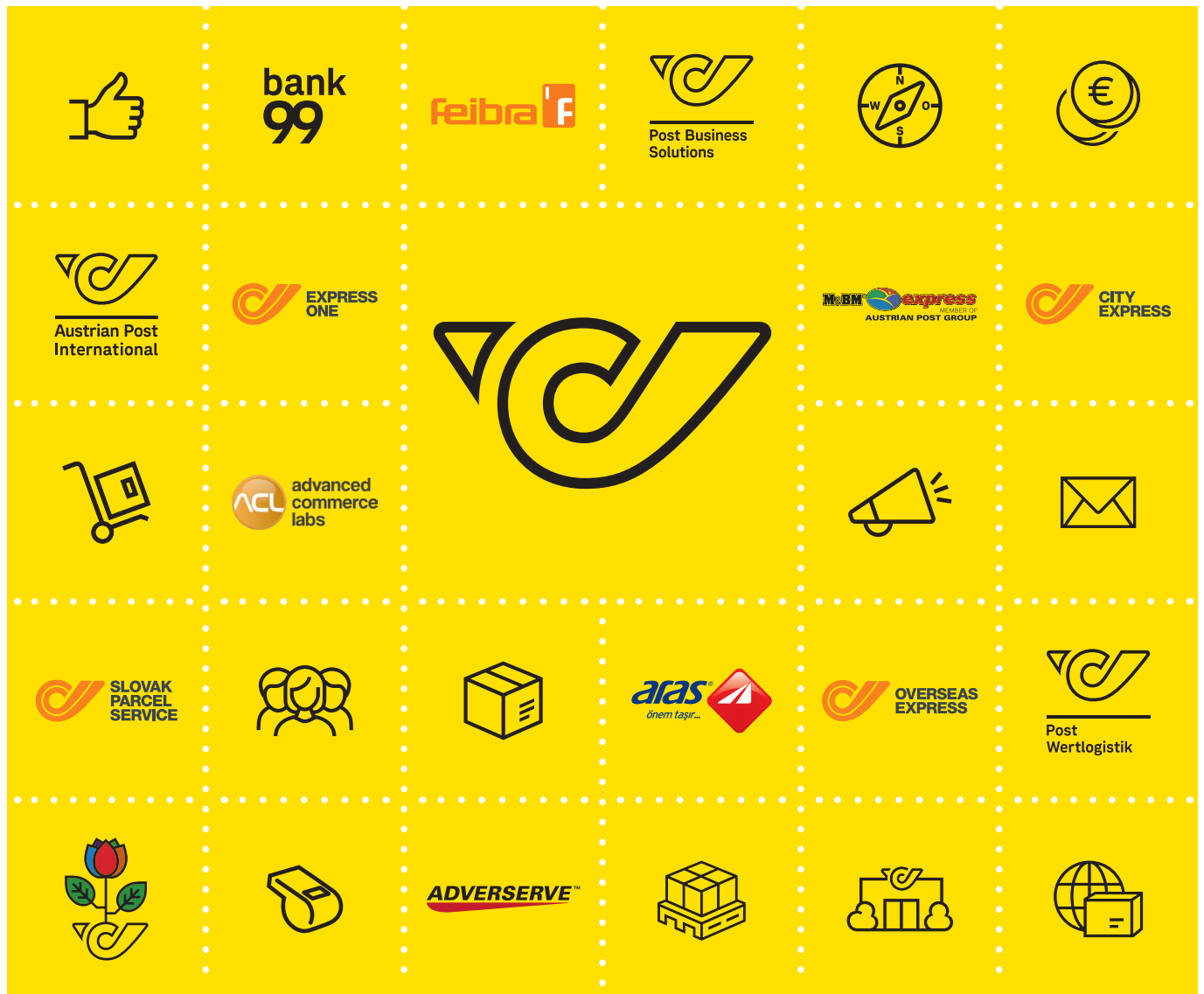


# Our CODE OF CONDUCT and ETHICS

#bringtogether





## Dear Colleagues,

the Austrian Post is the country's leading logistics and postal services company with group subsidiaries in Central and Southeast Europe. This entails considerable social responsibility on our part, a duty which we are determined to fulfil. Every single one of us is bound to contribute towards this. We want to ensure that we act in an ethical and exemplary manner at all times.

