

**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

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.