

**CODE OF BEHAVIOR  
ERSTE GROUP BANK AG**

**pursuant to Paragraph 7 Law on Lobbying**

Lobbying is a legitimate element of democratic systems. The Austrian legislative authority established with the Law on Lobbying ("Lobbying- und Interessenvertretungs-Transparenz-Gesetz") a Lobbying-Register and inter alia the obligation of companies which employ lobbyists to create a Code of Behavior for lobbying-activities.

The terms of the Law on Lobbying are available on the following website:  
[http://www.ris.bka.gv.at/Dokumente/BgblAuth/BGBLA\\_2012\\_I\\_64/BGBLA\\_2012\\_I\\_64.pdf](http://www.ris.bka.gv.at/Dokumente/BgblAuth/BGBLA_2012_I_64/BGBLA_2012_I_64.pdf)

The present Code of Behavior contains nine basic principles for lobbying. All employees of Erste Group Bank AG who do Lobbying are committed to this Code of Behavior.

**BASIC PRINCIPLES**

By communicating with function owners Company`s lobbyists have to respect the following:

1. They call themselves by name and indicate Erste Group Bank AG as their employer for whom they act as well as the specific concern of the employer;
2. they give true information about themselves and Erste Group Bank AG especially regarding the registration in the Lobbying-Register;
3. they make sure that the provided information is to the best of knowledge without distortion, complete, up to date and not misleading;
4. they provide information solely in a proper manner or obtain decisions in a proper manner and do not attempt to do anything contradicting;
5. they do not sell to third parties copies of documents obtained from any function owner;
6. they have to brief themselves on issued limitations of activities and rules of violations of the function owners and respect these limitations;
7. they do not tempt function owners to breach the rules and behavioral norms which apply for them;
8. they have to abstain from any improper or inadequate influence on function owners;
9. and although they follow the above mentioned principles, they always ask themselves "Is this the Right thing to do?" in the interest of the customers and the company.