



# Make sustainability happen





# RBI Sustainability Report 2023

(corresponds to the non-financial report pursuant to sections 267a and 243b of the Austrian Commercial Code)

## > Achievements

### Sustainability management

RBI again achieved stable ESG rating results (e.g. ISS ESG, Sustainalytics), a top ESG rating from PwC Austria and some ESG awards within the Group.



### Responsible banker

- New climate and environmental business strategy in line with regulatory provisions and voluntary commitments
- Among financial institutes, the largest green bond issuer in Austria and the second-largest issuer of sustainable bonds in CEE
  - Recognized arranger for sustainable bonds in RBI's home market
- Strengthening the ESG component in retail business in CEE by expanding green mortgage loans and unsecured loans with a social and/or green purpose
  - Extending the scope of calculation for financed emissions, among other things by including customers' indirect emissions (Scope 3)
  - Group-wide introduction of a qualification process for circularity with the aim of identifying at least € 200 million in circularity-eligible assets
  - Knowledge building on the issue of biodiversity within the Group, especially as regards RKAG's voluntary commitment to the Finance for Biodiversity (FfB) Pledge
  - Continued development of the Group's sector-specific strategies in the most carbon-intensive industries – monitoring the internally defined portfolio targets for 2025 and 2030 and continued development of the transition path



### Business conduct

Adaptation of the Code of Conduct with a greater focus on sustainability



### Fair partner/Employees

- The 2024 target of 35 per cent for the proportion of women in management positions (Supervisory Board, Management Board and second management tier) was already achieved in 2023
- Advanced ESG training through RBI sustainability competence certificates (eLearning module of RBI's ESG Academy, product training on green and social finance products)



### Fair partner/ Inhouse ecology

- Since 2020, a 14 per cent reduction in Scope 1&2 CO<sub>2</sub> emissions (mainly energy consumption)
- However, an increase in business trips compared to the base year 2020 (COVID-related)



### Engaged citizen

Establishment of the Brighter Future Initiative with the aim of bundling our sustainable initiatives for even greater social impact



### Fulfillment of legal and voluntary disclosure obligations/commitments

- Green Asset Ratio
- Progress report on the Principles for Responsible Banking
- GRI & TCFD Index
- Audit report by Deloitte



Contents in simply language

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### **Exclusion of liability:**

We have taken the utmost care in gathering the data and other information contained in this Report. Nevertheless, we cannot completely rule out the possibility of errors. Statements on future developments are based on information and forecasts which were available to us at the time this Report was published. The latter were also written with care. Notwithstanding the above, there are many factors and developments that can lead to discrepancies.

Furthermore, lack of ESG relevant data points is one of the main challenges when it comes to ESG risk assessment and its management. Methodologies to quantify ESG risks as well as the underlying data that is used as inputs to these methodologies are evolving. This Report reflects currently available data, as well as methods developed to be in line with, where available, current best practices – both points are expected to change/improve over the coming years. In assessing a counterparty's ESG data, RBI relies on the completeness and correctness of data and documents received from such counterparty. Assessments regarding the fulfillment of technical criteria are also based on details and information provided by the counterparty. We cannot assume liability for the correctness and completeness of underlying data, as submitted by counterparties. In view of the above, the Report is made on the basis of currently available information, our best understanding of the regulatory requirements as well as banking diligence. Due to the outlined shortcomings in data quality, a lack of precise methodological guidance and widely shared and aligned practices, the interpretation of the results is subject to limitations and is expected to improve over the next years.

We therefore ask for your understanding that we do not assume liability for data and other information contained in this Report.

This Report is based on RBI's current business policy. Changes to this business policy are reserved. Nobody may derive or assert any type of claims or other rights arising from or relating to this Report against RBI companies or their board members and employees; any liability of these companies, board members and employees arising from or relating to this Report shall be excluded.

This Report has been prepared and the data checked with the greatest possible care. Nonetheless, rounding, transmission, typesetting and printing errors cannot be ruled out. In the summing up of rounded amounts and percentages, rounding-off differences may occur.

This Report is subject to substantive Austrian law. The Bezirksgericht Innere Stadt (Local Court Vienna – Innere Stadt, Austria) is solely responsible for reaching a decision on all possible disputes arising from or relating to this Report.

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# > Foreword by the Supervisory Board

Dear readers,

In the current era of fundamental change and global challenges, we feel it is particularly important to provide a comprehensive insight into the measures we are taking and progress we are making in the area of sustainability. The transition to a more sustainable and climate-friendly economy is crucial, and financial companies have a major responsibility to bear in this process. In this respect, I would like to highlight RBI's focus on supporting the transition of its customers in Austria and Central and Eastern Europe. We must address the reality that greenhouse gas emissions and global average temperatures are reaching new highs. Extreme weather events are occurring more frequently, rapidly and with increasing intensity. Unfortunately, the energy transition has not yet reached the point at which people can rely purely on renewable energy sources. Funding is required to actively counteract these problems, which entails making investments in a sustainable future. This is an area in which RBI sees huge potential in Austria as well as Central and Eastern Europe, and offers its customers first-class ESG expertise together with bespoke financial products.

Transition is a gradual process – “Make Sustainability Happen” is the title of this report, which outlines the concrete and consistent efforts to make sustainability a reality. As Chairman of the Supervisory Board, I am therefore very keen to ensure that RBI continues to pursue its commitment to sustainability and provide the best possible service to its customers in realizing their sustainable transition plans.

In 2023, RBI established a climate and environmental business strategy, with the clear goals of supporting customers' funding for investments in the green transition process and reducing emissions financed by RBI. This strategy was also presented to the European Central Bank. Thanks to its key role as a financial intermediary in Austria and CEE, RBI acts as a catalyst in supporting the transition to sustainability.

As a responsible banker, RBI actively implements the United Nations' Principles for Responsible Banking. The corresponding progress report (see page 252 ff) was actively incorporated into the auditing process for the first time in 2023. RBI was also the only banking group in the DACH region to actively participate in a working group for the United Nations Environment Programme Finance Initiative in 2023, aimed at further developing the Principles for Responsible Banking for the period until 2030.

Furthermore, we have stepped up our efforts in the area of social responsibility and developed a regulatory framework that is being continuously improved to ensure compliance with human rights across our value chain.

I would also like to highlight the challenges facing RBI. Due to Russia's war of aggression, RBI and its stakeholders are in an unprecedented situation, and the need for action is unquestionable. RBI is actively working on strategic options for Raiffeisenbank Russia. The reduction of business operations in Russia is underway, while potential transactions leading to the deconsolidation of Raiffeisenbank Russia will be pursued in accordance with laws and regulations. In all scenarios, including in the case of a complete deconsolidation of Raiffeisenbank without compensation, RBI's CET1 ratio will remain robust. In the fiscal year 2023, RBI increased its Common Equity Tier 1 (CET1) capital ratio to 17.3 per cent. In the event of a deconsolidation of the Russian subsidiary bank without considering its equity, it would have been 14.6 per cent at year-end, significantly exceeding regulatory requirements.

RBI supports the green transition process by continuously improving its risk framework. The availability and reliability of relevant company data play a crucial part in allowing banks to fulfill their roles and responsibilities in the transition to a sustainable future. However, the disclosures required by the regulatory authorities are heavily reliant on the data provided by customers. Moreover, problems can arise in generating this data as the level of information available across different sectors and regions remains very varied. In addition, the new disclosure standards still leave room for interpretation regarding their implementation, which makes comparisons in the market difficult. RBI was materially involved in the development of OeKB's customer questionnaire, which represents a significant first step towards harmonization, at least in Austria. However, a comparable platform does not yet exist in most of the other countries in which RBI operates. Estimates dominate the current target picture in the market, which poses a challenge in terms of the accuracy of the own targets, especially given RBIs high demands in terms of data quality. This is a learning process for all players in the market, still involving several uncertain factors which will hopefully find a positive resolution in future.



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In addition to monitoring business development, examining this consolidated non-financial report is one of the most important tasks of the Supervisory Board in its role as RBI's highest governance body. Given the growing complexity of ESG regulation and the related requirements, the Supervisory Board and the Management Board continued to enhance their knowledge of ESG issues on an ongoing basis in 2023, in order to improve their understanding and assessment of the backdrop to the company's key sustainability risks, opportunities and impacts. Regulatory developments were presented in a series of „Fit&Proper“ training sessions, while specific and necessary changes at RBI were discussed together with the requisite implementation measures. The focus was on future topics in connection with the Corporate Sustainability Reporting Directive, which will apply from the 2024 financial year. This was rounded off by status reports on the group-wide "Fit4CSRD" project. Furthermore, legal requirements on existing and potential obligations as well as liability issues relating to ESG criteria were provided via external legal attorney expertise.

Once again, bonus-related qualitative and quantitative sustainability targets were also set for all Management Board members across the banking group in 2023 on the basis of the remuneration policy.

On behalf of the Supervisory Board, I would like to thank all of our employees for their outstanding work in what was once again a very challenging financial year, and to express our full support for their strong commitment to strengthening RBI in its role as a responsible banker now and in the future.

On behalf of the Supervisory Board

Mag. Erwin Hameseder  
Chairman of the Supervisory Board  
Raiffeisen Bank International AG

# > Foreword by the Management Board

## Dear readers,

We are living in extraordinary times in which the tangible effects of climate change, a war at the heart of Europe, technological challenges, demographic change and social instability are changing our business environment. While these forces are nothing new, their scope, impact and interdependencies are growing to varying degrees across different sectors and regions.

Consequently, environmental and social impacts have become just as important as traditional financial ratios in financial market assessments of corporate activities. This is also reflected in the legal disclosure and transparency obligations that are intended to enable customers and investors alike to gain a comprehensive picture of a particular company.

Today's credit and investment decisions will define tomorrow's world. This requires us to join forces with our customers in taking responsibility for the environment and society. ESG data are becoming increasingly important in the decision-making process. Digitalization and artificial intelligence will accelerate the comparability of company data going forward, while at the same time supporting the efficient implementation of climate and environmental agendas for a sustainable future.

In these highly challenging times, Russia's prolonged attack on Ukraine in particular has deeply affected us all in Europe, Austria, at RBI and, above all, at Raiffeisen Bank JSC in Ukraine. Thanks to its strong presence across the country, Raiffeisen Bank JSC not only supports the local community, but enables the Ukrainian economy to maintain vital cross-border ties. In a bid to bolster Ukraine's financial stability, we are working tirelessly to ensure that banking services are available, including lending services to the indispensable agricultural sector in particular. Our efforts are also designed to maintain international ties with Ukraine and thereby support its progress towards European integration.

At the same time, we are continuing to scale back our business activities in Russia and are closely examining potential transactions that would lead to the deconsolidation of Raiffeisenbank Russia. In December 2023, RBI announced its intention to acquire nearly 28 per cent of the shares in STRABAG SE through its Russian subsidiary AO Raiffeisenbank from the Russian company „MKAO Rasperia Trading Limited“. Closing of the acquisition is subject to the restructuring of the seller and a satisfactory completion of the sanction's compliance due diligence review by RBI. A successful completion of the transaction would significantly reduce the equity position of the Russian subsidiary bank and thus substantially reduce the risk of RBI's business in Russia. In this complex market environment with a constantly changing legal framework, we will adhere to the following principles in all potential transactions: satisfy Group-wide governance and compliance requirements, protect financial and non-financial assets for the RBI Group, manage contagion effects on the entire network and conduct processes in an orderly fashion to meet our obligations as a listed company.

As one of the leading banks in Central and Eastern Europe and Austria, RBI is committed to sustainability and corporate responsibility. In 2010 RBI joined the UN Global Compact, the world's largest initiative for corporate responsibility and sustainability. Our objective is to make ESG-related activities and business a key part of RBI's business development in our home markets. We aim to achieve a measurable impact. The United Nations Principles for Responsible Banking represent the framework which goes hand in hand with the fulfillment of regulatory requirements in Europe. Management of our business activities is guided by these principles, with due consideration given to the impact our activities have on the environment and society. This requires pro-active stakeholder engagement, especially with customers and consumers. We pursue climate targets that have been devised in liaison with the Science Based Targets initiative (SBTi) and work on their continuous development. In line with RBI Group's Code of Conduct, we have a zero tolerance policy towards illegal and unethical business practices, especially bribery and corruption. RBI Group does not participate in any transactions that are suspected of involving bribery or corruption practices. On the contrary, it takes decisive action to combat bribery and corruption in its business environment and home markets.



“Make Sustainability Happen” is the motto of this Sustainability Report. As a responsible banker, our focus is on the transition to sustainability, which we consider an ongoing process. This requires the capacity to identify, monitor and control ESG impacts, risks and opportunities on a continuous basis, while maintaining a firm focus on our customers. In 2023, RBI developed a new climate and environmental strategy for its financing business, which is currently being integrated into our business processes. The aim of this comprehensive strategy is to meet the following key targets: firstly, align RBI's balance sheet with the climate goals of the Paris Agreement; secondly, actively support our customers in their own process of climate and environmental transition and, thirdly, accelerate the transition to sustainable financial services within the Group based on the latest ESG expertise and governance practices.



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As a fair partner, we are proud of our commitment to diversity, and we take active measures to ensure an inclusive working environment. Thanks to its professional diversity management with a focus on empowering women as well as employing people with disabilities and actively supporting the LGBTQI+ community, RBI is actively helping to reduce inequality in our society. As well as contributing to RBI's success and motivating our employees, the combination of appropriate training and continuous professional development throughout the company has an influence on our society's potential.

As an engaged corporate citizen, we actively champion sustainable development in our society, in addition to environmental protection. To heighten the potential impact on society and enhance its visibility, the “Brighter Future Initiative” was launched in spring 2023 to bring donations, collaborative and corporate volunteering projects under one umbrella. Its aim is to focus RBI's social engagement on the core issues affecting society, while bringing impact measurement to the fore so that achievements can be presented in a transparent manner.

The success of our longstanding commitment to sustainability is reflected in our sustainability ratings. RBI was awarded Prime status with a rating of C+ by ISS ESG, for example. It also achieved another listing in the VÖNIX Sustainability Index on the Vienna Stock Exchange. PwC analyzed the ESG performance of the 155 companies with the highest revenues in Austria and ranked RBI as the top performer in financial services.

This report was compiled pursuant to the applicable Austrian Sustainability and Diversity Improvement Act in accordance with the international reporting standard “GRI Standards” issued by the Global Reporting Initiative. In preparation for future reporting requirements in Europe (as per the CSRD/Corporate Sustainability Reporting Directive), which will also come into force for RBI as of next year, the reporting structure has already been partially adapted. The report has been approved by the full Management Board, audited by Deloitte, and examined by our Supervisory Board.

On behalf of the entire Management Board, I would like to thank all our employees for their tireless efforts in promoting our commitment to a sustainable future and making sustainability happen in line with the title of this report.

On behalf of the Management Board

Johann Strobl  
Chief Executive Officer  
Raiffeisen Bank International AG



## **Sustainability and ESG Management:**

About the Report, RBI, Sustainability strategy, Impacts and material issues, ESG Governance, Stakeholder engagement, Ratings and awards

# Sustainability and ESG Management

## > About the Report

In this Sustainability Report, we describe the economic, environmental, and social impact of our business activities in the 2023 financial year (1 January to 31 December) and present our current activities in the area of sustainability. The aim of the report is to give a comprehensive account of how Raiffeisen Bank International (RBI) has fulfilled its sustainability mission during the reporting period and what plans it has to implement and improve its sustainability performance in the future. Our objective is to provide a transparent account of the ways in which RBI is currently contributing to sustainable development and how it plans to do so in the future. The motto is "Make sustainability happen".

GRI 2-3

This report represents RBI's summarized and consolidated "non-financial report" (pursuant to sections 267a and 243b of the Austrian Commercial Code). Some of the new reporting requirements of the European Union, laid down in the Corporate Sustainability Reporting Directive (CSRD), which will also apply to RBI from 2024, but which have not yet been implemented in Austrian law, have already been included in the reporting structure. The report includes the content that is necessary for an understanding of the course of business, business results and position of RBI as well as the impacts of its activities as derived from the materiality analysis or that is expected to be included by relevant stakeholders and at least refers to environmental matters, social matters and employee matters, the respect of human rights and the fight against corruption and bribery. The report is not structured according to these specific matters. Instead, the corresponding information can be found in the relevant chapters. These are divided into three strategic areas of action: Responsible banker (in connection with RBI's business), Fair partner (with regard to employees and inhouse ecology) and Engaged citizen (in connection with collaborations, corporate volunteering and donations).

PRB 6

RBI pursues a Group-wide approach to sustainability management that applies to both RBI AG and the RBI Group. Raiffeisen Bank International (RBI) is used to designate the RBI Group in this report. On the other hand, the term RBI AG is used to designate Raiffeisenbank International AG in Vienna. Group head office refers to Raiffeisen Bank International AG excluding its branches. For more information on the structure of RBI as a whole, see page 14. In accordance with the requirements of section 243b of the Austrian Commercial Code, the key figures are also reported separately for RBI AG where this is reasonable.

The report lays out the sustainability strategy as well as, for each identified key topic area, the impacts, risks and opportunities of our business activities/business relationships, together with corresponding management approaches (concepts) and measures. It also describes specific sustainability activities carried out during and prior to the reporting period. In addition, we present our ESG Metrics and ambitions including the sustainability program for the next reporting period and the progress made in the activities already initiated. The current reporting period follows on seamlessly from the RBI Sustainability Report for 2022. The Sustainability Report is published annually, and the report for the 2023 financial year will be published on 22 February 2024.

GRI 2-3

Group ESG & Sustainability Management at RBI is your point of contact concerning this report. Comments, ideas and suggestions for improvements can be sent to [sustainabilitymanagement@rbinternational.com](mailto:sustainabilitymanagement@rbinternational.com).

GRI 2-3

## Applied ESG guidelines

### GRI Standards

RBI has reported in accordance with the GRI Standards for the period from 1 January 2023 to 31 December 2023. The GRI Standards are internationally recognized Standards for sustainability reporting promulgated by the Global Reporting Initiative. In addition, selected indicators relating to the information of the financial services sector are included.

### Principles for Responsible Banking



### PRINCIPLES FOR RESPONSIBLE BANKING

In 2021, RBI became an official Signatory of the UN Principles for Responsible Banking (PRB), and was the first Austrian banking group to do so. The Principles for Responsible Banking are a single framework for a sustainable banking industry developed through an innovative global partnership between banks and the United Nations (UNEP FI). The roles, tasks and responsibilities of the banking sector are set out in six principles. The framework aims to bring the banking industry into line with the UN Sustainable Development Goals and the 2015 Paris Climate Agreement.

The principles support the banks in enshrining sustainability in all areas of their business. This helps them to recognize their potential for making the greatest possible contribution to a sustainable world.

At marked points in the text and in the PRB Report starting on page 252, the Sustainability Report documents how RBI is implementing the Principles for Responsible Banking and the progress it has made.

### Task Force on Climate-related Financial Disclosures

The requirements of the Task Force on Climate-related Financial Disclosures (TCFD) encompass the four areas of governance, strategy, risk management, and metrics and targets. RBI has been an official TCFD supporter since 2022. The aim of TCFD-compliant reporting is to appropriately publish the risks and opportunities of climate change in order to strengthen financial market stability. As the TCFD requirements are largely integrated into the CDP questionnaire, which RBI has completed for a number of years, RBI's TCFD index on page 251 refers extensively to the CDP questionnaire. Additionally, individual aspects of the TCFD reporting framework are covered at various points in the Sustainability Report, and the index contains corresponding page references.

### Regulatory disclosure according to the EU Taxonomy Regulation

The EU Taxonomy Regulation prescribes an EU-wide framework (a classification system described as a „taxonomy“) for assessing whether certain economic activities are „environmentally sustainable“. Article 8 of the Regulation sets out the reporting obligations. Financial companies calculate the proportion of taxonomy-based economic activities in their financial activities (loans, investments and insurance) - the so-called „Green Asset Ratio“, which must be published for the first time in the financial year 2023. There are no specifications as to which ratio a bank must achieve.

However, the information value is very limited due to its structure and restricted scope. For example, loans to smaller companies and international non-EU business are not included in the calculation. Depending on the focus of a banking group's activities, this can lead to a highly distorted picture. In addition, the Green Asset Ratio does not reflect the fact that RBI's focus is on the economic ESG transformation of our customers. We currently mainly support companies that have already embarked on the path of sustainability, but whose transactions are not yet fully „green“ in the sense of the EU Taxonomy Regulation.

Pages 219 et seq. of the Sustainability Report contain the section on the necessary regulatory requirements for the 2023 financial year.

## Regulatory disclosure of ESG risks

Since the 2022 financial year, it has been necessary to disclose the Implementing Technical Standards (ITS) on Pillar 3 disclosures on Environmental, Social and Governance (ESG) risks as published by the European Banking Authority (EBA). These standards aim to ensure that stakeholders are well informed about the ESG exposures, risks and strategies of institutions, that they can make informed decisions and can exercise market discipline. The aim is to guarantee the improved consistency, comparability and meaningfulness of disclosures by institutions. This framework considers existing initiatives such as the Task Force on Climate-related Financial Disclosures, but also exceeds it.

The relevant qualitative information overlaps to a large extent with the information already disclosed in the Sustainability Report in 2022. For the 2023 financial year, it is therefore disclosed directly in the appropriate chapters of the Sustainability Report and identified by means of side notes. Conversely, the regulatory Pillar 3 disclosure, which is available on RBI's website, contains references to the corresponding pages in the Sustainability Report. The quantitative information is available only on the website.

Find more at:  
[www.rbiinternational.com/en/investors/results-reports/disclosures.html](http://www.rbiinternational.com/en/investors/results-reports/disclosures.html)

## Verification of the report's contents

The contents of this Sustainability Report have been audited by Deloitte Audit Wirtschaftsprüfungs GmbH in the context of a limited assurance engagement (see pages 242-244). This report has been examined by the Supervisory Board pursuant to section 96 (1) of the Austrian Stock Corporation Act.

GRI 2-14  
TCFD

## Materiality, impacts, risks, opportunities and determination of the report contents

GRI 3-1

In the report, we address the subjects that have been identified within RBI as material, that reflect the expectations of our stakeholders, and that represented the focus of our engagement in the past year.

This report contains information – including non-financial performance indicators – describing the specific impact of RBI on the economy, environment and people, including human rights. The contents of the report were selected using the principle of materiality. A materiality analysis provides the basis for selecting the relevant topics (see page 21 ff.). The analysis should ensure that the contents of the report cover all topics and indicators that have the greatest current or potential, positive and negative impact in relation to the Group's business activities, products and services. This includes both the impacts that are directly attributable to RBI and occur within the organization, as well as those to which it contributes, i.e., those that have arisen based on business relationships with other entities. The risks and opportunities that are relevant to RBI in connection with the aforementioned matters or for which there are risks or opportunities for RBI on account of its business activities or its business relationships are also presented.

## Report scope and data collection

GRI 2-2  
GRI 3-1

The report includes Raiffeisen Bank International AG (RBI AG) and 12 subsidiary banks in Central and Eastern Europe. The key subsidiaries of RBI AG in Austria are also included in the report. These are Raiffeisen Bausparkasse Gesellschaft m.b.H., Raiffeisen Kapitalanlage Gesellschaft m.b.H. and Raiffeisen-Leasing GmbH, as well as the Valida Group, and Kathrein Privatbank AG. More than 90 per cent of RBI's employees work in these companies.

On 1 April 2022, Raiffeisen banka a.d., Belgrade completed the acquisition of 100 per cent of the shares of Crédit Agricole Srbija AD (CASRS), Novi Sad. The operational merger was completed in 2023.

All relevant facts and figures in this regard for the 2023 year are thus contained within Raiffeisen banka a.d., Belgrade. To enable a comparison with 2022, the corresponding indicators were integrated into the report as follows: Figures on sustainable financing and fundraising were omitted on grounds of immateriality. In the case of employee metrics, due to the large volume of data to be collected and in order to meet RBI's quality requirements, they were included only in the total headcount, but not in the detailed figures presented. Data on inhouse ecology was extrapolated based on the consumption values of Raiffeisen banka a.d., Belgrade.

The aim of the current report scope is to ensure that the quality of the data collected is of the highest possible standard and to be able to provide a valid statement on the impact on the economy, the environment and people, including human rights. The data collected therefore relates to the principal companies listed in the first paragraph of this chapter.

However, it is possible, especially in the "Responsible banker" chapter, that materiality extends beyond the companies mentioned above in order to cover all material ESG-relevant business components. Therefore, a transparent explanation as to which scope of consolidation is included in each case is provided in the respective chapters.

The structure of the chapters and summaries of figures in this report correspond with the segments of RBI's Annual Report. RBI is divided into Austria (AT), Central Europe (CE), Southeast Europe (SEE), and Eastern Europe (EE). RBI AG is presented separately.

Due to rounding, the tables may add up to greater or less than 100 per cent and the totals may not always correspond to the individual items.

Data collection was largely performed using the "ESG Cockpit" sustainability reporting software. This software is used to collect not only quantitative but also a wide range of qualitative data and information. To ensure high data quality, the principle of dual control is applied as an integrated part of the workflow process in the software. Internal applications are mainly used for data associated with customer metrics.

## Responsible banker

The data and information on economic circumstances contained in this Sustainability Report is based primarily on the information from RBI's 2023 Annual Report. This has been audited by external auditors.

Additional data and information in the "Responsible banker" chapter is primarily taken from internal applications and, in some cases, was collected using the "ESG Cockpit" software. The data on sustainable and Taxonomy-aligned financing was collected locally and consolidated using an internal RBI application (see page 100 ff.). This ensures that data is collected in a uniform manner across most of the Group. The CO<sub>2</sub> values for calculating financed emissions are integrated within the risk controlling system, which is, among other things, also used for the RWA calculation and which uses the factors from the PCAF database (see page 83).

## Inhouse ecology

Quantitative data relating to inhouse ecology is collected using the "ESG Cockpit" software. Additional data published in the report was gathered by means of specific requests and discussions with individuals. The environmental indicators include both data for the head office as well as the branches of the subsidiary banks in Central and Eastern Europe, thus covering more than 90 per cent of all employees. Backward extrapolation is performed when a subsidiary bank in Central and Eastern Europe enters key figures for the first time that could not be collected in previous years due to insufficient data quality. This means the figures shown are not always comparable with last year's report. Additional information relating to the reported data is included in corresponding footnotes.

The key figures of the subsidiary banks in Central and Eastern Europe are also published on our website ([www.rbinternational.com/en/raiffeisen/sustainability-esg.html](http://www.rbinternational.com/en/raiffeisen/sustainability-esg.html)). Data acquisition of the inhouse ecology indicators is time delayed on account of earlier than expected reporting requirements (as a result of the Austrian Sustainability and Diversity Improvement Act/NaDiVeG). Full-year values are published, with the figures for the fourth quarter of the previous year added to the figures for the first three quarters of the current year. In 2022, due to the commitment to the Science Based Targets initiative, the base year was changed from 2011 to 2020.

## Employees

Data and information relating to employees is recorded on a Group-wide basis either directly in the "ESG Cockpit" software or using the "Tagetik" software, after which it is imported into the "ESG Cockpit" software via an interface. Additional data published in the report was gathered by means of specific requests and discussions with individuals.

## Engaged citizen

Data relating to the "Engaged citizen" chapter is recorded on a Group-wide basis either directly in the "ESG-Cockpit" software, by means of standardized questionnaires, and with the involvement of the respective Accounts department. Additional data published in the report was gathered by means of specific requests or in discussions with individuals.

## Comparability of the information

GRI 2-4

Comparability of the 2023 Report with the 2022 Report is ensured as far as possible in terms of content.

The tables cover a period of three years for RBI.

# ➤ Interesting facts about Raiffeisen Bank International

GRI 2-1, -6

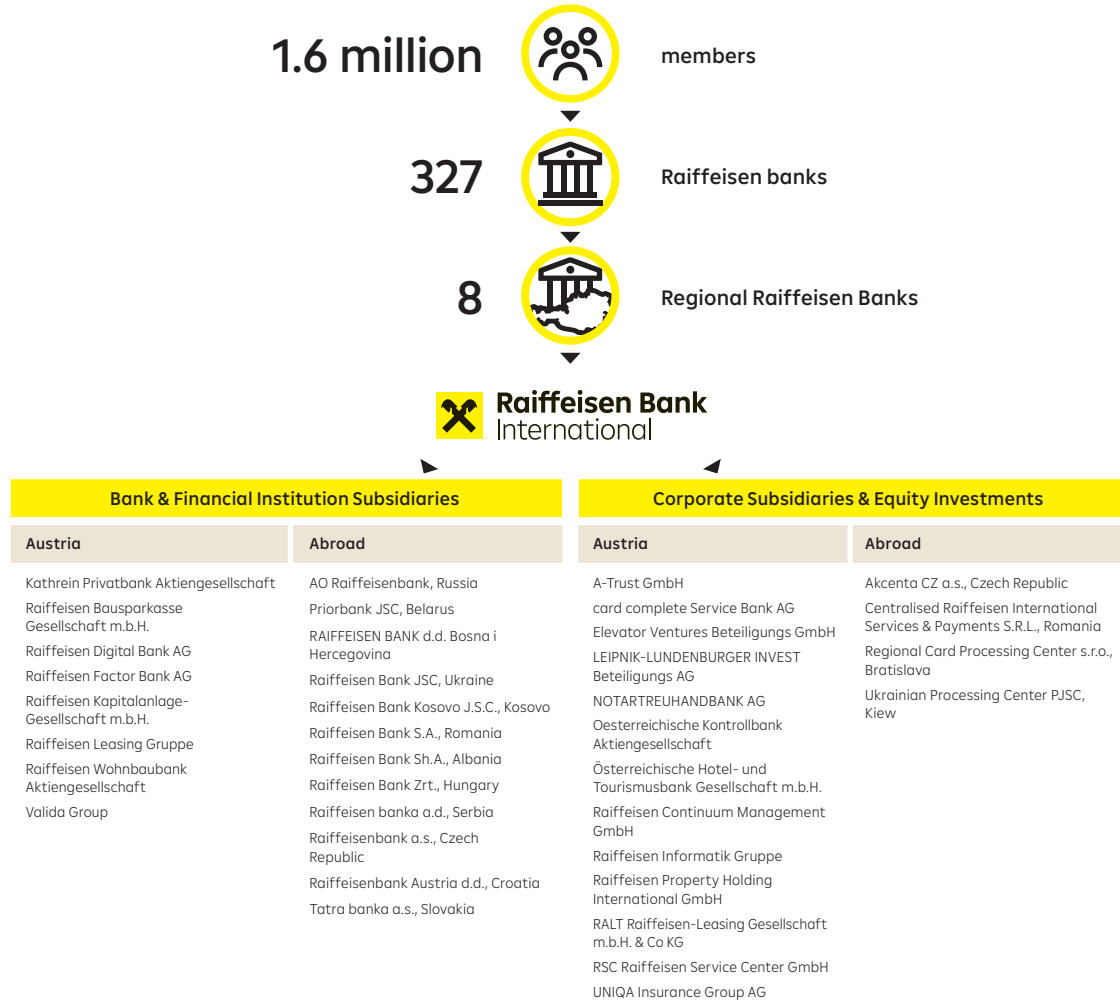
## Ownership relationships and structure

The Raiffeisen Banking Group Austria (RBG) is the country's largest banking group and has the most concentrated branch network in Austria. In financing, it primarily serves small and mid-sized retail, service, industrial and commercial enterprises, as well as tourism and agriculture sectors. The RBG is organized into three tiers: the independent, local Raiffeisen banks (1st tier), the eight independent regional Raiffeisen banks (2nd tier), and RBI AG (3rd tier).

The Raiffeisen banks and their branches, numbering around 300, as well as the regional Raiffeisen banks and specialist companies, together make up a comprehensive and extensive banking network. The Raiffeisen banks are universal banks that provide a full range of banking services and are also the owners of their respective regional Raiffeisen bank.

The regional Raiffeisen banks (Raiffeisen Landesbanken and Raiffeisenverband) provide liquidity balancing and other central services for the Raiffeisen banks in their area of activity. In turn, the regional Raiffeisen banks are connected to RBI AG through its role as the central institution of the RBG.

## Structure of the Raiffeisen Banking Group



GRI 2-6

## About Raiffeisen Bank International

Raiffeisen Bank International (RBI) regards Austria, where it is a leading corporate and investment bank, as well as Central and Eastern Europe (CEE) as its home market. Subsidiary banks cover 12 markets across the region. In addition, the Group includes numerous other financial service providers active in areas such as leasing, asset management and M&A.

In total, around 45,000 RBI employees serve around 18.6 million customers from more than 1,500 business outlets, the vast majority of which are in CEE. RBI AG shares have been listed on the Vienna Stock Exchange since 2005.

The regional Raiffeisen banks hold approximately 61.17 per cent of RBI AG shares, with the remaining per cent in free float.



## Customer segments

ESG Pillar 3 ER a

### Retail customers

RBI provides services to around 18.4 million retail, private banking and small business customers in CEE, offering a broad product range (e.g. account packages, clearing, settlement and payment services, consumer finance, mortgage loans and investment products). In Austria, RBI performs investment advisory and asset management services for retail customers solely via its subsidiary Kathrein Privatbank, as well as providing housing loans via building society Raiffeisen Bausparkasse and card business through Raiffeisen CardService entity. Through cooperation with a fintech company RBI offers an e-commerce sales finance product under the brand cashpresso. Information on the retail sustainability strategy in this business line can be found on page 98.

### Corporate & institutional clients

RBI serves around 134,000 corporate clients across CEE (including medium-sized businesses, large local companies, international corporations and local authorities) as well as local and international institutional clients. Its product range encompasses a broad spectrum of tailored solutions in the areas of finance, capital market advisory and risk hedging as well as an extensive selection of transaction banking solutions (clearing, settlement and payment services, trade and export finance). Information on the sustainability strategy in this business line can be found in the "Sustainable Finance" chapter starting on page 97.

# ➤ Sustainability concept and strategy

GRI 2-23, -24  
GRI 3-3

PRB 1, 5

TCFD

Find more at:  
[www.rbinternational.com/en/raiffeisen/sustainability-esg.html](http://www.rbinternational.com/en/raiffeisen/sustainability-esg.html)

## Our understanding of sustainability

Sustainability has always been a fundamental principle for RBI and a measure of corporate success. For over 130 years, Raiffeisen has combined financial success with socially responsible action.

- We understand sustainability to mean responsible corporate activities for a long-term, economically positive result in consideration of key societal and environmental aspects. This understanding is deeply rooted in Raiffeisen's fundamental values (see also page 44).
- We combine financial success with social responsibility by anchoring sustainability as a fixed component of our business and by practicing sustainability as an integral leadership and management responsibility, in addition to taking key sustainability aspects into consideration in our business activities.
- We are therefore committed to aligning our management structures and processes with this attitude. In the three strategic sustainability areas of responsibility, "Responsible banker", "Fair partner", and "Engaged citizen", which are closely linked to our business activities, we endeavor to professionally and effectively apply our values and competences to fostering sustainable development both in our companies and in society.

In our RBI Group ESG & Sustainability Policy (see also page 36), we have formulated how we pursue sustainability strategically and how we wish to live up to this ambition within our business activities.

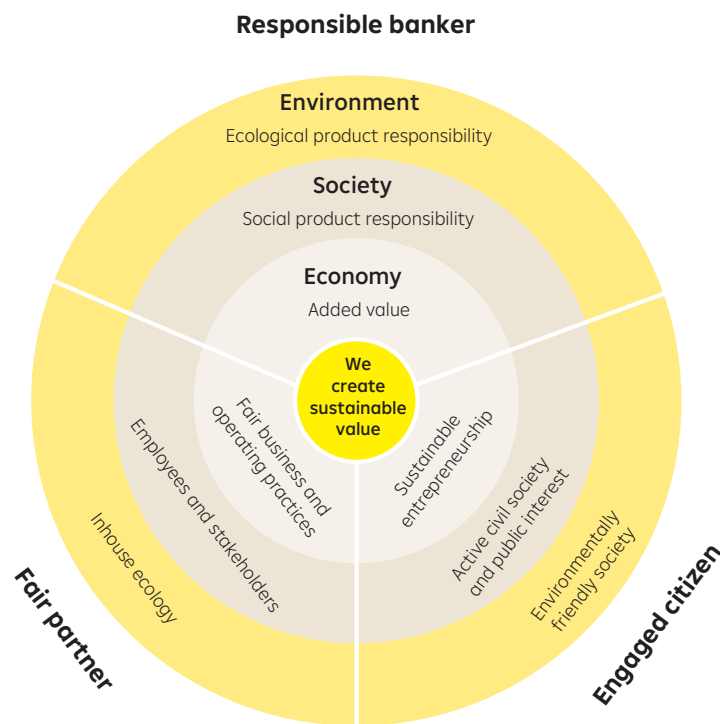
Our stated aim is to concentrate on those areas which have a significant impact on the economy, the environment and people, including human rights. This requires us to continuously improve the positive impacts of our business activities while reducing the more negative aspects, and develop ways to measure and verify both. In doing so, we aim to increase the long-term value of our group while also actively contributing to the sustainable development of society.

Sustainability is part of RBI's business strategy. It is imperative for us to have an ESG strategy that achieves real impact, primarily based on new regulations, supervisory authority expectations or demand from investors, customers and society. Consumers are demanding more and more sustainable products and services. Employees are demanding more from companies and choosing their jobs based not only on a company's core values, but also on its actual impact and results. Governments play an active role in steering the market through incentives, sanctions and regulations.

The SDGs (Sustainable Development Goals) and the Paris Agreement are just as relevant as the EU initiatives, forming a key part of fostering ESG initiatives. The EU's Sustainable Finance Action Plan sets three broad aims: (1) To reorient capital flows towards a more sustainable economy, (2) Mainstreaming sustainability into risk management, and (3) Enhancing transparency and long-termism. Now that the international community is generating momentum for ESG, the EU will continue to drive progressive standards and influence global ESG agendas. This has wide implications specifically for financial institutions, and therefore also for RBI and its business models.

## Our sustainability strategy

ESG Pillar 3 ER a  
ESG Pillar 3 SR a



Our approach as designers of a sustainable company and society

In order to improve the effectiveness and scope of our sustainability management across the whole of RBI, we have published the Group-wide sustainability strategy "We create sustainable value". This strategy consists of three strategic action areas: responsible banker, fair partner and engaged citizen (each of which addresses the three key pillars of sustainability: economy, environment and society), as well as nine core action areas within which we focus our Group-wide sustainability management. In order to systematically address these core areas, which are also important to our stakeholders, we continuously seek to improve our sustainability strategy.

In identifying the core action areas, we rely on our group perspective as well as the perspectives of our stakeholders, who include our employees, customers, shareholders and suppliers, as well as non-governmental organizations and a number of other stakeholder groups.

We carry out a multi-stage materiality analysis on a regular basis in order to prioritize these fields of activity. For this reason, as well as for the purpose of making any adjustments to our sustainability strategy, we place great value on maintaining a dialog with our stakeholders.

## Core action areas of our sustainability strategy

TCFD

RBI sustainability matrix	Economy	Society	Environment
<b>Responsible banker</b>	<b>Value creation</b> Successful business through responsible management and business strategies, sustainable responsibility in the real economy and the regional economy and the integration of sustainability aspects into the core business	<b>Social product responsibility</b> Social responsibility for our products and services by taking consumer concerns into account, consideration of social aspects in providing loans and financial products, protection of customer data and providing correct information	<b>Ecological product responsibility</b> Ecological responsibility for our products and services by guaranteeing national environmental provisions and recognized, international conventions as well as taking into account the environmental impact in project finance plans and financial products
<b>Fair partner</b>	<b>Fair business and operating practices</b> Fairness and transparency towards employees, customers and shareholders through exemplary behavior in areas of influence as an attractive employer; through transparent reporting as well as the avoidance of corruption and fraud	<b>Employees and stakeholders</b> Continuous inclusion of stakeholders as part of sustainable company development by strengthening cooperation management in order to reduce business risks and make use of business opportunities	<b>Inhouse ecology</b> A responsible approach to resources and the environment by reducing our environmental impact and implementing selected measures in order to achieve the defined Group-wide climate targets
<b>Engaged citizen</b>	<b>Sustainable entrepreneurship</b> Commitment to sustainable entrepreneurship and enterprise and the creation of wealth by helping to establish a framework for sustainable finance as well as direct and indirect support for organizations and socially relevant initiatives	<b>Active civil society</b> Commitment to a sustainable civil society and responsible political cooperation by promoting public interest and knowledge of financial topics and voluntary work	<b>Environmentally friendly society</b> Working for the environment and the climate through climate protection, protection of species diversity and conservation of the various ecosystem functions and services

The most effective leverage for a bank is in its core business, and in particular granting loans and investing funds. In all business areas and products, RBI takes the greatest possible care to structure its business and business relationships for long-term resilience, to avoid social and environmental risks and to take advantage of opportunities to improve environmental protection and social standards. Trust and reliability have always formed part of RBI's fundamental principles (more information can be found in the chapter "Responsible banker" starting on 64).