Our main focus is people. We champion the interests of customers, employees, and society in equal measure, and we always provide a solution.

Actively practised values are a decisive factor in a company's economic success, its appeal on the labour market and a sound managerial and corporate culture. Our values unite our finest traditions with modern, visionary and future-proof principles that reflect our core identity: we are yellow, we are green, and we are multicoloured. In this way, we bring together our economic, social, and ecological goals and incorporate customer orientation, sustainability and diversity as part of all our activities.

Our Code of Conduct and Ethics is a clear statement of our values and applies to all employees within the Group. This is true for the Management Board, executives, and the entire staff across all of the Austrian Post's business divisions.

The Code does not comprise a detailed set of instructions on how we should act. Instead, it sets forth the fundamental principles that inform our conduct and our interactions with one another during everyday working life – both within and outside of the Group. It forms part of a respectful, legally compliant, and sustainable company culture which we are committed to upholding and which we must breathe fresh life into each day.

We want to be seen as a trustworthy partner – by our customers, shareholders, business partners and employees as well as authorities, institutions, and the general public.

Walter Oblin  
CEO

Peter Umundum  
Deputy CEO | COO

Barbara Potisk-Eibensteiner  
CFO

# The Code of Conduct and Ethics

## What is the Code of Conduct and Ethics?

Our Code of Conduct and Ethics is based on the values contained in our mission statement and is binding for all members of the Management Board, executives, employees, temporary staff, and all of the Austrian Post's business divisions<sup>1)</sup>. Our guidelines and other corporate standards are derived from it and must also be observed by everybody in the Group. The Code of Conduct and Ethics is available on the Internet at post.at. It can also be obtained via OSKAR or from our managerial staff at any time, as is the case for all of our guidelines.

We want to achieve our goals in a legally compliant, honest, and considerate manner which also fully respects human rights. This Code sets forth rules for the legal and ethical conduct and decision-making of all employees in the Group. It is based on international agreements and ethical standards. In particular, it reflects our commitment to the principles of the UN Global Compact, the UN's Sustainable Development Goals, the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the ILO Declaration on Fundamental Principles and Rights at Work.

We undertake to comply with the statutory provisions such as laws, regulations, directives, etc. that apply in the legal systems we are active in as well as valid internal guidelines and behavioural codes in all of our actions and decisions. If there exist special grounds for non-compliance, the relevant business division in the parent company (Österreichische Post AG) must be consulted.

We also expect our direct and indirect business partners to conduct themselves in a manner which corresponds to the principles set out in the Code.



## How do I use the Code of Conduct and Ethics?

In everyday business life, situations can arise in which the correct or appropriate way to behave is not immediately clear. You should ask yourself the following questions in such cases:

- Is my action or decision permitted by law?
- Does it correspond to our values, that is, the principles contained in the Code of Conduct and Ethics as well as our internal guidelines and behavioural codes?
- Is it free of personal interests and is the focus on the good of our company?
- Do I feel that my action or decision is appropriate?
- Will my action or decision stand up to public scrutiny, for example, by the authorities?
- Does my action or decision protect the reputation of our company as part of a group with high ethical standards?
- Is my action or decision in the interest of our managerial and corporate culture?



If you can answer "Yes" to all of these questions, then your action or decision is almost certainly correct and complies with the principles set out below. When in doubt, please contact your manager and/or the Compliance Office or the responsible regional compliance officers.

### OUR CODE

We undertake to comply with the statutory provisions that apply in each case as well as relevant internal standards throughout the Group.

