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**EGP ETHICAL AND ENVIRONMENTAL  
CODE OF CONDUCT FOR SUPPLIERS OF  
GOODS AND SERVICES**

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## 1 INTRODUCTION

**Erste Group (EG)** was founded in 1819 as the first Austrian savings bank. In 1997, Erste Group went public with a strategy to expand its retail business into Central and Eastern Europe (CEE). Since then Erste Group's customer base has grown through numerous acquisitions and organic growth from 600,000 to more than 16 million. More than 99% of all clients are citizens of the European Union, which gives the countries a stable regulatory framework that supports their economic development.

Today Erste Group is one of the largest financial services providers in the Eastern part of EU in terms of clients and total assets. Its core activities, besides the traditional strength in serving private individuals, include advisory services and support for corporate clients in financing, investment and access to international capital markets, public sector funding and interbank market operations.

**Erste Group Procurement (EGP)** is the central procurement function within Erste Group. EGP has been established as the first address for the group's external supply needs and is managing the whole external spend of all majority owned entities within Erste Group.

Its mission is to efficiently satisfy demand while at the same time aiming for cost reduction and sustainable savings across the whole group. EGP defines and owns the global procurement processes for all entities within Erste Group.

Our main business targets are based on key principles that underpin our mission:

- Transparency
- Service Quality
- Cost Reduction and Cost Avoidance
- Ethical Standards
- Fraud Prevention

Based on these and other standards, EGP has developed a Supplier Code of Conduct that is applicable throughout our organization and we expect everyone with whom EGP has commercial dealings to support these basic principles:

## 1 Financial

The financial health of our suppliers is very important for us. We want to deal with suppliers financially stable that can commit or improve performance, reduce cost, have predictable deliveries and performance. A good financial health should imply significantly less time and effort managing the relationship and need fewer requirements to manage against performance risks.

The suppliers must present their financial health status by providing copy of Dun & Bradstreet report for their company. Only if the D&B report isn't detailed or relevant enough, the supplier must provide one of the local alternatives based on the Country:

- ROMANIA it is KeysFin
- HUNGARY it is Opten
- CROATIA it is Bisnode
- AUSTRIA it is KSV1870
- SLOVAKIA it is SIMS Credit Report
- CZECH REPUBLIC internal bank report can be requested by EGP

## 2 Operational

Since the quality of our suppliers may influence the quality of the services provided by Erste Group, we pay much attention to this topic and when we choose a supplier we must have the confidence that he is able to deliver a good or service that will satisfy all our customer's needs.

Our suppliers should have a documented Quality Policy in place which defines the objectives for a commitment to quality, Quality System based on any recognised national or international standard and Disaster Recovery Plan.

## 3 Governance

Suppliers should have governance policies to address the sensitive issues listed below and associated with business activities:

- Corporate Governance
- Compliance Practices
- Insider Trading
- Money Laundering
- Bribery & Corruption
- Gifts & Entertainment

- Conflicts of interest
- Security
- Ethical Trading
- Responsible Marketing
- Animal rights
- Stakeholder Engagement
- Risk Management
- Accounting & Taxation practice standards
- Handling of Complaints
- Customer Service commitments
- Governance criteria within supply chain

## 4 Social

The baseline responsibility is not to infringe on the rights of others. So, all our suppliers and other business partners have a responsibility to respect human rights. In addition, we expect that our suppliers take steps to support and promote the realization of human rights, because there are good business reasons to do so.

Our suppliers and business partners must take the necessary preventive measures to ensure that they are not complicit in human rights abuses. They should have policies on human rights and workplace conditions consistent with the requirements of the Universal Declaration of Human Rights and the International Labour Conventions relating to the following:

- The effective abolition of child labour
- The elimination of all form of forced and compulsory labour
- The elimination of discrimination in respect of employment
- Freedom of association and the right to collective bargaining
- Reasonable working hours and fair remuneration
- Provision of a safe working environment
- Health Promotion
- Occupational Health & Safety (OHS)
- Job Restructuring
- Remuneration
- Fair working conditions
- Social criteria in supply chain

## 5 Environmental

Businesses should support a precautionary approach to environmental challenges, undertake initiatives to promote greater environmental responsibility and encourage the development and diffusion of environmentally friendly technologies.

Suppliers should acknowledge of the planet's finite resources by maintaining an effective environmental policy that support environmental protection, prevention of pollution and prudent management of natural resources.