## Mission & Vision 2025

With the Vision 2025 that it presented in 2019 – "We are the most recommended financial services group" – RBI is clearly showing that it wants to be more than just a bank for its customers. RBI is committed to an outstanding service culture which regularly seeks to exceed the expectations of customers with regard to quality. To make this vision a reality, RBI's mission is formulated as follows: "We transform continuous innovation into superior customer experience." This is tied to the promise to the general public to "act in a socially responsible manner, fostering the long-term welfare of the people and businesses in our markets". This is consistent with RBI's sustainability strategy, the aim of which is to generate sustainable value.

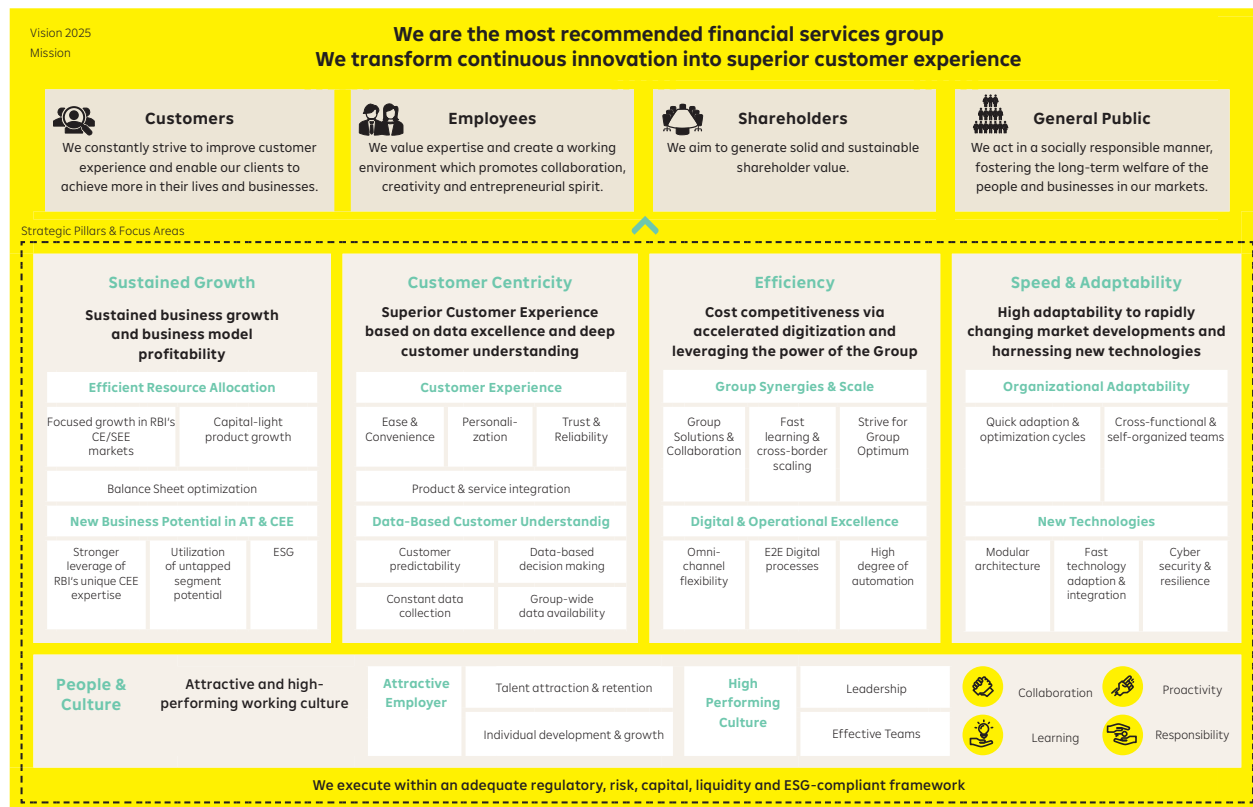
TCFD

Find more at:  
[www.rbinational.com/en/raiffeisen/rbi-group/about-us/vision-mission-values.html](http://www.rbinational.com/en/raiffeisen/rbi-group/about-us/vision-mission-values.html)

# The RBI Strategy

## RBI Group Strategy Map

GRI 2-12, -19, -23, -24  
 GRI 201-2  
 GRI 203-2  
 GRI G4-DMA (former FS1)  
 ESG Pillar 3  
 ER b, f, i  
 ESG Pillar 3  
 SR b, g  
 PRB 1, 2, 5



As one of the leading banks in Central and Eastern Europe as well as in Austria, RBI has confirmed its commitment to sustainable development. Our aim is to make ESG-related activities and business a key part of RBI's business development in our home markets. We want to achieve measurable impact, while at the same time complying with regulatory requirements. Accordingly, we have signed up to the Science Based Targets initiative and implement the Principles for Responsible Banking and the Sustainable Development Goals of the United Nations. Management of our business activity is aligned to the Principles for Responsible Banking, which cover both the impacts of business activities as well as the areas of target setting, corporate management, culture, stakeholder engagement and transparency, and also clients and customers. We endeavor to support our customers in their transition to a sustainable future, in particular with regard to climate and the environment.

A "Strategy Map" has been developed in order to put RBI's strategy into action. This is intended to function as a standardized implementation instrument for RBI AG and the individual subsidiary banks in Central and Eastern Europe, as well as an orientation tool for all employees. The objectives derived are applied from Management Board level right through to the individual employees. They are included in the remuneration targets for the Management Board members, which are disclosed in the remuneration report that is published annually at the end of the first quarter. Environmental factors and risks are taken into account through the setting of appropriate annual targets for the respective business areas and are included in performance evaluation. RBI's performance evaluation considers risk-sensitive performance criteria as well as appropriate financial, non-financial, qualitative and quantitative performance criteria. The non-financial performance criteria aim to provide an adequate reflection of the business strategy; in addition to strategic objectives, compliance with risk management guidelines and governance and compliance requirements, they also include criteria relating to the company's social responsibility, environmental factors and also objectives relating to the workforce, including diversity. There is a clear focus on the perception of RBI's social responsibility to provide banking transactions to its customers in a sustainable and social manner and support them in an advisory capacity.

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 Find more at:  
[www.rbinternational.com/en/investors/governance-remuneration.html](http://www.rbinternational.com/en/investors/governance-remuneration.html)

Our employees form the basis for sustainable business success. Consequently, top management level has in 2023 placed a strong focus on diversity and the development of management staff. These are also included in the Management Board targets (see also pages 165 and 171, Employees).

## RBI's climate and environmental business strategy (for financing and other sustainable products and services)

In 2023, RBI developed a new climate and environmental business strategy for its financing business.

We set ourselves the target of gradually implementing qualitative and quantitative criteria in order to integrate our climate and environmental business strategy into our business processes. This enables us to prioritize resource allocation at portfolio level and to reduce interactions with companies that do not meet our climate and environmental criteria and/or our economic expectations, or that do not follow any transition pathway.

As a responsible banker, we have set ourselves the goal of supporting our customers from the retail, corporate and institutional sectors in their climate and ecological turnaround. Customers are encouraged to work on a targeted basis towards improving their climate and environmental performance by developing and following a transition pathway. We also offer customers extensive ESG expertise and practical and innovative sustainable financial products and services, thereby contributing to increasing the proportion of climate-friendly transactions.

The climate and environmental business strategy is subject to regular reviews, when we consider not only the latest scientific advances and the updated ESG findings from our portfolios, but also the transformation progress made by our customers. Since our customers and stakeholders are from a very diverse range of sectors, not all elements of the strategy can be fully applied to each sector, and some elements may have to be adapted to the respective level of the sectors and markets.

Our climate and environmental strategy is based on three pillars, which are consistent with both our voluntary commitments and also with the regulatory requirements.

The first pillar aims to prepare RBI's financial income statements in such a way that they meet the objectives of the Paris Agreement. We analyze the impacts of, the weak points of and the opportunities presented by our business activity from a climate and environmental perspective. In doing so we consider climate and environmental factors when considering financial decisions, risk and operational control, and when allocating resources. We will also increase the use of assets for sustainable financing products. These efforts are in line with Principle 1 "Alignment", Principle 2 "Impact and Target Setting" and Principle 6 "Transparency and Accountability" of the PRB.

The second pillar is commensurate with PRB Principle 3 "Clients & Customers" and focuses on supporting RBI's customers on their path to a climate and ecological turnaround. Our contribution in terms of adapting to the Paris climate targets primarily focuses on supporting our customers during their transition to more climate and environmentally friendly business activities. We therefore offer our corporate and institutional clients as well as our retail customers our professional expertise, along with practical and innovative financial products and services. We are increasing investments in areas with positive impacts on the environment and on society, with a special focus on the region in which we operate, namely Central and Eastern Europe.

In the third pillar, we are driving forward the transition to sustainable financing, based on current ESG expertise and ESG governance. In order to make a credible contribution to the climate and ecological turnaround, it is crucially important for us to develop, maintain and pass on expert knowledge. The establishment of a series of ESG policies and appropriate governance (e.g. the ESG Risk Framework or the process to prevent greenwashing) are a key element of our strategy and support us in our endeavors. These are commensurate with the PRB principles "Stakeholders" and "Governance and Culture".

GRI 2-6

ESG Pillar 3 ER a  
ESG Pillar 3  
SR a, dFind more at:  
[www.rbinternational.com/en/investors/governance-remuneration.html](http://www.rbinternational.com/en/investors/governance-remuneration.html)

GRI 2-6

## Business strategy for investment products

Sustainable investing of customer deposits at RBI AG is in large part effected via Raiffeisen KAG, which offers securities and real estate investment funds as well as investment management products to institutional and private customers both in Austria and abroad under the brand name Raiffeisen Capital Management (RCM). Sales are focused on Austria, and the key markets also include Italy, Germany and CEE. In Austria, sales are also effected via Raiffeisen Banking Group Austria. In other countries, sales cooperations exist with local partners. Raiffeisen KAG has established itself as a qualitative market leader in the field of sustainable investment in Austria. The sustainable investment strategies and processes are continuously developed, with a focus on proprietary research and the field of engagement. Sustainable product solutions play a key role in contact with customers, as this also results in a transfer of know-how.

Kathrein Privatbank is one of the leading private banks in Austria and offers services relating to wealth management, "Family Konsult" family consulting services, sustainable investment and financing. Sustainable investments are consciously selected with a view to actively shaping a better future. Around 52.83 per cent of Kathrein's total fund volume is already sustainable (for further details see page 125 f.).

GRI 2-6

## Societal aspects in the core business

Considering societal aspects in the core business and thus knowing and incorporating the societal needs of customers and end consumers is important to RBI. Responsible sales practices and marketing are not only strictly regulated, but are part of our stakeholder approach for fair business and sales practices. Protecting customer data and data security in general is an integral part of the processing of banking business, and of great importance to RBI. It also endeavors to enable all groups of people to have access to banking products. This means also recognizing and considering the needs of disadvantaged groups.

GRI 3-1  
TCFD

# > Impacts and material topics

As an internationally active banking group, we are faced with specific challenges in our efforts to realize our sustainability vision. These arise from the economic, social and environmental impacts of our business activities as well as from the external conditions within which we operate. We work within a global environment that is characterized by numerous economic, geopolitical and environmental risks (see also pages 8 ff. and 189 ff. in RBI's Annual Report).

The financial services sector itself has for years been confronted with many challenges and risks. In order to remain profitable over the long term, these challenges call for a strong culture of risk management and sustainability. Compliance with appropriate due diligence processes is therefore of particular importance.

We intensively address RBI's impacts on the economy, environment and society, and the risks and opportunities associated therewith. This includes risks and opportunities for RBI and also those for the economy, the environment, and society. Our own activities or business relationships can have an impact, resulting in a positive or negative contribution to sustainable development. The aim is to mitigate negative impacts and enhance positive ones, and at RBI, we try to ensure this through strategic and operational sustainability management. There is a separate sub-chapter on this in each of the "Responsible banker", "Fair partner/Employees", "Fair partner/Inhouse ecology" and "Engaged citizen" chapters (see pages 64 ff., 156 f., 190 f., 200 ff.).

## Identification of relevant topics

The selection of material topics takes into account internationally recognized criteria and sustainability standards, primarily those of the GRI, but also the United Nations Global Compact and current laws and regulations. In addition, we consider feedback about the Sustainability Reports and evaluate dialogs with individual stakeholders.

Direct feedback in the form of surveys and workshops as well as evaluations of discussions held with individual stakeholder groups, including customers, employees, rating agencies, non-governmental organizations and sustainability experts, as well as the defined focal points of the company strategy, also served as important sources for RBI and its Sustainability Officers in identifying key topics. Current initiatives and projects, such as the UNEP FI Principles for Responsible Banking, Science Based Targets initiative, or our work with external experts on current topics such as human rights, play an increasingly important role in identifying those topics where impact is greatest.

## Prioritization of the sustainability aspects and materiality analysis

GRI 3-2

The materiality analysis carried out in 2022 also applies to the 2023 financial year and is described in the paragraphs below.

RBI applies a multi-stage approach to its materiality analysis in order to better evaluate and subsequently prioritize the material topics and areas for action. This was revised accordingly in 2021 to reflect the new GRI Standards.

The first step was to review the material topics in the Sustainability Report 2021. These were:

- inhouse ecology and supply chain
- engagement with society and the environment
- employee concerns
- sustainability in the core business
- economic added value
- organizational governance
- regulations and control
- risk management
- stakeholder engagement
- transparency and disclosure

We then examined whether these topics actually all have a directly attributable impact, or whether they are management tools used to manage the positive and negative impacts of other topics. Organizational governance, risk management, stakeholder engagement, and transparency and disclosure were among the topics identified. They continue to be material in the sense of "We apply them to manage our material topics" but they are not material topics in the sense of "impact materiality".

The second step was to conduct a detailed review of all GRI standards to determine their materiality for RBI. This primarily excluded standards applicable to manufacturing companies but not to financial services companies. All standards identified as material were subsequently assigned to the existing material topics.

Alongside this, all identified GRI standards were assigned to the existing material topics and their sub-topics. Sub-topics include those topics that were previously assigned to a main topic.

The impact of the individual sub-topics was evaluated on a case-by-case basis, using the likelihood of occurrence and the level of severity to assess their significance. The most important tool for our core business is the UNEP FI Impact Analysis tool, used to identify the most positive and negative impact areas (for details see page 68 onwards). For inhouse ecology, the main environmental impact factor was identified as consumption-related greenhouse gas emissions (see page 194 ff.). For the other sub-topics, we used qualitative descriptions combined with an assessment of each to determine the degree of impact and subsequently identify materiality.

Based on this, the material topics and their sub-topics are as follows:

GRI 3-2

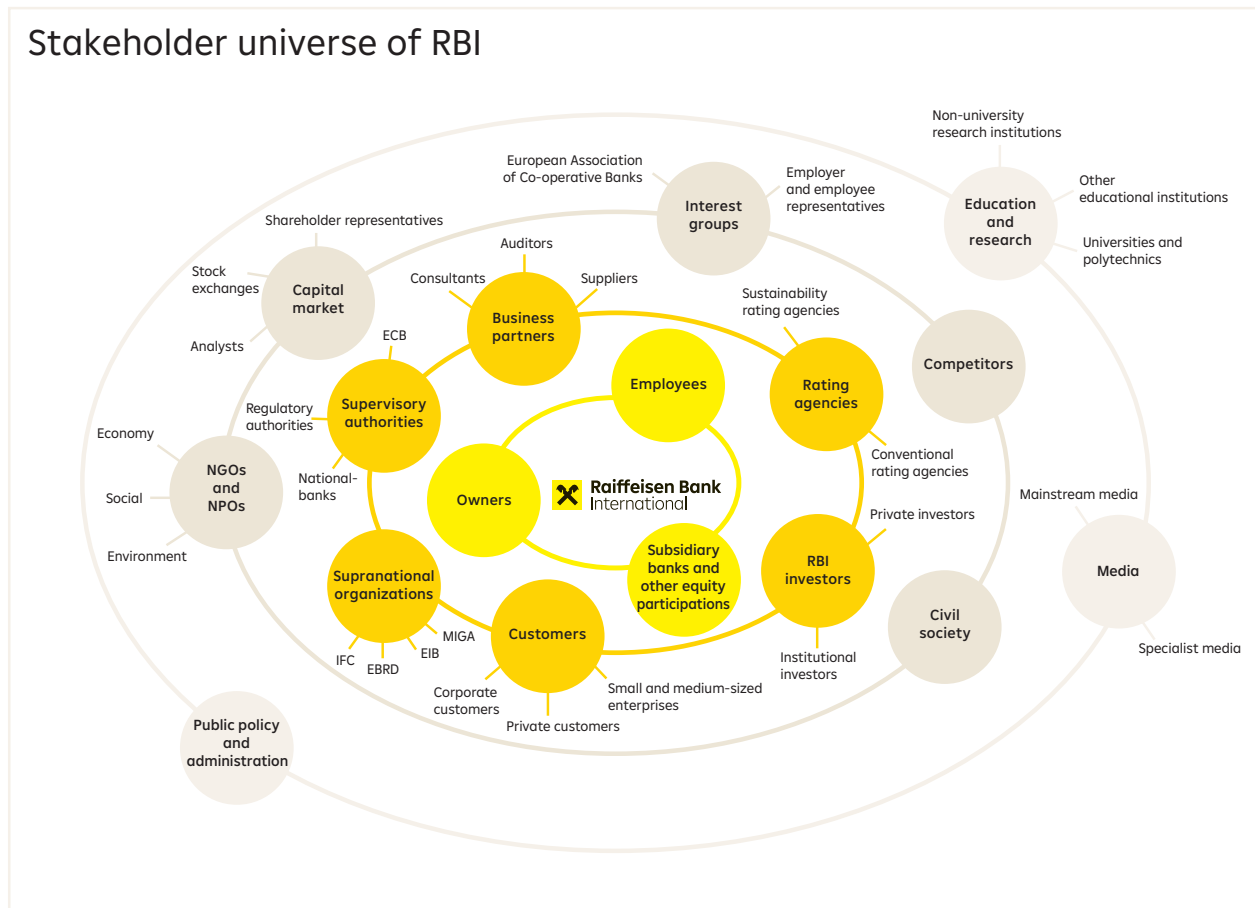
Strategic Area of Action	Material Topic	Material Sub-topic
Business Conduct	Compliance	<ul style="list-style-type: none"> <li>- Combating money laundering and terrorism</li> <li>- Combating Corruption</li> <li>- Tax Compliance</li> <li>- Political Engagement</li> </ul>
Responsible banker	Sustainable Financing Sustainable Investment	<ul style="list-style-type: none"> <li>- Climate Change</li> <li>- Circularity</li> <li>- Human Rights</li> </ul>
	Societal Aspects within the Core Business	<ul style="list-style-type: none"> <li>- Financial Inclusion</li> <li>- Protection of Customer Data and Data Protection</li> <li>- Responsible Sales Practices and Marketing</li> </ul>
	Economic value creation	<ul style="list-style-type: none"> <li>- Economic Sustainability</li> </ul>
Fair Partner/Employees	Employee Concerns	<ul style="list-style-type: none"> <li>- Employment</li> <li>- Diversity</li> <li>- Health</li> <li>- Employee Development</li> <li>- Employee Involvement</li> </ul>
Fair Partner/Inhouse Ecology	Inhouse Ecology	<ul style="list-style-type: none"> <li>- Emissions</li> <li>- Energy</li> <li>- Business Travel</li> </ul>
Engaged Citizen	Commitment to Society and Environment	<ul style="list-style-type: none"> <li>- Donations and Corporate Volunteering</li> <li>- Commitment to sustainable framework conditions</li> <li>- Financial Literacy</li> </ul>



# Stakeholder engagement

## Our stakeholders

RBI defines its stakeholders as those people or groups of people that have a legitimate interest in the company through their direct or indirect business activities. Stakeholders are therefore primarily employees, customers, owners, subsidiaries and equity participations as well as business partners. There are also several other stakeholder groups with regular mutual relations.



## Our stakeholder approach as a fair partner and responsible banker

RBI is a fair business and dialog partner to all stakeholders. In this role, we interact in an open and respectful manner with employees (see chapter Fair partner – Employees), customers, business partners, shareholders and other stakeholder groups. However, we also consider environmental and climate protection to be part of our social responsibility and see ourselves as a fair partner to the environment and to society (see Responsible banker and Fair partner – Inhouse ecology chapters).

## Fair business and operating practices

RBI places great value on fair business and operational practices. Trust and reliability have always been among RBI's fundamental principles, which includes fairness and transparency towards employees, customers and shareholders. Just as important to us is exemplary conduct within our sphere of influence. In our Code of Conduct, we have clearly stated that in our pursuit of profit, there must be no violations of law or our internal regulations. We forgo business that can take place only through such practices.

RBI stands for fair competition and responsible marketing. We feel obliged to offer an outstanding service culture in which we strive to exceed the expectations of our customers wherever possible. We ensure that recommendations are given in an honest and fair manner and that customers are adequately informed about the risks. False or misleading advertising is something we feel is unacceptable.

A prerequisite in our business and operational practices is the fair, ethical and legally compliant behavior of all members of staff. For further information, please see page 43 onwards.

## Transparency and disclosure

Transparent corporate governance is extremely important to RBI as it serves to build and maintain the trust and understanding of its stakeholders. It is a prerequisite for the performance of our banking group and a key principle in the implementation of modern corporate governance.

Transparency, i.e. the disclosure of measurable objectives and the reporting of measures taken and the success in meeting their targets, is our overarching central guiding principle. Reporting on business activities and sustainability is conducted transparently and comprehensively on the basis of recognized and authorized international standards (such as the Global Reporting Initiative, TCFD or the Principles of Responsible Banking).

## Comprehensive stakeholder engagement

Our business activities affect the interests of a wide range of stakeholder groups and individuals in different countries. We recognize that we are only able to run our company sustainably if we engage in open and constructive dialog with our stakeholders and seek out and find common solutions, even on controversial issues. We therefore foster and promote constructive exchange with our stakeholders. We strive to identify the needs of our key stakeholders and act within the scope of our authority. We work closely with our shareholders and see them both as dialog partners and advisors. One of the four mission statements is therefore: We aim to generate solid and sustainable enterprise value for our shareholders. We identify and assess relevant and sensitive issues through regular dialog with stakeholders. We use various forms of communication with our stakeholders to evaluate the relevance of sustainability topics and use the results to further develop our sustainability management. RBI also plays an active role in various national and international forums.

To ensure the inclusion of our stakeholders, we engage in many forms of dialog including the Internet, intranet, blogs, workshops and events, surveys, conversations with experts, training courses and participation in local, national and international discussions on sustainability and sustainability initiatives. These are supplemented by various publications, such as those published by Raiffeisen RESEARCH or Raiffeisen Kapitalanlage. Dialog with customers is also becoming increasingly important (see page 96 ff.).

The following table on stakeholder dialog provides an overview of the extensive dialog formats utilized in various areas of the company. In particular, we focus here on the key topics where RBI has the greatest impact on the environment and society. The focus here is on climate change and adaptation, the circular economy, biodiversity, financial inclusion and human rights.

## Stakeholder dialogs

Format	Contents	Frequency
<b>Owners/shareholders</b>		
Dialogs with shareholders	Shareholders with an interest in ESG are engaged on an ad hoc basis in order to jointly advance the topic of ESG in the interests of RBI and its sustainability agenda.	ad hoc
Dialogs with ESG rating agencies	ESG rating agencies (e.g., FTSE Russell, Dow Jones Sustainability Index, VÖNIX, Sustainalytics, ISS ESG, CDP) contact RBI once a year to update their rating results and obtain feedback.	ad hoc and regular
Dialogs with the Raiffeisen regional banks	Dialog on current topics at Supervisory Board meetings (e.g. "fit&proper" units) and other bilateral meetings. Raiffeisen Sustainability Initiative under the lead of the Austrian Raiffeisen Association (Österreichischer Raiffeisenverband) with the aim of best practice sharing and common projects. Cooperation with "Raiffeisen Campus" on ESG topics and trainings.	ad hoc and regular
Investor calls	Calls with investors in which our sustainability strategy is communicated in a structured manner and questions on ESG topics are answered.	ad hoc and regular
Annual General Meeting	Report of the Supervisory Board on the non-financial report and responses to shareholder questions on ESG topics.	annually
<b>RBI Sustainability Council</b>		
Digital and personal meetings	The Sustainability Council is responsible for supporting the further development of RBI's sustainability agenda in an advisory capacity and evaluating its sustainability performance. It is composed of internal and external experts and RBI decision-makers (see page 29 ff.).	bi-annually
<b>Customers &amp; other external stakeholders</b>		
Raiffeisen Research ESG services	Research services covering news and analysis with an ESG focus on: ESG monthly Green Deal Publication, daily Vienna Calling (extra part for ESG Newsflow), also coverage of all ESG bond new issues, ESG Bonds Screener, ESG Specials. All coverage publications (Equity, Credits) include an ESG part including scoring.	regular
ESG Consultancy for institutional and corporate customers	RBI offers tailored sustainable financing solutions for institutional clients and companies. RBI offers a regular and continuous dialog on ESG developments and the realization of ESG-related transactions throughout the Corporates and Investment Banking product universe (debt capital markets incl. bonds, loans and Schuldscheindarlehen, ABF, fund finance, mergers & acquisitions, and equity capital markets) including support and information on new ESG regulations. This takes place in close cooperation and coordination with ESG experts and the respective customer relationship managers (see page 96 ff.).	regular
ESG best practice sharing	RBI ESG experts across all areas within the bank share their knowledge in lectures and presentations on RBI's best practice in sustainable finance, sustainability management or special ESG topics in the course of university programs, courses of private education companies, associations, management consultancies or other institutions referring to sustainable development subjects.	regular
ESG events & activities	Principles for Responsible Banking (UN PRBs): Participation of RBI in dedicated working groups, especially as part of the "2030 Core Group". Topics include Climate Change and Adaptation, Circularity, Biodiversity, Financial Inclusion and Human Rights. Intensive stakeholder dialog and discussion with other global member banks and the United Nations Environment Programme Finance Initiative (UNEP FI).	regular
	United Nations-supported Principles for Responsible Investment (UN PRI): Active dialog with the PRI community via the participation of Raiffeisen Capital Management (RCM) and of RBI's Elevator Ventures.	regular
	Raiffeisen Capital Management (RCM) engagement process: Activities including exercising voting rights and actively communicating with listed companies on ESG issues (see page 122 f.).	regular
	Raiffeisen Capital Management (RCM), as a member of the FfB Foundation, is involved in knowledge building and transfer between financial institutions and the development of relevant industry standards. Additionally, RCM is a founding member of Nature Action 100, a global investor engagement initiative dedicated to the protection and restoration of biodiversity.	regular
	Vienna Initiative: Active participation in webinars focused on climate-related risks and opportunities.	regular
	OeKB service platform: Continuous exchange and further development of the ESG Data Hub established in 2022, which supports companies in preparing all relevant sustainability data.	regular
	Dialogs with non-governmental organizations (NGOs) advocating for human rights.	ad hoc

## Stakeholder dialogs

Format	Contents	Frequency	
<b>Customers &amp; other external stakeholders</b>			
	UNGC Business & Human Rights Accelerator: RBI head office participation in the UN Global Compact program organized by UNGC aiming to support the global business community to move from policy to action to respect and support human rights by enacting an ongoing human rights due diligence process and to show best practice cases around different industries setting concrete targets to address their salient human rights risks.	monthly between January and December	
	Raiffeisen Capital Management (RCM): ESG Investment Day (expert presentations and roundtables) & Fund Manager Update on Raiffeisen Sustainability Mix and ESG Income.	annual	
	RBI event: 10th RBI Schulschein Day with company presentations (Swietelsky AG, AT & S Austria Technologie & Systemtechnik AG, Porsche Holding, PALFINGER AG, vc trade) and an extensive exchange between issuers and investors.	annual	
	RBI event: Raiffeisen Bank International's Elevator Lab & Blockchain Hub organized a 48-hour Loyalty Solutions Hackathon, bringing together tech innovators to enhance customer retention in banking. Participants, spanning UX/UI design, development, marketing, and crypto-banking, were encouraged to explore concepts beyond banking norms, incorporating trends like ESG and Sustainable Development Goals.	one-off	
	Raiffeisen Bank International's Elevator Lab partnered with Female Founders to host "Lead Today. Shape Tomorrow.", an event uniting startups, investors, and innovation leaders for an inclusive future in entrepreneurship.	one-off	
	Raiffeisen Bausparkasse: press talk/presentation of a research study by SPECTRA on "Sustainable building and living in Austria".	one-off	
	Raiffeisenbank a.s., Czech Republic and the Czech Agricultural University collaborated on a successful project developing sustainable products for retail clients, including a carbon calculator.	one-off	
	Raiffeisenbank a.s., Czech Republic hosted a conference entitled "Sustainable Finance: a 360° view" at Raiffeisenbank at its Prague headquarters. The aim of the conference was to provide a comprehensive view of sustainability from the perspective of the private sector, to present what opportunities and obstacles they see in sustainability.	one-off	
	Raiffeisenbank a.s., Czech Republic was a partner in this year's CEE Sustainable Finance Summit in Prague, bringing to Prague influential personalities in the development of ESG in Europe. Our colleagues attended the event and shared know-how on the development of the topic of sustainable finance.	one-off	
	On the occasion of the 20th anniversary in Kosovo, Raiffeisen Bank Kosovo organized a two-day ESG Summit with a focus on "The Green Economy Transition" on 15 and 16 June 2023, in Pristina.	one-off	
	Exchange with the Umweltbundesamt on circularity and with WWF on biodiversity as well as subsequent internal seminars.	one-off	
<b>Employees</b>			
GRI G4-DMA (former FS4)	Trainings & exchange		
		RBI head office and subsidiary banks in Central and Eastern Europe: Internal education sessions for credit officers and relationship managers on ESG standards, green and social transactions, and best practices in the context of corporate clients and loan classification. The topics covered include climate change, Sustainable Development Goals (SDGs), greenhouse gas emissions (GHGs), CEBS strategy, and ESMS system.	regular
		RBI ESG Academy: 13 online modules for all employees on Sustainable Finance, ESG Risk Management, Products, Regulation, Human Rights and Sustainable Management according to the strategic pillars of RBI's sustainability strategy (see page 16).	regular
		Workshops on measures and activities to implement the ESG business strategy in the company.	regular
		Financial literacy plays a vital role in enabling individuals to make well-informed financial decisions. RBI is therefore committed to enhance knowledge about the topic through educational programs, workshops, and resources.	regular
		Kathrein: Several trainings covering a range of topics including ESG stocks, market outlook, sustainable finance integration, institutional investors, sustainable investing strategies, and updates on various ESG funds and initiatives.	regular
		RBI's commitment to sustainable investment is emphasized through discussions, dialogs and videos covering topics such as the Raiffeisen ESG Euro Corporates fund, infrastructure shares, emerging markets.	regular

## Stakeholder dialogs

Format	Contents	Frequency
<b>Employees</b>		
	Instant messenger on RBI's latest ESG news (posted and discussed on an internal Viva Engage platform).	regular
	Regular meetings are conducted to discuss and educate about current non-financial reporting requirements and upcoming ones, such as the Corporate Sustainability Reporting Directive (CSRD).	regular
	RBI head office and subsidiary banks in Central and Eastern Europe: In addition to collecting and reporting inhouse ecology data, meetings and presentations serve as forums for discussing methodologies, measures, and available options aimed at reducing carbon emissions.	regular
	Raiffeisen Capital Management (RCM): ÖGUT training to become certified advisors on sustainable investments as well as ongoing (online) trainings on sustainable finance.	regular
	ESG ambassador calls in all business lines, risk areas and Sustainability Officers of all subsidiaries.	monthly or quarterly
	RBI head office: Several ESG Finance trainings and "SkillUp!ESG" sessions organized by RBI's ESG Competence Center for business lines on ESG products, green dashboard or developments in material sectors for RBI employees.	bi-annually
	Topic-specific sustainability summit for 1-2 days for all subsidiaries in different board areas (Retail, Corporate, Risk, Sustainability Officers).	annual
	Innovation day workshop on "AI as an enabler for ESG Performance" with Tetranomics, a leading force in fostering a multidimensional responsible economy, bringing together economic potential and sustainable impact in businesses.	one-off
	Raiffeisen Kapitalanlage GmbH: 5th Raiffeisen Sustainability Symposium: Infrastructure of the Future.	one-off
	Hybrid workshop run by Risk & Sustainable Finance areas for all subsidiary banks on: a) open exchange on material ESG topics and latest developments and b) practical training on the implementation of ESG-relevant tools.	one-off
	Raiffeisen Bank JSC, Ukraine: Sustainable Agriculture training form Sustainalytics and presentation on ESG and Sustainability for the Agriculture Financing department.	one-off

# > ESG governance

## Sustainable corporate management

Sustainability was anchored within the organizational structure as follows as of 31 December 2023:

## Organizational anchoring of sustainability in RBI

### Control level

#### The Management Board of RBI AG

Supervisory Board and various committees, such as the Audit Committee

### Management Board level

#### The Management Board of RBI AG

### Management and program level

#### Sustainable Finance Department

ESG Group Competence Center for all customer segments

#### Group ESG & Sustainability Management

Focus on management and strategic development of sustainability agenda as well as the implementation of operational measures

#### Sustainability Council

Internal and external stakeholders with expertise in the areas of business, the environment and society

### Holistic ESG management within the line organization (Risk, Compliance, Finance, People...)

#### Sustainable Bond und Sustainable Deposit Committee

#### Environmental Committee (Inhouse Ecology)

#### Responsible Banking B-1 Steering Group (cross-functional)

### Implementation level

#### ESG Business Ambassadors

in the business units of the subsidiaries for the implementation of the ESG business strategy

#### Sustainability Officers

in the subsidiaries for the establishment and further development of the local sustainability agenda

#### Responsible Banking

**Task Force**  
(cross-functional)

#### Employees

Implementation of measures to achieve the sustainability goals in all companies

### Level of initiatives and memberships relevant to sustainability

**AFRAC:** Austrian Financial Reporting Advisory Committee

**Chartas der Vielfalt:** Local Diversity Charters (signed in Croatia, Kosovo, Austria, Romania, Slovakia, Czech Republic)

**EACB:** European Association of Co-operative Banks/Working Group for Sustainable Finance

**FfB:** Finance for Biodiversity Foundation (Member: Raiffeisen Kapitalanlage)

**NZAM:** The Net Zero Asset Managers initiative (Member: Raiffeisen Kapitalanlage)

**PCAF:** Partnership for Carbon Accounting Financials

**PRB:** Principles for Responsible Banking

**PRI:** Principles for Responsible Investment (The members are Raiffeisen Kapitalanlage and Elevator Ventures)

**Raiffeisen Sustainability Initiative:** Platform for sustainable business management and social responsibility

**respACT:** Austrian business council for sustainable development

**SBTi:** Science Based Targets initiative

**TCFD:** Task Force on Climate-related Financial Disclosures

**The Valuable 500:** Global initiative for companies, that work together for inclusion of people with disabilities

**UNEP FI:** United Nations Environment Programme Finance Initiative

**UNGC:** United Nations Global Compact

**Vienna Initiative:** International framework for safeguarding the financial stability of emerging Europe

**VfU:** Association for Environmental Management and Sustainability

Status: 31.12.2023

## The Management Board and Supervisory Board

ESG Pillar 3 ER e

The Management Board is the most senior decision-making body for ESG-related strategies, policies and commitments. Each board area must implement their respective sustainability strategies and integrate them into the performance management process. This should be reflected in the ESG policies and conditions for the individual area.

The Personnel Committee approves the ESG KPIs for the members of the Management Board of RBI AG, and these are published in the annual remuneration report.

The Management Board is kept informed on an ad hoc basis of all potential loss events (GRI: critical concerns) that fall under operational risk, including legal, IT or compliance risks exceeding € 1 million at local level and € 2 million at Group level. In 2023, 14 cases were reported to Senior Management (2022: 27 cases). Separate committees involving the Management Board, including specific documentation for the Supervisory Board, have been set up to deal with the war in Ukraine and the Swiss franc portfolio in Poland and the court cases relating to the latter.

GRI 2-16

The Management Board bears legal responsibility for preparing the RBI Sustainability Report, and is responsible for signing and submitting it to the Supervisory Board. The Supervisory Board is obliged to review the RBI Sustainability Report and report on it at the Annual General Meeting. The Management Board is also responsible for ensuring that RBI's Sustainability Report is published together with the Management Report in the companies register.

GRI 2-14

The Supervisory Board and the Management Board are required to develop existing and new expertise in the area of sustainability and understand how ESG relates to the company's material sustainability risks, opportunities and impacts. RBI AG offers members of the supervisory and management bodies continuing specific training on ESG topics as well as on climate and environmental risks (e.g. Fit&Proper training).

GRI 2-17

In Fit&Proper training sessions held for the Management Board in 2023, information was provided on the prerequisites for achieving the climate targets and on the current situation. Discussions were also held on regulatory changes and the resulting new requirements for RBI.

GRI 2-17

In 2023, the Supervisory Board's Audit Committee was informed once on topics relating to sustainability, with a focus on the CSRD reporting applicable from the 2024 financial year. The content included a status report by the Fit4CSRD project, which is being implemented, as part of a holistic project, under the lead of Group Accounting and Group ESG & Sustainability Management in conjunction with an external consultant. The ESG Risk Report, including the underlying data, was presented within the Risk Committee of the Supervisory Board. In addition, as part of two Fit&Proper training sessions for the Supervisory Board, updates were provided on current regulatory issues and associated obligations and liability matters in relation to the CSRD (Corporate Sustainability Reporting Directive) and to the CSDDD (Corporate Sustainability Due Diligence Directive).

GRI 2-17

## Sustainability Council

The Sustainability Council has become firmly established as a core organizational component of stakeholder dialog and as part of sustainability management. It is composed of external ESG and sustainability experts from the fields of economic, environmental and social issues, including human rights, alongside RBI decision makers. The Council is chaired by the CEO of RBI. Meetings are held twice a year and are organized by Group ESG & Sustainability Management. The role of the Sustainability Council is to advise on the development of sustainability agendas. It assists in defining important action areas and focal points (materiality approach), advises on deriving targets and measures, and makes recommendations.

GRI 2-16, -17  
TCFD

In fall 2023, a formal statute was adopted for the Sustainability Council. The composition of the members was, for example, internationalized through the Deputy Chair of Raiffeisenbank Ukraine, and interlinked even more closely with RBI's business divisions. Even closer dovetailing with the business community will be a further focus in 2024.