<sup>1)</sup> The group includes all companies in which Österreichische Post holds a direct or indirect stake of at least 50% or in which it exercises control by other means. The Code of Conduct and Ethics is made known to all other companies in which Österreichische Post has a direct or indirect stake of at least 25% and a request submitted that they recognise it independently within the framework of their decision-making structures under company law.

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## How does the Code of Conduct and Ethics protect me?

The Code of Conduct and Ethics contains guidelines and principles for a conduct as part of everyday business life which complies with our values and the law. Observance of these behavioural codes will protect you as an individual and the Austrian Post as a company. In this regard, managerial staff have a special function to fulfil as role models.

Should you find out that the law or the rules contained in our Code of Conduct and Ethics have been broken, inform your manager or the Compliance Team via the Compliance HelpDesk (compliance.helpdesk@post.at).

Your cooperation is particularly important since information from responsible employees is one of the most effective ways of resolving misconduct in companies. In this way, you protect the Austrian Post against serious risks and help to continually improve the Group.

Everybody may report a violation or suspected violation of statutory regulations, this Code, or internal guidelines.

Reports can be submitted in your name or anonymously and will be treated as strictly confidential.

We will not tolerate any retaliatory measures towards or the direct or indirect disadvantaging of persons who report such violations or suspected violations and who submit such information to the best of their knowledge and with honest intentions, even if this information should prove to be unsubstantiated. Information will be researched and checked in a strictly confidential manner and by persons obliged to observe confidentiality.

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## What are the consequences of non-compliance?

Non-compliance with the principles contained in the Code can harm the reputation and competitiveness of our company and may therefore

result in consequences under employment and labour law or disciplinary measures.

**OUR CODE**  
Misconduct will not be tolerated.





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# We all adhere to OUR VALUES and the Code of Conduct and Ethics.

The Management Board bears ultimate responsibility for the uniform application of our Code of Conduct and Ethics within the Group.

All managerial staff are responsible for its application and compliance with it in their respective area of responsibility. This includes the managing directors and executives of our affiliated companies.



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## WE ARE YELLOW

Yellow is the Austrian Post's company colour and stands for reliability and trust as a result. Yellow is also fast, optimistic and future-oriented – just like we are.



## Customer orientation

### OUR CODE

We act in a customer-oriented manner and strive for continuous improvement.

Our closest relationship is with our customers. This is what drives us to establish connections each day and improve on a continuous basis. Whether digitally or in person, we always do so in a practical and sustainable manner. That is our mission. We are always there for our customers and treat them as we would like to be treated ourselves, namely, in a friendly, obliging, competent and solution-oriented manner. Our uniform provides us with a clear, unique, and appealing appearance. We serve as brand ambassadors for our company.

We set the benchmark for quality and customer orientation. We take criticism from our customers seriously and see it as an incentive to improve. We use our strengths for the good of our customers, including across national borders.

We give our customers a clear performance promise and strive to comply with this at all times. We design our products and services in a way that is customer-oriented, simple, and easy to understand. As a universal service provider, we guarantee the provision of postal services throughout Austria in a changing environment.

## A future-oriented approach

### OUR CODE

We act in a cost-effective manner and are forward-looking in our work.

We are more than a postal service. As a pioneer, we successfully unite people and markets with the world of tomorrow. That is our vision. We are forward-looking in our work and aim to secure our market position. We act in a cost-effective manner and contribute jointly to the company's success. We think in the long term and make provisions for economically challenging situations.

We safeguard the future of our group as one of the most important service providers and employers in Austria and as an important economic actor on the European and international stages. We secure our market position through purposeful ideas and innovations together with a unique corporate culture.

We use new technologies and the diverse skills of our employees to create added value. In the process, we consciously promote the development of a diverse range of sustainable products and services to serve the different requirements of our customers in both the business and private client segments.

## Fair competition

### OUR CODE

We reject anti-competitive behaviour.