## 6 Monitoring and Audits

Our suppliers and business partners need to ensure compliance with this code of conduct to enter into business with us and during the ongoing business relationship. Furthermore, suppliers should apply, monitor and ensure this Code and his aims.

EGP introduced a supplier audit questionnaire which is an important element in the procurement process and covering all above mentioned principles (Appendix 1). Suppliers that are not able to provide and prove satisfying results of that audit are subject to exclusion from entering/continuing business.

## APPENDIX 1 - Supplier Audit Questionnaire

### 1. Company Information

1.1. Supplier Details	
Name:	
Address:	
City:	
Country:	
Post Code:	
Telephone Number:	
Fax Number:	
E-Mail Address:	
Legal Form (Ltd, GmbH, LLC etc):	
Date of Formation:	
Company Registration Number:	
Court of Registration:	
Company Tax Number:	

1.2. Key Management (i.e. Owners, CEO, CFO etc)	
Name:	Title:
Name:	Title:
Name:	Title:

Name:	Title:
Name:	Title:
Name:	Title:

1.3 General Information			
<b>1.3.1</b>	Number of Employees	<b>1.3.2</b>	Number of Years in business
<b>1.3.3</b>	Is your company a producer/manufacturer, distributor, agent or affiliated partner for the services/goods that you provide to EG? Please specify.		
<b>1.3.4</b>	For any company that is part of a Group please complete the section 1.4 "Holding" or "Mother" Company Details.		
<b>1.3.5</b>	Please provide scanned copy of your company registration document no older than 3 months		

**1.4. "Holding" or "Mother" Company Details**

Name:
Address:
City:
Country:
Post Code:
Telephone Number:
Fax Number:
E-Mail Address:
Legal Form (Ltd, GmbH, LLC etc):
Date of Formation:
Company Registration Number:
Court of Registration:
Company Tax Number:

**1.5. This questionnaire was completed by**

Name:
Job Title:
Date:
Signature:



## 2. Financial

2.1. Financial Details	
	<p>Please provide copy of Dun &amp; Bradstreet report for your company.</p> <p>(if your company's D&amp;B report isn't detailed or relevant enough, please use one of the local alternatives based on the Country:</p> <ul style="list-style-type: none"> <li>• ROMANIA it is <b>KeysFin</b></li> <li>• HUNGARY it is <b>Opten</b></li> <li>• CROATIA it is <b>Bisnode</b></li> <li>• AUSTRIA it is <b>KSV1870</b></li> <li>• SLOVAKIA it is <b>SIMS Credit Report</b></li> <li>• CZECH REPUBLIC internal bank report can be requested by EGP</li> </ul>

## 3. Operational

3.1. Quality System Information	
3.1.1	Does your company have a documented Quality Policy in place which defines the objectives for a commitment to quality? Yes/No
3.1.2	Does your company have a documented Quality System? Yes/No
3.1.3	<p>Is your Quality System based on any recognised national or international standard? Yes/No.</p> <p>If Yes, which standard(s)? Date of the last audit?</p> <p>Last audit was performed by?</p>
3.1.4	Does your company have a documented Disaster Recovery Plan?

## 4. Governance

Does your company have a governance policy that deals with any of the following sensitive issues associated with your business activities?

<b>4.1. Governance</b>			
<b>4.1.1</b>	Corporate Governance	Yes/No	Please attach relevant documentation
<b>4.1.2</b>	Compliance Practices	Yes/No	Please attach relevant documentation
<b>4.1.3</b>	Insider Trading	Yes/No	Please attach relevant documentation
<b>4.1.4</b>	Money Laundering	Yes/No	Please attach relevant documentation
<b>4.1.5</b>	Bribery & Corruption	Yes/No	Please attach relevant documentation
<b>4.1.6</b>	Gifts & Entertainment	Yes/No	Please attach relevant documentation
<b>4.1.7</b>	Conflicts of interest	Yes/No	Please attach relevant documentation
<b>4.1.8</b>	Security	Yes/No	Please attach relevant documentation
<b>4.1.9</b>	Ethical Trading	Yes/No	Please attach relevant documentation
<b>4.1.10</b>	Responsible Marketing	Yes/No	Please attach relevant documentation
<b>4.1.11</b>	Animal rights	Yes/No	Please attach relevant documentation
<b>4.1.12</b>	Stakeholder Engagement	Yes/No	Please attach relevant documentation
<b>4.1.13</b>	Risk Management	Yes/No	Please attach relevant documentation
<b>4.1.14</b>	Accounting & Taxation practice standards	Yes/No	Please attach relevant documentation
<b>4.1.15</b>	Handling of Complaints	Yes/No	Please attach relevant documentation
<b>4.1.16</b>	Customer Service commitments	Yes/No	Please attach relevant documentation
<b>4.1.17</b>	Does your company take care of governance criteria within its supply chain?	Yes/No	Please attach relevant documentation