As of 31 December 2023, the following internal and external persons sit on the Sustainability Council:

- Johann Strobl, CEO of RBI AG, Chair of the Sustainability Council
- Dieter Aigner, Managing Director of Raiffeisen Kapitalanlage GmbH
- Rudolf Bretschneider, Consultant at GfK Austria GmbH (member until November 2023)
- Larysa Bondarivva, Deputy Chair of Raiffeisenbank JSC, Ukraine
- Ralf Cymanek, Member of the Management Board of Raiffeisen Bank Zrt. in Hungary
- Eva Eberhartinger, Head of the Tax Management Group at the Institute of Accounting & Auditing, Vienna University of Economics and Business Administration and Member of the Supervisory Board of RBI AG
- Martin Essl, Founder of the Essl Foundation
- Franz Fischler, Franz Fischler Consult GmbH
- Andreas Gschwenter, COO of RBI AG, Member of the Management Board of the Stepic CEE Charity
- Gregor Höppler, Head of the Group Executive Office of RBI AG
- Heike Mensi-Klarbach, Head of RBI Group People & Organisational Innovation
- Hannes Mösenbacher, Chief Risk Officer of RBI AG
- Petr Polach, CFA, Deputy Head of Group Structured Finance & Investment Banking, Co-Chair of the B-1 Responsible Banking Steering Group
- Johannes Rehulka, General Secretary of the Austrian Raiffeisen Association
- Prof. René Schmidpeter, Professor for Sustainable Management at Bern University of Applied Sciences
- Georg Schöppl, Member of the Management Board of Österreichische Bundesforste AG
- Matthias Spitzer, Head of the department ESG Transformation; Raiffeisenlandesbank Niederösterreich-Wien AG
- Alfred Strigl, Managing Director of plenum gesellschaft für ganzheitlich nachhaltige entwicklung gmbh
- Christine Würfel, Head of RBI Group ESG & Sustainability Management; Co-Chair of the B-1 Responsible Banking Steering Group

## Responsible Banking Steering Group and Task Force

The Management Board is supported in its ESG decisions by the cross-functional and cross-divisional Responsible Banking B-1 Steering Group. This steering group is composed of the divisional heads from all board areas whose main focus is on ESG issues, and acts as an advisory and recommendation body for the Management Board. Each member of the B-1 Steering Group has an appropriate level of knowledge and experience in ESG activities. The inclusion of all relevant areas serves to ensure vigilance with regard to ESG risks as well as implementing a holistic approach to sustainability. The group meets monthly and since 2023 has been led by the Co-chairs from One Business Bank and Group ESG & Sustainability Management, in order to place the focus on implementing RBI's ESG business strategy and ensure a holistic ESG approach and comprehensive stakeholder engagement.

For 2024 it is planned to convert the Steering Group into a formal Sustainability Committee and directly include individual Management Board members in its work. In future, the Sustainability Committee will report regularly to RBI's Management



Board in order to ensure that it can make corresponding decisions on the short, medium and long-term strategic steps and also on critical ESG matters.

The Steering Group currently has the following tasks and responsibilities:

- It advises the Management Board on ESG issues: The Steering Group or the relevant departments inform the Management Board in an appropriate manner about any potential or existing material impacts, risks, and opportunities related to sustainability, e.g., the need to make changes to ESG strategies, implementing provisions, or ESG-related commitments.
- It recommends ESG KPIs in relation to the members of the Management Board's performance management activities at head office and in the subsidiaries.
- It monitors the holistic alignment of the principles for responsible banking.
- It discusses and reviews RBI's ESG strategy in relation to its "Paris alignment" and SDG commitments as well as the UNEP FI Principles for Responsible Banking.

Operational management of the UNEP FI Principles for Responsible Banking (PRBs) is overseen by the cross-board Responsible Banking Task Force, which is led by Group ESG & Sustainability Management. The Task Force mirrors the B-1 Steering Group at an operational level. Members of the Task Force meet every other week. They define, coordinate, and collate key ESG issues on a range of topics. A project management tool is used to help manage PRB tasks and ensures a continuous, transparent tracking of progress. The Task Force reports regularly to the Responsible Banking B-1 Steering Group and proposes agenda items for its meetings.

It is through this ESG governance of the Responsible Banking B-1 Steering Group and its operational Task Force that top-down and bottom-up discussions involving all relevant functions are possible.

At Group level, ESG ambassadors for the individual business areas have been appointed at the subsidiaries in order to ensure a standardized and coordinated approach throughout RBI.

## Group ESG & Sustainability Management division and Sustainability Officers at the subsidiaries

The principal tasks of Group ESG & Sustainability Management, which reports directly to the CEO, include the planning, implementation and continued development of RBI's approach to environmental, social and governance (ESG) activities. This department works closely with representatives of the specialist departments and business units as well as the sustainability officers at the subsidiary banks in Central and Eastern Europe and the Austrian subsidiaries, and serves as both a central point of contact and center of expertise. One important task is to support the divisions and subsidiaries in setting ESG-related environmental and social targets and deriving measures for improvement in the individual areas, while taking international requirements and standards into consideration.

Furthermore, the department is responsible for managing and ensuring the proper annual disclosure of new and extended reporting requirements for non-financial data as part of the Group's sustainability report for 2023 and for fulfilling the UNEP FI Principles for Responsible Banking. Group ESG & Sustainability Management is responsible for the holistic coordination of ESG stakeholder engagement and acts as a collection point for activities involving internal and external stakeholders. Other areas of responsibility include cooperation with selected ESG rating agencies.

Group ESG & Sustainability Management provides the Management Board and Supervisory Board with an update report on the key strategic and operational focus areas on a quarterly basis or, in the event of critical concerns, on an ad hoc basis. The department coordinates the Sustainability Council and organizes the Responsible Banking B-1 Steering Group and its task force.

GRI 2-16

## Sustainable Finance

The Sustainable Finance department functions as a central competence center for all customer segments (corporate finance, financial institutions, public authorities and retail banking). In organizational terms, the department is located in the "Corporate and Investment Banking" board area within "Group Structured Finance and Investment Banking". The department provides ESG expertise for all customer segments and supports the customer and product departments in advisory discussions and in the structuring of sustainable financing and investment products. In this connection, the department coordinates a team of ESG experts. One of its key tasks is to manage sustainable loan portfolios for green bond transactions.

A key focus for 2023 was to coordinate a Group-wide ESG business strategy and to integrate the retail customer segment into the ESG Group Competence Center.

## Risk

The Risk Management board area – led by the Chief Risk Officer (CRO) – plays an essential role in relation to implementing the ESG strategy and the associated risk management. Compliance (see also from page 48 ff.) and Credit Portfolio Management (see also from page 70 ff.) are mainly responsible for this.

The Compliance function is responsible for a wide range of activities. Alongside other stakeholders involved in compliance with applicable climate-related regulations and standards, it has the task of monitoring statutory and regulatory requirements, recommending changes to corporate policy, providing expert opinions on sector policies, preparing and recommending follow-up measures, and reviewing the product offering for sustainable financing, such as "green" products. The tasks and responsibilities of Compliance also encompass the mitigation of risks related to greenwashing and conflicts of interest. The Compliance function is represented on a number of relevant committees, e.g. Responsible Banking and the Remuneration Committee. In 2023, the role of a separate ESG Ambassador for Compliance was established in the Capital Market Compliance department. This was done as a result of current regulatory developments and due to the importance of the Human Rights Policy and its inclusion in RBI's processes.

Credit Portfolio Management is responsible for Group-wide risk management. As such, it identifies and manages portfolio risks by setting risk appetite and portfolio limits. In hierarchical terms, it is assigned to the Financial Institutions, Country and Portfolio Management ("FCPM") risk area, which reports directly to the Group CRO. In view of the significant and increasing importance of ESG risks and their potential steering impact, FCPM has assumed responsibility for steering and implementing ESG-related issues across the risk organization in alignment with regulatory, business and market requirements. Other ESG-relevant topics (such as the operationalization of steering measures, compliance with the disclosure requirement) are now located directly with the responsible risk areas.

## Group Finance

The Finance Department plays a pivotal role in sustainability reporting and management reporting for sustainable financing, and ensures effective control, tracking, monitoring, data collection, budgeting and reporting. In this context, the Finance Department ensures strategic management and supervision in order to ensure that green and social asset reporting is consistent with the organization's objectives. It specifies policies, procedures and framework conditions in order to promote sustainable practices and monitor progress in reaching sustainability targets and identifying potential for improvement. It collaborates with various departments in order to collate relevant information and guarantee data integrity. The Finance Department incorporates corresponding sustainability-related metrics into the company's budgeting process and together with other departments such as Sustainable Finance, defines targets for the Corporates and Retail business areas.

In future, this will also include information on sustainability-related risks and impacts within the context of annual financial reporting.

## Internal audit

RBI Group Internal Audit is a permanent organizational unit within RBI AG that performs its duties throughout the year in accordance with auditing standards that are valid across the Group. All auditors work solely for RBI Group Internal Audit. RBI Group Internal Audit is the relevant Group audit function of RBI and as such also controls all local audit functions within the subsidiaries. In general, RBI uses a risk-based approach to determine the nature and scope of its auditing activities.

RBI Group Internal Audit is independent in its audit planning, execution and reporting as well as in its evaluation of audit results. Furthermore, the unit and its employees are prohibited from being involved in any decisions or business processes or from assuming any other tasks that are not consistent with the audit function.

The required quality of internal auditing activities is achieved through ongoing monitoring, periodic self-assessments, and external quality assessments to ensure compliance with audit-specific regulations, especially the International Standards for Internal Auditing (IIA Standards) and the corresponding Code of Ethics. External quality assessments are conducted at least every five years by an independent auditor or third-party assessment team.

RBI Group Internal Audit has incorporated the strategically important ESG topics into its auditing activities. Since ESG topics affect most business and risk areas, Group Internal Audit monitors ESG topics across all the relevant audit areas, which then serve as input for the annual/quarterly audit plan and for the specific work plan for each individual audit. ESG topics are covered either through specific audits or as one of several topics within an audit. An overview of all of the audits is ensured at the area-wide planning stage and at the individual audit level.

ESG Pillar 3 ER F

For 2023, specific ESG topics were covered in several of the audits performed. No material findings were identified as a result of these activities.

## Sustainable Bond Committee

On the corporate side, the Sustainable Bond Committee (until 2023: Green Bond Committee) was established. Eligibility criteria are used to determine the eligible green and social loans within the various eligible sectors under the supervision of the Sustainable Bond Committee (SBC). The SBC is part of the RBI Group's Asset Liability Committee and represents an extension of the management team. It comprises an extended team of management and experts from Corporate Finance, Group Corporate Credit Management, Group Treasury, Group Sustainability Management and Group Compliance as well as Group Investor Relations.

The Sustainable Bond Committee has the following responsibilities:

- Ensuring that the potentially eligible loans are consistent with the categories and eligibility criteria outlined in the above section "Use of proceeds", as well as approving all proposed changes to the green/social loan portfolio if the loans no longer meet the eligibility criteria;
- Replacing assets that no longer fulfill the eligibility criteria;
- Ensuring that the proposed allocations are consistent with the bank's relevant general corporate policies and ESG strategy;
- Approving the report on the use of funds and environmental impacts.

RBI's Sustainable Finance department is responsible for collecting and monitoring all data required for evaluating and selecting the eligible green and social loans and for administering the green/social/sustainability bonds.

## Sustainable Deposit Committee

The Sustainable Deposit Committee was established by RBI's Asset and Liability Committee as a body for managing RBI's Sustainable Deposit Program in accordance with the "RBI Sustainable Deposit Framework". It comprises an extended team of management and experts from Corporate Finance, Group Corporate Credit Management, Group Treasury, Group Sustainability Management and Group Compliance as well as Group Investor Relations and Group Capital Markets Trading & Institutional Sales.

The Sustainable Deposit Committee has the following responsibilities:

- Determining the principles for sustainable deposits;
- Managing the Sustainable Deposit Framework;
- Conducting regular reviews of the eligible portfolio and the use of proceeds in accordance with the Framework (see section "Use of proceeds");
- Approval of eligible assets for the portfolio of sustainable deposits in accordance with the Framework (see section "Assets evaluation and selection");
- Reviewing and approving impact reporting in accordance with the Framework (see section "Reporting").

## Environmental Committee

TCFD In accordance with their responsibility for environmental measures, the Management Board members at Group head office appointed an Environmental Officer and an Environmental Committee in 1994. The Environmental Committee is the advisory and decision-making body for operational environmental management and sustainability measures at Group head office. Permanent members are the Environmental Officer of Group head office as well as representatives of Group ESG & Sustainability Management and of the Staff Council. Depending on the topics being addressed, other representatives of the departments, such as IT, Marketing or Procurement, are involved in the meetings. The Environmental Officer convenes the Environmental Committee at least twice a year. Tasks of the Environmental Committee include developing decision-making principles for the Management Board regarding ecological strategies, planning and initiatives, as well as conducting periodic present state assessments and weak point analyses.

## ESG & sustainability policies

The RBI Group Policy Framework is based on different types of internal policies:

- Regulations (REGs) for the implementation of regulatory requirements,
- General instructions (LAWs) that affect a large number of employees,
- Specific instructions (SPINs) for defining internal governance, and their supporting documents (SUPs).

The entire Management Board of RBI AG is responsible for approving new, updated and canceled REGs and LAWs. Senior Management (B-1) is responsible for approving new, updated and canceled SPINs and SUPs.

The rules stated in the internal policies are mandatory and binding, unless otherwise stated in the policy itself. The scope of application is defined for each policy by the respective policy owners and approved by the respective approval authorities.

RBI Group Policy SharePoint is the standard information platform for RBI and the official source for all RBI internal policies. All employees at Group head office as well as employees in the various Group units that are part of the RBI Group Policy Framework can access this data at all times. Information on new and updated policies is also sent to the relevant employees on a regular basis.

## Overview ESG & Sustainability Management policies

The main ESG & Sustainability Management policies for which the individual Management Board areas or Senior Management (B-1) are responsible are described in the individual chapters:

### Overall

- RBI Group Code of Conduct
- RBI Group Human Rights Policy
- RBI Group ESG & Sustainability Policy
- Remuneration
- ESG Definitions and Greenwashing Prevention Check
- Simplified EU Taxonomy Regulation KPI Calculation Framework

### Responsible banker

- ESG Risk Framework and the EU Taxonomy Regulation KPI Calculation Framework
- ESG in Corporate Underwriting
- Business Policy on Nuclear Energy (published: Position Statement of RBI Group – Nuclear Energy)
- Business Policy on Steel Strategy
- Business Policy on Oil & Gas (published: Exclusion Policy on Oil & Gas)
- Business Policy on Thermal Coal (published: Focus on Renewable Energy, Phase-out of Thermal Coal)
- Business Policy on Tobacco
- Counter Terrorist Financing
- Policy on Defense Sector (published: Position Statement of RBI Group – Defense Sector)
- Policy on Gambling Sector (published: Position Statement of RBI Group – Gambling)
- RBI Group ESG Rulebook

### Fair partner – Employees

- RBI Group Diversity Policy
- RBI Group Total Rewards Management Policy
- Performance Management RBI Group Policy

GRI 2-23 d-f

ESG Pillar 3 ER a  
ESG Pillar 3 SR a

GRI 2-23 a, c; -24

GRI G4-DMA  
(former FS1)Find more at:  
[www.raiffeisen.com/en/raiffeisen/sustainability-esg/responsible-banking/code-of-conduct.html](http://www.raiffeisen.com/en/raiffeisen/sustainability-esg/responsible-banking/code-of-conduct.html)GRI G4-DMA  
(former FS1)Find more at:  
[www.raiffeisen.com/en/raiffeisen/sustainability-esg/responsible-banking.html](http://www.raiffeisen.com/en/raiffeisen/sustainability-esg/responsible-banking.html)

Find more at:  
[www.raiffeisen.com/en/raiffeisen/sustainability-esg/inhouse-ecology.html](http://www.raiffeisen.com/en/raiffeisen/sustainability-esg/inhouse-ecology.html)

#### Fair partner – Inhouse ecology

- RBI Supplier Code of Conduct (publiziert: RBI Group Supplier Code of Conduct)
- RBI Environmental Policy (published: Environmental Policy)

#### Engaged citizen

- RBI Donations, Sponsorship and Membership Fees Internal LAW

In 2022, work was carried out on two key policies, for which Group ESG & Sustainability Management is responsible.

## RBI Group ESG & Sustainability Policy

The RBI Group ESG & Sustainability Policy defines the management of sustainability & ESG and focuses on the topics for which Group ESG & Sustainability Management and the Sustainability Officers in the subsidiaries are primarily responsible. Sustainability governance and transparency are emphasized in the document in order to meet regulatory requirements/processes. It also covers the requirements of the UNEP FI Principles for Responsible Banking, including processes, governance and responsibilities. The policy focuses on the material topics and how these should be defined, managed and reported. The ESG Stakeholder Engagement Process as well as the internal ESG Corporate Rating Process for RBI are also part of this policy.

This policy is also the documented approach to the regulatory reporting requirements of the EU Non-Financial Reporting Directive, the upcoming EU Corporate Sustainability Reporting Directive including the European Reporting Standards and the developments of the EU Corporate Sustainability Due Diligence Directive. International standards requirements such as the Global Reporting Initiative (GRI), the UNEP FI Principles for Responsible Banking (PRB) and the Task Force on Climate-related Financial Disclosures (TCFD) also form the basis of this document.

The policy has applied since the 2023 reporting year.

## RBI Group Human Rights Policy

RBI's Group Human Rights Policy sets out RBI's values, areas of impact and influence, as well as responsibilities in relation to its human rights responsibilities in accordance with the RBI Code of Conduct. It is the result of work and cooperation between the Ludwig Boltzmann Institute of Fundamental and Human Rights and a cross-divisional RBI working group established in 2022 specifically to address the topic of human rights. It states the importance of the topic and serves as a starting point towards further defining and implementing a risk-based due diligence process.

In order to respect, promote and comply with human rights, RBI refers to its sphere of influence among employees, suppliers and customers. With regard to employees and suppliers (see pages 156 ff. and 58 ff.), the RBI Group is already able to draw on established state-of-the-art processes and policies. In terms of customers, the policy illustrates how RBI is adapting existing processes and highlights further key tasks that are being addressed by the cross-divisional working group. It is a continuously evolving working and learning process that takes the new EU regulatory requirements into consideration and aligns itself to the UN Guiding Principles on Business and Human Rights.

RBI's Group Human Rights Policy was approved by the RBI Management Board in January 2023. In 2023 the due diligence processes were continuously further developed (see page 93).

# Sustainability ratings, indices and awards

GRI 2-12  
GRI 3-3 e, f  
TCFD

## Sustainability ratings and sustainability indices

In addition to financial indicators, sustainability criteria are increasingly relevant to the investment decisions taken by investors. Guidance is offered by the analyses and ratings issued by agencies specializing in sustainability as well as index providers.



ISS ESG evaluates a company’s social and ecological performance in the context of corporate ratings by applying over 100 sector-specific social and environmental criteria. ISS ESG ensures that the ratings are kept up to date through regular update cycles. In order to make the evaluations transparent, ISS ESG publishes not only criteria and processes, but also key rating results.

RBI again maintained its “Prime Status” C+ sustainability rating in September 2023.



RBI was awarded an A rating (on a scale of AAA-CCC) by the MSCI ESG Ratings\* in September 2023.

\* The use by RBI of any data of MSCI ESG Research LLC or its affiliates (“MSCI”), and the use of MSCI logos, trademarks, service marks or index names herein, do not constitute a sponsorship, endorsement, recommendation or promotion of RBI by MSCI. MSCI services and data are the property of MSCI or its information providers, and are provided “as-is” and without warranty. MSCI names and logos are trademarks or service marks of MSCI.



Sustainalytics is a leading independent provider of environmental, social and corporate governance (ESG) research, ratings and analyses. It specializes in analyzing and evaluating the sustainability performance of companies and countries, and helps investors around the world to develop and implement responsible investment strategies.

In September 2023, RBI was rated “low risk” with regard to material financial impacts of ESG factors. RBI ranked 36th among the 360 banks included in the “Diversified Banks” category.



RBI AG has been included in the FTSE4Good Index Series of FTSE Russell since 2015. FTSE Russell has confirmed that RBI was assessed independently in accordance with the FTSE4Good criteria and meets the requirements for membership of the FTSE4Good Index Series (most recent index review: July 2023). This series was developed to measure the performance of companies that demonstrate strong environmental, social and governance (ESG) practices. The FTSE4Good indices are used by a wide variety of market participants to create and assess responsible investment funds and other products.



RBI AG is listed in the VBV-Österreichischer Nachhaltigkeitsindex (VÖNIX Index), the sustainability index of the Vienna Stock Exchange. It contains domestic companies listed on the Vienna Stock Exchange that are leaders in terms of environmental and social activities and performance.

Launched in June 2005, VÖNIX was one of the first domestic sustainability indices and demonstrates the long-term benefits of sustainable management and investment. VÖNIX is based on the measurement of entrepreneurial sustainability. This requires a complex model featuring extensive ecological and social exclusion criteria and positive criteria. As part of an annual sustainability analysis, information on the relevant sustainability criteria is collected for all domestic companies whose shares are listed in the Prime Market of the Vienna Stock Exchange. Publicly available company information, individual company sources and other materials such as press reports and databases serve as the sources of this information.

## Moody's Analytics

RBI received an overall ESG score of 50/100, which is above the average score of 46/100 for Retail & Specialized Banks in Europe (as of April 2023).

Moody's Analytics provides trusted and transparent data and perspectives across multiple areas of risk – credit; climate; environmental, social, and governance (ESG) – to help market participants identify opportunities and manage the continuously evolving risks of doing business.

Moody's Analytics' rigorous and relevant ESG and Climate capabilities provide market participants with a holistic understanding of risk across a variety of complex customer workflows, including insurance underwriting, bank lending and risk monitoring, portfolio and risk management, as well as disclosure and regulatory reporting needs across client segments. For more information, visit: [www.moody.com/esg](http://www.moody.com/esg)



The annual environmental disclosure and evaluation process of CDP – a global non-profit organization – is recognized as the gold standard for the environmental transparency of listed companies. CDP uses a detailed and independent methodology to assess companies, assigning a score from A to F based on comprehensive disclosure, awareness and management of environmental risks and the demonstration of best practices relating to environmental leadership, such as setting ambitious and meaningful targets. Over 18,700 companies worldwide have been rated by CDP.

In February 2024, RBI received a B which is in the Management band. This is the same as the Europe regional average of B, and the same as the financial services sector average of B. Thanks to its environmental ambition, ESG Governance, and risk management processes, RBI shows continuous commitment to climate protection and transparency.



## Awards

### PWC ESG Performance Assessment 2023

RBI AG was rated a top performer in this year's ESG ranking for the financial services segment. PwC analyzed the ESG performance of the 155 companies with the highest revenues in Austria. The methodology focused not only on the transparency of sustainability reporting, but also in particular on a measurable improvement in the evaluation criteria compared to previous years.

### Awards for financial services companies – general

In 2023, RBI and some of its subsidiary banks again received recognition for the quality of their products and services at awards events for the sector organized by renowned international financial journals and institutions.

For example, the Financial Times publication "The Banker" voted RBI "Bank of the Year in CEE" and the subsidiary banks in Bosnia and Herzegovina and Ukraine "Bank of the Year" in their respective country.

For EMEA finance, RBI in Austria and many of its network banks were voted "Best Bank" in their respective country.

Global Finance recognized RBI as "Best Bank for Cash Management in CEE" and "Best Treasury & Cash Management Banks and Providers in CEE".

### Awards for financial services companies – ESG

As part of the Sustainable Finance Awards 2023, RBI was recognized for its "Outstanding Leadership in Social Bonds" and "Outstanding Leadership in Sustainable Bonds".

At the Euromoney Awards for Excellence 2023, Raiffeisen Bank in Ukraine was voted "Best Bank for CSR" and Raiffeisenbank Kosovo "Best Bank for ESG".

The first sustainability bond of Raiffeisen Bank S.A. in Romania (RBRO) received the award of "Sustainability Bond of the Year" from Environmental Finance. RBRO was praised for its leading role on the domestic capital market and its commitment to social projects. The bond, which was issued in August 2022, was the first sustainability bond of a Romanian issuer, following on from RBRO's issue of the first Romanian green bond in May 2021.



Future Banking Gala, © Ovidiu Udrescu

Raiffeisen Bank S.A. also received the award "The Acceleration Champion in ESG" at the Future Banking Gala. The Future Banking Gala gives awards for outstanding services in the financial sector and recognizes the best digital products and services which offer a unique experience for users.



Mastercard Bank of the Year is the most prestigious Czech award for financial products for retail customers. This year, Raiffeisenbank a.s. was awarded the title "Responsible Bank of the Year" and thus recognized for its range of responsible services and products.

For the second time in succession, Raiffeisenbank a.s. was victorious in the competition "VISA Best Bank of the Year 2023". The bank secured first place in the two main categories "Best Bank of the Year" and "Most Client-Friendly Bank of the Year".

VISA awarded Tatra banka in Slovakia the title "#1 Sustainable bank" for implementing the carbon footprint calculator in a sustainable account product. It is the first award received by Tatra banka for ESG in the retail customer business.

The AICO Grand Prix is a competition for the best projects in the field of internal communications, and is organized under the auspices of the European Federation of Internal Communication Associations (FEIEA). As the most innovative digital bank in Slovakia, Tatra banka secured first place in the Online/Digital category for the third year in succession. Tatra banka was also awarded first place in the "Tactical Solutions" category and second place in the "Strategic Solutions" category.

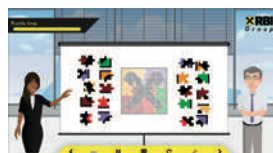
Raiffeisen Capital Management received two awards at the 25th "Premio Alto Rendimento". The company received the award as "Best ESG Manager" in the "Foreign Funds" category, and its Raiffeisen Sustainable Emerging Markets Equities Fund was recognized as "Best Fund" in the "SRI Special Section Global Emerging Equity" category. These awards recognize the company's commitment to sustainability and its outstanding performance within the sector.

## RBI an attractive employer

In 2023, RBI AG received several awards relating to its role as an attractive employer, including being recognized by LinkedIn as "Top Employer 2023" and by "WeAreDevelopers" as "Top IT Employer". Raiffeisenbank Austria d.d. in Croatia was awarded the "Employer Partner" certificate. This certificate is awarded to companies that meet the quality requirements for human resources management, with recertification taking place each year. In the Czech Republic, Raiffeisenbank a.s. was ranked third in Randstad's TOP 10 "Most attractive employers in banking and insurance industry" and also secured third place in TOP EMPLOYER's ranking in the "Banking and Investments" category.



The "RBI Group Code of Conduct" eLearning course won the "Compliance" category at the eLearning AWARD 2024. The eLearning Award is presented annually in the German-speaking world by eLearning Journal and recognizes current state-of-the-art projects in over 80 categories.



From 300 project submissions, the "RBI Group Code of Conduct" eLearning course received the award for its particularly easy way of conveying a "dry subject" based on a jigsaw puzzle: The individual conduct modules are each presented as a piece of a jigsaw puzzle, with the selected innovative mix of methods (gamification, avatars), supporting the communication of the Code of Conduct in a sustainable way and ensuring that the corporate culture can be lived across the Group.

Raiffeisen Bank JSC in Ukraine also received several awards, including from the online portal Delo.ua, which ranked it 12th among the top 100 employers. The bank was also a finalist in the competition for the "HR Pro Award" and was nominated for "HR Brand 2023".

In 2023, Raiffeisenbank Kosovo was recognized by the UNFPA (United Nations Population Fund) as a champion company in Kosovo for a family-friendly corporate culture.

The largest platform for responsible and sustainable business in the Czech Republic, "Byznys pro společnost", presented awards for the "TOP Responsible Companies of the Year 2023". In the project category "TOP Responsible Company in Diversity", Raiffeisenbank a.s. received the highest award for its project "Flexible Working Conditions in the Branches". In addition, the Head of the HR department at Raiffeisenbank a.s. in the Czech Republic was awarded the title of "TOP 10 finalist HR Director of 2023".

## Engaged citizen awards

The CEO of Raiffeisenbank a.s. in the Czech Republic was awarded the title "TOP finalist CEO of 2023" for his longstanding support for education in the Czech Republic.

Raiffeisen Bank S.A. in Romania received the Gold Recognition Award from Community Index for its program "Financial Education in Romanian Schools (13th edition)". More than 60,000 pupils and almost 2,000 teachers at schools and universities benefited from the program in the 2022/23 academic year.

## Sustainability program

SDG	PRB	Objective	Measure
<b>Sustainability management and corporate responsibility – primary objective: Promoting and enhancing our commitment to sustainability and achieving efficient ESG governance</b>			
	1, 2, 5	Continuous work on incorporating our understanding of democratic and social rights, as well as the human rights impacts – particularly on climate change – into the company processes.	2023: Introduction of the internal Group human rights policy  2023 and 2024: Further development and implementation of human rights due diligence processes
	4	Further development and intensification of the realization of sustainable objectives with relevant stakeholders	Conducting and enhancing extensive stakeholder dialogs on specific ESG issues that are essential for the RBI
	6	Fit4CSRD – Implementation of the directive on Corporate Sustainability Reporting for the financial year 2024	2023: Start of the Fit4CSRD group project with extensive preparation for the new legal reporting requirements  2024: Implementation of the CSRD
	1-6	Further development and future orientation 2030 of the UNEP FI's Principles for Responsible Banking (PRB)	2023 and 2024: Active participation in the PRB "2030 Core Group" workshops, as the sole banking group from the DACH region
	5	Transformation of the B-1 Responsible Banking Steering Group into a formal Sustainability Committee with direct involvement of the Executive Board	2023: Development of bylaws for the planned formal Sustainability Committee  2024: Approval of the bylaws by the Executive Board, nomination of members, and factual implementation
	5	Optimization of the Sustainability Council's governance	2023: Adoption of a formal statute for the Sustainability Council  2024: Refinement of the "Purpose" and closer integration of the Sustainability Council with both the economy and RBI's key sustainability topics

SDGs

No poverty	Zero hunger	Good health and well-being	High quality education	Gender Equality	Clean water and sanitation	Affordable and clean energy
Decent Work and Economic Growth	Industry, innovation and infrastructure	Reduced inequalities	Sustainable cities and communities	Responsible consumption and production	Climate action	Life below water
Life on land	Peace, justice and strong institutions	Partnerships for the goals				



## **Business Conduct**

Corporate governance, RBI values and principles, compliance, tax compliance, suppliers

# Business Conduct

ESG Pillar 3 GR a

RBI places great value on responsible and transparent business management and culture. This is a basic prerequisite for the performance of our banking group. The traditional Raiffeisen values provide the basis for this (see page 16) as does the Code of Conduct (CoC; see page 44 f.), which is applied across the Group, as well as sustainable principles and related memberships. Above all, this demands functioning compliance and tax compliance as well as responsible supplier management.

GRI 2-23

## ➤ Corporate Governance

GRI 2-12, -23,  
-24

Corporate governance (CG) refers to the framework of rules and practices for managing and monitoring a company and is determined by legislators and owners. In short, it describes the principles of leading a company. The specific structure is the responsibility of the Management Board and the Supervisory Board.

TCFD

Management and control within a company that is responsible, qualified, transparent and focused on long-term value enhancement are the goals of good corporate governance. Trust-based, efficient cooperation between the various company bodies, protection of shareholder interests as well as open and transparent communication are central guidelines for us in the implementation of modern corporate governance.

The structure of RBI's corporate governance is based on various legal standards and other provisions that guide its actions both internally and externally. Building on the legal framework, RBI defined internal rules of conduct – the RBI Code of Conduct – as an expression of its commitment to sustainable corporate governance and the accompanying social and environmental responsibility. These serve to ensure compliant conduct.

Openness and transparency in communication with shareholders, their representatives, customers, analysts, employees and interested members of the public is of great importance to RBI AG. RBI's website contains extensive information on the company, our business success and our share price performance. This information is regularly updated.

Find more at:  
[www.rbinternational.com/en/investors/governance-remuneration.html](http://www.rbinternational.com/en/investors/governance-remuneration.html)

RBI AG is committed to the principles of good and responsible company management as laid out in the Austrian Corporate Governance Codex (in the version of January 2021) and has pledged to comply with these principles. The compliance evaluation of the Corporate Governance Report in accordance with section 243c of the Austrian Commercial Code (UGB) was carried out by Deloitte Audit Wirtschaftsprüfungs-GmbH on behalf of RBI AG. In their conclusive report, they noted no cause for objections. Regarding the composition of the Management Board and the Supervisory Board, we refer to the RBI Annual Report.

# › Our values and principles implemented in applicable rules

## The historical values of RBI

In the 19th century, Friedrich Wilhelm Raiffeisen simplified the idea of a cooperative down to one basic principle: In unity lies strength. This idea is backed by the values of helping others to help themselves, charity, communality, solidarity and responsibility for others. We continue to build on these values. They can be seen in RBI's key strategies and decisions, and expressed in a strong brand that places an emphasis on the principles of identity, self-administration, economic solidarity, sustainability and subsidiarity.

## Code of Conduct



Our Code of Conduct (CoC) is an important part of our corporate culture and forms the basis of our business practices.

RBI's business model places people at its core. The Code of Conduct is a binding regulatory framework that is applicable Group-wide for all employees and can be found in the respective national language on all of the websites of RBI and the subsidiary banks in Central and Eastern Europe. The Code is based on Raiffeisen's fundamental values and RBI's values of collaboration, proactivity, learning and responsibility. It is oriented towards the specific requirements of everyday business at home and abroad.

Complying with laws and international standards forms the basis of the CoC. This includes laws supporting the fight against money laundering and terrorist financing, prohibiting fraud, corruption and bribery as well as market abuse, avoiding conflicts of interest, complying with financial sanctions, adhering to data protection standards and other forms of critical business practices, including respect for the fundamental rights of employees, as well as complying with environmental laws to the best of our knowledge and ability. In addition, the CoC consciously goes beyond formal and legally ordained conduct and describes how we deal with customers, business partners and employees.

Furthermore, all persons acting for or providing services on behalf of RBI as well as all other business partners are expected to apply regulations and standards that are identical or comparable to those set out in the CoC. The commitment to observing the CoC is included in all contracts with contractors, suppliers and service providers. In 2020, a tailored document for suppliers was created based on the Code of Conduct, setting out the expectations arising from the contractual relationship.

To raise the necessary awareness of the principles of the CoC, all employees are required to participate in mandatory elearning that covers the basics of the CoC. In addition, all employees must sign a compliance statement in which they commit to observe the CoC, which includes the disclosure and regular updating of statements on conflicts of interest.

Responsibilities, accountabilities and reporting lines are defined on a systematic basis for all departments and Group companies. The Management Board of RBI AG bears ultimate responsibility for the CoC. Operational responsibility for implementing the CoC in all global group units lies with the respective competent management bodies. The divisional head responsible for compliance is tasked with coordinating the activities in connection with the CoC. This person is also responsible for all issues relating to compliance with selected legal requirements. In addition, all members of management are responsible for ensuring compliance with the CoC in their own areas of responsibility. CoC compliance is linked to the remuneration of employees, whereas the employee performance appraisal systems take compliance with the CoC into consideration.

The CoC and its effectiveness are reviewed regularly and approved and published by the RBI Management Board following extensive consultation with a number of stakeholders. In 2022, RBI initiated a review process focusing more on ESG-related topics and compliance with the latest regulatory guidelines. The updated CoC, which was published in April 2023, has a greater focus on sustainability, the guidelines issued by the European Banking Authority (EBA) and other regulatory topics.

All employees are obliged to report serious violations of the CoC, such as market abuse, fraud, theft, embezzlement, bribery or corruption. RBI uses a whistleblowing platform (provided by an external service provider) that enables anonymous electronic reporting. Above and beyond this solution, there are other channels for reporting breaches of the Code of Conduct (e.g. telephone, email). Our employees are proactively informed about these mechanisms. All reports are processed in accordance with RBI's internal compliance investigation mechanism. Our zero-tolerance policy (e.g. against harassment and discrimination) stipulates that all allegations are taken seriously. All reports are treated as confidential.

GRI 2-25, -26

Find more at:  
[www.raiffeisen.com/en/raiffeisen/rbi-group/leadership-governance/compliance/whistleblowing.html](http://www.raiffeisen.com/en/raiffeisen/rbi-group/leadership-governance/compliance/whistleblowing.html)

Where violations are identified, appropriate disciplinary action, including dismissal, is carried out in accordance with Group policy. We constantly analyze our rules and regulations in order to minimize the risks for the future as far as possible.

GRI 2-25

Violations and breaches of the CoC (e.g. general statistics and KPIs) are reported regularly (at least annually) to the Management Board of RBI AG, and to the relevant committees (Risk Committee, Audit Committee) of the Supervisory Board of RBI AG. Specific material cases are ultimately escalated to the highest management bodies on an ad hoc basis. The number of incidents according to corresponding categories are shown on page 53 in the sub-chapter „Metrics and ambitions“. All reports and cases were appropriately investigated, and the necessary consequences drawn.

GRI 2-16

RBI is one of the signatory companies of the UN Global Compact (UNGC) (see also pages 45–46) and is therefore committed to proactively and consistently complying with the principles contained therein, which cover the core areas of human rights, labor regulations, environmental protection and anti-corruption. The globally responsible approach associated with this is expected of all employees and managers, as well as partners and suppliers.

GRI 2-23

In addition to the abovesaid, the CoC, the CoC for Suppliers (see page 59), the Diversity Policy (see page 169) and the new Human Rights Policy (which was approved at the beginning of 2023; see page 36) represent a core framework for implementing human rights within RBI. All documents include the core principles proclaimed by the European Convention on Human Rights and the Universal Declaration of Human Rights.

In this regard, the CoC supports fair employment practices, does not tolerate discrimination or harassment and violence in the workplace, and protects employees' occupational health and safety. The CoC for Suppliers addresses core principles that RBI suppliers have to meet (see page 59).

Human rights violations may generate illicit profit, support slavery and human trafficking, promote the continuation of poor working conditions, and lead to other abuses. RBI strives to further improve the implemented controls concerning financed projects and corporate customers as well as existing and potential suppliers. RBI also endeavors not to directly or indirectly finance any businesses, projects or parties in which human rights violations are discernible. Our employees have been instructed to take information on forced or child labor into account and, in case of doubt, to involve Compliance. RBI strives for a zero-tolerance policy with regard to child labor, both within RBI and with its suppliers.

GRI 2-23

## UN Global Compact

RBI is one of the signatory companies of the UN Global Compact (UNGC), meaning that it is committed to consistently complying with the ten UNGC principles of responsible business. The UNGC is the world's largest CSR and sustainable development initiative. Its principles include the core areas of human rights, labor standards, environmental protection and combating corruption. The globally responsible approach associated with this is expected of all employees and managers, as well as partners and suppliers of RBI.

ESG Pillar 3  
ER a,b  
ESG Pillar 3  
SR a, b, d

Find more at:  
[www.unglobalcompact.org](http://www.unglobalcompact.org)

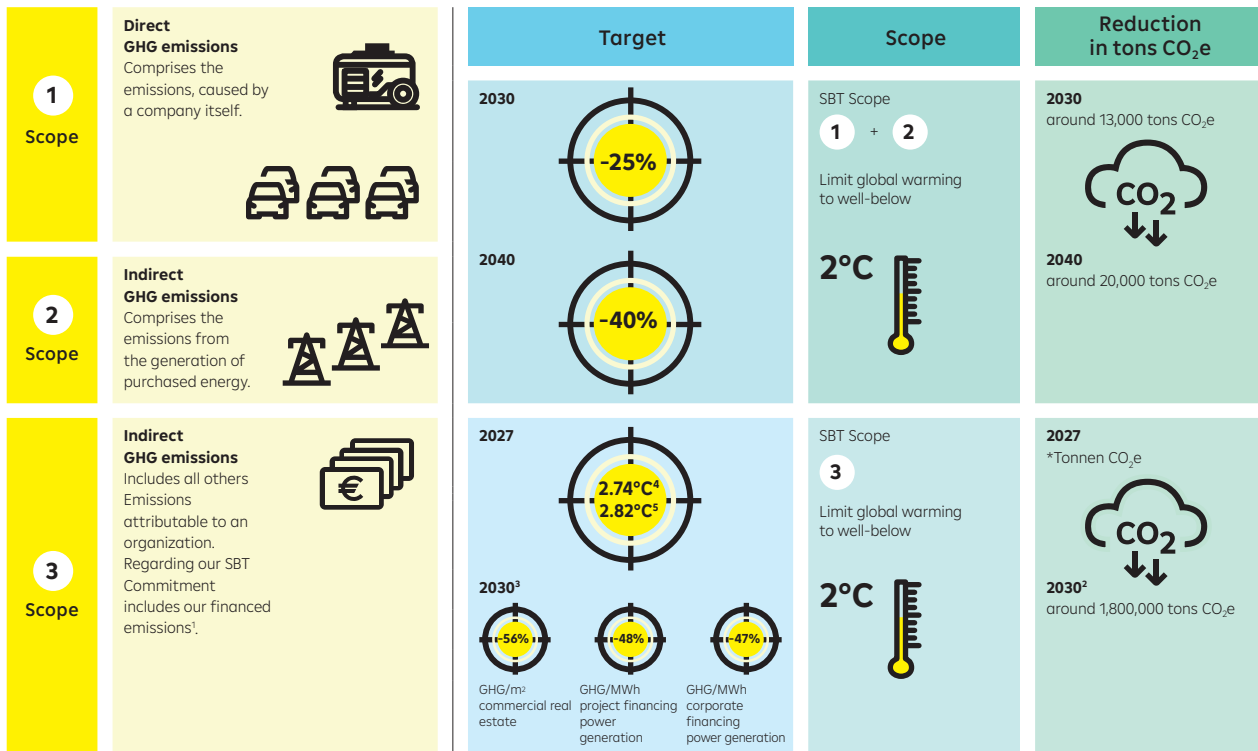
## The ten principles of the UN Global Compact

<b>Human rights</b>	Principle 1:	We support and respect the protection of international human rights within our sphere of influence.
	Principle 2:	We make sure that we are not complicit in human rights abuses.
<b>Labor</b>	Principle 3:	We uphold the freedom of association and the effective recognition of the right to negotiations about the Collective Bargaining Agreement.
	Principle 4:	We support the elimination of all forms of forced and compulsory labor.
	Principle 5:	We support the abolition of child labor.
	Principle 6:	We support the elimination of discrimination in employment and occupation.
<b>Environmental protection</b>	Principle 7:	We support a precautionary approach to environmental challenges.
	Principle 8:	We undertake initiatives to promote greater environmental responsibility.
	Principle 9:	We encourage the development and diffusion of environmentally friendly technologies.
<b>Anti-corruption</b>	Principle 10:	We work against corruption in all its forms, including extortion and bribery.