We compete in a fair and transparent way and undertake to comply with the rules of competition and antitrust law. We reject anti-competitive behaviour such as price agreements, the abuse of a market position or dishonest business practices.

We counter the challenges posed by growing competition with changes to our skills and processes, new products, and by continuously increasing our efficiency.

## Capital market

### OUR CODE

We are a trustworthy actor on the capital market.

As a company listed on the stock exchange, Österreichische Post AG is subject to the strict requirements of the capital market. The correct preparation and disclosure of our financial reports takes place as a matter of course.

We comply with the relevant statutory provisions and foster open and transparent communication with shareholders, investors, and analysts to protect the company and its reputation.

We are also committed to the fundamental principle that shareholders should be treated equally. We are aware that the misuse of insider information ("insider trading") is prohibited by law and punishable in a court of law.

## Data privacy

### OUR CODE

We process personal data pursuant to the statutory regulations.

We use the personal data of natural persons in accordance with the respective statutory regulations and pursuant to the explicit instruction of the employer. In particular, we comply with authorisation concepts and only copy, send, download, and save personal data within the framework of our professional activity and in compliance with the law.

If we have any questions, we contact the data privacy managers available in our business divisions or the responsible data privacy officer.

We report suspected data privacy incidents to our manager immediately. To do so, we use internal forms (for example, on OSKAR at the Austrian Post) or we inform the responsible data privacy officer.

## Cooperation with the authorities

### OUR CODE

We are cooperative in our interactions with the authorities.

We undertake to provide complete, fair, precise, and easily comprehensible data in a timely manner within the framework of existing disclosure obligations towards the supervisory authorities.

We foster open, transparent, and cooperative dealings with the supervisory and regulatory authorities relevant to the Group's companies.

It is our goal to guarantee a stable relationship of trust between the Austrian Post and the authorities.



## Transparency

### OUR CODE

We act in a trustworthy, credible and reliable manner.

This is how we want to be perceived by our customers, shareholders, business partners and employees as well as by institutions and the general public.

Our decisions are independent and uninfluenced. They are based on complete and transparent information. As a result, comprehensible documentation is important to us.

## Accounting and reporting

### OUR CODE

Accounting and bookkeeping are done with the greatest of care.

We are committed to our social responsibility with regard to proper accounting and bookkeeping and the fulfilment of our tax and social security obligations.

Accounting and financial data are treated as strictly confidential within the Austrian Post's group of companies. All business transactions must be recorded in our accounts.

This is done according to strictly defined procedures and auditing principles as well as generally recognised principles of accounting to ensure that it is done correctly.



## Handling of business and operating secrets

### OUR CODE

We keep business and operating data secret.

We treat information that is not already known to the general public as confidential and do not forward it to unauthorised third parties. This information includes financial data, operating data, customer data and employee data.

It also includes information that relates to the Austrian Post's business, its operating activities, and its future strategies.

We keep data used in data processing secret unless there are legally permissible grounds for its transmission. Intellectual property is a valuable asset that must be protected against unauthorised usage. This includes copyrights, trademark rights and patent rights.

## Information security

### OUR CODE

We handle information, data, and systems in a careful and responsible manner.

The security of all information is an important prerequisite and a fundamental aspect of the efficient and smooth running of business processes. It has a strong bearing on our relationships with customers and business partners.

Owing to technological developments and the ever-increasing importance of data for the successful development of the company, the Austrian Post takes comprehensive measures to guarantee the confidentiality of customer, employee and company data as well as the integrity and availability of the IT systems which we operate.

The proper and careful handling of IT resources is necessary to protect against cyber-crime and the loss of data. As a result, it is the duty of every employee to handle information, data, and systems in a careful and responsible manner.





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## WE ARE GREEN

We pro-actively invest in the well-being of our employees, the environment, and our society with our sustainable business model.



## Environment and climate

### OUR CODE

Our actions combine environmental and climate protection with cost efficiency.