#### 4.2. Prosecution

Has your company been prosecuted for any breaches of the law or been subject to a civil action in respect to any of the ethical issues listed above during the past 3 years?

If Yes, please give details of such prosecutions.

## 5. Social

Does your company have policies on human rights and workplace conditions consistent with the requirements of the Universal Declaration of Human Rights and the International Labour Conventions relating to the following?

5.1. Social			
5.1.1	The effective abolition of child labour	Yes/No	Please attach relevant documentation
5.1.2	The elimination of all form of forced and compulsory labour	Yes/No	Please attach relevant documentation
5.1.3	The elimination of discrimination in respect of employment	Yes/No	Please attach relevant documentation
5.1.4	Freedom of association and the right to collective bargaining	Yes/No	Please attach relevant documentation
5.1.5	Reasonable working hours and fair remuneration	Yes/No	Please attach relevant documentation
5.1.6	Provision of a safe working environment	Yes/No	Please attach relevant documentation
5.1.7	Health Promotion	Yes/No	Please attach relevant documentation
5.1.8	Occupational Health & Safety (OHS)	Yes/No	Please attach relevant documentation

<b>5.1.9</b>	Job Restructuring	Yes/No	Please attach relevant documentation
<b>5.1.10</b>	Remuneration	Yes/No	Please attach relevant documentation
<b>5.1.11</b>	Fair working conditions	Yes/No	Please attach relevant documentation
<b>5.1.12</b>	Does your company take care of social criteria in its supply chain	Yes/No	Please attach relevant documentation

### 5.2. Social Policies

Do such policies extend to all offices and factories, including those of any subcontractors, which supply products & services to us?

### 5.3. Risk Assessment

Has your company undertaken a risk assessment of workplace health&safety and identified suitable and sufficient precautions and control measures?

### 5.4. Prosecution

Has your company been prosecuted for any breaches of employment laws or any infringement of health & safety legislation in the past 3 years? If Yes, please give details of all such prosecutions.

## 6. Environmental

6.1. Environmental Policy & Practice			
6.1.1	Does your company have an Environmental management system (e.g ISO 14.001 or EMAS)?	Yes/ No	Please attach relevant documentation
6.1.2	Does your company participate in the CDP (Carbon Disclosure Project)	Yes/ No	Please attach relevant documentation
6.1.3	Does your company have a written Environmental Policy?	Yes/ No	Please attach relevant documentation
6.1.4	Does your company measure its CO2 emissions? If No, why not?	Yes/ No	Please attach relevant documentation
6.1.5	Does your organisation set environmental objectives and targets?	Yes/ No	Please attach relevant documentation
6.1.6	Has your company been fined/prosecuted for an environmental infringement over the last three years? If yes, please provide further details.	Yes/ No	Please attach relevant documentation
6.1.7	Does your company take care about environmental criteria within its Supply Chain?	Yes/ No	Please attach relevant documentation

6.2. Product Related Impacts			
6.2.1	Does the product contain potentially	Yes/	Please attach relevant documentation

	hazardous chemicals?  If yes, please supply further details, including guidance for use of these substances.	No	
6.2.2	Has consideration been given to reuse/recycling of the product at end of useful life?	Yes/ No	Please attach relevant documentation
6.2.3	Will the supplier take the product back at end of useful life?	Yes/ No	Please attach relevant documentation
6.2.4	Does the product meet energy star standards or equivalent?	Yes/ No	Please attach relevant documentation
6.2.5	Does your company take care about environmental criteria within its Supply Chain?	Yes/ No	Please attach relevant documentation

## 7. Additional Information

Additional Information
<p>Please provide any additional information which will explain any unanswered questions or will provide support for any aspect of your business which are considered critical and may not have been covered above.</p>