ESG Pillar 3  
ER a, b

## Science-based targets

In 2022, RBI submitted its science-based climate targets to the Science Based Targets initiative (SBTi) in line with the “well below 2°C” reduction pathway. The Science Based Targets initiative is a partnership between CDP (formerly the Carbon Disclosure Project), UNGC (United Nations Global Compact), WRI (World Resources Institute), and WWF (World Wide Fund For Nature), and has created industry-specific methodologies and calculation tools for companies to help develop scientifically validated carbon targets. SBTi also enables the financial sector to use its own methodology to commit to its own reduction pathway and incorporate corporate climate targets into internal risk management.



<sup>1</sup> The portfolio targets of Raiffeisen Bank International cover 23 per cent. of the total investment and lending activities.  
<sup>2</sup> Assuming constant base values (square meters for commercial properties, MWh for electricity generation).  
<sup>3</sup> Intensity targets for project finance and corporate lending in power generation (GHG per kWh) and for corporate lending in commercial real estate (GHG per m<sup>2</sup>). Base year: 2020.  
<sup>4</sup> To reduce the Scope 1+2 portfolio temperature score for corporate loans (other long-term debt), listed equities and corporate bonds from 3.20°C (base year: 2021) to 2.74°C by 2027.  
<sup>5</sup> To reduce the Scope 1+2+3 portfolio temperature score for corporate loans (other long-term debt), listed equities and corporate bonds from 3.20°C (2021) to 2.82°C by 2027.  
 \* Greenhouse gas emission savings cannot be calculated with temperature scoring.  
 GHG: greenhouse gas emissions



RBI's targets were approved by SBTi in September 2022. In doing so, RBI has committed to setting CO<sub>2</sub> reduction targets for its core business. In order to fulfill its ambitions, RBI has chosen a holistic approach across all customer groups, with the aim of making a significant contribution to RBI's sustainable business growth through responsible banking activities.

## UNEP Finance Initiative: Principles for Responsible Banking

As a long-standing member of the UNEP Finance Initiative, RBI signed up to the "Principles for Responsible Banking" in 2021, thereby committing to implement the six associated principles within the Group. These principles anchor sustainability at a strategic, portfolio and transaction level, as well as in all areas of business. RBI is thus underlining its efforts to proactively contribute to the implementation of the goals of the Paris Agreement and the redirection of capital flows to sustainable activities.

Find more at: [www.unepfi.org/industries/banking/case-studies-on-impact-analysis-and-target-setting/](http://www.unepfi.org/industries/banking/case-studies-on-impact-analysis-and-target-setting/)

The implementation phase, which began in 2021, continued in 2023. In a three-stage process covering the first years, RBI as the respective signatory bank is initially demonstrating its commitment by conducting an impact analysis of its portfolio. It will then disclose the most important impacts of its products and services on society and the economies in which the bank operates (impact analysis see pages 68 and 114). An important focus is now on defining measurable targets and implementing them in those areas of the bank that have the greatest sustainable impact. Annual reporting will ultimately help to document the progress made in implementing the principles in a transparent manner (see page 252 ff.). This was audited by an external auditor for the first time in 2023 (see page 242 ff.).

### The six principles for Responsible Banking of UNEP Finance Initiative

#### Alignment

Principle 1: We will align our business strategy to be consistent with and contribute to individuals' needs and society's goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks.



#### Impact & target setting

Principle 2: We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services. To this end, we will set and publish targets where we can have the most significant impacts.



#### Clients & customers

Principle 3: We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.



#### Stakeholders

Principle 4: We will implement our commitment to these Principles through effective governance and a culture of responsible banking.



#### Governance & culture

Principle 5: We will implement our commitment to these Principles through effective governance and a culture of responsible banking.



#### Transparency & accountability

Principle 6: We will periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society's goals.



## Sustainable Development Goals

In order to help find solutions for global challenges, promote human welfare and protect the environment, the international community of states making up the UN adopted "Agenda 2030" in September 2015 in the interests of sustainable development. At its core are 17 goals for sustainable development – the Sustainable Development Goals (SDGs) and their 169 sub-goals. The SDGs encompass social and economic development as well as environmental sustainability. They also address aspects such as peace and security, justice and global partnerships, all of which are of great importance for sustainable development. The SDGs are globally applicable. In other words, all 193 UN member states, including Austria, are called upon to contribute to achieving the goals according to their means. Incentives should also be established to encourage non-state actors to increasingly make active contributions to sustainable development.

As an international banking group, we consider ourselves obliged to support these important international initiatives within the scope of our sustainability agenda. Our focus is on those SDGs that are relevant to the business activities in each individual case and that best complement our sustainability strategy.

GRI 2-23, -24, -25  
GRI 3-3 a-f

## > Compliance

### Impacts

RBI meets high standards in adhering to all legal requirements, in the fight against corruption and money laundering, and in preventing breaches of sanctions. The alignment with our core values in all areas of business, particularly the consistent implementation of a zero-tolerance policy against corruption, not only has a positive impact on RBI's reputation, but also on its employees, customers and society in general. Corruption and money laundering can have far-reaching negative implications for the company, including a loss of confidence in state institutions, human rights violations, shadow economy, tax evasion, poverty or deterioration of public services. The fight against corruption is dependent on joint efforts, including transparent leadership behavior, strong institutions and the active involvement of the citizens, to ensure responsible actions are taken and to encourage a fair and just society.

Compliance with international financial sanctions and trade restrictions is of crucial importance for the containment of global risks (e.g. financing of terrorism, proliferation of weapons of mass destruction, continuation of armed conflicts, serious human rights violations). At the same time, compliance with these sanctions and restrictions supports the long-term fight against behavior that threatens the territorial integrity, sovereignty, independence and stability of crisis-ridden countries and regions.

### Risks and opportunities

RBI is perceived to be a responsible bank, thanks to its exemplary behavior in complying with legal requirements, which are implemented through appropriate internal processes to combat money laundering, terrorist financing, corruption and bribery. These measures not only serve to strengthen confidence in RBI, but they also improve its position in the market and ultimately enable it to attract new customers as well.

Reputational risk is one of the key risks with potential negative implications for RBI's business opportunities. The bank's reputation might be damaged and financial risks can also arise, which can lead to considerable financial losses, including fines. On the other hand, playing an exemplary role in compliance with legal requirements, promoting human rights and having a positive influence on a fair and sustainable society can be a source of business management opportunities. Overall, we are seeing greater attention being paid by (potential) investors to the topics of compliance and observance of human rights.

## Management

GRI 2-13, -25,  
-26

RBI places great value on compliance with relevant regulations. We do not tolerate any form of financial crime (e.g. bribery/corruption, tax evasion, money laundering, terrorist financing, evasion of sanctions, fraud or market abuse) and we work actively against such activities.

A prerequisite in our business and operational practices is the fair, ethical and legally compliant behavior of all members of staff. Mechanisms for complying with laws as well as internal or external codes of conduct are established in all countries in which RBI operates through our CoC and the clear, detailed regulations contained in the Compliance Policies, which are continuously adapted and improved in response to the latest regulatory requirements and global challenges.

Internal reports (ad hoc, quarterly, annual) discuss various aspects of the implementation of compliance guidelines and processes as well as data and statistics.

The Compliance division has an important managing and control function in our company, particularly in the context of the development of Group standards and their implementation.

Position statements on customer relationships, lending and RBI's own investments in certain sectors (e.g. military equipment and technology, gambling and nuclear power) are also communicated proactively. Business inquiries involving these sectors are forwarded to Compliance for further evaluation to ensure that risks of this nature are adequately managed, minimized or avoided. The management of the military, gambling and nuclear power sectors were combined with sustainability topics within RBI Compliance in mid 2023, so that sustainability can be considered from an overall risk perspective. RBI AG regularly evaluates and analyzes the economic sectors that are subject to policy-making (e.g. thermal coal, oil and gas, tobacco, steel). Our processes and control mechanisms are aimed at identifying potential environmental, social (including human rights) or reputational risks resulting from such companies in good time and revising them regularly in the event of changes to our risk appetite.

GRI 2-23, -25

Find more  
at: [www.raiffeisen.com/en/sustainability-esg/responsible-banking/code-of-conduct.html](http://www.raiffeisen.com/en/sustainability-esg/responsible-banking/code-of-conduct.html)

The Group Steering and Control department, set up in 2021, is intended to provide oversight and expertise within our network using a risk-based and comprehensive approach to steering and control, and to facilitate the Group-wide exchange of best practices, standards and competencies in order to avoid regulatory breaches, support the implementation of RBI's business strategy and protect RBI's reputation.

The Head of Compliance regularly reports directly to the Management Board and Supervisory Board on compliance matters. As part of the business efforts to ensure RBI's competitiveness, Compliance has also taken measures to continuously improve efficiency and effectiveness (e.g. organizational changes, digitalization, machine learning, improved data analysis, introduction of agile methodology).

GRI 2-12

RBI runs annual Group-wide awareness initiatives to build a better culture and greater awareness of compliance. The course contents are tailored to the target groups and prepared in different formats, some of which are interactive. All RBI employees are given regular training on compliance topics in line with their compliance-relevant function. Compliance risk is taken into account in the different organizational units and their workflows, processes, roles and responsibilities (e.g. by adopting the "Chinese walls" concept). All new RBI employees must complete training courses on the topic of compliance. In particular, these cover aspects of preventing economic crime (especially combating money laundering and the financing of terrorism, international sanctions and embargoes, and corruption and fraud prevention), market abuse and conflicts of interest, as well as appropriate measures and rules concerning internal reporting obligations. Furthermore, defined groups of employees are required to attend regular refresher training. To raise the level of employee compliance and risk awareness, RBI has updated its training concept and sessions to incorporate advanced techniques and user-centric approaches to learning. In addition, managers, compliance ambassadors and employees of selected areas are trained in line with the specific requirements of their role and responsibility. The training measures are supplemented with campaigns to raise awareness of, for example, whistleblowing or conflicts of interest. A Group-wide campaign to raise awareness of the importance of whistleblowing was launched in 2022. The Group-wide e-learning code of conduct received the e-Learning Award 2024; it is seen as a flagship project in the field of e-learning by international standards.

GRI 205-2  
GRI G4- DMA  
(former FS4)

## Anti-corruption

GRI 2-25 Measures and activities in the area of corruption prevention are guided by the principles of the Austrian Criminal Code, the UK Bribery Act and the US Foreign Corruption Practices Act in the versions currently applicable. These include the obligation of the management staff of all units of RBI to shape a corporate culture in which each and every form of economic crime and corruption is unacceptable.

GRI 2-23, -24  
GRI 205-2

Find more at:  
[www.raiffeisen-rbi-group-leadership-governance-compliance-abc-program-me.html](http://www.raiffeisen-rbi-group-leadership-governance-compliance-abc-program-me.html)

These processes are monitored and reviewed on a regular basis. The Group's internal Anti-Bribery and Corruption ("ABC") framework is continuously revised and is based on risk and prevention with the following principles: proportionate, process-based annual risk assessment and scenario analysis; commitment of the Management Board; disclosure obligations in connection with (potential) conflicts of interest, especially gifts, invitations, secondary employment, related party relationships, company participations, sponsorship and contributions/donations; a continuous communication and training program including candidate testing; monitoring and review of business activities. Service providers are subject to a thorough review. The relevant processes for preventing breaches related to business activities are in place and clearly communicated. This also applies to intermediaries.

The key figures for training and corruption incidents can be found in the Metrics at the end of the chapter.

## Handling conflicts of interest

GRI 2-15, -23,  
-24, -25

ESG Pillar 3  
GR C

RBI has internal policies in place governing the handling of conflicts of interest. RBI employees are required to disclose potential and actual conflicts of interest in accordance with defined system-based reporting guidelines. Reports filed are assessed by the Compliance department and remedial action is taken as required. Provision is also made for regular monitoring and disclosure of conflicts of interest. The Management Board receives regular reports and an appropriate escalation procedure is in place. RBI strives to prevent and avoid conflicts of interest. RBI discloses conflicts of interest to its stakeholders in accordance with statutory requirements relating to capital markets or other relevant regulations.

## Anti-money laundering

GRI 2-25

Money laundering is the act of concealing the existence, origin, movement, intended purpose or use of illegally obtained assets or funds in order to make them appear legitimate. This system typically involves three stages: the placement of funds in a financial system, the stratification of transactions in order to conceal the origin, ownership and location of the funds, and the integration of the funds into society in the form of investments that appear legitimate. We recognize that money laundering undermines confidence in the financial system.

GRI 2-28

Based on our mission of becoming the most frequently recommended financial service provider in CEE, we are committed to combating money laundering by complying with all the applicable legislation on money laundering as well as international best practice standards, such as the recommendations of the Financial Action Task Force (FATF), in all countries and areas of responsibility in which we are active. In order to design the statutory preventive mechanisms in a targeted manner, RBI supports legal initiatives wholeheartedly and has co-initiated and been regularly involved in a number of working groups in Austria (e.g. Compliance Package, Financial Crime), as well as participating in several initiatives at a European level (such as the EUROPOL Public Private Partnership).

This commitment is made fully transparent in RBI's anti-money laundering (AML) declaration and our adjusted risk appetite with respect to offshore customers and customers with high reputational risk, as well as our correspondent banking relationships. RBI reviews its customer portfolio on an ongoing basis and adjusts it according to RBI's risk appetite.

RBI has created a comprehensive AML framework to ensure that AML risks are properly identified, evaluated and appropriately mitigated. Our AML framework provides orientation for all employees and Group units and obliges them to conduct transactions in accordance with the applicable laws and regulations. It is based on a number of components, including the following:

GRI 2-23

- Appointment of an anti-money laundering officer
- Risk identification and classification with regard to customers and products as well as risk-based due diligence obligations
- Systematic, continuous due diligence obligations with regard to customers (including identifying politically exposed persons and beneficial owners), comprising enhanced due diligence for high-risk customers and management approval for certain types of customers (e.g., customers associated with politically exposed persons or certain high-risk countries).
- Role-based training and awareness programs (classroom-based, e-learning, micro-learning)
- Customer data, transaction and account monitoring, including coherence screening
- Reporting suspicions of money laundering to the AML officer

Additionally, we continuously evaluate the effectiveness of our AML framework and the technologies used and update them as required to take into account changes in the environment (e.g. media screening in connection with negative reporting, artificial intelligence, correspondent bank risk scoring). This is supported by functions such as Internal Audit/ Group Audit and internal control systems. Employees are provided with corresponding training and development programs.

GRI G4-DMA  
(former FS9)

RBI participates in and uses the know your customer (KYC) information exchange platform SWIFT KYC Registry, which aims to improve transparency through the simple and centralized exchange of KYC information.

Because the fight against money laundering is a continuously evolving process, we recognize the importance of constant diligence and the capabilities of our employees and our banking group, and are committed to keeping pace with the increasingly complex techniques used by criminals. As well as adopting a clear focus on compliance with laws and regulations, we concentrate on operational efficiency and effectiveness – a statement that is underlined by the Management Board's commitment to make further investments in RBI compliance.

RBI is committed to rigorously combating tax evasion and tax avoidance (see also from page 55 ff.). In case of doubt, it obtains the necessary declarations, confirmations from authorities, and tax records. Along with the heightened know your customer and due diligence obligations that are already in place, RBI has defined additional requirements for companies domiciled in offshore territories and takes particular care to ensure that transactions are legitimate. In these cases, the nature and purpose of the business relationship with RBI and the source of funds of the respective companies are examined in greater detail. This involves a focus on the transparency of the business model, the legal and economic connections with companies operating onshore, and special verification mechanisms for payment transactions, assets and collateral; the ownership structure of offshore customers is also scrutinized.

The country evaluation in the Business Compliance Framework for institutional clients covers the following topics: Quality of the AML/CFT framework, bribery and corruption, financial transparency and standards, public transparency and accountability. Information is derived from the following indices, among others: Worldwide Governance Indicator, Global Terrorism Index, Corruption Perceptions Index (CPI), Heritage Foundation. RBI Group uses several indices for the customer assessment, which form the basis for excluding business relationships, such as sanctioned units or sensitive areas of business as well as restricted sectors. The Minimum Safeguard Standards as part of the EU Taxonomy screening will also be developed further in line with the ESG rules and regulations. A product matrix was also developed, with the objective of establishing a business strategy depending on the inherent compliance risks for institutional clients. Every product was assessed on the basis of the reputational risk, AML product risk, transparency level and cash intensity, among others.

ESG Pillar 3  
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GRI G4-DMA  
(former FS9)

## Sanctions compliance

RBI's sanction program includes significant management commitment, a thorough assessment of the sanctions risks, a dedicated sanctions compliance function with the necessary expertise, authority and autonomy, and a direct reporting line to senior management. It has also put in place strict guidelines, processes, controls (including quality assurance, quality control, Group management, etc.) as well as routine, regular and ad hoc reporting.

RBI has taken extensive Group-wide precautions and implemented IT-based verification processes to ensure that all banking transactions are consistent with EU sanctions and that applicable UK and US sanctions are taken into account. RBI complies with the highest standards and comprehensively meets its obligations with regard to international financial sanctions and trade restrictions.

An internal, Group-wide task force has also been established, whose role it is to implement the latest sanctions developments in the bank and ensure that expertise is shared. More and more colleagues across the Group are being encouraged to obtain an international certification in sanctions compliance.

RBI fosters an intensive exchange with national, European and international supervisory authorities, and continuously implements measures to improve existing processes and policy frameworks.

We seek to routinely review our approach and systems internally and externally to comply with regulatory requirements and to ensure that our systems are aligned with market standards.

GRI 2-13

## Internal Control System

RBI has a well-established internal control system (ICS). The Internal Control Systems department within RBI is responsible for safeguarding the effectiveness of the ICS. Identification, development, documentation, prioritization and regular verification checks serve to ensure a suitable control environment. The Internal Control Systems department operates independently and employs various types of tests to measure the effectiveness, appropriateness and efficiency of the controls used to reduce underlying risks. The ICS as a whole, monitored by the Internal Control Systems department, ensures that the organization achieves its operational and financial reporting and regulatory compliance objectives.

Policies governing strategically important topics are a key element and form the basis of our effective internal control system. Collectively, these policies are core to our company principles. They include the authority to approve Group and company policies as well as departmental and separation of duties policies (see also page 33 ff.).

## Capital markets compliance

RBI has implemented a comprehensive framework to identify, evaluate, control and manage risks arising from the bank's capital markets business. This framework covers both securities services for customers and trading activities for the bank's own account, and seeks to ensure proper standards of market conduct. Our focus lies in stringent investor protection and preventing market abuse. RBI is committed to fair, transparent and clear communication with investors, which includes comprehensive disclosure of sustainability-related information for all financial instruments issued by RBI and marketed as sustainable.

RBI maintains tight control over employee access to sensitive information. It defines and monitors restrictions on employee access to such information. For instance, personal account dealing restrictions have been introduced in order to prevent conflicts of interest and market abuse.

In addition, RBI actively participates in national and international trade associations and working groups to create best practice guidelines for strong corporate governance in capital market activities.

Responsibility for implementing such guidelines lies with the management of the respective Group units. Compliance monitoring is triggered on a regular basis by a process known as "confirmation of implementation". As part of this process 61 Group units must confirm that they are following the policies relevant to them. The monitoring process is carried out by the Group's internal auditing department and local auditing departments as part of their auditing activities.

GRI G4-DMA  
(former FS9)

All cases that are classified as operational risks, in particular penalties and legal actions, are monitored and controlled on a Group-wide basis within the scope of the operational risk management by the Operational Risk Controlling team as part of integrated risk management. Within the operational risk strategy, scenarios and plans of action are analyzed and early warning indicators developed together with the operational risk managers. Cases with overlapping effects/causes are treated exclusively in the results and allocated to the main driver. You will find the key figures in this context below in the section "Metrics and ambitions".

GRI 2-13

## Metrics and ambitions

Regular training of employees is vital to ensure compliance with the statutory requirements (see pages 44 and 49-50). RBI has therefore set itself the goal of achieving a participation ratio of 95 per cent for compliance-related training sessions in 2024.

In 2023, we assessed 83% (15) of the group units included in this report. No significant corruption risks were identified during the risk assessment.

GRI 205-1

The following table shows the number of anti-corruption training sessions held in the respective fiscal year, broken down by employee category and region in both absolute and percentage terms.

GRI 205-2

	RBI*				RBI AG**	
	2023	2022	Change over previous year	2021	2023	2022
<b>Anti-corruption training sessions according to employee categories</b>						
Board (first tier of management)	51	55	-7 %	54	1	3
B-1 (second tier of management)	414	410	1 %	419	45	38
B-2 (third tier of management)	1,303	1,320	-1 %	1,175	173	123
Other managers	1,548	1,700	-9 %	1,531	41	36
Other employees	30,182	31,510	-4 %	28,138	3,425	2,972
Board (first tier of management)	57 %	65 %	-8 PP	57 %	17 %	50 %
B-1 (second tier of management)	77 %	75 %	2 PP	71 %	98 %	75 %
B-2 (third tier of management)	79 %	81 %	-2 PP	72 %	95 %	69 %
Other managers	68 %	75 %	-7 PP	59 %	98 %	78 %
Other employees	79 %	85 %	-6 %	72 %	97 %	88 %
<b>by region</b>						
Central Europe	6,960	8,656	-20 %	6,449		
South Eastern Europe	10,649	10,313	3 %	9,935		
Eastern Europe	11,299	12,314	-8 %	10,535		
Austria	4,590	3,713	24 %	4,398	3,685	3,172
Central Europe	76 %	95 %	-19 PP	76 %		
South Eastern Europe	88 %	90 %	-2 PP	75 %		
Eastern Europe	68 %	75 %	-7 PP	60 %		
Austria	95 %	80 %	15 PP	97 %	97 %	87 %

\* The values include the figures from the companies listed in the Overview chapter (Report scope and data collection).

\*\* RBI AG only includes the figures for the group headquarters here.

In 2023, 2 (2022: 2) passive bribery cases were identified at RBI.

GRI 205-3

In 2023, 106 (2022: 114) compliance-related reports were received via the whistleblower system. Investigations confirmed the allegations in 27 (2022: 13) cases, which led to appropriate disciplinary action under Group regulations, up to and including termination. Of the 27 reports, 1 case was related to bribery and corruption (2022: 0), 2 cases to conflicts of interest (2022: 4), 4 cases to fraud and theft (2022: 1), 12 cases to harassment, discrimination and retaliation (2022: 2) and 8 cases to other internal misconduct (2022: 6). In addition, 86 cases (2022: 33) of violations of the Code of Conduct (e.g.

GRI 205-3  
GRI 406-1ESG Pillar 3  
GR c

breach of professional duties, fraud and theft) were identified.

The ombudsperson received 61 concerns/requests for advice (2022: 56), with six of them still in process.

GRI 2-27 For reporting indicator 2-27 regarding non-compliance with laws and regulations, the threshold of € 100,000 was applied as this represents the current risk appetite threshold in terms of required mitigation actions. For 2023, 2 cases (2022: 3) were identified as potentially material. Whereas so far, there has only been a cash flow in one case. The second case has been provisioned for in accounting. These two cases relate to two entities in Eastern Europe.

## > Political engagement

### Impacts

Lobbying is an aspect of the public political decision-making processes in democracies. The important features of parliamentary democracy include bringing interests, data and facts to the attention of decision makers. The legislator must inform itself about highly complex issues and content, so that it can make decisions that are in the interest of society as a whole. To do so, it relies on well-prepared information and arguments from various stakeholders. Stakeholder representatives enter into dialog with the legislator in order to contribute to informed decision-making processes.

### Risks and opportunities

Banks can have a voice in shaping policies and regulations that directly affect their industry. Engaging politically can provide banks with valuable insights into upcoming legislation or government initiatives. Political engagement allows banks to build relationships with policymakers, industry leaders, and other influential stakeholders. Active involvement in politics can potentially lead to favorable policies and regulations that benefit the bank and its customers. Additionally, it can enhance the bank's reputation and brand image, demonstrating its dedication to societal issues. Political involvement may lead to public backlash, particularly if the bank supports controversial policies or politicians. Engaging politically may subject banks to heightened regulatory scrutiny, with regulators monitoring potential conflicts of interest or unethical behavior. Political instability or policy changes can impact the financial landscape, potentially affecting a bank's profitability and stability. Strict compliance with campaign finance laws and regulations is imperative for banks to avoid legal consequences related to improper political contributions or activities. Furthermore, prudent consideration of the opportunities and risks associated with political engagement is crucial for financial institutions to ensure that it aligns with their strategic objectives and values.

### Management

Lobbying is subject to high standards of transparency, both for specialized lobbying companies and their own employees – known as corporate lobbyists – as well as for Raiffeisen Bank International and its relevant employees. RBI is required to register lobbyists who act on its behalf in the national lobbying register. RBI's lobbying work is carried out by its qualified employees as well as the Fachverband der Raiffeisenbanken (Association of Raiffeisen Banks), which is part of the Austrian Economic Chambers (WKO). Accordingly, RBI is registered in the Austrian lobbying register.

Find more at:  
[www.lobbyreg.justiz.gv.at/edikte/ir/iredi18.nsf/Suche!Open-form](http://www.lobbyreg.justiz.gv.at/edikte/ir/iredi18.nsf/Suche!Open-form)



At EU level, RBI AG is listed in the Transparency Register of the European Commission and the European Parliament. This involves observing activities by EU institutions with regard to possible impacts on the Raiffeisen Banking Group (RBG), the creation of networks and shared interest coalitions, as well as gathering and preparing specific research and information on EU initiatives and measures in the area of financial services that are of relevance to RBI (e.g. Basel, deposit insurance fees, corporate governance). Since it was included in the register, RBI has been obliged to comply with the code of conduct of the institutions (European Commission/European Parliament). Position statements concerning consultations of the European Commission can be found on the Commission website. At national level, the position of RBI/RBG enters into joint position statements by the Austrian Economic Chambers, banking and insurance section (membership in the Austrian Economic Chambers is mandatory).

GRI 2-28

Find more at: [www.ec.europa.eu/transparencyregister/public/consultation/search.do?locale=en&reset=](http://www.ec.europa.eu/transparencyregister/public/consultation/search.do?locale=en&reset=)

Find more at: [www.banking-madeforcee.com/en/raiffeisen-international.html](http://www.banking-madeforcee.com/en/raiffeisen-international.html)

Corporate lobbyists of RBI are obliged to observe the following points in their contact with office holders: They are committed to the truth, and any information that they provide must be – to the best of their knowledge – undistorted, complete, up to date and not misleading. The officials must know who they actually are, that they work for RBI, and declare that they are entered in the lobbying register.

All lobbyists who work for RBI obtain information exclusively by fair means and make decisions in a fair way. They inform themselves about the restrictions on activities and rules on incompatibility that apply to office holders, and comply with these restrictions and rules. Office holders may not be tempted to infringe on the applicable rules and standards of behavior, and unfair or inappropriate pressure may never be exerted on office holders. The Compliance Policies rules as well as the "Code of Conduct according to Article 7 of the Lobbying Act" are to be observed.

The full Management Board of RBI is solely authorized to approve contributions to political parties, election committees, party-affiliated organizations and political figures (politicians, candidates), and such contributions are permitted only if the following conditions are fulfilled:

GRI 2-12

- The contribution does not violate any statutory regulations.
- The contribution is within the customary extent of the respective country.
- The contribution is not apt to have any improper impact.

If such contributions are granted, they must be handled transparently and with the involvement of RBI Group Compliance. The transparency provisions regarding party financing and lobbying, which have been in place in their latest version since 1 January 2013, must be complied with and are implemented in the Group Executive Office of RBI.

## Metrics and ambitions

In 2023, RBI did not make any financial or in-kind contributions to any politicians or parties.

GRI 415-1

# ➤ Tax compliance

GRI 3-3  
GRI 207-1,-3

## Impacts

RBI makes contributions to the national budget, by paying its taxes promptly and in full, so that the state can fulfill its social responsibility. In addition, RBI's tax-compliant behavior can also result in other market participants adopting the same behavior.

## Risks and opportunities

Compliance with the tax provisions in the countries in which RBI operates is of essential importance. If the taxes are not declared in full or paid on time, this can lead to high financial risks. In addition to payments for tax arrears, RBI may incur penalties and late payment interest. Furthermore, in cases of intentional or grossly negligent underpayment of taxes, the persons involved may be held personally liable under financial criminal law. It may also result in reputational risks for RBI and therefore to financial repercussions.

## Management

### Tax strategy

RBI's tax strategy is derived from the statutory requirements, the Code of Conduct and the internal policies derived on this basis.

The fulfillment of the applicable tax obligations plays a prominent role. RBI applies this principle to its business activity in all jurisdictions and markets in which it is active.

In its legal form as a stock corporation domiciled and managed in Austria, RBI AG is subject to unlimited tax liability in Austria with its entire global income. Outside Austria, it is also subject to unlimited tax liability with its subsidiaries domiciled outside Austria, as well as limited tax liability in respect of its permanent establishments for tax purposes and the income they generate. RBI AG is also subject to extensive tax obligations arising from its business relationships with its customers and business partners.

Tax obligations also entail tax risks, i.e. uncertainty with regard to the tax assessment of relevant matters. This can arise in particular from the complexity of the economic matters involved and the applicable tax system. RBI AG has established internal processes and control systems to identify, control and minimize tax risks.

GRI 207-1

### Tax concept

In line with our Code of Conduct, we reject all forms of tax evasion. Accordingly, we are fully committed to complying with the applicable laws and regulations on combating tax evasion and other financial criminal offenses in the markets and legislations in which we operate. These principles are taken into account in all business activities and decisions.

When designing new products, we take care to ensure compliance with the applicable tax provisions.

RBI also complies with regulations and initiatives on tax transparency, such as the Foreign Account Tax Compliance Act (FATCA), Common Reporting Standard (CRS), US Qualified Intermediary (QI), VPDG, GMSG and DAC 6 (see the notes on GRI 207-4).

In our internal processes and controls, we ensure that we comply with internal and external regulations and that undesirable tax practices are identified at an early stage and prohibited. Our overarching objective is to satisfy our tax obligations completely, correctly and in a timely manner in order to prevent compliance-related tax risks. With the Code of Conduct and our internal policies and processes, we are working toward a uniform understanding of this tax strategy at all RBI locations in order to ensure that the tax strategy is implemented accordingly.

In 2023, we continued to strengthen our control mechanisms and governance system to prevent any potential tax abuse, and subsequent tax evasion.

These principles and approaches are set out in the Code of Conduct, which applies to the entire Group. This is regularly reviewed, expanded and elaborated on in various individual guidelines.

RBI AG's business model in no way seeks any presence in tax havens. Any outstanding activities in such locations are to be terminated as soon as possible.

## Tax governance, control and risk management

GRI 207-2

The CEO bears ultimate responsibility for the fulfillment of RBI AG's tax obligations. The CEO assigns this responsibility to the Chief Financial Officer (CFO), who delegates it to the Head of Group Tax Management. Tax responsibility for the respective foreign subsidiaries (especially the network banks) lies with the respective local management.

Tax risks are identified, managed and monitored in line with the internal processes.

Employee expertise on tax matters is ensured by way of internal and external training. Some employees of Group Tax Management are also subject to strict further training obligations in connection with their professional qualification as tax advisors. Extensive regular training for internal departments conducted by Group Tax Management and external consultants forms part of internal tax compliance. Necessary measures are derived from an annual analysis of the Group-wide tax compliance risk.

Additionally, external consultants perform recurring audits of tax compliance.

Compliance with tax provisions and the corresponding control framework are monitored at multiple levels. Monitoring of the relevant matters is reinforced through internal control measures and the arrangement of external audits. External expert opinion is sought where clarification on certain complex issues is required.

Incidents or suspicions of tax misconduct can be reported to the bank internally or by third parties using the established communication channels of the compliance function. This includes the whistleblowing platform (see pages 32-33).

GRI 2-26

Reporting on taxes in the Annual Report is also audited as part of the external audit of the annual financial statements.

## Stakeholder engagement and management of tax concerns

GRI 2-29  
GRI 207-3

Important tax topics and projects are presented to the CEO or the full Management Board for acknowledgment or approval. External opinion is sought where necessary in order to ensure that the perspectives of the different stakeholders are taken into account in the decision-making process and that tax risks are identified and documented accordingly.

Group Tax Management pursues an intensive dialog with the responsible local tax authorities with a view to engaging in partnership-based cooperation. Regular expert dialog also takes place with the ministries of finance.

The active participation of Group Tax Management in the tax committees of various institutions, such as the Austrian Economic Chambers (assessment of legislation, expert exchange, etc.) and the Federation of Austrian Industries, allows trends in tax law to be identified and responded to in a timely manner.

## Metrics and ambitions

### Country-by-country reporting

GRI 207-4

2023	Net income from third-party sales in € million	Net income from intra-group transactions with other tax jurisdictions in € million	Profit/loss before tax in € million	Tangible assets other than cash and cash equivalents in € million	Corporate income tax paid on a cash basis in € million	Corporate income tax accrued on profit/loss in € million	Number of employees in FTE
Albania	152	2	71	33	0	-11	1,271
Belarus	303	0	151	31	-36	-39	1,610
Bosnia and Herzegovina	174	1	66	72	1	-3	1,376
Kosovo	107	6	36	33	-4	-4	965
Croatia	416	30	130	141	-14	-25	1,773
Austria	3,254	866	1,009	530	-5	-20	5,619
Poland	-739	14	-868	3	0	0	291
Romania	1,107	9	423	88	-41	-77	5,037
Russia	3,042	134	1,805	193	-480	-464	9,942
Serbia	449	4	236	86	-19	-34	2,113
Slovakia	1,068	122	305	92	-55	-64	3,484
Czech Republic	2,103	353	401	134	-117	-96	3,599
Ukraine	753	8	247	54	-31	-125	5,333
Hungary	1,813	574	297	99	-31	-33	2,404
Other countries	40	0	7	94	-2	-2	70
<b>Subtotal</b>	<b>14,040</b>	<b>2,124</b>	<b>4,315</b>	<b>1,681</b>	<b>-834</b>	<b>-997</b>	<b>44,887</b>
<b>Reconciliation</b>	<b>-</b>	<b>-</b>	<b>-739</b>	<b>-10</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Total</b>	<b>-</b>	<b>-</b>	<b>3,576</b>	<b>1,672</b>	<b>-834</b>	<b>-997</b>	<b>44,887</b>

#### Notes:

Names of resident companies can be found starting on page 241 ff. of the Annual Report. Primary activities of the organization can be found on pages 17 and 93-94 of the Annual Report. The number of employees is calculated as the number of full-time equivalents as at 31 December 2023. Countries not listed individually are summarized in the "Other countries" item due to immateriality. With the exception of Russia, RBI had no offshore jurisdictions in the reporting period as defined in the EU list: <https://www.consilium.europa.eu/media/67379/st13879-en23.pdf> Annex I. The tax rates, which differ from the nominal tax rates of individual countries, largely result from effects of the recognition of deferred taxes (subsequent recognition or value adjustment), effects of employment initiatives, from taxes for previous years (e.g. from the reversal or recognition of tax provisions).

GRI 3-3 c-f

## > Suppliers

GRI 2-6 RBI has some 13,000 suppliers in Austria and CEE (of which around 1,200 suppliers for Group headquarters), mainly in IT, facility management, consulting services and marketing.

## Impacts

The procurement of goods and services, their transport and manufacturing, generates CO<sub>2</sub> emissions. This has a direct climate and environmental impact.

Another related material issue is the composition of products, material consumption and the recycling of, for instance, packaging. The circular economy is an important focus area for RBI, with suppliers also taken into account in this respect.

The observance of human rights is crucial when considering the supply chains and business partners in procurement. Respecting local and international labor law forms the basis for the cooperation with our suppliers.

Being a fair partner for our suppliers and demanding fairness towards their employees and suppliers as well as sustainable

behavior, not only safeguards our operational banking activities. We also see it as an opportunity to make a positive contribution to society and the environment.

## Risks and opportunities

RBI is conscious of its position in the finance industry in Austria and CEE. Group head office as well as the subsidiary banks in Central and Eastern Europe play a significant role as a customer for businesses in the relevant sectors in their respective domestic markets.

Furthermore, suppliers that demonstrate a high level of commitment to their social and environmental business practices are stable partners and lower the risk of supplier failures, high workforce fluctuation and reputational damage, as well as ensuring compliance with regulatory provisions.

Establishing a fair partnership with suppliers also fosters stability and provides a sound basis for the company's business operations.

Suppliers from the region in which we are active as a bank are preferred, as we have a strong interest in boosting the local economy. Local proximity delivers environmental and social benefits, and lowers risks in the supply chain. By strengthening the regional economy, RBI makes a positive contribution to maintaining and creating jobs and reduced transport distances, thereby lowering emissions further.

## Management

Purchasing for RBI is partly carried out via Group head office or for subsidiaries in Austria via ZHS Office & Facility management GmbH (ZHS). Among other tasks, ZHS carries out the following duties for Group head office: building & property administration, building management, energy management, space & relocation management, event support, purchasing of office supplies, waste management and environmental protection.

GRI 2-13

Acting responsibly towards the environment and society, ZHS Office & Facilitymanagement GmbH (ZHS) revised the requirements for suppliers in 2013. Criteria taken into consideration include quality and costs as well as inquiries about supplier distance, compliance with industry standards, agreements and guidelines on the environment and sustainability (e.g. UNGC), and maintenance of certifications (quality, environment, employee protection, such as ISO 9001, ISO 14001, EMAS). All suppliers of ZHS must meet certain sustainability criteria, which are electronically recorded and analyzed. If these criteria are not met, no business relationship is entered into.

All RBI suppliers must comply with the RBI Supplier Code of Conduct (CoC) and its principles, which, among other considerations, include compliance with the law, the prohibition of corruption and bribery, respect for the fundamental rights of employees and environmental regulations. The Supplier Code of Conduct is included on a Group-wide basis in contracts agreed with suppliers. In exceptional cases, supplier codes of conduct with comparable content are accepted as part of the contract. The principles defined in the Supplier Code of Conduct are to be regarded as a minimum level for environmental and social criteria and are based on the various regulations and directives with which RBI has undertaken to comply. They are a material prerequisite to becoming a supplier to RBI.

GRI 2-23

Find more at:  
[www.raiffeisen.com/en/raiffeisen/sustainability-esg/responsible-banking/code-of-conduct.html](http://www.raiffeisen.com/en/raiffeisen/sustainability-esg/responsible-banking/code-of-conduct.html)

The Supplier Code of Conduct helps to ensure that the RBI suppliers adhere to important environmental and social criteria. Moreover, in the event of the principles being breached, RBI has the right to terminate the contractual relationship with the supplier. This approach underlines the importance of this issue to RBI and highlights compliance with selected ESG standards as a fundamental requirement for working with us.

Further measures include taking into account the progress made in relation to sustainability in the selection of suppliers and the annual survey of RBI's top suppliers. This will lead to even higher standards being expected of the suppliers and additionally heighten these companies' responsibility to society and the environment. Should RBI identify a breach of the regulations by a supplier, it would assess the impact and define rectification measures. If the supplier failed to meet its obligations, RBI would terminate the contractual relationship.