We bring people, regions, and countries together, create jobs and generate added value by way of our logistics solutions. However, our business activity also has an impact on the environment and the climate, particularly through the emission of climate-changing greenhouse gases such as CO<sub>2</sub>.

As a logistics group, we have an increased responsibility to play an active role in achieving national and international climate targets.

We all contribute to reducing greenhouse gases that have an effect on the climate and actively champion measures that protect the environment and the climate. We do not waste any resources and actively participate in reducing the burdens placed on the environment and the climate. We always comply with all of the provisions and standards under environmental and climate law in the development and use of our products.

## Corruption

### OUR CODE

We do not tolerate any form of corruption.

We do not tolerate any form of corruption. We strictly avoid any semblance of inappropriateness or dishonesty. We take our business decisions solely on the basis of objective considerations in the interest of our company. Private interests never play a role in this regard.

We do not accept any undue benefits and do not allow ourselves to be influenced in our business decisions. Demanding such benefits is also prohibited. There are no exceptions to this rule.

In addition, employees of the Austrian Post are regarded as public officials under Austrian law and must comply with special legal requirements as a result. Without exception, it is prohibited to offer, promise or grant undue benefits when dealing with third parties, either directly or indirectly.

## Gifts and invitations

### OUR CODE

Demanding a benefit is always punishable.

Regional business practices may allow for a modest exchange of gifts and invitations. However, it is always forbidden to demand, accept a promise of, accept or grant gifts, invitations, or other gifts where these would be capable of influencing the current and future business relationship in an improper manner or where they would give the impression that this is so.

An exception to this is the acceptance of minor gifts, invitations or other benefits if they do not exceed the usual limits within business.



## Donations and sponsoring

### OUR CODE

Compatibility with our values and principles.

Donations and sponsoring must be compatible with the values and principles defined in this Code of Conduct and Ethics and may not be used to bypass our internal policies.



## Avoidance of conflicts of interest

### OUR CODE

We always act in the company's interest. We disclose potential conflicts of interest without being prompted to do so.

We only ever act in the company's interest. We act in such a way as to avoid any type of conflict of interest that could have a negative impact on our company.

We avoid situations in which personal or economic interests come or could come into conflict with the company's interests. We disclose potential conflicts of interest (relationships to persons or companies with which the Group's companies conduct business such as family ties, business relationships or investments) in full and without being prompted to do so.

Conflicts of interest can also arise in connection with secondary jobs. We report these to the HR Department.

## International sanctions

### OUR CODE

We comply with national and international export and trading restrictions.

To act in a sustainable manner as a company which operates internationally, the Austrian Post places great importance on compliance with national and international export and trading restrictions. Consequently, export control rules, customs regulations and embargoes imposed on certain countries, companies or persons are complied with and corresponding checks carried out.

The companies as part of the Group do not conduct any business involving companies or persons who are the subject of sanctions.

## Money laundering

### OUR CODE

We categorically reject business involving money of criminal origin.

We do not tolerate any form of money laundering. As a result, we closely monitor financial transactions that may aim to conceal funds of a criminal origin within the framework of a legal transaction (money laundering).

The Austrian Post does not tolerate any violations of applicable laws or of provisions which aim to combat money laundering and the financing of terrorism.

We categorically reject transactions with funds of a criminal origin.

## Handling company property

### OUR CODE

We handle company property appropriately and carefully.

We handle the resources provided to us required for work-related use (e.g., buildings, furnishings, operational and auxiliary materials) appropriately and carefully.

We do not use company property for private use or for tasks that do not serve the company's business purposes. An exception to this is the private use of company property granted pursuant to contract (e.g., company cars).

## Procurement

### OUR CODE

Our procurements are based on the principles of cost effectiveness, sustainability and integrity.