## Metrics and ambitions

GRI 2-29  
GRI G4-DMA  
(former FS5)

As part of the supplier survey, RBI's top suppliers are surveyed annually on topics including environmental and/or socially relevant certificates for the company and for products and/or services purchased by RBI, proceedings due to the infringement of environmental regulations, and indicators on mobility (km/tkm<sup>1</sup>).

65 per cent of RBI's top suppliers responded in 2023 (total number of top suppliers surveyed was 148<sup>2</sup>). The feedback shows the following results (disclosures relate to the surveyed companies):

- 67 per cent of suppliers have at least one environment-related certificate, 44 per cent of these companies are ISO 14001 certified and 45 per cent ISO 9001 certified.
- 53 per cent of suppliers hold at least one certificate on social standards, of which 42 per cent "Great Place to Work" and 32 per cent "Company health management".
- 47 per cent of suppliers have already certified their products and/or services under an environmental or social label.
- 36 per cent provide details about tkm driven.
- 38 per cent of suppliers have implemented a due diligence process for their suppliers in relation to environmental and social criteria.
- 52 per cent of suppliers publish their environmental and social data. 36 per cent have this data audited.
- 22 per cent of suppliers commit to compliance with the UNGC Guidelines, four per cent with the OECD Guideline for Multinational Enterprises, 25 per cent have set SBTi targets and 39 per cent have already committed to the Ecovadis principles.

One supplier reported an infringement of environmental regulations; two suppliers stated that they are currently involved in ongoing ESG-related proceedings.

RBI has set itself the goal of exploiting the potential of its role as customer, by setting high environmental and social principles for a contractual relationship and incorporating sustainability criteria when selecting suppliers.

GRI 2-29  
GRI G4-DMA  
(former FS5)



As part of our commitment to the Science Based Targets initiative, we will work with our top suppliers to reduce emissions together by leveraging our role as a key customer in our region. This applies in particular to the areas of IT, Consulting, facility management and marketing.





IT operations are an essential part of the banking activities. As part of the "ESG for IT" project that was launched in 2023, measures will be planned and implemented over the course of the next few years. They will cover areas such as purchasing and suppliers, who will also be involved in the development process. This will lead to a sustained improvement in IT operations with regard to social and environmental criteria.

<sup>1</sup> Ton kilometers or tkm are calculated on the basis of the transported mass in tons and the distance covered in kilometers.

<sup>2</sup> The top suppliers cover 80 per cent of the expenses for the head office and 50 per cent of the expenses of the RBI Group.

## Sustainability program

SDG	PRB	Objective	Measure
<b>Suppliers – primary objective: Reduction in environmental impacts</b>			
	2	Survey of the status of the top suppliers with regard to their environmental and social aspects	Implementation of a supplier survey, in which they receive a corresponding questionnaire once a year
	5	Supplier policy	Continuation of the supplier policy for the entire Group, taking into account environmental and human rights concerns

SDGs






## Field of action Responsible banker:

For sustainability in the core business



# Interesting facts at a glance

## Financed greenhouse gas emissions 2023



Asset Class	PCAF Data Quality Score		Covered on-balance exposure (in € billion)	Financed emissions (in million tCO <sub>2</sub> e)		Intensity (tCO <sub>2</sub> e/million €)	
	Scope 1+2	Scope 3		Scope 1+2	Scope 3	Scope 1+2	Scope 3
Business loans and unlisted equity	3.6	3.6	49.62	8.39	6.97	169.07	563.73
Project finance, electricity generation	3.0		0.01	0.00		435.65	
Project finance, real estate	4.0		6.63	0.16		24.46	
Listed equity/participations and corporate bonds	3.5	2.2	4.13	0.65	0.89	158.16	2,092.81
<b>Total/(weighted) average</b>	<b>3.6</b>	<b>3.5</b>	<b>60.39</b>	<b>9.21</b>	<b>7.86</b>	<b>152.48</b>	<b>590.33</b>
Project finance, electricity generation – avoided emissions	3.0		0.35	0.19		536.21	

## Breakdown of green financing based on sustainability criteria

**€ 5,525 million**

(of which € 1,245 million unutilized line)

Green financing RBI AG + subsidiary banks in CEE



## Breakdown of social financing based on sustainability criteria

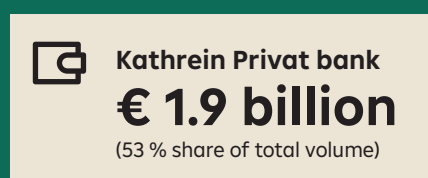
**€ 1,038 million**

(of which € 37 million unutilized line)

Social financing RBI AG + subsidiary banks in CEE



## Sustainable funds volume



# Responsible banker

As a “responsible banker”, long-term added value is our primary objective. Accordingly, sustainability is an integral part of our business strategy, and our products, services and processes are aligned with this goal (see page 18 ff.). We therefore pursue a holistic approach to avoiding ESG risks and taking advantage of opportunities to improve both environmental protection and social standards.

## ➤ Principles for Responsible Banking

To support this approach, RBI became the first Austrian banking group to sign up to the global Principles for Responsible Banking (PRBs) of the UNEP Finance Initiative at the start of 2021. The Principles for Responsible Banking are a single framework for a sustainable banking industry that was developed through an innovative global partnership between banks and the United Nations Environment Programme Finance Initiative (UNEP FI). By signing the Principles, we have undertaken to systematically pursue the path we have adopted, anchoring sustainability topics even more strongly in all business areas and leveraging our potential further so that we can make the greatest possible contribution to a sustainable world. The PRBs constitute the overriding steering framework for RBI, which is substantiated by EU regulation.

Our aim is to offer financial products and services in a way that supports our customers in their transformation toward a sustainable future, thereby making a positive contribution to society. This is also consistent with our Vision 2025.



RBI has committed to fulfilling these six principles within the timeframe prescribed by UNEP FI. The requirements arising from the principles are managed on a project basis as part of the holistic governance approach established by the company (see pages 27-28) and by an operational steering group. We use a detailed impact analysis as well as annual progress reports to define our targets and transparently illustrate what has already been achieved and what remains to be done. On this basis, together with a cross-functional way of working within the Group and the integration of innovative and digital initiatives, we are working to continuously implement these guidelines, which are defined as follows:

**Principle 1: Alignment**

We will align our business strategy to be consistent with and contribute to the realization of individuals' needs and society's goals, as expressed in the Sustainable Development Goals (SDG), the Paris Climate Agreement and relevant national and regional frameworks.

TCFD

**Principle 2: Impact & target setting**

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services. To this end, we will focus our efforts on the areas where we have the most significant impacts and set ourselves corresponding targets.

GRI 201-2

**Principle 3: Clients & customers**

We will work responsibly with our clients to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

GRI G4-DMA  
(former FSS)**Principle 4: Stakeholders**

We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society's goals.

GRI 2-29

**Principle 5: Governance & culture**

We will implement our commitment to the Principles through effective governance and a culture of responsible banking.

**Principle 6: Transparency & accountability**

We will periodically review our individual and collective contributions towards the implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society's goals. A PRB report including a self-evaluation and showing the progress made to date in implementing the Principles at RBI can be found on page 252.

## ➤ Economic value creation

Economically successful business is a prerequisite for ensuring the long-term survival and success of a company. Economic value creation is generally the primary goal of productive activities. Only this ensures that other, ethical objectives can also be realized. In creating economic value via its business activities, RBI generates added value for the company itself as well as for its owners and employees, its customers and the economy in general. In this way, it makes an important contribution to the stability, resilience and productivity of the economic system and the prosperity of society. We are aware of the responsibility that this entails.

## Economic sustainability

Another requirement is ensuring appropriate capital resources. The concept of Group risk controlling comprises a sustainability perspective that should ensure that RBI has a sufficiently high core capital ratio at the end of a planning period, even if the macroeconomic environment worsens unexpectedly (details can be found in RBI's 2023 Annual Report starting on page 192).

The following tables provide an overview of the direct contribution RBI makes to the economy.

GRI 201-1

## Economic performance – Direct economic value generated and distributed

in € million	RBI*			RBI AG		
	2023	2022	2021	2023	2022	2021
Interest income according to effective interest method	8,293	6,681	3,847	1,797	1,141	3
Interest income other	2,313	577	747	1,084	209	930
Dividend income	35	64	42	568	359	740
Current income from investments in associated companies	85	64	46	0	0	0
Net fee and commission income	4,066	4,835	2,852	595	604	482
Net trading income, fair value result and net gains/losses from hedge accounting	158	622	51	21	69	-91
Impairment losses on financial assets	-393	-949	-295	-97	-103	-71
Other net operating income	414	351	331	151	130	141
Other result	-880	-585	-284	-301	-1,528	169
Gains/losses from discontinued operations	0	453	86	0	0	0
<b>Direct economic value generated – revenues</b>	<b>14,091</b>	<b>12,112</b>	<b>7,424</b>	<b>3,818</b>	<b>882</b>	<b>2,304</b>
Operating expenses	-2,778	-2,572	-2,241	-713	-627	-550
Fee and commission expenses	-1,025	-957	-867	-196	-175	-163
Other net operating expenses	-351	-322	-212	-37	-62	-36
Other administrative expenses	-1,214	-1,069	-988	-438	-339	-312
Resolution fund	-74	-89	-75	-42	-52	-39
Deposit insurance fees	-114	-135	-99	0	0	0
Employees	-2,209	-2,010	-1,579	-463	-400	-358
Wages and salaries	-1,806	-1,651	-1,291	-380	-326	-290
Social security costs	-402	-359	-288	-82	-74	-68
Payments to investors	-5,186	-2,205	-1,671	-2,571	-791	-839
Net interest expenses	-4,923	-2,205	-1,267	-2,309	-791	-434
Payments to investors	-263	0	-404	-263	0	-404
Payments to state and investments at municipal level	-1,084	-1,073	-432	11	-21	-10
Governmental measures and compulsory contributions	-95	-87	-39	-3	-26	-19
Current income taxes	-976	-973	-390	15	5	10
Investments in the community/donations	-11	-13	-4	-1	-1	-1
<b>Economic value extracted</b>	<b>-11,253</b>	<b>-7,859</b>	<b>-5,924</b>	<b>-3,736</b>	<b>-1,840</b>	<b>-1,756</b>
<b>Economic value retained</b>	<b>2,838</b>	<b>4,253</b>	<b>1,500</b>	<b>82</b>	<b>-958</b>	<b>548</b>

\* Includes all companies of the IFRS consolidation scope (according to RBI Annual Report 2023, pp. 241-244).

GRI 201-4

## Total monetary value of financial assistance from the government

in €	RBI			RBI AG		
	2023	2022	2021	2023	2022	2021
Total monetary value of financial assistance from the government	838,226*	1,552,130	2,290,521	0	0	0

\* These relate entirely to tax relief and tax credits at Raiffeisen Bank S.A., Romania and Valida Holding AG, Vienna. No financial support apart from this was provided.

## RBI\* key figures by segment 2023

2023	Total assets in € million	Change from previous year**	Business outlets	Employees***	Profit/loss after taxes in € million	Banking levies in € million	Customers in million	Amounts owed to customers in € million
Poland	1,431	-30.0 %	1	291	-868	-4	0.0	13
Slovakia	29,991	8.2 %	128	3,599	306	0	2.2	24,069
Czech Republic	22,324	2.3 %	143	3,484	242	0	1.3	15,742
Hungary	11,571	7.4 %	67	2,404	264	-91	0.5	7,883
<b>Central Europe segment</b>	<b>65,006</b>	<b>4.6 %</b>	<b>339</b>	<b>9,778</b>	<b>-57</b>	<b>-96</b>	<b>4.0</b>	<b>47,702</b>
Albania	2,908	17.8 %	76	1,271	60	0	0.5	2,491
Bosnia and Herzegovina	2,724	3.6 %	87	1,376	63	0	0.4	2,250
Kosovo	1,489	4.9 %	38	965	31	0	0.3	1,219
Croatia	6,997	9.4 %	70	1,773	105	0	0.5	5,091
Romania	14,230	12.5 %	288	5,037	346	0	2.3	10,995
Serbia	5,695	2.0 %	108	2,113	202	0	1.0	4,634
<b>Southeastern Europe segment</b>	<b>34,035</b>	<b>8.6 %</b>	<b>667</b>	<b>12,535</b>	<b>806</b>	<b>0</b>	<b>5.0</b>	<b>26,680</b>
Belarus	2,446	-9.1%	45	1,610	112	0	1.0	1,754
Russia	20,702	-23.0 %	124	9,942	1,341	0	3.2	14,639
Ukraine	4,473	5.0 %	321	5,333	121	0	2.9	3,767
<b>Eastern Europe segment</b>	<b>27,611</b>	<b>-18.3 %</b>	<b>490</b>	<b>16,885</b>	<b>1,575</b>	<b>0</b>	<b>7.1</b>	<b>20,159</b>
<b>Group Corporates &amp; Markets segment</b>	<b>60,131</b>	<b>-4.0 %</b>	<b>23</b>	<b>3,536</b>	<b>561</b>	<b>0</b>	<b>2.5</b>	<b>28,836</b>
<b>Corporate Center segment</b>	<b>36,485</b>	<b>-18.5 %</b>	<b>-</b>	<b>2,153</b>	<b>438</b>	<b>0</b>	<b>0.0</b>	<b>766</b>
<b>Total</b>	<b>198,241</b>	<b>-4.3 %</b>	<b>1,519</b>	<b>44,887</b>	<b>2,578</b>	<b>-95</b>	<b>18.6</b>	<b>119,353</b>

\* Includes all companies of the IFRS consolidation scope (according to RBI Annual Report 2023, pp. 241-244).

\*\* The change in total assets in local currency compared with 31 December 2022 is due to the euro exchange rates.

\*\*\* In full-time equivalents as of the reporting date.

## ➤ Sustainable finance in RBI

RBI's pivotal role means that its activities and business relationships impact the economy, environment and society, including human rights. Thus, it can provide negative or positive contributions to sustainable development. Only by knowing the impacts of our business activities on the environment and society can we pursue a serious policy of sustainability and align the company strategy with this goal. The sustainability impact of the core business of a bank is felt across a wide range of dimensions that comprise opportunities as well as risks.

### Impacts

The sustainability impact was analyzed for our portfolio in 2022 using the UNEP FI Portfolio Impact Analysis tool. This process involves the analysis of actual and potential impacts in the environmental, social and economic areas of the overall portfolio. First of all, impacts are identified to determine the key areas and define specific measures. The impact tool supports the alignment of the signatory banks' strategy and practices with the Sustainable Development Goals (SDGs) and the Paris Climate Agreement. As the portfolio did not change materially in 2023, the results are still up to date.

## Analysis of impacts (UNEP FI Impact Analysis)

The scope of the analysis included the business activities of consumer banking, business & corporate banking and the market positions in Central and Eastern European (CEE) countries. In business & corporate banking, the gross profit per sector and country, as well as the NACE code for the respective customers were analyzed. In the consumer banking business, the impacts of five banking products were analyzed. In the data collection process, industries with negative key sectors for the 38 impact themes in twelve impact areas were prioritized. For further information on the analysis, please refer to pages 56-60 of the Sustainability Report 2022.

The results of the analysis showed that the two main positive impact areas were financial services in general (public access to financial services) and growth in SMEs (development and value creation thanks to successful SMEs). Both areas had positive impacts on SDGs 8 and 9. The main negative impact areas relating to the largest proportion of the exposure were climate stability and circularity, including resource intensity and waste.



## Objective and implementation

Building on these results, the targets and measures for the central topics of "climate stability" and "circularity" were defined by the business areas. This was implemented in sectorspecific policies such as oil & gas and in the first phase for steel and real estate & construction, and will also be incorporated into future policies (e.g., for agriculture). The target-setting process is also supported by the science-based targets that were approved in 2022. To better address the negative impact on circularity, RBI has been an active member of the PRB Resource Efficiency and Circularity Target working group since 2022. An internal working group on circularity was also established in 2023. This convenes on a regular basis and develops cross-divisional objectives in line with the UNEP FI PRB requirements. Various stakeholder dialogues (see page 25 ff.) also took place to broaden expertise within RBI and define practical goals in the areas of climate stability and circularity.



As a result of the data analysis using the UNEP FI Portfolio Impact Analysis tool, two impact areas of strategic importance to RBI were identified that are relevant as material themes in all three business areas:

Climate stability/SDG 13, 7, 9 and 12  
Circularity/SDG 11, 12, 6, 7, 8, 9, 14 and 15

Sustainability targets were agreed at the level of RBI's Management Board and are also transparently disclosed in the Remuneration Report (see Remuneration Report on our website).

GRI 203-2

TCFD



## Main causes of the negative impact

As per the UNEP FI tool, the key causes of negative impacts are listed in the table below:

	Climate stability	Circularity
<b>A – Agriculture, forestry and fishing</b>		
01 Agriculture, forestry and related activities	x	x
<b>B – Mining and quarrying</b>		
06 Extraction of crude oil and natural gas	x	x
08 Extraction of stone and earths, other mining		x
09 Providing services for mining and extracting stone and earths		x
<b>C – Manufacturing</b>		
10 Manufacture of food and animal feed		x
11 Manufacture of beverages		x
12 Tobacco processing		x
16 Manufacture of wood, wicker, plaiting and cork goods (except furniture)		x
17 Manufacturing paper, cardboard and related products		x
19 Coking and oil refining	x	x
20 Manufacturing chemical products	x	x
21 Manufacturing pharmaceutical products	x	x
22 Manufacturing rubber and plastic goods	x	x
23 Manufacturing glass and glass products, ceramics, processing	x	x
24 Metal production and processing	x	x
25 Manufacturing metal products		x
26 Manufacturing data processing devices, electronic and optical products		x
27 Manufacturing electrical equipment		x
28 Mechanical engineering		x
29 Manufacturing motor vehicles and motor vehicle parts	x	x
30 Manufacturing other vehicles (e.g. railway rolling stock)		x
31 Manufacturing furniture		
<b>D – Electricity, gas, steam and air conditioning supply</b>		
35 Energy supply	x	x
<b>F – Construction</b>		
41 Structural engineering	x	x
42 Civil engineering		x
43 Building site preparation, construction installation and other finishing trades	x	x
<b>H – Transporting and storage</b>		
49 Land transportation and transport in pipelines	x	x
50 Shipping	x	x
53 Postal, courier and express services		x
<b>L – Real estate activities</b>		
68 Real estate and housing	x	x

List of sectors categorized by NACE codes. Sectors/industries that have a direct negative impact on climate stability and circularity are marked. If a sector is not marked, it either has no connection or only an indirect connection to these areas of impact.

The credit exposure for corporate customers and project finance, broken down by sectors, can be found in the Annual Report on page 202.

## Risks and Opportunities

PRB 1, 3  
TCFD Environmental, social and governance (ESG) risks can manifest themselves in negative financial impacts as well as reputational damage to RBI Group, its customers, other counterparties or assets RBI Group is invested in. These risks are viewed as cross-dimensional risks that can impact traditional risk types (market, operational, credit and liquidity risks) through risk-specific transmission channels.

ESG risks have a double impact on the financial institution's activity: outside in (ESG risks impacting the financed counterparts' activity) and inside out (the impact that financed counterparts' have from an ESG perspective). This is referred to as double materiality.

GRI 203-2 The global volume of new financing of sustainable financial instruments fell for the second year in a row to USD 1,326.1 billion in 2023 compared to USD 1,551.7 billion in 2022. Nevertheless, sustainable financing solutions remain an important part of the exchange with customers as well as in the financing transactions concluded. Long-term customer demand for products and services that combine social, environmental and economic criteria provides us with additional business opportunities in the field of sustainable finance. We see a great potential in supporting our customers on their transformation journey (e.g. by financing new technologies/improvements needed by customers to make their business model ESG-sustainable in the future) and increasing their literacy on the topic.

In addition, we at RBI believe that financial institutions play a central role in reorienting capital flows towards a more sustainable economy. RBI recognizes this responsibility as well as the growing business opportunity it provides, and offers a variety of different sustainable finance products and services for customers in different segments, such as corporate, retail and institutional clients.

## Management

### RBI risk management approach

GRI 201-2  
GRI G4-DMA  
(former FS2)  
ESG Pillar 3  
ER a, e, h, j, o  
ESG Pillar 3  
SR d, l

PRB 2, 5

RBI gears its business model to the high-level strategic goal of creating long-term value in line with the principles of responsible banking and regulatory requirements. In concrete terms, RBI identifies, acknowledges, and aligns the continuous development of its risk management approach with the additional risks originating from ESG.

While social and governance aspects are equally important, alongside regulatory requirements, we are focusing heavily on tackling climate and environment-related risks (transition and physical risks), not only via assessment at the counterparty level but also by considering the potential impact of those risks as observed when conducting internal and external climate stress tests.

This approach (including other measures that are described in further detail in this chapter) is used to enhance the existing classical four pillars of risk management on multiple operational levels:

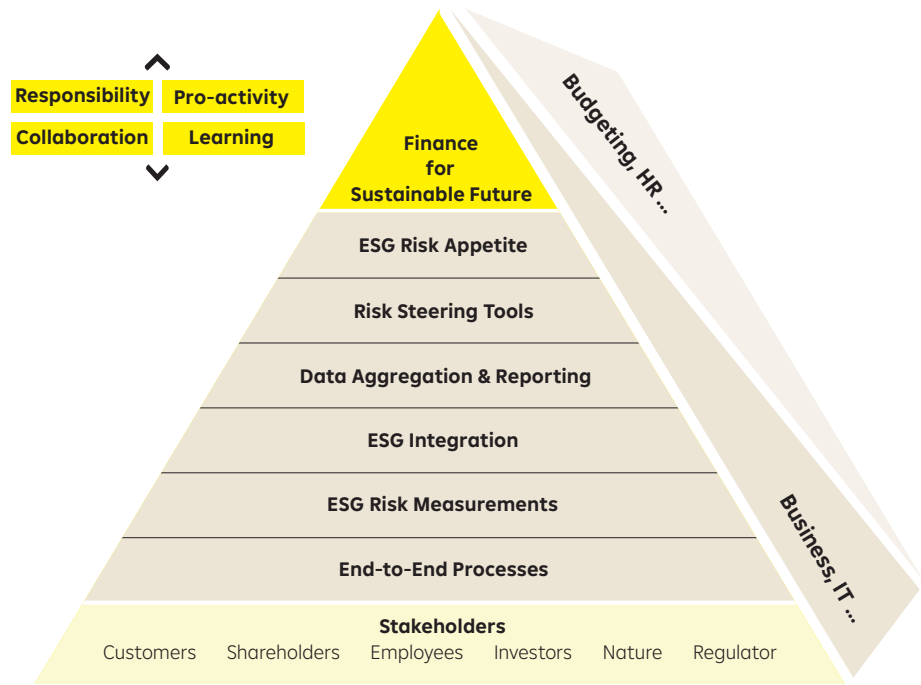
- identification and definition of ESG risks
- measurement, methodologies and analytics
- steering approaches, reflecting risks and opportunities, and
- risk processes and governance

As of 2024, all ESG-related topics in the CRO area will be addressed via the line organization, thus ensuring full integration into our daily activities.

Our aim is to always adhere to the regulatory requirements, while aligning our actions with the RBI business model. From a regulatory perspective, our efforts are based on the ECB guide on climate-related and environmental risks.



To illustrate the affected areas of the risk management framework, we have mapped the respective requirements in the following pyramid, which provides a concise overview of the steering set up within the risk area:



In addition to the existing efforts to minimize environmentally damaging activity, RBI has adopted sustainability and sustainable finance as a key topic. In line with the expectations of the market, the industry, and the supervisory authorities, we are integrating ESG risks into our processes.

When we talk about the classical four pillars of risk management, the cornerstone of the RBI Risk Management approach, RBI is currently focusing on addressing, quantifying, managing and, last but not least, integrating the respective risks, as well as the opportunities. Our progress is measured via the regular monitoring and establishment of internal ESG KPIs.

Within the respective pillars, actions will be further enhanced and developed in the short and medium term in line with market and regulatory expectations.

I. Identification & definition of ESG risks	II. Measurement methodologies & analytics	III. Steering approaches, reflecting risks & opportunities	IV. Risk processes and governance
<ul style="list-style-type: none"> <li>■ Climate-related and environmental risks</li> <li>■ Identifying risks according to:                             <ul style="list-style-type: none"> <li>✓ Climate-change</li> <li>✓ Circularity</li> <li>✓ Biodiversity</li> </ul> </li> <li>■ Social risks</li> <li>■ Governance risks</li> </ul>	<p>Use of metrics for measurement of ESG on a customer and portfolio dimension:</p> <ul style="list-style-type: none"> <li>■ Environmental, Social and Governance score</li> <li>■ Green Asset Ratio</li> <li>■ Financed GHG emissions</li> <li>■ Science-based targets</li> </ul>	<ul style="list-style-type: none"> <li>■ Sectoral strategies &amp; special policies</li> <li>■ Climate stress testing</li> </ul>	<ul style="list-style-type: none"> <li>■ Credit processes enhancement</li> <li>■ Prevention of liability, reputational and greenwashing risk in the design phase</li> </ul>

RBI tackles the above within the internal ESG Risk Framework. The framework serves as a high-level overview and guidance on the main undertakings started or planned on the risk management side, while fulfilling market and regulatory expectations (e.g. 13 ECB expectations from the ECB guide on environmental and climate-related risks); it is complementary to the enhancement of the classical four pillars of risk management. The framework is reviewed on a yearly basis and approved by the RBI's Management Board.

## I. Identification & definition of ESG risks

### I. Identification & definition of ESG risks

- Climate-related and environmental risks
- Identifying risks according to:
  - ✓ Climate-change
  - ✓ Circularity
  - ✓ Biodiversity
- Social risks
- Governance risks

Proper identification, definition and understanding of the risks at hand is of the utmost importance, and in the first phase RBI has particularly focused on climate-related and environmental risks, although S and G risks are also gaining increasing attention in internal risk initiatives. As a general approach to E risks, RBI distinguishes between risks associated with climate change (including transition risk arising from new regulations, changes in technology etc. and physical risk) and circularity (including resource efficiency and biodiversity). A qualitative and expert-driven approach has been employed initially and further substantiated via a quantitative assessment (covering impact analysis and materiality assessments, financed emissions calculations and climate stress tests). The definition of ESG risks and the transmission channels to traditional risk types are explained in more detail in the following chapter.

The knowledge gained is transferred across the organization (including all our subsidiaries) through organized training sessions (which are mandatory in the risk area) and regular ideas exchange workshops.

The financed emission calculation has reinforced the above-mentioned definition process and supported us in identifying the top carbon-intensive industries in our non-retail portfolio (published annually in the RBI Sustainability Report; a more detailed description and results are included under the section on measurement methodologies & analytics). See "Steering approaches, reflecting risks & opportunities" on page 86 for a more detailed description of how RBI integrates the results into its internal steering procedures.

## Definition of ESG risks

### Environmental risk

Climate and environmental risks are driven by environmental factors (E risks). In the outside-in view, these risks should be understood as the financial risks posed by RBI's exposures to counterparties that may potentially contribute to or be affected by climate change or adaption, and other forms of environmental degradation (such as air pollution, water pollution, scarcity of fresh water, land contamination, biodiversity loss and deforestation). Related to this, RBI Group and its customers have to comply with additional political and social demands, otherwise the portfolio of RBI Group may face additional risks relating to physical damage or transition.

As such, E risks can result in additional capital requirements, expenditures and potential losses of revenue, which may lead to a deterioration in the respective credit standing and therefore have an adverse effect on the business, financial position and results of RBI Group's operations.

### Social and governance risks

These risks are addressed in our internal risk framework, building on the existing structure and internal information.

At RBI, we are therefore continuously updating and refining our approach to enhance our positive impact and align ourselves with the latest industry standards.

- Social risks arise from the financial impact generated by the misuse of human capital, e.g. with regard to the rights, wellbeing and interests of people and communities. This could refer to working conditions, health and safety, employee relations and diversity, employee training, inclusiveness, equality or community programs.

With regard to all E, S and related topics, we also include the country-specific situation as well as the legal background. For example, countries with low (or high) standards in social aspects such as human rights have a lower (or higher) score. This also impacts the ESG score of the customer: identical corporates with different country of risk will not have the same ESG scores due to different country scores.



- Governance risks refer to the governance practices of RBI's counterparties, including the inclusion of ESG factors in policies and procedures under the governance of the counterparties. This may include, but is not limited to, executive pay, board diversity and structure, shareholder rights, bribery and corruption, compliance, ethical standards (e.g. data ethics), fair tax strategy etc.

Our internal ESG score model includes social and governance-related risks and assessments that are specifically related to human rights, diversity, transparency and corporate governance-related principles. In contrast, the internal governance (measurement and escalation process) of S and G risks is based on the exposure-weighted E,S and G score as described above (reflecting ESG risks within RBI's Group risk framework).

## Climate change – time horizon



For climate and environment-related risk, RBI differentiates between the impact expected in the short, medium and long term in line with the ECB guide on managing climate-related and environmental risks.

- Short term (up to three years) – risks mainly associated with transition risks (e.g. changes in legislation and regulation, changes in technology), i.e. the ability of companies and customers to achieve the transition to a low-carbon economy. RBI sees opportunities both from supporting our customers with financing, allowing them to achieve the transition to a low-carbon economy, as well as potentially increasing our financing directed at industries that are already green (e.g. renewables) and supporting industries that are contributing to the development of a circular economy.
- Medium term (more than three years, up to ten years) – risks driven by the paradigm shift in business models, the emergence of new technologies and continuous updating of regulations, with potentially increasing risks from a physical perspective (if CO2 reduction is not achieved as targeted). Both physical and transition risks will pose challenges. Technological risks can arise if innovations in connection with energy efficiency result in old technologies that RBI has invested in becoming outdated and unprofitable. On the other hand, investments in new technologies can also fail if they prove to be technically immature. Regulatory risk in connection with stricter environmental protection laws and regulations can also make existing investments less profitable or even unprofitable.

The withdrawal of many investors from the fossil energy sector, especially coal and carbon-dependent industries, is an indication that the corresponding assets of our customers or investees can be expected to fall in value over the medium term ("carbon bubble"). On the other hand, RBI sees a great opportunity in terms of investing in new technologies that are more likely to be profitable in the medium term (and divesting from coal).

- Long term (more than ten years) – challenges will come from physical risks, their impact on customers' business models and supply chains, as well as on their ability to mitigate and ensure that their repayment capacity is not severely affected. In the event of an insufficiently orderly climate transition, various long-term scenario analyses suggest large losses, particularly for carbon-intensive industries.

## Assessment of the materiality of climate and environment-related risks

ESG Pillar 3  
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ESG Pillar 3 SR m

To complement the impact analysis performed using the UNEP FI Portfolio Impact Analysis tool (see above, page 67 ff.), and in line with the ECB guide on climate-related and environmental risks (expectation 1), an extended annual risk assessment for climate and environmental risk drivers has been implemented within RBI's risk framework.

While the UNEP FI Portfolio Impact Analysis also considers the inside-out perspective, the materiality assessment described below focuses on the outside-in view: i.e. how the climate and environmental risks affect RBI's risk profile. The inside-out view, on the other hand, would additionally address how RBI's activities affect the outside world (including the financed emission calculation, as well as how science-based targets are measuring and mitigating the inside-out impact).

The additional risk assessment process has been established to identify the severity of environmental risk from applicable transmission channels within the current portfolio and over different time horizons. This multiple dimensional approach considers:

- A. different individual C&E risk drivers (physical risk, transition risk, other environmental risks)
- B. the impact of each C&E risk driver through risk-dependent transmission channels, assessed for each risk type (credit, market, operational and liquidity risk)
- C. the impact under different transition risk scenarios (orderly, disorderly, hot-house transition)
- D. the impact over different time horizons: short (less than three years), medium (three to ten years), long-term (more than ten years)
- E. the threshold for materiality that has been defined for each risk type (credit, market, operational and liquidity risk).

Risk assessment input includes, but is not limited to, the results of the climate risk stress test (performed using methodologies developed during the ECB climate stress test 2022) as well as a granular physical risk map from the external data provider Prometeia S.P.A.

#### Transition risk

With transition risk being defined as the risks related to the process of adjustment towards a low-carbon economy, the transition risk drivers represent climate-related changes that could generate, increase or reduce transition risks. They include changes in public sector (generally government) policies, legislation and regulation, changes in technology and changes in market and customer sentiment, each of which has the potential to generate, accelerate, slow or disrupt the transition towards a low-carbon economy. Looking one step further, the transmission channels are the causal chains that explain how climate risk drivers give rise to financial risks that impact banks directly or indirectly through their counterparties, the assets they hold and the economy in which they operate.

RBI has identified transmission channels in line with the BCBS (Basel Committee on Banking Supervision) paper on "Climate-related risk drivers and their transmission channels" (April 2021):

- **Credit risk**  
Credit risk increases if climate risk drivers reduce borrowers' ability to repay and service debt (income effect) or banks' ability to fully recover the value of a loan in the event of default (wealth effect). For the non-retail portfolio, macroeconomic and climate-related risk factors (e.g. carbon tax, emission trading system (ETS) expenses) are used to make sector-specific projections on production and operating costs which are "distributed" to the single borrower's financial figures (e.g. operating revenues, operating costs such as costs of goods sold and labor costs, additional costs relating to carbon tax, costs for green transitions etc.). Finally, the projected financial positions are used to simulate the projection of the probability of default in RBI's rating models for a materiality assessment.
- **Market risk**  
Climate and environmental risk drivers may have a significant impact on the value of financial assets. Transition-related changes in official sector policy, technological advances and investor sentiment can alter or reveal new information about future economic conditions, or the value of real or financial assets resulting in downward price shocks and an increase in market volatility in traded assets. For instance, the transition to a low-carbon economy may impact commodity markets, especially fossil fuels which are prone to transition risks. Transition risk could also lead to a breakdown in correlations between assets, reducing the effectiveness of hedges and challenging banks' abilities to actively manage their risks.

The impact of transition risk on market risk is assessed using internally-developed methodology. This covers both corporate and sovereign issuers, according to which risk levels are assigned to positions – based on the NACE code/ industry and risk country of the issuer.

Corporate exposures are linked to NACE codes/industries and risk levels are assigned based on the industry share of GHG emissions in the total risk country's GHG emissions. Sovereigns are linked to countries and risk levels are based on several factors: the industry's GHG emissions, gross value added, wages and salaries, social security costs, environmental taxes, and operational surplus and mixed income (net). The materiality on market risk is assessed based on the total loss in relation to the Group's common equity tier 1 (CET1).

- Liquidity risk

From a liquidity risk perspective, climate change transition risk can affect inflows from customers' loan repayments (due to lower creditworthiness) and the value of securities in the liquidity buffer. Liabilities and retail loans are not deemed vulnerable to transition risk. Meanwhile, if it is assumed that the transition risk is spread over a period of more than three months (i.e. a relatively gradual change in the legislative environment), the effect on liquidity risk is deemed negligible as it is expected that the balance sheet of RBI Group will gradually adapt to the change. If the risk realization period is less than three months, the effect will be more palpable and is approached using the same assumptions as for market risk in terms of the devaluation of securities in the liquidity buffer, and credit risk, in terms of decreased inflows from loans due to a higher default rate. The materiality is assessed on the basis of the liquidity buffer devaluations' relative impact on the time to wall.

- Operational risk

Corporates and banks may be exposed to increasing legal and regulatory compliance risk, as well as litigation and liability costs associated with climate-sensitive investments and businesses. Furthermore, climate-related lawsuits could target corporations as well as banks for past environmental conduct, whilst seeking to direct future conduct. The impact of this transmission channel has been assessed by the operational risk framework that is in place, as current expected losses are measured by analyzing historical data as well as identifying trends and forward-looking approaches. Operational risk is assessed on the loss in relation to the total revenue of RBI Group.

### Physical risk

Physical risk drivers are changes in both weather and climate that impact economies. Physical risks are expected to increase over a longer time horizon if the transition to a sustainable, net-zero economy is not successful (e.g. the hothouse world scenario). Physical risks can be classified as acute risks, which are related to extreme weather events, or chronic risks associated with gradual shifts in climate:

- Acute physical risks are generally considered to consist of: heatwaves, floods, wildfires and storms, including hurricanes, cyclones and typhoons, as well as extreme precipitation.
- Chronic physical risks include rising sea levels, rising average temperatures, and ocean acidification. Extended periods of increased temperatures may lead to the further development of chronic climate events, such as desertification. Similarly, extended periods of increased average temperatures could impact the ecosystem, especially agriculture. The way in which physical risks impact economies will vary depending on geographical location as different regions exhibit distinct climate patterns and levels of development. Some regions are expected to be more severely affected than others because they are more exposed and more vulnerable to specific types of weather disasters.

Like transition risk, physical risk can affect credit, market, liquidity, and operational risks through risk-specific transmission channels:

- **Credit risk**  
Physical risk drivers mainly impact banks' credit risk indirectly through their counterparties. The physical capital (housing, inventory, property, equipment or infrastructure) of households, corporates and sovereigns can be damaged or destroyed by physical hazards. This damage reduces the value of assets and, consequently, a counterparty's wealth. Physical risk drivers can also negatively impact the cash flows of the affected entities as damaged physical capital, such as impaired rental properties and factories, will generate less income. The damage may be caused by acute physical risks and chronic physical risks, such as rising sea levels. By mapping portfolio exposure to a physical risk map, while accounting for coping capacity at the country level (INFORM risk model), the materiality of this transmission channel is assessed. The physical risk assessment is based on a comprehensive set of climate change-related physical risk hazards: six that are classified as "acute" and eight as "chronic". Hazard severity is assessed on a spatial grid of 30x30 kilometers (or 1x1 km for flood risk), based on climatology modelling in the "orderly" and "hot house world" transition scenarios defined by NGFS (Network for Greening the Financial System) over a time horizon of up to 2050. Considering the large and diverse geographical footprint of RBI Group's activities, hazard data used as the basis of the assessment was provided by an external data provider, Prometeia S.P.A., to guarantee adequate geographical coverage and consistent physical risk measurement across regions that are of relevance to the Group.

The assessment of materiality has been performed as follows:

- In the first step, "relevant" locations corresponding to assets in scope are identified. For collateral assets, the address of the real estate is used to identify the location that is relevant to the physical risk assessment. For non-financial corporates (NFCs) lacking more representative data (address of the main operating facilities), the registration or headquarters address of counterparties is used as a proxy for the location at which hazard sensitivity is assessed.
  - In the second step, the physical risk sensitivity of each location is defined by a hazard-specific "synthetic physical risk indicator" (SPRI). The SPRI is allocated on a scale of 1 to 4, with 4 representing the highest risk and 1 the lowest. On the SPRI scale, very high represents a probability of occurrence > 10 per cent, high represents a probability ranging from 2 to 10 per cent, medium represents a probability ranging from 1 to 2 per cent and low represents a probability of less than 1 per cent.
  - In the next step, the results are adjusted by applying a vulnerability matrix, a tool developed by Prometeia S.P.A. that reflects the vulnerability of different economic activities or asset types to the same weather and climate conditions.
  - In the final step of the assessment, the coping capability of each region or country (or lack thereof) is considered. INFORM data is used for this purpose.<sup>1</sup>
- **Market risk**  
Physical risk may be sudden and severe, and have knock-on effects across regions and sectors through interconnected socioeconomic and financial systems. Physical risks emerging from climate change can cause market price fluctuations, such as more frequent and severe extreme weather events causing losses in equity prices due to the destruction of firms' assets or capacity to produce. Uncertainty about the timing, intensity and location of future severe weather events and other natural disasters may lead to higher volatility on the financial markets. Overall, the presence of physical risk may lead to a "classical" risk factor (e.g. an equity price or an exchange rate) being more volatile than historically observed, or being subject to severe jumps, diminishing the value of the financial instrument being traded. This transmission channel is assessed by mapping market risk exposure to a physical risk map, while considering historical losses and the impact on GDP.

<sup>1</sup> <https://drmkc.jrc.ec.europa.eu/inform-index/INFORM-Climate-Change/Methodology>

- Liquidity risk

With respect to the effect of physical climate risk on liquidity risk, the logic is similar to that applied to transition risk. If the risk event is spread over a significant period of time or does not have an immediate effect, this risk has a negligible impact on liquidity risk. If acute climate physical risks materialize, the following effects are possible:

- Devaluation of securities in the liquidity buffer (in line with the market risk assessment).
- Decrease in inflows from loans due to a higher default rate and higher rollover rate, combined with higher withdrawals of loans from credit lines. Customers, including those in the retail segment, use loans to cover damages caused by the event. Outflows from customers' liabilities arise due to the need to cover damage caused by the event. This effect is not straightforward, as if a bank has a significant market share and a diverse customer base, it is most likely that a customer who has suffered from the event would have to pay other customers (e.g. retail customers with damaged houses will pay for construction goods). In addition, the effect can be temporary in this case, as if the accounts are mainly in a customer's portfolio, inflows from insurance coverage will be reflected in the liabilities relatively soon after the potential decrease.
- The materiality of this transmission channel has been evaluated by analyzing the effect on the liquidity buffer under different interest and credit spread shocks, derived from the regional dependent physical risk score.

- Operational risk

Physical hazards can affect banks directly as operational risks. For instance, if physical hazards disrupt transportation facilities and telecommunications infrastructure, banks' operational ability may be reduced. The impact of this transmission channel has been assessed by extending the physical risk drivers to the operational risk assessment and scenario. In this scenario, business continuity management (BCM) costs are measured using scenario methodology, i.e. it is assumed that the physical risk may cause potential BCM events ("critical site not available" and "IT availability & continuity"). The locations for both the primary head office (HO) and data centers (DC) have been evaluated by the external data provider Prometeia S.P.A in terms of exposure to the climate and environmental risk drivers mentioned. The results of the scenario analysis did not reveal any severe impacts from those specific risk drivers.

In the materiality assessment 2023, with the cut-off date of 31 December 2022 and using the methodology outlined above, moderate transition risk was identified in the long term (>10 years) for credit and operational risk only. Transmission of other transitional and physical risks was assessed at a low level for RBI Group. The result of the assessment informs the ESG business strategy. Methodologies and input parameters for the risk assessment are expected to be further refined during the coming years as the methodologies and common methodologies evolve.

## Circularity

The topic refers in general to technological improvements and innovations aimed at eliminating waste and the continual use of resources. A circular economy employs re-use, sharing, repair, refurbishment, re-manufacturing, and recycling to create a closed-loop system, minimizing the use of resource inputs and the creation of waste, pollution, and carbon emissions.

Financial risk materializes as new technology displaces old systems and disrupts some parts of the existing economic system via the value chain. One example is the transformation of the automotive industry, where automotive producers are becoming end-to-end providers of mobility thanks to the emergence of a sharing economy and the development of electric vehicles with a longer useful life, among other aspects.

RBI Group sees this as a medium-term risk for companies that cannot adapt and may lose their competitive advantages, while it is also viewed as a short-term opportunity to onboard new sectors and companies that still offer future potential.

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From a risk perspective, topics relevant to circularity have already been included in the E score on several levels:

- Investments in waste management/treatment
- biodiversity considerations
- resource management and resource reduction targets.

From a steering perspective, as an important component of the total ESG score, the E score is already reflected in the way we cluster our customers and have set up the underwriting process to include the ESG component. As a result, circularity also plays an indirect role. Further developments in this area will be considered in 2024, as further quantitative KPIs may be needed.

## Biodiversity

Loss of species, deforestation, and ecosystem degradation in particular increase the risk of emerging zoonotic diseases, i.e. the transmission of infectious diseases between animals and people or in particular from animals to people. For this reason, RBI's current framework already includes the bank's view on biodiversity loss and the potential risks that may arise from it. Even though developments on the topic are still at an early stage, especially when it comes to the transmission channels at the macro and micro levels and, consequently, the classical types of risks, we have started to build knowledge in this area given the complexity of the topic.

The focus is on the financial risks of biodiversity loss and land degradation triggered by human activity. In addition to climate change that can destabilize ecosystems, other risks require to be considered:

- insive species, whereby animals or plants have been moved to places where they damage existing ecosystems
- land use change, such as cutting down a forest to make way for agriculture or human habitat (encroachment)
- overexploitation of natural resources, whereby a resource is used up more quickly than it can be replaced, e. g. overfishing
- pollution of air, land or water.

In order to ensure further developments in this area, RBI is participating as a business case partner in a biodiversity-related project, which is being co-financed by the European Commission. In the first step, we will start by developing a biodiversity-focused materiality assessment in 2024, the conclusions of which will be reflected accordingly by our internal steering.

## II. Measurement methodologies & analytics

GRI G4-DMA  
(former FS3)

TCFD



### II. Measurement methodologies & analytics

Use of metrics for measurement of ESG on a customer and portfolio dimension:

- Environmental, Social and Governance score
- Green Asset Ratio
- Financed GHG emissions
- Science-based targets

The second pillar revolves around data creation, collection, and sourcing. This has been identified as one of the main challenges both by most of the market participants and by the regulator in its surveys. Though, RBI also sees it as an opportunity to support our customers in their transformation journey (e.g. by financing new technologies/ improvements that are needed by customers to make their business model ESG-sustainable in the future) and increase their literacy on the topic. Educating and making this journey with our customers is an act of responsibility that RBI takes very seriously in its daily business.

The measurement tools that RBI uses support us both in our internal steering (i.e. portfolio and customer assessment, GHG (greenhouse gas) footprint and science-based targets) and in the fulfillment of external disclosure requirements (e.g. Green Asset Ratio).



## ESG customer score

For corporate customers as well as for project finance transactions, RBI has developed an ESG customer score by measuring the impact of ESG-related risk through individual scores. The ESG customer score is used to:

- a) assess the ESG performance of our customers
- b) assess the mid- to long term-related risk arising from customers' ESG behavior
- c) identify customers with a restrictive, transformative or supportive ESG performance and draw conclusions for our underwriting decisions on certain customers.

The ESG score is based on the following components:

- **Environmental:** measures the impact of transition risk and physical risk; focus areas are to support net zero, the circular economy and biodiversity; in addition, we are able to identify those customers that we want to support further: either on their way to a low-carbon economy, as a contributor to the circular economy, or due to their low impact/enabling function vis-à-vis the environment (already green industries).
- **Social:** capturing social risks at the customer level and identifying those with a negative impact on society and/or that contradict RBI's internal societal standards and reflect negatively on our reputation. Positive impacts will also be considered and potential support for such customers may subsequently be envisaged. Compliance with existing health and human rights regulations is already taken into account. A more extensive update of the ESG scoring model was performed throughout 2023 in relation to human rights. As of late 2023 onwards, RBI will take a closer look at the following areas relating to our customers:
  - social/human rights-related code of conduct and supplier screenings
  - minimum safety standards in the work environment
  - appropriate business behavior
  - supporting diversity and educational aspects at the employee level.
- **Governance:** governance-related risks at the customer level are measured by scoring questions on transparency, business ethics, diversity, strategy and risk management, specifically at the top management level.

The ESG customer score is based on individual assessments by internal analysts. Qualitative and quantitative information on E, S and G criteria is used to evaluate the customer. The ESG score is determined for all corporate credit customers.

In late 2023, RBI also rolled out ESG score models for other non-retail areas, namely financial institutions as well as national, local and regional governments.

In addition, a reputational risk score is calculated for all corporate credit customers based on individual assessments. Specifically, E, S and G-relevant data are used to identify potential greenwashing and to assess whether cooperation with certain entities could lead to reputational damages or risks for RBI.

## Customer data collection

To support the development of internal ESG customer scoring, the continuous improvement of the financed emissions (as described above in the report) and internal steering decisions, we place a strong emphasis on data quality; for this purpose, we have developed a customer questionnaire allowing us to collect relevant environment-related information directly from our customers. As social and governance-related questions have already been included in the regular rating process, we have focused on the challenge of data collection for environment-related topics.

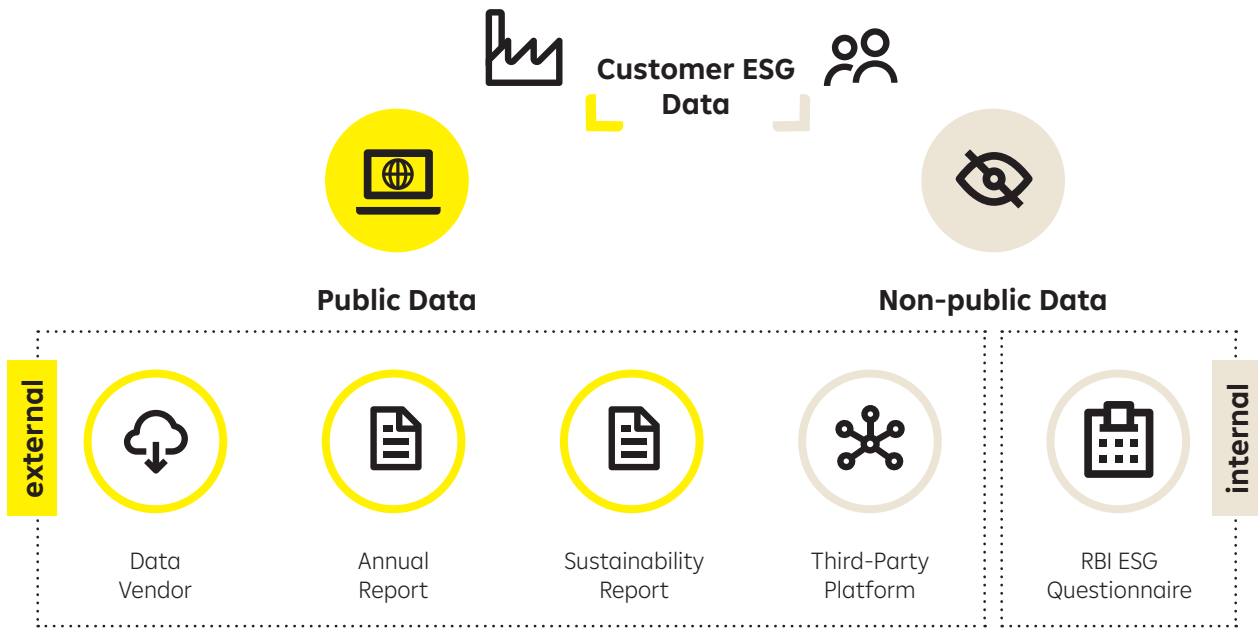
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ESG Pillar 3  
SR b, d, e, h-l



ESG Pillar 3  
ER p

In addition to meeting regulatory requirements, we strive to make data collection as easy and convenient as possible for our customers and are aligning with our peers on the content of the questionnaire. We have already achieved such alignment in our home market of Austria, where we continue to use the OeKB ESG Data Hub for all Austrian customers, and are supporting similar alignment and cooperation across our other markets (where we are now using an in-house questionnaire). In some of our network countries, national standards have been developed for the questionnaire-based collection of ESG data. These solutions are based partly on harmonized questionnaires, which are implemented individually by each bank, and partly on digital platforms where companies can enter their ESG data for subsequent retrieval by banks, which is comparable to the Austrian model of the OeKB ESG Data Hub.

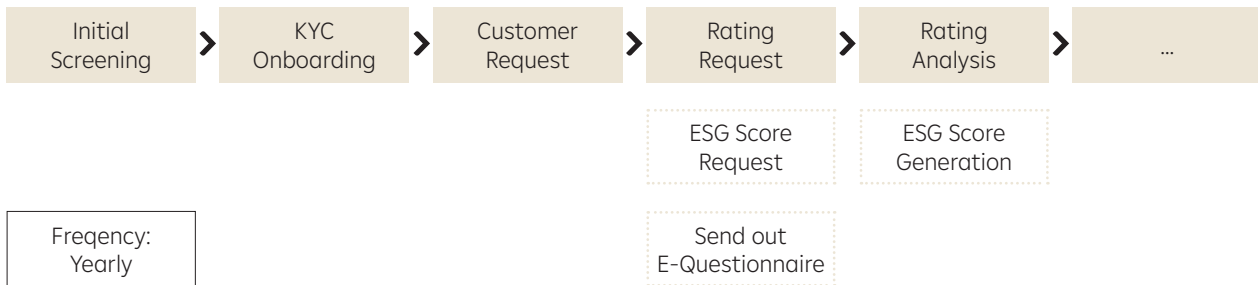
In summary, overall ESG data collection is anchored in both publicly available data and direct customer data, as shown in the illustration below.



Our own ESG questionnaire covers the main environmental aspects, i.e.

- GHG emissions
- Circular economy
- Energy consumption
- Water consumption

"Social" and "Governance"-related information is gathered both from annual reports and sustainability reports.



In 2023, we adapted the approach to ESG data collection – from focusing on customers with the highest ESG priority to an approach that is aligned with the rating process. In addition to the package of financial data, ESG data is now also requested, which is then included in the ESG customer score and used for regulatory disclosure. Examples of KPIs requested from the customer are as follows:

- GHG Scope 1, 2, 3 emissions
- share of Taxonomy-eligible and Taxonomy-aligned economic activities in total turnover (revenue) and (CAPEX)
- share of water sources in water-stressed areas

## Environmental metrics and ambitions

### Green Asset Ratio

The Green Asset Ratio is taken into account in the measurement methodologies and analytics. Details can be found in the chapter entitled "Regulatory disclosure requirements pursuant to Article 8 of the EU Taxonomy Regulation", see pages 219–240.

### Financed GHG emissions 2023

Since 2020, RBI has calculated and published its Scope 3 category 15 financed GHG emissions, i.e. the indirect downstream emissions associated with its lending and investment activities. This was an important step in identifying sectors on which to focus our efforts to mitigate the negative impact on the environment of our customers' activities. It was also the first important step for setting science-based targets, which were officially validated in September 2022, and are covered in the next section.

The methodology applied is based on the "PCAF Standard" – the most widely accepted, GHG Protocol-compliant standard for financed emissions calculations.

Compared to last year, we have enlarged the scope of our calculations materially by including the following for the first time:

- Scope 3 relating to our customers in our financed emissions calculations, to include our customers' indirect upstream and downstream emissions
- a first estimation of financed "production emissions" associated with the "sovereign debt" asset class.

An overview of the PCAF asset classes<sup>1</sup> in scope for the YE 2023 calculations is provided below, with an indication of the coverage achieved in each asset class. Coverage of less than 100 per cent is the result of data gaps.

PCAF asset class	Total gross carrying amount (in € billion)	of which covered O/B exposure (%)
Business Loans and unlisted equity	54.00	92 %
Project finance electricity generation	0.01	98 %
Project finance real estate	7.44	89 %
Listed equity and corporate bonds	7.66	54 %
Sovereign debt	21.77	100 %
<b>Total</b>	<b>90.88</b>	<b>91 %</b>

The PCAF asset classes of mortgages – which requires a technical enhancement to calculations to include property data that we have started collecting – and motor vehicle loans, which are non-material to our overall portfolio, are still outside the scope of the calculations.

<sup>1</sup> An overview and explanation of PCAF asset classes can be found in The Global GHG Accounting and Reporting Standard for the Financial Industry (carbonaccountingfinancials.com).

In total, RBI-financed GHG emissions calculations covers 30 per cent of the Group's total assets and 48 per cent of total lending and investment activities. This corresponds to an increase in coverage of 4 percentage points and 1 percentage point, respectively, compared to 2022.

The PCAF Standard sets out requirements for determining the portion of customers' emissions that can be attributed to a financial institution. Customer-specific GHG emissions data has been used in the calculation where available. This data allows a more precise assessment of financed emissions, but availability is still limited. Around 29 per cent of total financed GHG emissions have been calculated based on such data (YE 2022: 24 per cent), while the remainder had to be estimated based on methodologies set out in the PCAF Standard. We launched an extensive data collection exercise to support us in our endeavor to constantly improve the quality of our calculations in order to better tailor our steering efforts.

GRI G4-DMA  
(former FS3)

Estimates for borrowers'/investees' Scope 1, Scope 2 and Scope 3 emissions are derived using "emission factors", representing average (physical or economic activity-based) emissions intensity values for specific industries and countries. As of last year, our main source of emission factors is the PCAF database.

The evolution of RBI-financed emissions over the past three years is shown in the table below. The comparison is limited to the customers' Scope 1 and 2 emissions and asset classes (project finance, business loans and unlisted equity/participations, listed equities /participations and corporate bonds) covered so far. Avoided emissions are reported separately "below the line" as, in line with the GHG Protocol, there is no netting with positive emissions from the portfolio. As the name suggests, avoided emissions are those that have been avoided by investing in renewable energy projects, compared to the emissions that would have been created in the absence of the respective project.

As we can see, despite a material increase in the on-balance ("O/B") exposure covered (+6.7 per cent year-on-year), customers' Scope 1 and 2 emissions show a decrease of 7.9 per cent. One of the reasons for this was that more customer specific GHG emissions data was available for the GHG calculation. Methodological changes such as the use of balance sheet exposure before securitization and the classification of non-commercial public sector companies as companies were made. The PCAF parameters from 2022 were still applied. The value for the quality of PCAF data (PCAF Data Quality Score) shows an improvement to 3.5, which resulted from the aforementioned increased availability of customer specific GHG emissions data. Further improvements in data quality are reflected in the segmentation of the PCAF asset classes.

GRI G4-FS6



PCAF asset class	PCAF data quality score (Scope 1+ Scope 2)		Covered on-balance exposure (in € billion)			Financed emissions (Scope 1 + Scope 2) (in million tCO <sub>2</sub> e)			Intensity (Scope 1 + Scope 2) (tCO <sub>2</sub> e/million €)		
	2023	2022	2023	2022	2021	2023	2022	2021	2023	2022	2021
Business loans and unlisted equity	3.6	3.7	49.62	47.02	44.49	8.39	9.07	11.00	169.07	192.93	247.23
Project finance, electricity generation	3.0	3	0.01	0.00	0.03	0.00	0.00	0.03	435.65	494.98	1,058.25
Project finance, real estate	4.0	4	6.63	4.87	3.94	0.16	0.09	0.16	24.46	17.99	40.11
Listed equity/participation and corporate bonds	3.5	3.3	4.13	4.69	4.89	0.65	0.84	0.47	158.16	178.65	96.01
<b>Total/weighted average</b>	<b>3.6</b>	<b>3.7</b>	<b>60.39</b>	<b>56.58</b>	<b>53.35</b>	<b>9.21</b>	<b>10.00</b>	<b>11.66</b>	<b>152.48</b>	<b>176.69</b>	<b>218.49</b>
Project finance, electricity generation – avoided emissions	3.0	3	0.35	0.19	0.12	0.19	0.09	0.03	536.21	442.49	296.9

The table below shows the results of our financed emissions calculations including customers' Scope 3 emissions for PCAF asset classes "business loans" and "equity/participations and corporate bonds" for the mandatory sectors specified by the PCAF standard<sup>1</sup>. We would like to highlight that, to some extent, the Scope 3 financed emissions imply double-counting of emissions in a bank's portfolio. This is because some of our customers' Scope 3 emissions will already be accounted for in the Scope 1 and 2 of other RBI Group customers as long as the latter are part of the former's value chain –either upstream (as suppliers) or downstream (as customers).

<sup>1</sup> Sectors covered are energy (oil & gas) and mining plus transportation, construction, buildings, materials, and industrial activities.

PCAF asset class	PCAF data quality score		Covered on-balance exposure (in € billion)	Financed emissions (in million tCO <sub>2</sub> e)		Intensity (tCO <sub>2</sub> e/million €)	
	Scope 1+ Scope 2	Scope 3*		Scope 1+ Scope 2	Scope 1+ Scope 2	Scope 3*	Scope 1+ Scope 2
Business loans and unlisted equity	3.6	3.6	49.62	8.39	6.97	169.07	563.73
Project finance, electricity generation	3.0		0.01	0.00		435.65	
Project finance, real estate	4.0		6.63	0.16		24.46	
Listed equity and corporate bonds	3.5	2.2	4.13	0.65	0.89	158.16	2,092.81
<b>Total/weighted average</b>	<b>3.6</b>	<b>3.5</b>	<b>60.39</b>	<b>9.21</b>	<b>7.86</b>	<b>152.48</b>	<b>590.33</b>
Project Finance, electricity generation - avoided emissions	3.0		0.35	0.19		536.21	

\*Scope 3 emissions were not calculated for the following PCAF asset classes: Project Finance Power Generation, Project Finance Real Estate, Project Finance Power Generation - Avoided Emissions. The corresponding cells were therefore not filled in the table.

Like many of our peers, we are working to stabilize the data quality, calculation platform and scope of our financed emission calculations. We also understand that data quality and stability are not exclusively driven by our own efforts, but also reflect the soundness and comprehensiveness of the data we depend on, namely customers' own disclosures and external databases. We expect corporate disclosures to progressively converge towards best practice and provide the most comprehensive coverage, supported by the improved harmonization of reporting requirements.

Top 10 industries by financed emissions contribution within the asset classes of "business loans and unlisted equity" and "equity and bonds" are reported in the table below.



GICS industry group (excluding project finance)	Total gross carrying amount (in € billion)	Covered on-balance exposure (in € billion)		Financed emissions (in million tCO <sub>2</sub> e) (Scope 1+ Scope 2)		Intensity (tCO <sub>2</sub> e/million €) (Scope 1+ Scope 2)		Financed emissions (million tCO <sub>2</sub> e) (Scope 3)
		2023	2022	2023	2022	2023	2022	
Metals & mining	2.62	1.85	2.23	1.31	1.41	706.29	632.47	0.72
Food products	3.84	3.53	3.33	1.22	1.34	344.61	402.46	0.83
Oil, gas & consumable fuels	1.32	1.31	1.16	0.99	1.76	756.16	1,512.93	1.15
Chemicals	1.57	1.55	1.73	0.87	0.82	560.47	475.73	1.34
Construction materials	0.56	0.55	0.65	0.74	0.69	1,332.09	1,068.17	0.10
Electricity suppliers	0.94	0.94		0.59		627.06		0.02
Independent power suppliers & renewables	0.72	0.71	0.88	0.46	0.09	643.99	100.12	0.00
Trading companies & distributors	2.87	2.70	2.57	0.26	0.25	97.00	95.81	0.04
Paper and forest products	0.81	0.79	0.78	0.25	0.09	322.74	119.43	0.13
Multi-utilities	0.75	0.75	0.81	0.25	0.45	335.70	551.47	0.00
Other suppliers	45.67	39.07	37.59	2.10	3.02	53.84	80.24	3.53
<b>Total (without project financing)</b>	<b>61.66</b>	<b>53.75</b>	<b>51.72</b>	<b>9.04</b>	<b>9.91</b>	<b>168.23</b>	<b>191.63</b>	<b>7.86</b>
Project financing	7.45	6.64	4.87	0.17	0.09	25.04	18.35	0.00
<b>Total</b>	<b>69.11</b>	<b>60.39</b>	<b>56.59</b>	<b>9.21</b>	<b>10.00</b>	<b>152.48</b>	<b>176.69</b>	<b>7.86</b>

The top ten sectors by total financed emissions contribute to 75 per cent or 6.94 million tCO<sub>2</sub>e of the financed Scope 1 and Scope 2 emissions. The balance sheet exposure covered by the same ten sectors amounts to 24 per cent or € 14.7 billion of the total exposure.

The table below details the first estimations of the financed emissions associated with the exposure mapped to the PCAF asset class of "sovereign debt" – the last to be covered within the PCAF calculation standards.

In total, we included a portfolio of € 21.8 billion, corresponding to lending and securities exposure towards governments irrespective of maturity and currency. As sovereign bond exposure typically fulfils a special purpose for financial institutions due to its liquidity, the scope for carbon footprint management by reallocating sovereign exposure is limited by the requirement to maintain high-quality liquidity buffers.

Scope 1 emissions	PCAF data quality score	Number of Countries covered	Covered onbalance exposure (in € billion)	Financed emissions (Mio. tCO <sub>2</sub> e (Scope 1))	Financed intensity (tCO <sub>2</sub> e/million €)
Including land use, land use change and forestry	1.26	51	21.8	5.10	234.15
Excluding LULUCF*	1.26	50	21.8	5.51	253.06

\* Land Use, Land Use Change and Forestry.

In line with the requirements, we are disclosing Scope 1 "production emissions" twice, with the first calculation including the net effect of the land use, land use change and forestry sectors, while this effect is excluded in the second calculation. The results obtained amount to 5.10 million tons of CO<sub>2</sub>e if the net effect of LULUCF is included, and 5.51 million tons of CO<sub>2</sub>e if these sectors are excluded.

Emission factors were primarily sourced from the PCAF Database<sup>1</sup> and represent the emission intensity of the countries' respective economies (GDP expressed in purchasing power parity terms). The high data quality score achieved reflects the good quality of the underlying data, obtained directly from the GHG inventories that countries are required to regularly maintain<sup>2</sup>. It is also important to highlight that, to some extent, the sovereign emissions can be expected to overlap with those of our corporate portfolio, providing activities at the source of the corporate emissions are located in countries and sectors covered by the national GHG inventories.

## The way forward – science-based targets

RBI's science-based targets were approved in September 2022 and represent an important tool supporting the Group's portfolio steering towards financing activities that are compatible with the Paris Agreement goals. Achievement of science-based targets will also contribute to fulfilling the commitments linked to RBI Group's status as a signatory of the Principles of Responsible Banking. The table below provides a compact overview of the targets and key metrics as published on the Science Based Targets initiative website.

Sectoral decarbonisation targets (SDA* approach)	Timeline	Targets alignment	Calculated target (well-below 2°C)
Commercial real estate (Corporate Loans)	<b>Target year 2030</b> Revalidation & recalculation in five years	well-below 2°C scenario	56 per cent reduction in GHG emissions per m <sup>2</sup> by 2030 (base year: 2020)
Electricity generation (Corporate Loans)	<b>Target year 2030</b> Revalidation & recalculation in five years	well-below 2°C scenario	47 per cent reduction in GHG emissions per MWh by 2030 (base year: 2020)
Electricity generation (Project Finance, incl. Renewable Energy)	<b>Target year 2030</b> Revalidation & recalculation in five years	well-below 2°C scenario	48 per cent reduction in GHG emissions per MWh by 2030 (base year: 2020)
Portfolio targets (Temperature rating approach)	Timeline	S1+S2 customers' emissions (well-below 2°C)	S1+S2+S3 customers' emissions (well-below 2°C)
Corporate loan: other long-term debt	<b>Target year 2027</b> Revalidation & recalculation in five years	2.74°C portfolio temperature score by 2027, from current 3.20°C (base year: 2021)	2.82°C portfolio temperature score by 2027, from current 3.2°C (base year: 2021)
Listed equity and corporate bBonds			

\* Sectoral Decarbonization Approach as described in the Financial Sector Science-Based Targets Guidance V.1.1

<sup>1</sup> with the sole exclusion of one country for which data had to be sourced from a publicly available IMF paper.

<sup>2</sup> Parties to the Paris Agreement are required to regularly submit a national inventory report (NIR) of anthropogenic emissions by sources and removals by sinks of greenhouse gases (GHGs).



We use two types of targets: sectoral targets and portfolio targets.

Sectoral targets are set for the portfolio, corresponding to the Group's commercial real estate and electricity generation financing activities. For these portfolios, targets have been calculated using the Sectoral Decarbonization Approach (SDA). This is a scientifically informed methodology developed for homogeneous sectors that takes into account the emissions scenarios set out by the International Energy Agency. The SDA methodology derives the physical emission intensity<sup>1</sup> pathway that is compatible with limiting global warming to well below 2°C.

SDA targets cover a minority of our Scope 3 category 15 emissions. In total, SDA portfolios represent 13 per cent of exposure covered by financed emissions calculations and 4.7 per cent of RBI Group's total assets as of year-end 2022. Due to the small size of the financing activities within these portfolios (project finance – commercial real estate, project finance – electricity generation and corporate loans – electricity generation), the results are most sensitive to what remains a developing landscape of financed emissions calculations. We share these data challenges with most peers, as reflected by the frequent restatement of figures. We therefore abstain from disclosing the overly positive progress results obtained for these portfolios as we believe they do not necessarily reflect actual changes in the portfolios' characteristics, but are driven by changes in the data used for the calculations in 2022 vs the base year and the continuously substantial data gaps. We have established an internal timeline for upgrading our financed emissions calculations further and filling external data gaps so that we can review our SDA targets in the course of 2024 and ensure they provide sound guidance for steering the portfolios.

Portfolio targets have been set using the "temperature rating" methodology, an "engagement-oriented" approach whereby the progress of the temperature rating of the RBI portfolio, down from a default value of 3.2°C, depends on our customers' ambitions in setting their own decarbonization targets.

Temperature rating targets are the most material as they cover the majority of the portfolio for which financed emissions are calculated. As of year-end 2022, the on-balance exposure within this approach equaled € 66 billion (87.7 per cent of total exposure covered by financed emissions, and 31.8 per cent of RBI Group's total assets).

As per the initial approval, we calculate the portfolio temperature broken down into product type (PCAF asset classes of "corporate loans" and "listed equity and corporate bonds"), with the first calculation taking only Scope 1 and 2 emissions and targets of investees into account, while the second calculation also includes their Scope 3 emissions and targets. The results for FY 2022 are reported in the table below.

Asset class	Total on-balance exposure under temperature rating approach (in € billion)	Temperature score – S1 and S2 of clients in °C	Temperature score – S1, S2 and S3 of clients in °C
Corporate loans	58.12	3.11	3.20
Listed equity and corporate bonds	7.52	3.12	3.20
<b>Total exposure under temp. rating approach</b>	<b>65.64</b>		

Find more at:  
[www.raiffeisen.com/en/raiffeisen/sustainability-esg/responsible-banking/science-based-target.html](http://www.raiffeisen.com/en/raiffeisen/sustainability-esg/responsible-banking/science-based-target.html)

Since the targets' approval, in the course of 2023 RBI developed a step-by-step approach for its temperature rating customer engagement. In the first step, we focused on data analysis and the selection of the top contributing customers to RBI's temperature rating, prioritizing the highest contributing customers, out of which an initial customer engagement proposal was developed in conjunction with the respective Industry Leads within RBI's Corporate Customers division. This involved a two-fold approach: 1) identifying customers with existing CO<sub>2</sub> reduction targets that we are aware of, but who lack the relevant data required for the temperature rating calculation tool; 2) identifying customers with whom we will enter into an engagement process, informing them about our SBTi targets and flagging the importance of CO<sub>2</sub> reduction targets going forward. For 2024, we plan to further implement ownership of the customer engagement plan within RBI. We believe that a material impact can be achieved by engaging and supporting customers in their own target-setting and implementation journey, rather than shifting business towards customers who are already aligned with the Paris Agreement goals – especially considering the geographical footprint of RBI Group's operations and its focus on regions in which environmental topics may not rank as highly in the political agenda as in western European countries. We understand that this is a lengthy process, whose outcome will only

<sup>1</sup> Emission intensity metrics are sector-specific: kg CO<sub>2</sub>e/m<sup>2</sup> is used for the commercial real estate sector; tCO<sub>2</sub>e/MWh is used for electricity generation.

become visible with a time lag, and that achievement of our goals is dependent on customers' own actions as well as data quality.

The table below provides an overview of the data behind the temperature rating calculations. It is clear that the largest portion of the portfolio is covered by the default temperature value (3.2°C), whereas we were able to use customers' target data for only 32 per cent of the total exposure within the scope of the temperature rating methodology.

Data is shown below for the whole temperature rating portfolio, followed by separate data for corporate loans and listed equity & bonds:

Target caclulations based on:	CO <sub>2</sub>	EUR
Publicly disclosed data	12 %	5 %
Default data	88 %	95 %

### III. Steering approaches, reflecting risks and opportunities

**III. Steering approaches, reflecting risks & opportunities**

- Sectoral strategies & special policies
- Climate stress testing

As a leader in our markets, RBI has a responsibility to redefine and reshape our business in line with the latest market and regulatory requirements. We have already made commitments in the areas of thermal coal, nuclear power, arms and war material, and gambling. We have also been working to (re)define our approach to industries with high CO<sub>2</sub> emissions and/or high negative impacts on circularity and biodiversity by further developing sector-specific Group policies.

As things stand, we have completed the Oil & Gas exclusion policy (which has been published) and the first phases of the Oil & Gas, Steel and Real Estate & Construction sectoral business policies – involving the ESG clustering of corporate customers. The second phase of these policies includes operational targets and engagement criteria. In this sense, the Oil & Gas policy was finalized in 2023 and the Steel and Real Estate & Construction policies will be finalized in the first half of 2024. All approved policies will be made available to all employees involved, while additional information sessions will be provided upon initial approval and as required. From a social perspective, we have also defined our approach to tobacco through a specific policy.

During 2023, the method of clustering customers was changed; instead of the expert-driven approach, we started to use a model-driven approach that is based on the customers' assigned ESG scores. This approach consists of several components including, but not limited to, the status of reduction targets, measurement of companies' carbon emissions and energy consumption. Based on this approach, customers in a specific industry with the top third scores are considered „supportive“, the third in the middle are considered „transformative“, and the worst third are considered „restrictive“. Such scores are based on a minimum and maximum score in a certain industry, and the clustering score ranges vary from one industry to another one. While we will encourage „transformative“ customers to become „supportive“, we will also work with „restrictive“ customers to move them to „transformative“ or higher status; if such transformation does not occur, „restrictive“ customers will be subject to potential attrition and exit processes. Efforts to use more quantitative measures and implementations will continue to be our focus in 2024. In addition to our commitment to the Science Based Targets initiative, we will continue to focus on quantitative measures (e.g. restrictions, further CO<sub>2</sub> reduction targets and resource efficiency targets). The development of the sectoral strategies is a joint effort between Business, Risk, Strategy and GESM, as well as Supervisory Affairs and Regulatory Governance departments.

GRI 2-23, -24  
GRI 4-DMA (former FSI)  
ESG Pillar 3 ER d  
ESG Pillar 3 SR c  
TCFD



## Thermal coal

RBI has made a commitment to significantly reduce its carbon finance portfolio, i.e. its total assets relating to thermal coal and thermal coal trading. The business policy prohibits transactions – with the exception of green products – involving companies that generate more than 25 per cent of their revenues from thermal coal mining. The same applies to energy and trading companies. No new lending exposures are to be entered into with such customers and their outstanding balance must be repaid by 2030 at the latest. Furthermore, RBI has undertaken to no longer provide new financial services to new or existing thermal coal power plants or mines from 2021 onward, nor will it directly participate in (re-)financing for such companies.

## Oil and gas

RBI published its Oil & Gas exclusion policy in June 2022.

Based on the policy, RBI defined exclusions on a) Arctic oil & gas activities, b) tar sands oil, c) fracked oil & gas, d) ultra-deepwater mining/offshore drilling, e) liquefied natural gas (LNG) fed by shale gas, ultra-deepwater gas, or Arctic offshore drilling gas, and f) other exclusions including, but not limited to, the immediate exclusion of any Amazon oil.

Exclusions and thresholds for such exclusions can be viewed in the policy that is available on our homepage.

In addition to the exclusion policy, RBI is working on an Oil & Gas sectoral business policy. This policy will be applicable Group-wide and includes the following focus areas:

- redefining supportive, transformative, and restrictive customers in the Oil & Gas industry based on the new ESG scoring methodology
- setting operational targets, and
- establishing engagement criteria with customers based on their ESG cluster.

The policy was implemented before the end of 2023.

## Steel

RBI Group fully supports the transition towards zero carbon and the circular economy, but at the same time the Group acknowledges that steel production will continue to play a key role in overall global commodity production in the medium (2030) and long term (2050).

The first phase of the sectoral business policy for Steel was finalized in November 2022.

The second phase of the Group's policy:

- redefines supportive, transformative and restrictive customers in the steel industry based on the new ESG scoring methodology
- sets operational targets, and
- establishes engagement criteria with customers based on their ESG cluster.

The policy will be implemented in the first half of 2024, while the engagement criteria and operational targets were finalized in December 2023.

## Real estate and construction

RBI Group acknowledges that the real estate and construction industries will continue to play a key role in the overall global economy. In alignment with the GHG reduction targets, RBI Group is working on a sectoral business policy on Construction and Real Estate. The first phase of the policy, which focused on preparing a status-quo of our portfolio and classifying customers based on their ESG performance, was finalized in 2023. Currently, during the second phase of developing the policy for the construction and real estate sectors, we are focusing on refining the engagement criteria and setting operational targets, which will make the implementation of the policy more viable and measurable.

Find more at:  
[www.rbinternational.com/en/raiffeisen/rbi-group/leadership-governance/compliance.html](http://www.rbinternational.com/en/raiffeisen/rbi-group/leadership-governance/compliance.html)

The focus areas in the second phase of the Real Estate & Construction ESG policy are:

- redefining supportive, transformative and restrictive customers in real estate and construction industries based on the new ESG scoring methodology
- setting operational targets, and
- establishing engagement criteria with customers based on their ESG cluster.

The policy will be implemented in the first half of 2024, while the engagement criteria and operational targets were finalized before the end of 2023.

## Nuclear energy

Find more at:  
[www.raiffeisen.com/en/raiffeisen-sustainability-esg/responsible-banking/code-of-conduct.html](http://www.raiffeisen.com/en/raiffeisen-sustainability-esg/responsible-banking/code-of-conduct.html)

The financing of or participation in any transactions or projects that put the environment at risk of lasting substantial detrimental impact (e.g. negative impact on human beings, pollution of land, air or water) are not in accordance with our business conduct. We recognize the serious risks derived from nuclear fuel mining and processing, nuclear power generation, and nuclear waste management. Recent experience shows that the risks associated with nuclear power plants both to the environment and human beings are currently unforeseeable.

We aim to avoid the mobilization and catalyzing of nuclear energy business (in terms of financing, consultancy or other banking services, or participation in investment funds focusing on nuclear energy). We have implemented a zero tolerance approach, particularly regarding the following entities and their relevant suppliers (key technologies and components):

- nuclear power plants (NPPs),
- companies engaged in mining, processing and trading with nuclear fuel, or
- companies managing nuclear waste (storage of spent fuel derived from NPPs).

All financing transactions are subject to a thorough assessment with regard to potential exposure to nuclear energy production and appropriate controls are implemented to prevent RBI's involvement in such businesses.

We understand that nuclear power plants are usually operated by electricity companies or holding companies. Cooperation with electricity companies or holding companies continues, albeit with strict segregation from nuclear power plants and connected activities. The trading of electricity from mixed sources (including nuclear energy) is not subject to such restrictions, although pure nuclear energy trading is excluded.

## Defense sector

Find more at:  
[www.raiffeisen.com/en/raiffeisen-sustainability-esg/responsible-banking/code-of-conduct.html](http://www.raiffeisen.com/en/raiffeisen-sustainability-esg/responsible-banking/code-of-conduct.html)

We respect and support the protection of human rights as stipulated in the European Convention on Human Rights as well as the UN Universal Declaration of Human Rights. We aim to engage in business which is in line with these principles. We seek to avoid any business involving products that are intended to be used to quell demonstrations, political protests, or other violations of human rights. This applies in particular to countries where political unrest, military conflicts or other violations of human rights are ongoing or expected.

We aim to avoid the mobilization and catalyzing of military business (in terms of financing, advisory or other banking services, or participation in investment funds focusing on military business). We have implemented a zero tolerance approach, particularly regarding entities that manufacture, maintain or trade, as well as provide assistance services or technologies dedicated to controversial weapons (nuclear, biological, chemical weapons, blinding laser weapons, anti-personnel mines, cluster munitions, depleted uranium ammunition, incendiary weapons and nondetectable fragments) and their relevant suppliers (key technologies and components), and regarding pure producers of listed products (military goods and dual-use goods) as well as wholesale arms merchants.

Cooperation with entities (and holdings) involved in the production of listed products on a small scale is accepted on a very selective basis, with our relationships generally focusing on non-defense-related activities.

All financing transactions are subject to a thorough assessment with regard to potential exposure to defense business and appropriate controls are implemented to prevent RBI's involvement in such businesses.

In the event of defense-related payment transactions in which RBI is involved in any way, we apply strict controls on these transactions to comply with the relevant embargo regulations and national requirements, and also apply additional conditions according to our internal risk management decisions.

## Gambling sector

In the absence of a harmonized framework for the betting and gambling industry within the EU, most European countries (including major countries of the CEE region) provide a regulatory framework to support the development of a legitimate betting and gambling industry and continuously eliminate illegal gambling activities. Regulators are increasingly requiring licensees to commit to responsible gaming and consumer protection, as well as to implementing methods to combat money laundering, terrorist financing, and corruption. The heightened risk of money laundering and organized crime requires special attention.

We seek to provide our services to reputable, transparent corporates in the European Economic Area or other European countries with a regulated market for the gambling industry that are subject to supervision, adhere to the principles of responsible gambling, and also comply with EEA-wide anti-money laundering and counter-terrorist financing standards.