Cost effectiveness, sustainability and integrity are fundamental criteria for our procurements. We are aware of our role in the supply chain, and we assume our responsibility along the entire value-added chain. As a result, we expect our direct and indirect suppliers to comply with the principles set out in our Supplier Code.

We carry out our procurements pursuant to the valid statutory provisions and internal guidelines.

## Working conditions

### OUR CODE

We comply with the nationally applicable provisions under labour law. An appreciative working climate is very important to us.

We do not tolerate any working conditions that conflict with international and national laws and regulations. We also expect the same from our direct and indirect business partners. Child and forced labour as defined by the Conventions of the ILO and the UN or by national legal regulations are forbidden at our group of companies.

We guarantee safe working conditions at the Austrian Post. There is no place for any form of discrimination at the Group. This includes discrimination against characteristics that are not currently protected by law. A zero-tolerance policy towards discrimination constitutes the basis for a respectful working climate in which every employee feels safe and accepted.

That is why all employees are also entitled to fair and performance-based remuneration. We respect the rights of freedom of association and collective bargaining in compliance with valid laws and regulations.

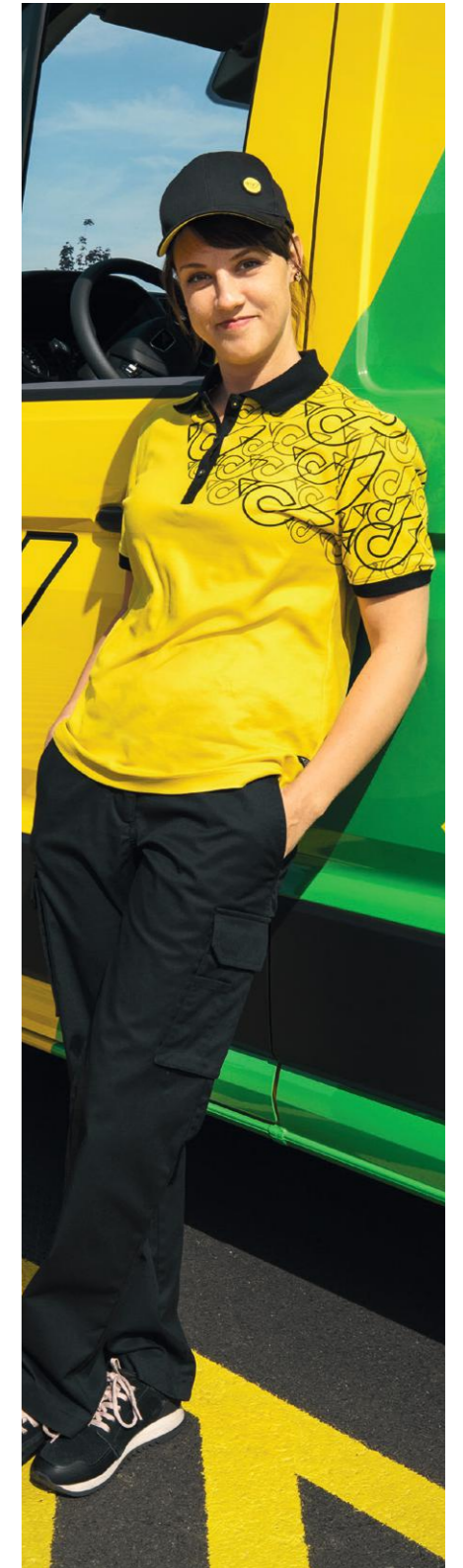
## Health and safety

### OUR CODE

The health and safety of our employees is a particular concern of ours.

We attach great importance to compliance with statutory and company-internal provisions aimed at protecting employees. This is because the Austrian Post places a high priority on the well-being of its employees.

The health and safety of our employees is a particular concern of ours. That is why we actively promote health at our company and implement preventive measures to preserve our employees' health and fitness for work in the long term.





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# WE ARE MULTICOLOURED

The diversity of our teams is just as crucial to our success as the diversity of our products and services and our international commitments.