## Tobacco

The fight against smoking is at the heart of chronic non-communicable disease prevention. Due to its concerns about the prevalence of tobacco smoking and its harmful impact on health and society, RBI introduced its own business policy for tobacco in January 2022, which is aligned with its social responsibility goals, commitment to the Sustainable Development Goals and the Principles for Responsible Banking.

The policy applies to all companies or groups of companies whose activities derive more than 25 per cent of their revenues from the production or distribution of tobacco products. RBI restricts on- and off-balance-sheet financing activities and all investment banking and advisory services in the tobacco industry to globally active producers (including their distributors) that can demonstrate best-in-class ESG ratings, a clear commitment to responsible marketing, packaging and labeling practices, as well as clear evidence of moving their portfolio away from traditional tobacco products.

RBI will not engage in any project or investment financing activities linked to the extension and enhancement of traditional tobacco production facilities. Exposure towards tobacco producers and distributors not eligible under the policy must be fully phased out by 2028.

## Climate stress testing

The outcome of the 2022 climate stress testing (CST) exercise confirmed the sectors and regions that were identified internally as mostly affected by climate risk. However, at the overall RBI Group level, the outcome has been assessed as non-material. The exercise gave us important benchmark information with respect to model calibrations, data availability and the general confirmation of our internal framework. Based on this information, the three-year disorderly transition scenario (delayed warming by 2 degrees Celsius) has been incorporated into our internal capital adequacy assessment framework (ICAAP), together with a flood risk scenario. See "Coverage of ESG in RBI's Group Risk Framework" on page 91.

Find more at:  
[www.raiffeisen.com/en/raiffeisen/sustainability-esg/responsible-banking/code-of-conduct.html](http://www.raiffeisen.com/en/raiffeisen/sustainability-esg/responsible-banking/code-of-conduct.html)

ESG Pillar 3  
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In 2023, the internal framework for climate stress testing was further extended to include the execution of a short-term climate stress test in the internal integrated stress testing exercise. The transitional risk for non-retail and retail credit risk, as well as operational and market risks were subject to an acute physical risk stress test for the retail collateral relating to flood risk. The basis of the scenarios was assessed by RBI Group's Risk Research in line with the latest NGFS (Network for Greening the Financial System) publications.

For the non-retail portfolio, due to the lack of historical data combined with sharp and prolonged increases in carbon taxes and electricity costs, RBI cannot directly estimate the impact of climate transition policies on corporate default events as performed in IFRS9 and stress testing. Instead, RBI currently uses an approach that models the impact of such policies on the NACE sector level (level 2) and further transposes such impacts to the corporate profitability and debt servicing ability as reflected in the companies' balance sheets, using structural models. RBI then uses the financial module of our corporate rating model to turn projections of firm finances into one-year probability of default (PD) projections. RBI refers to the first step as the transition risk engine, which consists of two parts:

- Sectoral-level general equilibrium models: this model calculates the impact of policies or shocks in the economy by taking account of the interdependencies between market participants and applying the economic theory of general equilibrium using sets of equations. The outcome of the sectoral model is the "stressed" production/output and cost level at the gross level of the respective sectors.
- Firm-level balance sheet models: the outcomes of the sectoral model are then transposed to the individual companies in the respective sectors.

This approach produces stressed balance sheets that include both the "direct" effect of carbon taxes and the "indirect" effect of macroeconomic aggregates. Once RBI has produced the stressed corporate balance sheets, the corporate rating model is applied to these shocks to produce one-year PDs. Finally, the projected PD is calculated by taking the internal rating derivation logic into account.

In the retail portfolio, especially for residential mortgage exposures, retail models have been extended for the purpose of the climate stress test to include energy price and house price index (HPI) developments in the PD and LGD (loss given default) macroeconomic models according to the energy efficiency (EPC, energy performance certificate) label awarded to the underlying collateral. For this purpose, each retail macroeconomic model now includes the HPI per EPC as parameter and energy prices in the C&E stress calculation. The HPI per EPC scenario applied is based on the NGFS input, which also includes a HPI for unknown EPC labels that is applied accordingly in the assessment.

In line with the ECB Climate Stress Test 2022, all corporate bonds and equity positions in the trading book are subject to this fair value revaluation as Market Risk Scope. From an operational risk perspective, initial physical risks in the form of direct losses (e.g. critical IT infrastructure) and transitional risk scenarios (e.g. greenwashing) have been defined as part of the economic capital calculation to account for forward-looking risk triggered by environmental and climate-related events.

As stated above, the results of these stress tests contribute to RBI's Group Risk Framework via a deduction item from the internal capital.

For underwriting real estate, the Carbon Risk Real Estate Monitor (CRREM) tool is used to identify Scope 1, 2 and 3 CO<sub>2</sub> emissions based on companies' energy consumption and any CO<sub>2</sub> saved as a result of retrofitting. This indicates whether the asset is meeting decarbonization targets, as well as the monetary present value of excess CO<sub>2</sub> emissions, which helps to evaluate a real estate asset and support corresponding credit risk decisions/recommendations.

## IV. Risk processes and governance

### IV. Risk processes and governance

- Credit processes enhancement
- Prevention of liability, reputational and greenwashing risk in the design phase

The Management Board is the most senior decision-making body for ESG-related strategies, policies and commitments. However, reports and the main tools used to manage and supervise environmental related risks are pre-approved by the Group Risk Committee. In addition to the regular Risk Committee structure, the RBI Management Board is supported in its ESG decisions by the cross-functional, cross-divisional Responsible Banking B-1 Steering Group. This steering group comprises the heads of the divisions in the board areas that mainly deal with ESG topics and acts as an advisory and recommendation body for the Management Board.

The Green Bond Committee has been established on the business side. Eligible green and social loans are sourced from the various eligible sectors after applying the eligibility criteria and fall under the responsibility of the Green Bond Committee (GBC). The GBC is part of the RBI Group Asset/Liability Committee and represents an extension of its management team. It comprises an extended management and expert team of Corporate Finance, Group Corporate Credit Management, Group Treasury, Group Sustainability Management, Group Compliance, and Group Investor Relations representatives. RBI's Sustainable Finance Department is responsible for collecting and monitoring all data required for the evaluation and selection of eligible green and social loans as well as the management of green/social/sustainability bonds.

From a risk management and supervision perspective, environmental, social and governance (ESG) risks are viewed as cross-dimensional risks that affect all areas of risk management. As such, the ESG risks have been included in the Group risk framework and methods as drivers of existing risk types. The materiality assessment described in the previous chapter forms the basis for implementation in the ICAAP framework and is expected to be refined over the coming years as methodologies are further developed and common practices evolve. As such, each relevant risk department (market, operational, liquidity and credit risk) is responsible for measuring environmentally-driven risks over each specific time horizon (long term, short term and medium term). The risk framework and processes are continuously updated, refined and adjusted to the current standards.

As part of the RBI Group Risk strategy, the overarching Group risk tolerance is set at a threshold of <100 per cent of overall risk capacity. The impact of transition risks and physical (flood) risks on the risk profile has been introduced to the economic perspective of the ICAAP as an item for deduction from the pillar 2 capital. This item has been defined on the basis of the climate risk stress test result. As such, these risks are included in the overarching risk appetite budgeting, or are bundled together with all other risk types measured under pillar 2 for the short-term horizon (up to three years). Finally, the results of the yearly materiality assessment are included for further development in the ICAAP framework.

A second important component for the integration of ESG risks in the RBI Group's risk framework has been the development of the internal ESG scoring method (see chapter II, Measurement methodologies & analytics).

The ESG score model for corporates is embedded in the rating process and is updated at least once per year for each customer. In total, 55 data points are used to assess the ESG score and allow RBI to identify customers with higher transition and physical risks. The data points used include:

- carbon footprint/emissions
- energy consumption
- usage of green energy
- water withdrawal
- setting and meeting own targets
- governance principles
- social factors, such as codes of conduct for customer supply chains

Currently (as of December 2023), around 85 per cent of the corporate portfolio has an individually assessed ESG score. For other segments, the country score (for sovereigns, LRG) was implemented in Q4 2023, and the SMB ESG score is on the agenda for 2024.

Furthermore, the exposure-weighted E, S and G scores form the basis of RBI's internal monitoring and escalation procedures for E, S and G risks. Starting from Q4 2023, developments relating to the exposure-weighted scores are reported to the Group Risk Committee on a quarterly basis as key risk indicators for E, S & G risks, taking account of both the booking company (subsidiary bank in CEE) and the industry.

If the exposure-weighted E, S, or G score at the subsidiary bank level changes by more than 10 points versus the previous quarter, or in year-to-date terms, it must be reported to the local supervisory board, together with the root causes of this development. The monitoring and reporting framework for ESG risks is expected to be refined over the next year as more experience is obtained.

An additional key risk indicator is the financed emissions of RBI Group and relevant quarterly reporting to the Group Risk Committee has been established. The first steps in terms of internal budgeting for the financed emissions are planned for 2024.

Additionally, by the end of 2023 the ESG risks were effectively incorporated into the impairment calculation by introducing the ESG score as part of the risk costs and pricing considerations. Thus, an annual calibration is performed to calculate the impact of certain ESG scores on long-term probability of default values. This reflects a further step in incorporating the environmental, social and governance score into the processes of customer and risk cost assessment.

The main tools for managing and supervising environment-related risks approved by the RBI Management Board as of year-end 2023 are:

- environmental, social and governance score
- Green Asset Ratio/(GAR)
- financed GHG emissions
- science-based targets
- business policy on nuclear energy
- business policy on steel
- business policy on oil & gas
- business policy on real estate and construction
- business policy on thermal coal
- RBI Group ESG Rulebook
- ESG Risk Framework
- climate stress test methodology and results
- ICAAP: from Q1 2022 onwards, transition and physical risks have been defined as items for deduction from the pillar 2 internal capital. Since 2021, environmental risk drivers have been included in the Group risk assessment.

Regarding specific reporting, ESG risk reports are continuously included in the risk controlling reporting framework. Reports currently implemented include the financed emissions, physical risk assessment/vulnerability, energy efficiency distribution, climate stress tests, ESG rating distribution and GAR results report. With the exception of the climate risk stress test, which is reported yearly, the ESG reporting frequency to the Group Risk Committee has been established as quarterly from Q4 2023 onwards.

Furthermore, and related to RBI's remuneration policy, ESG-related KPIs have been set for each RBI Board Member and further cascaded down across the organization and units; a progress report on RBI Board Members' achievement of KPIs is published on a regular basis.

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Sustainable finance is already an important part of RBI Group's Corporate Credit Policy in order to ensure the integration of ESG-related risks into risk management and underwriting considerations, as well as shift the focus towards those industries that enable the transition to a low-carbon economy.

RBI has further enhanced its Three Lines of Defense model (first line: business; second line: risk and compliance; third line: audit) to take better account of ESG-related topics, while also paying close attention to reputational risk that may result from greenwashing (we are of the opinion that the same concept also applies to social aspects).

More specifically, the lending decision process is carried out on a case-by-case basis in line with standardized principles and guidelines as well as a comprehensive due diligence process. This is currently being enhanced with a view to establishing how climate-related risks are affecting the respective industry. In the first step, we have defined the industries and activities in which we do not want to do business (based on market standards and internal constraints, we have drawn up an internal exclusion list to be published externally once all internal alignment steps have been concluded). Once these criteria have been verified, both the customer and the transaction are analyzed from an ESG perspective. If critical, the ESG impact of these cases is analyzed in detail on both the business and risk management side. Industries with high CO<sub>2</sub> emissions are automatically part of this process, especially if a policy is already in place.

In addition, the Bank has adopted an innovative ESG controversy monitoring tool that leverages the power of artificial intelligence (AI) and machine learning (ML). This cutting-edge tool sifts through more than 10 million articles from online news coverage each day, extracting material ESG controversies regarding a pool of 2,200 company groups that are customers of RBI. The tool's intelligent algorithms are designed to identify, classify, and highlight potential ESG risks, thereby enabling the bank to proactively address any issues and maintain its commitment to sustainable operations.

The tool's development and optimization are spearheaded by RBI's team of advanced analytics & AI experts who are continuously exploring the data science toolbox, including large language models (LLMs), to determine the most appropriate state-of-the-art modelling approach. In-house training of ML models in close collaboration with sustainability, data security and data protection experts ensures that biases inherent to large training data sets are addressed, and ethical considerations are incorporated into end results. As of December 2023, the system is monitoring the majority of Head Office customers, with a strategic objective of expanding coverage to the entire RBI Head Office portfolio by the end of the first half of 2024. In the expansion plans, exploration will also be used to fine-tune the tool to specific topics, such as human rights monitoring and greenwashing prevention. This will enable both additional continuous monitoring and initial screening of new customers, utilizing more than ten years of historical data sourced by the Bank. Furthermore, the tool will be progressively expanded to the rest of the RBI Group as the experts find the best local language and local market-adjusted approach, ensuring comprehensive ESG controversy monitoring across all its operations in Central and Eastern Europe.

All of the above steps follow a clear personnel and functional separation between business activities and all risk management activities. In addition to traditional "hard facts" and numerous qualitative criteria for all customers, the internal rating model incorporates an evaluation by the management, which is responsible for appropriate handling of environmental and social topics within the company. In addition, an evaluation is performed as to whether customers are subject to special environmental or social risks, including human rights violations or health risks (as part of the qualitative assessment in our internal corporate rating model), and whether a potential borrower follows the existing general and sector-specific rules with regard to the environment, human rights, and health standards relevant in general and in the respective industry.

Thus, the respective data collection is performed in two ways:

- a) via an individual assessment as well as data collection by the credit analyst in the course of the rating assessment
  - b) via support from the technical side using newsfeed checks as well as negative news reports on the customer.
- RBI uses several tools and software to review customers and collect potential negative information on social/human rights or any other ESG-relevant information.

The agreed credit terms are also assessed as a standard part of the annual analyses.

In addition, it is RBI Group's policy to have sustainable credit-lending practices to ensure long-term value creation for its customers. For example, customers' repayment ability is of the utmost importance and collateral alone is not a reason for granting loans. Speculative products are not offered, and foreign currency-denominated financing is provided in exceptional cases based on solid argumentation, with customers well advised of the risks involved.



In this regard, RBI Group has established policies and processes which ensure that lending activities are not only geared to the risk-taking capacity of the Group, but also to the borrowing capacity of the individual customer. Thus, special attention is paid to avoiding over-indebtedness and ensuring that customers are in a position to sustain their activities in the long term. Depending on the customer segment, different policies and measures apply. Refinancing is affected with a view to ensuring that the refinanced loan is closed, and lending after restructuring is regulated using sound limitations in order to give our customers time to recover from financial difficulty.

Should payment difficulties nevertheless result, dealing proactively with the affected customers is a natural part of our banking operations to deliver on our promises in line with the RBI Vision/Mission. As soon as RBI notices any evidence of payment difficulties, support is provided to the customer to solve the problems. Furthermore, the bank tries to find a suitable solution for the situation at hand within the scope of its options and the customer's financial situation. If difficulties in the servicing of loans arise, RBI looks at each case individually and assesses how the customer can be helped by means of contractual concessions within financially justifiable limits and with due regard for the regulatory requirements, while endeavoring to work with the customer to find a fair solution. In doing so, particular attention is paid to changes in the customer's circumstances. In the event of a dispute, RBI follows a fair and professional complaints procedure.

Several subsidiary banks have also applied the standards of the International Finance Corporation (IFC) and/or the Multilateral Investment Guarantee Agency (MIGA): Raiffeisen Bank Sh.a in Albania, Raiffeisen BANK d.d. Bosna i Hercegovina, Raiffeisen Bank Kosovo J.S.C., Raiffeisen Bank S.A. in Romania, Raiffeisen banka a.d. in Serbia, Priorbank JSC in Belarus, Raiffeisen Bank JSC in Ukraine.

GRI G4-DMA  
(former FS4)

These subsidiary banks have all introduced an Environmental and Social Management System (ESMS) and a corresponding Environmental and Social Policy (E&S Policy). This policy describes the principles of ecological and social risk management applicable in the bank and defines key roles and responsibilities for managing E&S risks as well as key elements of the E&S risk management process. Employees involved in E&S risk assessment are familiarized with the requirements of the policy, kept informed of updates, and trained to conduct the analysis. The credit process ensures that all credit applications in the corporate customer segment are reviewed in three steps in addition to the usual credit and risk criteria:

1. Evaluating whether the company is engaged in activities on the IFC or MIGA exclusion list.
2. Categorizing the environmental and social (E&S) risk level depending on the type, location, noticeability, and size of the project as well as the nature and scope of its possible environmental and social impact (low, medium, or high).
3. Social and environmental impact assessment/E&S due diligence for all transactions with high and medium risk: determining the environmental and social impacts and risks of a project as well as determining whether it meets the laws of the respective country and other policies and guidelines of the World Bank and IFC.

This also includes performance standards regarding work and labor conditions, resource efficiency and the avoidance of environmental pollution, public health and safety, land acquisition and forced relocations, retention of biodiversity as well as sustainable management of natural resources, indigenous peoples and cultural heritage (see the IFC website at [www.ifc.org](http://www.ifc.org)).

Furthermore, the Code of Conduct is part of our lending policy. All employees involved in lending are accordingly obliged to act responsibly and carry out their supervising duties with great care. Likewise, the reputation of our banking group must be considered in all activities and decisions. The executives of our company are responsible for compliance with these standards in their respective areas of responsibility.

Moving one level up, RBI takes ESG topics into consideration not only in the individual credit decision, but also at the portfolio level, thus contributing to the further alignment of its actions to the Group's long-term goals. The credit portfolio of the Group is steered by means of a portfolio strategy, which is the core tool for enabling healthy exposure diversification across countries, industry sectors, or types of products. By ensuring this diversification, the Group's concentration in terms of undesirable risks and systematic shocks is limited. In order to keep pace with a dynamically changing environment, RBI Group performs quarterly reviews of its portfolio strategy, specifically with the aim of achieving a target portfolio quality or a target industry or geographic split. One of the central tools in this process is the "industry matrix", a framework that allows the clustering of industries based on their short-term (one-year) and long-term (three-year) risk as assessed by the respective industry experts for each economic sector. The industry



matrix quadrant assignment is used not only for top-down portfolio steering (i.e. in setting industry thresholds to limit the relative size of risky segments within the portfolio), but also in bottom-up credit decisions (i.e. in underwriting and single-name limit sizing). This and other steering frameworks ensure that RBI Group's high-level lending practices are upheld going forward. The risks and potential of various industries in the individual countries, together with the individual customer's credit standing, are continuously evaluated to ensure a timely response to challenges. To capture the impact of these developments on the future structure of the credit portfolio, existing lending guidelines and limits for the portfolio are refined and new ones developed. In addition, within our industry limitations, preferential treatment is given to "green transactions" over transactions which have not been identified as such.

The topic of climate is covered on multiple levels in our ESG industry base ratings and includes factors such as local pollution, residential pollution, transportation, energy, and within our industry limitations, preferential treatment is given to "green transactions" over waste. However, we pay most attention to the CO<sub>2</sub> factor, to which we give significantly more weight in our model than is the case with the average ESG ratings of agencies, as our main focus is the topic of CO<sub>2</sub>.

By these means, the two impact areas identified by the PRB impact analysis (climate and circularity) are included in the RBI scoring tool in a meaningful way.

Last but not least, both individual and portfolio decisions are also made with a view to how we can make a positive contribution to the Sustainable Development Goals (SDGs) and how RBI can further limit potential negative impacts.

Thus, we are committed to further supporting participants in the healthcare sector (there is currently no industry limitation in place), gender equality (incorporated into the lending process; RBI uses standardized selection criteria and conditions offered to its customers from the private individuals sector), poverty reduction (RBI Group finances SME start-ups, micro businesses and private individuals) and innovation, and infrastructure/renewable energy projects, ensuring that RBI's regional footprint is of the utmost importance.



## Sustainable Finance Management

The RBI Group's contribution to the Paris Agreement alignment is central to the support we offer our customers in their transition to a more climate and environmentally friendly business. To do so, we provide our corporate, retail and institutional customers with expertise as well as offers at the industry, customer and product/transaction levels.

We hold individual engagement conversations with our customers to understand and support their transition paths. We consult corporate and institutional customers on their ESG transition, which contributes to our ambition of becoming the bank of choice in ESG consultancy in our markets. We provide financing solutions for their ESG transition in our ambition of becoming the preferred bank for ESG financing. We assist retail customers in understanding their environmental footprint and offer sustainable financial and investment products, which supports our ambition of becoming the bank of choice for ESG banking products. The RBI Group has already actively initiated and cultivated regular dialogues on ESG with customers since early 2020.

GRI 201-2  
ESG Pillar 3  
ER c

The basis for our sustainable product offerings and customer engagement is the RBI ESG Rulebook, which ensures that current market standards and greenwashing prevention are taken into consideration.

RBI has set itself the goal of providing best-in-class ESG consultancy services and tailor-made sustainable finance products for customers, and ensuring high quality standards. With our sustainable finance product offerings, we aim to support our customers' efforts and targets towards a transition to a sustainable future.

Finally, to ensure increasing integration of the topic of ESG risks and negative impact prevention into the overall financing process, RBI AG has implemented corresponding processes.

## ESG Rulebook for sustainable customers and transactions

To help our customers improve their carbon footprint and make their transformation a sustainable success, we need to be able to assess transactions and projects on the basis of ESG criteria and advise our customers accordingly. In 2020, RBI devised a harmonized definition of sustainable customers (including the customer ESG score) and transactions, and made it available to the whole of the RBI Group in the form of an ESG rulebook. In 2022, the RBI Group ESG Rulebook was expanded to include additional definitions and framework conditions, and was introduced as a binding policy at Group level, subject to a yearly review. The RBI Group ESG Rulebook sets out Group-wide uniform definitions for sustainable customers and for green, social and ESG-linked finance within the RBI Group. When classifying transactions, RBI has decided to take the uniform RBI in-house definitions and, wherever possible, the provisions of the currently applicable version of the EU taxonomy into account. Internal RBI definitions of "green", "social" and "ESG-linked finance" are based on the ICMA Green & Social & Sustainability Bond Principles and the LMA Sustainability Linked Loan Principles. In this way, RBI wishes to ensure a uniform understanding of sustainable financing throughout the Group and prevent greenwashing. RBI aims to update the RBI Group ESG Rulebook regularly in order to reflect the latest market developments.

RBI's Retail Banking division (private individuals and SMEs in CEE) published its own Framework for Green and Social Loans in 2022, which was also validated by Sustainalytics. By publishing such a framework, we aim to ensure that our green and social loans to retail banking customers are aligned with the Green Bond Principles and Social Bond Principles and also meet regulatory requirements. We also expect that additional assets can be flagged as green or social.

Under this Framework, RBI sets "green" (for private individuals and SMEs) and "social" (for SMEs only) loan definitions based on the Green Loan Principles and EU Taxonomy requirements. These definitions were implemented by the subsidiary banks in the markets where RBI operates with the aim of supporting mitigation and adaptation goals. They represent a part of RBI's broader sustainability strategy with the aim of focusing on assets with a positive environmental and social impact to support the necessary transition to a sustainable future. The Framework provides valid ESG definitions for green and social loans, which will serve as the basis for assessing the assets as well as for regular and mandatory reporting purposes by RBI network banks. In 2023 we updated the Framework to refine the definitions.

## ESG customer consultancy and engagement

Addressing the global threat posed by climate change, it is key that corporates and banks partner together to accelerate the ESG transition. To achieve the objective of the Paris Agreement, customers and banks have to collectively aim for solutions. To this end, RBI acts as a trustful partner for the sustainable transformation. By offering tailor-made sustainable finance products and ESG knowledge to our customers, we create value for our customers' businesses.

RBI has set itself the goal of providing best-in-class ESG consultancy for customers and ensuring a high standard of quality. RBI performs expert analyses and evaluations of corporate and institutional customers from an ESG perspective, and helps our customers to identify green and social aspects of their business profile. In addition, we act as an expert consultant on the structuring of new products and services, and for adapting existing products to customers' specific ESG requirements.

GRI 2-23, -24  
GRI G4-DMA  
(former FS1)  
ESG Pillar 3  
ER a,d,m  
ESG Pillar 3  
SR a,b,c

Find more  
at: [www.rbinternational.com/en/raiffeisen/rbi-group/about-us/our-network/retail-private-banking.html](http://www.rbinternational.com/en/raiffeisen/rbi-group/about-us/our-network/retail-private-banking.html)

GRI 2-29  
GRI 203-2  
GRI G4-FS10  
GRI G4 - DMA  
(former FS5)

As a responsible bank, RBI supports its customers in their own sustainable transition journey: we bring the subject of sustainable finance to Central and Eastern Europe, covering corporate, retail and institutional customer segments. RBI capitalizes on the close network of ESG experts in our Banking Group to strengthen knowledge building and its competence in consultancy. In this way, we can ensure that customers receive the best-possible support at local level when choosing a suitable sustainable financing strategy.

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### Corporate and institutional customers

GRI 203-2

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RBI provides in-depth and intensive advice on various sustainable financing formats geared towards customers' business models and sustainability strategies. These sustainable financing formats can cover a wide range of financial instruments (bonds, Schuldschein loans, syndicated loans, bilateral facilities, etc.) and a variety of sustainability formats (linking with ESG ratings or sustainability targets, or linking through proof of sustainable use of funds).

RBI AG's Sustainable Finance experts support corporate and institutional customers in developing proper methodology to identify sustainable transactions based on international sustainable standards specified by the market. The basis for this assessment is provided by the EU Taxonomy Regulation as well as the standards provided by the Loan Market Association (LMA) and the International Capital Markets Association (ICMA). We support our customers in verifying the suitability of various projects and activities with regard to EU Taxonomy compliance and RBI's internal definitions of green, social or sustainable transactions, which represent the current best market practice. When engaging in dialog with customers on ESG-linked formats, it is especially important to jointly define material KPIs that are important for the customer's sustainability and business strategy. When establishing the annual target values, care is always taken to ensure a certain degree of ambition and that the ESG KPIs represent a significant improvement in the customer's sustainability position.

Sustainable financial products can be tailored to the individual customers so that they have a positive impact in terms of ESG criteria. RBI AG's Sustainable Finance team advises customers in all industries – in critical sectors such as oil and gas, and through to non-critical sectors such as renewable energy – and in doing so, addresses each individual customer's respective challenges and opportunities. With all sustainable financing transactions, RBI's Sustainable Finance experts always endeavor to provide corporate and institutional customers with a clear understanding of market standards and requirements, as well as best practices.

RBI AG supports customers during financing transactions:

- in all roles – as arranger, bookrunner, sustainability structuring advisor and lender
- across all financing instruments, from lending, promissory notes and bonds, through to guarantees and derivatives
- in all forms of sustainable finance, both sustainability-linked formats and ESG rating-linked formats as well as formats focusing on the sustainable purpose of the liquidity

In addition to sustainable finance, we advise our customers on the EU Taxonomy (where applicable), subsidized financing and corresponding subsidy programs in Austria and in the EU.

RBI also advises customers on different ESG ratings and supports them in the verification process for obtaining a second party opinion. More in-depth subject-specific advice can be provided where necessary, for example with regard to net zero matters or the Science Based Targets initiative.

Furthermore, RBI AG's Sustainable Finance team supports institutional customers with tailor-made advanced educational sessions to raise internal awareness on ESG topics, provide updates on ongoing sustainability trends and regulations, and to change the mindset towards being a sustainable banker. Our ESG experts also assist with the strategic transformation of our customers' credit portfolios to achieve carbon neutrality and compliance with Sustainable Development Goals. We specifically provide support in assessing and developing ESG strategies, building brand recognition competence, drafting a sustainable finance policy, changing the internal mindset, and in ongoing ESG related processes and sustainability trends. Moreover, we help them with the implementation of transaction flagging. To sum it up, we always endeavor to provide our customers with a clear understanding of market standards and requirements as well as best market practices.

## Retail customers

ESG Pillar 3  
SR a

In 2023, responsible banking evolved further in the retail strategy and is one of the key elements of the Strategic Roadmap of retail banking. Our focus is on supporting our customers in their green transition and becoming their first choice for retail ESG products. We developed solutions which aim at better understanding customers' carbon footprints and provided products with an environmental and social impact that, for the first time, allow retail customers to receive a superior supply of sustainability-oriented solutions.

We aim to further increase new green and social loan sales to private individuals and small-business customers, and therefore advise our customers on the possibility of green unsecured purpose loans, (i.e. loans with a distinctive purpose to improve energy efficiency of properties. The purpose of the loan must be validated through the approval process) and green mortgage loans (secured by real estate and are made available exclusively to finance or refinance, in whole or in part, new and/or existing transactions with a specific use of proceeds as defined by the Framework for Green and Social Loans).

On the investment side, we offer advisory services for the fund and certificates business, which forms the flagship product line. However, there is also a focus on green bonds. The target customer base was extended from private banking to premium banking, and also to retail business at some subsidiary banks in CEE. In 2023, the funds and certificates product lines saw a significant expansion of the product range. The product offer of certificates was broadened, especially by new underlying. The current high interest rate environment dramatically increased the attractiveness of fixed income instruments, which enabled the product range of sustainable funds to be extended towards lower risk categories targeting more risk-averse customers.



In January 2023, the Retail sustainability strategy became part of the Sustainable Finance department in the Corporate board area. In doing so, Corporate and Retail will form a cross-functional ESG competence center as an umbrella for business. In succession, Sustainable Finance will act as an ESG competence center for all customer segments including the retail business.

ESG Pillar 3  
GR c

## Prevention of greenwashing and negative ESG impacts

To tackle the topics of negative ESG impacts and greenwashing prevention within the sustainable finance transactions, RBI has implemented different processes, which include the ESG Expert Opinion, and the Greenwashing Prevention Check as well the establishment of an exclusion list of all corporate activities in which RBI does not wish to be involved. In addition, employees receive regular training on identifying certain signals which indicate that certain activities and sectors are particularly critical from a sustainability perspective.

ESG Pillar 3  
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ESG Pillar 3  
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## ESG expert opinion

An ESG expert opinion is prepared for particularly critical customers, but specifically for critical projects. The ESG expert opinion evaluates the ESG impact of the transaction at project and company level, and assesses its impact on the environment and social issues. It also includes a qualitative assessment and presents a conclusion on whether or not the transaction should be pursued from an ESG impact point of view. Consequently, the ESG expert opinion provides decision makers with more detailed information and enables them to consider ESG impacts in their lending decisions. It therefore plays a key role in preventing negative impacts from an ESG perspective. The assessment in the ESG expert opinion takes the following aspects into account: industry impact based on the Principles for Responsible Banking (PRB) Impact Radar; company- and project-related negative impact on key sustainability issues and their mitigation measures; past and current controversies and incidents; the legal environment (i.e. whether high environmental and social standards are ensured through EU regulations).

For RBI AG critical cases, the ESG expert opinion is issued by the Sustainable Finance department. At local level, the ESG expert opinion is issued by the local ESG experts under the guidance of the RBI AG's Sustainable Finance department. To formalize and standardize the process, an ESG expert opinion tool has been set up internally and a workshop was held to train local ESG experts on how to write an ESG expert opinion and how to navigate through the tool. Follow-up trainings will be established.

## Greenwashing revention check

RBI has established a process to prevent greenwashing and has rolled it out across the Group as part of the "RBI Group ESG Rulebook". Under the greenwashing prevention check, RBI commits to certain internal process steps, which must be complied with in the event of a sustainable transaction with a customer. In particular, ESG experts from RBI AG's Sustainable Finance team are involved in the bid phase, the decision phase and the execution phase of a sustainable financing transaction.

GRI 2-23, -24  
GRI G4-DMA  
(former FS1)

ESG Pillar 3  
ER a, d, f, m  
ESG Pillar 3  
SR a, c

The greenwashing prevention check focuses on the structure of sustainable financial products, including products that are designated as green, social, sustainability-linked or similar. For the definitions of sustainable business transactions, standards such as the LMA Guidelines, the ICMA Principles and the EU Taxonomy Regulation were applied. These are used for qualification and (de)flagging of business transactions and form the basis for the greenwashing prevention process. In other words, the greenwashing prevention check is a precondition for RBI Group's involvement in sustainable finance products and must therefore be followed by the members of RBI Group (RBI AG, subsidiary banks). The check is applied for all sustainable finance products.

By involving the RBI AG ESG experts in ESG transactions, RBI provides a further supervisory body to minimize greenwashing risks and contribute to greenwashing prevention.

## Raising awareness – supporting our business units in RBI AG and the subsidiary banks in Central and Eastern Europe

It is key to raise awareness of ESG-related topics in the business units, to build up ESG knowledge internally and to ensure efficient cooperation within the Banking Group. Accordingly, Corporate ESG Ambassadors have been established in all the subsidiary banks in Central and Eastern Europe. On the retail side, RBI is actively working towards creating a knowledge-sharing hub and a broad network of Retail ESG Ambassadors across its operating retail markets.

GRI 2-24  
GRI G4-DMA  
(former FS4)  
ESG Pillar 3  
ER d  
ESG Pillar 3  
SR c

GRI 2-13

TCFD

The primary objectives of the network are to pass on knowledge and information between head office and the subsidiary banks in CEE, to advertise ESG activities for corporate customers in the CEE region, and to support these companies so that they can leverage the opportunities available to them in the area of ESG megatrends and combat global climate change to the greatest possible extent. Besides the basic ESG e-learning modules of RBI's ESG Academy, the head office provides business-specific training for the ESG Ambassadors on subjects such as EU taxonomy compliance, ICMA bond standards, current developments, circular economy, as well as on the various ESG and sustainability-related products. In addition, monthly update calls are held with the Corporate ESG Ambassadors in order to maintain a dialog on ESG topics.

In addition to the onboarding and inhouse upskilling of the ESG Ambassadors within the network, the head office also supports the subsidiary banks during appointments with customers on the question of sustainable financing. Through this close cooperation, RBI is striving to establish a Group standard for day-to-day business on the subject of sustainable financing.

In 2023, RBI held its first joint Climate and Environmental Business Summit for all business lines, with close to 200 participants. Colleagues from the corporate, retail, institutional customers and MIB areas, as well as sustainability officers at head office and subsidiary banks participated. The summit was a milestone for RBI in supporting the implementation of the Climate and Environmental Business Strategy, which focuses on all business lines. At the summit, RBI shared its future vision for sustainable finance, discussed corporate and retail banking sustainability actions and shared the future activities required to implement the Climate and Environmental Business Strategy.

GRI G4-FS6, -FS7, -FS8

TCFD

# Metrics and ambitions

Providing sustainable financing generates added value for our customers and a wide range of activities for society that are suited to sustainable financing. We describe financing as being sustainable when it has a long-term positive impact on the environment and climate and/or on societal and social issues, and when it supports the attainment of the Sustainable Development Goals (SDGs). More specifically, the definition of a sustainable transaction is based on the EU Taxonomy Regulation and on RBI's in-house definition of green and social (basis: RBI AG Sustainability Bond Framework) and on the LMA Sustainability Linked Principles (ESG-linked financing). The eligibility criteria of the listed frameworks differ in terms of complexity and precision.

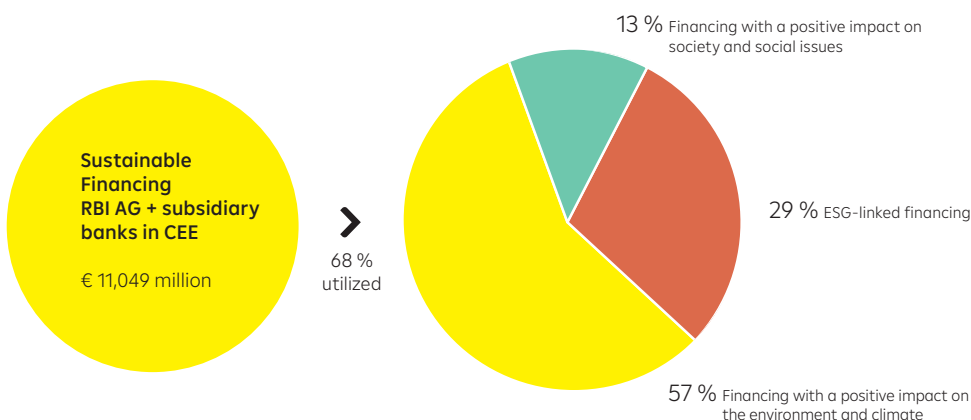
The total volume of sustainable financing (excluding retail financing) for corporate and institutional customers at RBI AG and the subsidiary banks in CEE (RBI\*) in 2023 was around € 11 billion as at 31 December 2023. Of this amount, € 7.5 billion was utilized by customers. In addition, there is an unutilized line of sustainable financing of € 3.6 billion.

The volume of sustainable financing for corporate customers (without institutional customers) at RBI\* in 2023 was around € 10.3 billion as at 31 December. Of this amount, € 7 billion was utilized by customers. That is around 14 per cent of the entire portfolio (corporate business line, banks). In addition, there is an unutilized line of sustainable financing of € 3.3 billion. At RBI AG, the volume utilized was around € 4 billion, or 18 per cent of the total portfolio of RBI AG (corporate business line).

## Sustainable financing – corporate and institutional customers

(in million €)	RBI*				RBI AG			
	2023	Change from previous year	2022	2021	2023	Change from previous year	2022	2021
Financing with a positive impact on the environment and the climate	4,280 (57 %)	17 %	3,671	2,660	1,757 (40 %)	2 %	1,729	1,224
Financing with a positive impact on society and social issues	1,001 (13 %)	-1 %	1,011	689	876 (20 %)	-10 %	968	628
ESG-linked financing	2,184 (29 %)	18 %	1,851	986	1,749 (40 %)	13 %	1,550	779
<b>Subtotal (utilized line)</b>	<b>7,465 (68 %)</b>	<b>14 %</b>	<b>6,533</b>	<b>4,335</b>	<b>4,382 (58 %)</b>	<b>3 %</b>	<b>4,247</b>	<b>2,632</b>
Unutilized line	3,584 (32 %)	114 %	1,677	1,791	3,217 (41 %)	142 %	1,329	1,443
<b>Sustainable financing</b>	<b>11,049 (100%)</b>	<b>35 %</b>	<b>8,210</b>	<b>6,126</b>	<b>7,599 (100%)</b>	<b>36 %</b>	<b>5,576</b>	<b>4,075</b>

\* Including RBI AG and the subsidiary banks in CEE, excluding the Austrian subsidiaries RBSK, RKAG, RL, Valida, Kathrein. Adding up rounded percentages may result in total amounts not equal to one hundred.



€ 8.2 billion in sustainable financing was reported at RBI\* for corporate and institutional customers in 2022. The volume increase in sustainable financing in 2023 as compared to 2022 was visible in all categories except the social financing and was most noticeable in the "ESG-linked financing" category. In 2023, the allocation of sustainable financing was continuously adapted to current developments, while ESG definitions were adapted to market standards and rolled out across the Group based on the RBI Group ESG Rulebook. Further changes are expected in the next few years as a result of additional regulations. This means that the prior year figures must be treated with caution.

A more detailed breakdown of the individual categories can be found in the sections below.

## Metrics of financing with a positive impact on the environment and the climate

In 2023, the total volume of financing by corporate and institutional customers at RBI\* with a positive impact on the environment and the climate was around € 5.5 billion as at 31 December. Around € 4.2 billion in RBI\* sustainable financing was utilized by customers in 2023. In 2023 as compared to 2022 the volume of financing with a positive impact on environment and the climate increased.

GRI 203-1, -2  
GRI G4-FS8

TCFD



### Financing with a positive impact on the environment and the climate – corporate and institutional customers

(in million €)	RBI*				RBI AG			
	2023	Change from previous year	2022	2021	2023	Change from previous year	2022	2021
Utilized line	4,280 (77 %)	17 %	3,671	2,660	1,757 (66 %)	2 %	1,729	1,224
Unutilized line	1,245 (23 %)	67 %	745	480	901 (34 %)	120 %	409	195
<b>Financing with a positive impact on the environment and the climate</b>	<b>5,525 (100 %)</b>	<b>25 %</b>	<b>4,415</b>	<b>3,140</b>	<b>2,659 (100 %)</b>	<b>24 %</b>	<b>2,138</b>	<b>1,420</b>

\* Including RBI AG and the subsidiary banks in CEE, excluding the Austrian subsidiaries RBSK, RKAG, RL, Valida, Kathrein. Adding up rounded percentages may result in total amounts not equal to one hundred.