## Diversity

### OUR CODE

We encourage and respect diversity.

Diversity is a decisive competitive advantage for our business success. As a result, it is enshrined as a central guiding principle as part of our integrated group strategy and in our managerial and corporate culture. This means that we respect the diversity of our employees, customers, and stakeholders, actively incorporate it into the development of our processes and services and deliberately encourage it among our workforce.

Our Group brings together people from a broad range of genders and sexual orientations, religions and ideologies, age groups, mental and physical skills, ethnic and social origins, and cultural groups. They all bring different perspectives, skills, and experiences with them.

Our employees and managers are expected to promote an inclusive (working) environment in which people with diverse lives feel involved and that they belong.

## Equal opportunities

### OUR CODE

We do not tolerate any form of discrimination.

The Austrian Post wants to make its own contribution to promoting equal opportunities in society and strives to guarantee the right conditions for our employees and customers in line with this.

We do not tolerate any form of discrimination, especially with respect to gender, age, ethnic origin, skin colour, psychological or physical impairment, religion, ideology, or sexual orientation.

We create the general conditions required to facilitate equal opportunities, for example, those which encourage further development, career progression and the successful combination of work and home life. Furthermore, we provide a setting which promotes the unique development and growth of individual employees.

We guarantee equal opportunities for our customers by recognising and understanding the different requirements of our customer groups and consciously integrating them into the design and further development of our products and services.

## Team spirit without borders

### OUR CODE

We benefit from international collaboration.

National borders and distances are not an obstacle in our daily interactions with one another. They enable us to benefit from the diverse experiences of our employees, customers, and individual markets.

As a postal group which operates internationally, cooperation with and respect for different ethnic backgrounds and cultural groups constitute one of the most important foundations for our joint success.

We see the diverse languages, skills, and lifestyles of our employees as a resource which will allow us to grow as an international group, learn from one another and develop new ideas.

## Innovation

### OUR CODE

We promote innovation as an integral part of our business.

We see innovation as a core element of our business that is crucial to success and drive it forward in all areas of our strategy. Innovation at the level of business processes, products, services and the business model is an integral part of the Austrian Post's future.

We can develop and offer innovative solutions for all markets and people by incorporating the diversity of our customers and stakeholders into the design of all our processes and actively using the diverse experiences and perspectives of our employees as a valuable resource.



## Openness and respect

### OUR CODE

Openness, appreciation, and respect for all form the basis for our everyday interactions with one another.

We interact with one another in an open and respectful way. We treat each other with respect and acceptance and do not tolerate disparaging behaviour towards others. This not only applies to our interactions with employees but also with customers, partners, and other persons. We give each other feedback directly and provide constructive criticism. It is never personal. We solve conflicts within the Group, do not transmit information outwards and constantly strive to uphold the company's image. We stand as one behind decisions and implement them jointly.

Managers serve as role models, both on a personal and professional level. They assume responsibility, provide orientation, encourage cooperation, and create trust. We are open to our employees' concerns and their feedback since it is important for each individual to be able to contribute his or her opinion in the interest of our company's success.

## Communication

### OUR CODE

We promote clear and open communication.

In the interest of strategic thematic management, the business divisions responsible for communication are to be informed as early as possible during the preparation stage about projects, product changes and strategic planning. We ensure a consistent and coordinated image throughout the company both internally and externally.

We comply with the corresponding in-house policies regarding contacts in the media, politicians and interest groups, investors, and conduct when using social media.

Please contact the Compliance Team if you have any questions or suggestions.



Ask questions - understand the rules:  
Our **Compliance HelpDesk** is there for you  
at [compliance.helpdesk@post.at](mailto:compliance.helpdesk@post.at)



Identify irregularities – commit to integrity:  
Our **Compliance WhistleDesk** is there for you  
at [post.at/whistleblowing](https://post.at/whistleblowing)

Österreichische Post  
Compliance Office  
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Austria

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