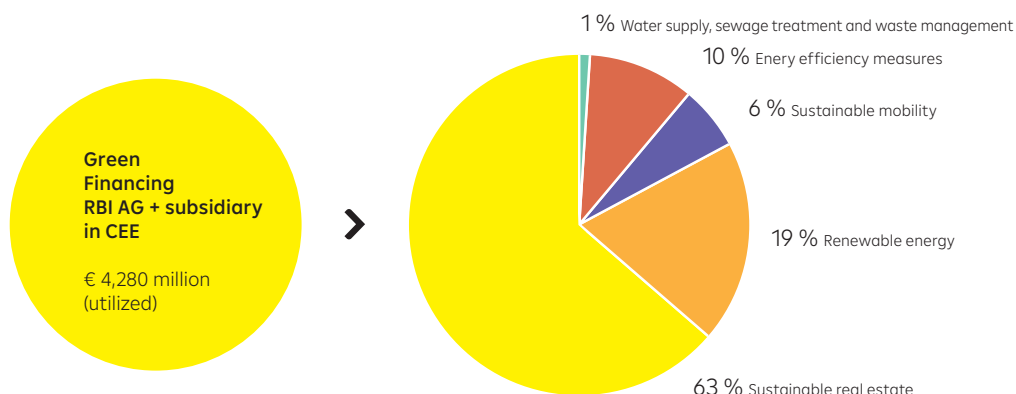
### Breakdown of green financing by sustainability criteria

Details of financing with a positive impact on the environment and climate are shown below.

### Financing with a positive impact on the environment and climate – corporate and institutional customers

(in million €)	RBI*				RBI AG			
	2023	Change from previous year	2022	2021	2023	Change from previous year	2022	2021
Sustainable real estate	2,702 (63 %)	27 %	2,130	1,886	705 (40 %)	16 %	609	766
Renewable energy	816 (19 %)	12 %	727	232	440 (25 %)	-12 %	498	115
Energy efficiency measures	447 (10 %)	37 %	327	52	428 (24 %)	36 %	316	52
Sustainable mobility	236 (6 %)	-42 %	407	477	176 (10 %)	-27 %	241	282
Water supply, sewage treatment and waste management	63 (1 %)	161 %	24	12	8 (0 %)	-22 %	10	10
Sustainable forestry and farming	17 (0 %)	1,988 %	1	0	0 (0 %)	-	0	0
Manufacturing industry	0 (0 %)	-100 %	55	0	0 (0 %)	-100 %	55	0
<b>Subtotal (utilized line)</b>	<b>4,280 (77 %)</b>	<b>17 %</b>	<b>3,671</b>	<b>2,660</b>	<b>1,757 (66 %)</b>	<b>2 %</b>	<b>1,729</b>	<b>1,224</b>
Unutilized line	1,245 (23 %)	67 %	745	480	901 (34 %)	120 %	409	195
<b>Financing with a positive impact on the environment and the climate</b>	<b>5,525 (100 %)</b>	<b>25 %</b>	<b>4,415</b>	<b>3,140</b>	<b>2,659 (100 %)</b>	<b>24 %</b>	<b>2,138</b>	<b>1,420</b>

\* Including RBI AG and the subsidiary banks in CEE, excluding the Austrian subsidiaries RBSK, RKAG, RL, Valida, Kathrein. Adding up rounded percentages may result in total amounts not equal to one hundred.



#### ■ Sustainable real estate

Sustainable real estate finance is the most important asset category in the volume of finance with a positive impact on the environment and the climate. In 2023, the volume of financing utilized at RBI\* amounted to around € 2.7 billion as at 31 December and rose by around 27 per cent compared to 2022.

#### Sustainable real estate – corporate customers

(in million €)	RBI*			RBI AG				
	2023	Change from previous year	2022	2021	2023	Change from previous year	2022	2021
Utilized line	2,702 (89 %)	27 %	2,130	1,886	705 (90 %)	16 %	609	766
Unutilized line	331 (11 %)	-11 %	371	295	80 (10 %)	-7 %	86	13
<b>Sustainable real estate</b>	<b>3,032 (100 %)</b>	<b>21 %</b>	<b>2,501</b>	<b>2,181</b>	<b>785 (100 %)</b>	<b>13 %</b>	<b>695</b>	<b>778</b>

\* Including RBI AG and the subsidiary banks in CEE, excluding the Austrian subsidiaries RBSK, RKAG, RL, Valida, Kathrein. Adding up rounded percentages may result in total amounts not equal to one hundred.

The properties are located in Slovakia (29 per cent), Romania (21 per cent), Czech Republic (12 per cent), Hungary (10 per cent), Austria (9 per cent) and other countries.



#### ■ Sustainable mobility

In 2023, the volume of financing at RBI\* in the field of sustainable mobility was around € 487 million as at 31 December, which represents a slight increase compared to 2022.

#### Sustainable mobility – corporate customers

(in million €)	RBI*			RBI AG				
	2023	Change from previous year	2022	2021	2023	Change from previous year	2022	2021
Utilized line	236 (48 %)	-42 %	407	477	176 (46 %)	-27 %	241	282
Unutilized line	251 (52 %)	412 %	49	0	204 (54 %)	-	0	0
<b>Sustainable mobility</b>	<b>487 (100 %)</b>	<b>7 %</b>	<b>456</b>	<b>477</b>	<b>380 (100 %)</b>	<b>58 %</b>	<b>241</b>	<b>282</b>

\* Including RBI AG and the subsidiary banks in CEE, excluding the Austrian subsidiaries RBSK, RKAG, RL, Valida, Kathrein. Adding up rounded percentages may result in total amounts not equal to one hundred.

In particular, the following areas are covered at RBI AG: maintenance of public electric rail transportation (freight and passenger transportation), e-mobility as well as advancement of e-mobility and hybrid. Subsidiary banks in CEE mainly cover the following areas: e-mobility, personal mobility devices (e.g. bicycles); infrastructure for electric car production as well as carriage purchasing.





- Renewable energy

In 2023, the volume of financing utilized at RBI\* in the area of renewable energy was around € 816 million as at 31 December. The volume increase mainly stems from the new business originated within 2023.

### Renewable energy – corporate and institutional customers

(in million €)	RBI*				RBI AG			
	2023	Change from previous year	2022	2021	2023	Change from previous year	2022	2021
Utilized line	816 (65 %)	12 %	727	232	440 (112 %)	-12 %	498	115
Unutilized line	436 (35 %)	184 %	154	179	394 (47 %)	159 %	152	177
<b>Renewable energy</b>	<b>1,252 (100 %)</b>	<b>42 %</b>	<b>881</b>	<b>411</b>	<b>834 (100 %)</b>	<b>28 %</b>	<b>650</b>	<b>291</b>

\* Including RBI AG and the subsidiary banks in CEE, excluding the Austrian subsidiaries RBSK, RKAG, RL, Valida, Kathrein. Adding up rounded percentages may result in total amounts not equal to one hundred.

Most RBI\* renewable energy projects involve solar energy. Bioenergy, wind power and hydroelectric power projects are also financed.

- Energy efficiency measures

In 2023, the volume of financing utilized at RBI\* in the area of energy efficiency was around € 447 million as at 31 December.



### Energy efficiency measures – corporate and institutional customers

(in million €)	RBI*				RBI AG			
	2023	Change from previous year	2022	2021	2023	Change from previous year	2022	2021
Utilized line	447 (67 %)	37 %	327	52	428 (66 %)	36 %	316	52
Unutilized line	225 (33 %)	32 %	171	6	224 (34 %)	31 %	171	6
<b>Energy efficiency measures</b>	<b>672 (100 %)</b>	<b>35 %</b>	<b>497</b>	<b>58</b>	<b>652 (100 %)</b>	<b>34 %</b>	<b>487</b>	<b>58</b>

\* Including RBI AG and the subsidiary banks in CEE, excluding the Austrian subsidiaries RBSK, RKAG, RL, Valida, Kathrein. Adding up rounded percentages may result in total amounts not equal to one hundred.

This category includes projects that relate to the manufacture, development, installation, maintenance or repair of products or technology that reduce energy consumption, such as: projects improving the energy efficiency of industrial production process in a factory aiming to achieve at least 30 per cent improvement in energy efficiency, energy efficient equipment (e.g., LEDs), energy storage projects, replacement of energy intensive alternative networks with fibre-optic networks with minimal environmental impact and others. The volume increase in 2023 compared to the previous year stems from the financing of new business originated in 2023.

- Manufacturing industry

In 2022, a project in the field of steel production was classified as sustainable and complied with the substantial contribution rules of the EU Taxonomy (climate change mitigation). The volume of financing utilized at RBI\* in this field in 2023 was zero as at 31 December.

### Manufacturing industry – corporate customers

(in million €)	RBI*					RBI AG				
	2023		Change from previous year	2022	2021	2023		Change from previous year	2022	2021
Utilized line	0	–	–100 %	55	0	0	–	–100 %	55	0
Unutilized line	0	–	–	0	0	0	–	–	0	0
<b>Manufacturing industry</b>	<b>0</b>	<b>–</b>	<b>–100 %</b>	<b>55</b>	<b>0</b>	<b>0</b>	<b>–</b>	<b>–100 %</b>	<b>55</b>	<b>0</b>

\* Including RBI AG and the subsidiary banks in CEE, excluding the Austrian subsidiaries RBSK, RKAG, RL, Valida, Kathrein. Adding up rounded percentages may result in total amounts not equal to one hundred.

#### Water supply, sewage treatment and waste management

In 2023, the volume of financing utilized at RBI\* in the area of water supply and sewage treatment was around € 63 million as at 31 December. The volume increase in 2023 compared to the previous year stems from the financing of circularity projects with a focus on the development of eco-efficient products and production activities that enhance resource efficiency as well as projects that relate to waste prevention, waste reduction and waste recycling.

### Water supply, sewage treatment and waste management – corporate customers

(in million €)	RBI*					RBI AG				
	2023		Change from previous year	2022	2021	2023		Change from previous year	2022	2021
Utilized line	63 (95 %)		161 %	24	12	8 (98 %)		–22 %	10	10
Unutilized line	3 (5 %)		–	0	0	0 (2 %)		–	0	0
<b>Water supply, sewage treatment and waste management</b>	<b>66 (100 %)</b>		<b>174 %</b>	<b>24</b>	<b>12</b>	<b>8 (100 %)</b>		<b>–20 %</b>	<b>10</b>	<b>10</b>

\* Including RBI AG and the subsidiary banks in CEE, excluding the Austrian subsidiaries RBSK, RKAG, RL, Valida, Kathrein. Adding up rounded percentages may result in total amounts not equal to one hundred.

#### Sustainable forestry and farming

Projects in this category promote the environmentally sustainable management of living natural resources and land use. The volume of financing utilized at RBI\* in this field in 2023 was around € 17 million as at 31 December.

### Sustainable forestry and farming – corporate customers

(in million €)	RBI*					RBI AG				
	2023		Change from previous year	2022	2021	2023		Change from previous year	2022	2021
Utilized line	17 (100 %)		1,988 %	1	0	0	–	–	0	0
Unutilized line	0 (0 %)		–	0	0	0	–	–	0	0
<b>Sustainable forestry and farming</b>	<b>17 (100 %)</b>		<b>1,993 %</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>–</b>	<b>–</b>	<b>0</b>	<b>0</b>

\* Including RBI AG and the subsidiary banks in CEE, excluding the Austrian subsidiaries RBSK, RKAG, RL, Valida, Kathrein. Adding up rounded percentages may result in total amounts not equal to one hundred.

## Metrics of financing with a positive impact on society and social issues

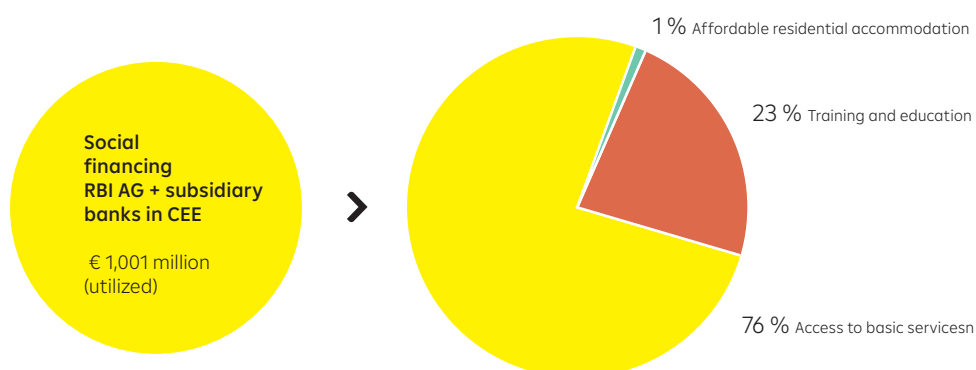
GRI 203-1, -2  
GRI G4-FS7

In 2023, the volume of financing utilized by corporate and institutional customers at RBI\* with a positive impact on society and social issues was around € 1 billion as at 31 December and thus remained stable as compared to the previous year.

### Breakdown of social financing by sustainability criteria

Financing with a positive impact on society and societal issues – corporate and institutional customers									
(in million €)	RBI*				RBI AG				
	2023	Change from previous year	2022	2021	2023	Change from previous year	2022	2021	
Access to basic services	764 (76 %)	-2 %	783	499	672 (77 %)	-12 %	761	453	
Training and education	231 (23 %)	4 %	223	190	203 (23 %)	-2 %	207	175	
Affordable residential accommodation	6 (1 %)	-4 %	6	0	0 (0 %)	-	0	0	
<b>Subtotal (utilized line)</b>	<b>1,001 (96 %)</b>	<b>-1 %</b>	<b>1,011</b>	<b>689</b>	<b>876 (97 %)</b>	<b>-10 %</b>	<b>968</b>	<b>628</b>	
Unutilized line	37 (4 %)	-36 %	57	68	23 (3 %)	-48 %	44	67	
<b>Finanzierungen mit positivem Impact auf Gesellschaft und Soziales</b>	<b>1,038 (100 %)</b>	<b>-3 %</b>	<b>1,068</b>	<b>757</b>	<b>899 (100 %)</b>	<b>-11 %</b>	<b>1,012</b>	<b>695</b>	

\* Including RBI AG and the subsidiary banks in CEE, excluding the Austrian subsidiaries RBSK, RKAG, RL, Valida, Kathrein. Adding up rounded percentages may result in total amounts not equal to one hundred.



One key aspect of the definition of the social category is the existence of a vulnerable target group.

Details of financing with a positive impact on society and social issues are shown below.

#### Access to basic services

In 2023, the volume of RBI\* financing utilized in this area amounted to around € 764 million as at 31 December and thus remained stable as compared to the previous year.

Access to basic services – corporate and institutional customers									
(in million €)	RBI*				RBI AG				
	2023	Change from previous year	2022	2021	2023	Change from previous year	2022	2021	
Utilized line	764 (96 %)	-2 %	783	499	672 (97 %)	-12 %	761	453	
Unutilized line	35 (4 %)	-16 %	41	45	23 (3 %)	-45 %	41	44	
<b>Access to basic services</b>	<b>799 (100 %)</b>	<b>-3 %</b>	<b>824</b>	<b>544</b>	<b>695 (100 %)</b>	<b>-13 %</b>	<b>802</b>	<b>496</b>	

\* Including RBI AG and the subsidiary banks in CEE, excluding the Austrian subsidiaries RBSK, RKAG, RL, Valida, Kathrein. Adding up rounded percentages may result in total amounts not equal to one hundred.

GRI 203-1



The following areas in particular are covered at RBI AG: health and healthcare (hospitals and clinics, care facilities, cancer research projects, etc.), regional development and infrastructure (e.g. school buses), and drinking water supply. Subsidiary banks in CEE mainly cover the following areas: health and healthcare (hospitals and clinics, care facilities, etc.), regional development and infrastructure (road construction and renovation, bridge renovation, public lighting, provision of high-speed Internet access in rural areas, etc.).

In 2023, as at 31 December, RBI AG also gave 113 institutes of the Raiffeisen Banking Group in Austria incentives to finance a further 47 public-sector projects, such as water supply facilities, sewerage systems, schools and kindergartens, and similar projects.



#### Training and education

In 2023, as at 31 December, the volume of RBI\* financing utilized in the field of training and education amounted to around € 231 million and thus remained stable as compared to the previous year.

#### Training and education – corporate and institutional customers

(in million €)	RBI*				RBI AG			
	2023	Change from previous year	2022	2021	2023	Change from previous year	2022	2021
Utilized line	231 (99 %)	4 %	223	190	203 (100 %)	-2 %	207	175
Unutilized line	2 (1 %)	-90 %	16	24	1 (0 %)	-82 %	3	24
<b>Training and education</b>	<b>233 (100 %)</b>	<b>-2 %</b>	<b>238</b>	<b>214</b>	<b>204 (100 %)</b>	<b>-3 %</b>	<b>210</b>	<b>199</b>

\* Including RBI AG and the subsidiary banks in CEE, excluding the Austrian subsidiaries RBSK, RKAG, RL, Valida, Kathrein. Adding up rounded percentages may result in total amounts not equal to one hundred.



#### Affordable residential accommodation

In 2023, the volume of financing utilized at RBI\* in this category was € 6 million as at 31 December and thus remained stable as compared to the previous year. This category includes projects to improve access to affordable residential accommodation for low-income sectors of the population, which are defined in the respective national programs for affordable residential accommodation and are in line with the funding eligibility criteria stipulated by the respective governments.

#### Affordable residential accommodation

(in million €)	RBI*				RBI AG			
	2023	Change from previous year	2022	2021	2023	Change from previous year	2022	2021
Utilized line	6 (100 %)	-4 %	6	0	0 –	–	0	0
Unutilized line	0 (0 %)	–	0	0	0 –	–	0	0
<b>Affordable residential accommodation</b>	<b>6 (100 %)</b>	<b>-4 %</b>	<b>6</b>	<b>0</b>	<b>0 –</b>	<b>–</b>	<b>0</b>	<b>0</b>

\* Including RBI AG and the subsidiary banks in CEE, excluding the Austrian subsidiaries RBSK, RKAG, RL, Valida, Kathrein. Adding up rounded percentages may result in total amounts not equal to one hundred.



## Metrics for ESG-linked financing

This financing product is intended to give customers an incentive to improve their sustainable behavior. In ESG KPI-linked financing, the financing terms are linked to the attainment of agreed environmental or social targets. In ESG rating linked financing, the main aim is to improve the borrower's published ESG rating. These types of financing were rolled out throughout the Group and reported on for the first time in 2021. In 2023, the utilized volume of the portion of ESG-linked financing at RBI\* totaled around € 2.18 million as at 31 December. ESG KPI-linked financing accounts for 71 per cent of the ESG-linked financing volume at RBI\* (utilized line).

The volume increase in 2023 mainly stems from financing in the "ESG KPI-linked financing" category.

### ESG-linked financing – corporate and institutional customers

(in million €)	RBI*					RBI AG			
	2023	Change from previous year	2022	2021	2023	Change from previous year	2022	2021	
ESG-KPI linked loan	1,546 (71 %)	32 %	1,171	838	1,169 (67 %)	33 %	880	642	
ESG-rating linked loan	638 (29 %)	-6 %	680	148	580 (33 %)	-13 %	670	138	
<b>Subtotal (utilized line)</b>	<b>2,184 (49 %)</b>	<b>18 %</b>	<b>1,851</b>	<b>986</b>	<b>1,749 (43 %)</b>	<b>-13 %</b>	<b>1,550</b>	<b>779</b>	
Unutilized line	2,302 (51 %)	163 %	875	1,243	2,292 (57 %)	162 %	875	1,181	
<b>ESG-linked financing</b>	<b>4,486 (100 %)</b>	<b>65 %</b>	<b>2,726</b>	<b>2,229</b>	<b>4,041 (100%)</b>	<b>67 %</b>	<b>2,425</b>	<b>1,960</b>	

\* Including RBI AG and the subsidiary banks in CEE, excluding the Austrian subsidiaries RBSK, RKAG, RL, Valida, Kathrein. Adding up rounded percentages may result in total amounts not equal to one hundred.

- **ESG rating-linked financing**  
Since 2019, RBI has offered ESG rating-linked financing instruments in the form of a loan, bond or promissory note linked to an improved ESG rating. The agreement ties the interest margin to the ESG rating issued by a renowned sustainability rating agency. If the borrower's ESG rating improves, the margin and hence the interest rate may decrease and vice versa.
- **ESG KPI-linked financing**  
An ESG KPI (key performance indicator)-linked loan, bond or promissory note is a financing instrument that gives the borrower incentives to attain agreed sustainability targets. In particular, the specification of relevant and material environmental KPIs, such as a reduction in CO<sub>2</sub> emissions, ensures that negative impacts on the climate are prevented as far as possible and that a positive contribution is made to climate protection. In addition, the ESG KPI-linked financing product provides a financial incentive for companies that want to improve their ESG performance, and therefore reduces the overall costs of the debt. One key feature of this product is a mechanism that links decreases or increases in the financing terms to the borrower's performance with regard to the agreed KPIs. The KPIs should be meaningful to the business and related to borrower's overall ESG goals. If the company's performance reaches a specific threshold, the financing margin is reduced, and vice versa. RBI advises its customers and jointly works on identifying informative and ambitious ESG KPIs.

RBI donates sustainability premiums resulting from ESG rating-linked and ESG KPI-linked financings for charitable causes. In 2023, the resulting premiums were donated to the Stepic CEE Charity (also see page 208). RBI will continue this initiative in 2024 and applicability of the scheme will be extended to ESG-linked financings in the entire customer universe incl. institutional clients in Head Office.

## ESG financing metrics for retail customers

- Green mortgage and unsecured green and social loans

In 2023, RBI offered green mortgage loans for retail customers in all its operating markets. The loans are secured by real estate and are made available exclusively to finance or refinance, in whole or in part, new and/or existing transactions with a specific use of proceeds as defined by the Framework for Green and Social Loans.

In May 2023, our subsidiary bank in Hungary launched a new product – home equity product – focusing on financing appliances to improve a property's energy efficiency.

From 2023, RBI has offered green unsecured purpose loans for private individuals and SME customers in Albania, Kosovo, Slovakia and Bosnia & Herzegovina. All eligible green and social loans provide clear environmental and/or social benefits. The use of the proceeds of these loans and eligibility criteria are also stipulated in the Framework for Green and Social Loans. By implementing the Framework within the Retail Banking division, we have ensured that our subsidiary banks in CEE can issue sustainability bonds and use the proceeds to finance or refinance, in whole or in part, existing or future projects that will lead to positive environmental outcomes and social advancements.

In 2023, the volume of new green mortgage and unsecured green and social retail loan sales was around € 738.5 million (2022: € 466 million).

## Ambitions

To address our Climate & Environmental Business Strategy's "Ambition 2025", we defined business priorities related to each pillar.

Pillar I ambitions:

- 30 per cent of the corporate portfolio at RBI head office is ESG eligible on the basis of the definitions in our RBI Group ESG Rulebook 2025. We aim to achieve this target by increasing resource allocation and investments in industries and products with positive impacts on environment and society.
- Reaching 10 per cent of new green mortgage loan and unsecured ESG purpose loan sales within the retail loan volumes.
- Introducing an industry-specific approach with sectoral strategies for industries with high ESG relevance.
- Following quantitative climate-related targets according to the Science Based Target initiative.
- Group-wide roll-out of qualification process for circular economy with the target to identify at least € 200 million circularity-eligible assets or with an impactful circularity KPI.
- Implementing a customer-friendly ESG data collection process, by using established and alternative data sources and smart digital tools which help us create additional customer benefits.

Pillar II ambitions:

- Be the bank of choice in ESG consultancy for corporate and institutional customers in Austria and CEE.
- Be the bank of choice in ESG financing and transition in Austria and CEE.
- Be the bank of choice for our retail customers' ESG transition, by providing supporting banking products and solutions.

Pillar III ambitions:

- Continuously providing advanced ESG know-how and sharing it across internal and external stakeholders.
- Continuing to educate employees across the RBI Group (currently over 1,000 per year).
- Training our retail employees about ESG and its implications for the retail banking area.



# ➤ Sustainable financing at Raiffeisen Bausparkasse Gesellschaft m.b.H.

Raiffeisen Bausparkasse is a 100 per cent subsidiary of Raiffeisen Bank International AG and the Raiffeisen Banking Group's specialist institution for financing, maintenance and improvement of residential property. It offers market-leading and discounted building loan agreements as well as tailored financing solutions. Raiffeisen Bausparkasse's products are primarily sold via the Austrian Raiffeisen banks. The majority of its customers are private individuals. Raiffeisen Bausparkasse also finances projects by non-profit and commercial real estate developers as well as municipalities in Austria.

## Impacts

In recent decades, domestic building societies in Austria have co-funded the construction, purchase or modernization of a large volume of residential units. In this way, building societies have contributed to the broad accumulation of property and wealth as well as individual financial security. A significant portion of this financing was provided by Raiffeisen Bausparkasse Gesellschaft m.b.H., the largest building society on the Austrian market. In the housing finance sector, the topics of renovation, energy efficiency improvements in existing structures and energy-efficient construction are becoming increasingly important. This is demonstrated in a trend study commissioned by Raiffeisen Bausparkasse in 2023 on "Sustainable building and living in Austria", and is confirmed by the growing demand for loans for refurbishing and renovating residential property. In 2023, building society loans for building or purchasing new properties were less sought after. In 2023, Raiffeisen Bausparkasse recorded its highest proportion to date of financing for renovation and refurbishment projects/conversions and extensions.

Raiffeisen Bausparkasse pursues a sustainability strategy based on the concept "Building a sustainable future". As a fair, social and ecologically responsible financial company, the aim is to continue contributing to the creation of sustainable residential accommodation and to a sustainable society. One of Raiffeisen Bausparkasse's particularly important impacts is enabling a broad spectrum of society to acquire residential property by financing affordable, social accommodation both within the retail sector and in the field of non-profit housing construction.

The building society system offers stable and calculable home loan and savings financing with an interest rate ceiling, factors which are becoming increasingly important in volatile markets with increasing building costs and property prices. Thus, even in times of economic uncertainty, Raiffeisen Bausparkasse offers its customers a planable, secure means of financing both residential property and also measures to improve energy efficiency and reduce CO<sub>2</sub> – such as thermal insulation, replacement of heating or the switch to renewable energies.

Moreover, a building society loan can also be used to finance training and upskilling, as well as maintenance measures. This underlines the role of building societies as financing partners for the general population in socially and societally relevant fields.

## Risks and opportunities

For many years and decades, the general public associated Raiffeisen Bausparkasse's financing business with demand for new-build financing. However, the growing awareness of the problem of soil sealing coupled with the increase in inflation and lending rates in the past year has prompted a rethink and now presents a challenge for Raiffeisen Bausparkasse. In 2023, financing demand for new-build projects declined significantly, with more and more people recognizing the potential offered by existing residential buildings. For Raiffeisen Bausparkasse, this offers an opportunity

for growth in the field of refurbishment and renovation. The existing building stock throughout Austria harbors huge resources that can be utilized for refurbishment, renovation, or densification. Firstly, refurbished buildings can make a major contribution to achieving Austria's climate protection targets, while also mitigating the problem of soil sealing. Indeed, demand for financing for the refurbishment and renovation and also the conversion and extension of existing buildings is now rising steadily.

The collection of energy performance certificates, which is also growing in importance due to legislation, is producing increasing volumes of data on financed buildings.

## Metrics and ambitions

Raiffeisen Bausparkasse Gesellschaft m.b.H.	2023	2022	2021
Number of customers	1.3 million	1.3 million	1.4 million
Home savings deposits	€ 6.7 billion	€ 6.7 billion	€ 6.3 billion
Loans*	€ 8.3 billion	€ 8.1 billion	€ 7.1 billion
Proportion of loans for housing creation (purchase, new build, refurbishment, renovation)	99.95 %	99.95 %	99.93 %
Proportion of refurbishment/renovation (as a proportion of loans for housing creation)	31.7 %	24.2 %	20.6 %
Proportion of loans for education (as a proportion of total loans)	0.04 %	0.04 %	0.06 %
Proportion of loans for maintenance (as a proportion of total loans)	< 0.01 %	< 0.01 %	< 0.01 %

\* Total lending volume (outstanding loans without equity prefinancing)

We have set ourselves the target of increasing awareness around the subject of sustainable building and living, emphasizing the ecological and economic benefits, while also highlighting the issue of the shortage of land and the simultaneous need to ensure high-quality residential accommodation over the long term. The refurbishment of and energy improvements to existing building stock will remain a key focus.

To this end, Raiffeisen Bausparkasse implemented a number of communication measures in 2023. The findings from a trend study carried out in collaboration with the market research institute Spectra were presented at a press briefing on "Sustainable building and living in Austria". In March, Raiffeisen Bausparkasse launched the podcast "Planspiel.Wohnen" (Simulation game.Living) The podcast is exclusively dedicated to the question of sustainability for residential property, engages in discussions with experts from a range of disciplines, and offers food for thought and possible solutions. Raiffeisen Bausparkasse is also a partner of the information campaign "Österreich ist nicht ganz dicht!", which is organized by the Austrian Federal Ministry of Climate Action, Environment, Energy, Mobility, Innovation and Technology (BMK) and which aims to raise awareness about insulating homes.

Find more at:  
[www.bausparen.at/de/wohnwelt/planspiel-wohnen-podcast.html](http://www.bausparen.at/de/wohnwelt/planspiel-wohnen-podcast.html)



# ➤ Sustainable financing at Raiffeisen-Leasing

Raiffeisen-Leasing has operated as a specialist institution of the Raiffeisen Banking Group Austria in Austria and other countries since 1970 and offers all types of vehicle, movable property and real estate leasing, fleet management and real estate development business (under the Raiffeisen WohnBau brand). In 2007, Raiffeisen-Leasing was a founding member of the Raiffeisen Sustainability Initiative (RNI) in which sustainability and climate protection represent two key pillars. Throughout Austria, Raiffeisen-Leasing draws on the structures of the independent Raiffeisen bank branches. In its cross-border business, the company works with the branch network of RBI AG.

Raiffeisen-Leasing GmbH acts as a service provider for all leasing finance and services within the Raiffeisen-Leasing network and retains the staff and all necessary infrastructure. Although the individual units of Raiffeisen-Leasing are not consolidated within the RBI CRR group, they are included in the reporting due to the uniform processing with the parent company Raiffeisen Leasing GmbH. The separation of transactions in the RBI CRR group and outside of the RBI CRR group is presented in detail.

Raiffeisen-Leasing operates in four strategic business areas:

## Standard leasing business

Leasing finance for retail and SME clients as well as public authorities up to a volume of around € 1 million, especially for vehicles and movable property.

## Fleet management

Financing and fleet management services (especially tires, refueling, maintenance, insurance, claims management) for vehicles (cars and trucks up to 3.5 t) for SME and corporate clients and also public authorities from a fleet size of one vehicle; comprehensive consulting services in relation to fleet optimization and greening – including in particular the switch to electric vehicles and charging solutions.

## Individual leasing business

Structuring and financing of long-term real estate leasing solutions and movable property leasing from a volume of € 1 million for corporate clients, SME clients and public authorities; expertise in the implementation of municipal EEBS and PPP projects where energy consumption guarantees have to be considered.

## Real estate management and real estate developer

Planning, construction and sale of high-quality privately financed residential building projects under the "Raiffeisen WohnBau" brand; operation and management of commercial real estate projects (shopping centers and specialist retail centers, office and logistics properties) in Austria and other countries.

## Impacts

The provision of mobility as a core service naturally has an impact on the environment. Consequently, Raiffeisen-Leasing particularly strives to offer sustainable mobility solutions and support the switch to renewable energies. E-mobility for private individuals and companies and also the fleet services as well as the green finance solutions in the movable sector are in line with this orientation. Raiffeisen-Leasing's financing solutions support the transition to a sustainable economy and to the circular economy.

As well as supporting climate objectives, Raiffeisen-Leasing also considers its social responsibility to include financing comprehensive, long-term overall solutions from a single source that serve the wider public. These include, for example, public-private partnership models, especially in the schools and education sector. Raiffeisen-Leasing thus helps the public authorities ensure a modern infrastructure for social and educational institutions.

## Risks and opportunities

At corporate level, Raiffeisen-Leasing does not believe it faces any direct ecological risks. At Raiffeisen-Leasing, the risks of sustainable financing are addressed within the context of RBI's risk policies. In the same way as for the RBI Group, impacts relating to sustainability will in future be considered in ESG scores and included in decision-making. Raiffeisen-Leasing considers its most relevant risk to lie in it failing to work on the company's transformation and thereby missing out on key future business opportunities, which could harm the overall business model. It can be assumed that in future, Raiffeisen's broad customer base will demonstrate increasing demand for sustainable financing solutions.

With an investment of around € 1 billion, the EU Green Deal enables Raiffeisen-Leasing to succeed in its business model by offering sustainable financing services. The product portfolio already offers tailored solutions. In future, a leasing company's asset know-how will play a more dominant role, including in terms of advising customers on sustainable business. Well-founded training of Raiffeisen-Leasing employees and the anchoring of ESG as a topic within the key strategic role of corporate governance will support this development.

Within the context of the Austrian leasing sector (Verband Österreichischer Leasing Gesellschaften) and the European association of leasing companies (Leaseurope), Raiffeisen-Leasing is an active member of the respective sustainability working groups and thus has its finger on the pulse of the green developments within the leasing sector.

Raiffeisen-Leasing's broad involvement in the sustainability initiatives of the Raiffeisen Banking Group and within the RBI Group ensures that Raiffeisen-Leasing will succeed in its transformation to a leading provider of sustainable leasing solutions in Austria.

GRI 203-1

## Metrics and ambitions

Through the two strategic business areas of vehicle leasing and fleet management, Raiffeisen-Leasing already recognized the need to promote electric mobility finance in Austria through attractive financing more than 15 years ago. At the same time, demand for charging solutions and infrastructure to produce renewable energy also rose.

Raiffeisen-Leasing is convinced that the switch to more environmentally friendly technologies must be made affordable. This is made possible by flexibly structured monthly installment payments. At the same time, care is taken to ensure that the financing can be combined with any state subsidies in order to give an additional incentive for the switch to more environmentally friendly (and ideally even climate-neutral) technologies.

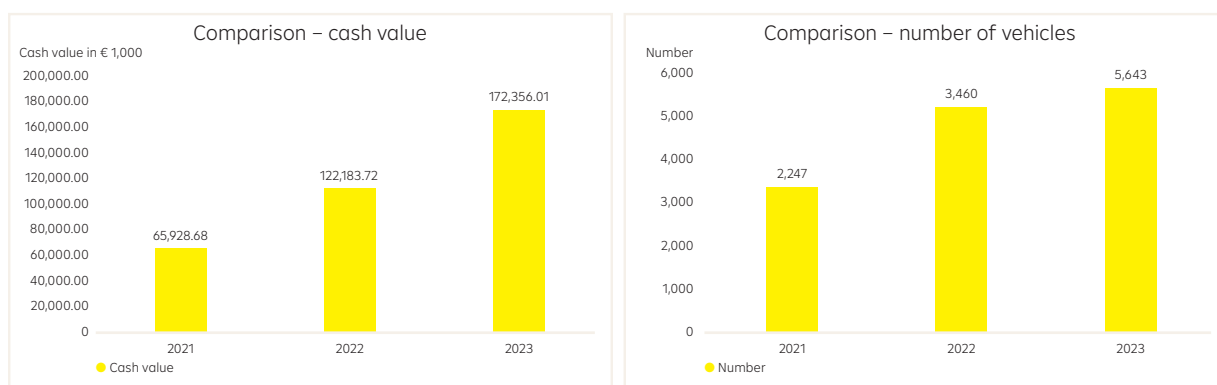
### Financing electro-mobility

Raiffeisen-Leasing's expertise in the field of electro-mobility originally stems from its subsidiary, Raiffeisen-Leasing Fuhrparkmanagement GmbH. In 2008, it already started offering corporate customers customized financing for the then still niche segment of electric vehicles.

Raiffeisen-Leasing Fuhrparkmanagement is Austria's only fleet manager that is certified pursuant to both the ISO 9001 quality standard as well as the ISO 14001 environmental management standard. Both certifications were confirmed by TÜV Austria in April 2023.

In 2021, Raiffeisen-Leasing Fuhrparkmanagement already recorded the highest proportion of electrified vehicles among new contracts concluded by Austrian fleet managers. In 2023, 60.25 per cent (2022: 54.3 per cent) of all new contracts concluded at Raiffeisen-Leasing Fuhrparkmanagement were for electric vehicles. Of this, 52.64 per cent (2022: 46.2 per cent) was represented by fully electric company vehicles – an increase of more than 6.44 percentage points compared to the whole of 2022. At 7.61 per cent (2022: 8.1 per cent), the proportion of newly registered hybrid vehicles declined.

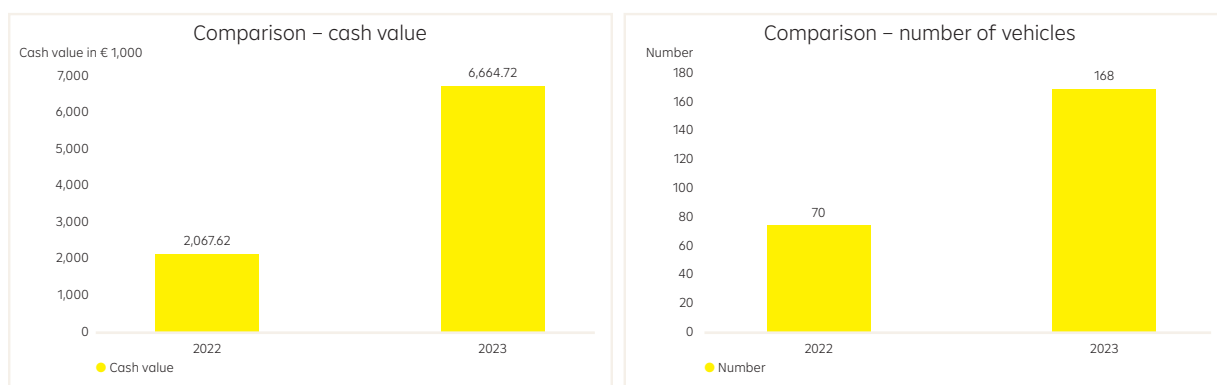
As at 31 December 2023, the cash value<sup>1</sup> of the Raiffeisen-Leasing Group's volume of electric mobility financing for fully electric vehicles amounted to around € 372 million (2022: € 260 million). This included new contracts of around € 172 million concluded in 2023 (2022: € 122 million; 2021: € 66 million). In 2023, around € 44 million of this (2022: € 29 million; 2021: € 11 million) related to RBI's scope of consolidation (IFRS). The remaining sum of approximately € 129 million (2022: € 93 million; 2021: € 55 million) is not included therein.



Development of new contracts for the financing of fully electric vehicles

## Environmentally friendly technologies

Since fall 2021, Raiffeisen-Leasing has offered special movable property financing for companies and also retail customers under the product name "Green Finance". This financing can be used to purchase environmentally friendly technologies. In 2023, financing with a cash value<sup>1</sup> of around € 6.7 million (2022: € 2.1 million) was concluded. The projects financed included, for example, photovoltaic systems, charging stations, power/heat pumps and pellet heating systems.



Development of new contracts for financing environmentally friendly technologies

In addition to the reported figures, the Corporates segment offers solutions and products for sustainable and social movable property and real estate financing in collaboration with RBI Sustainable Finance.

<sup>1</sup> In previous years, the property purchase prices were reported instead of the present values. For this reason, the values in this section are not comparable with those in the 2022 Sustainability Report

ESG Pillar 3  
ER c  
TCFD

# > Sustainable investment

The following section focuses on the sustainable investment products of Raiffeisen Kapitalanlage-Gesellschaft m.b.H., Kathrein Privatbank Aktiengesellschaft and Raiffeisen Bausparkasse Gesellschaft m.b.H., as well as on the Raiffeisen certificates of RBI AG and the sustainable investment products of the subsidiary banks in Central and Eastern Europe. It thus covers the most relevant parts of sustainable investments within the Raiffeisen universe.

## PRB 2 Impacts

Analyzing sustainability impacts on society and the environment and risks for RBI in connection with investments is crucial. Firstly, and in the same way as for the loan portfolio (see page 95) – an understanding of the relevant impacts and risks is a prerequisite for a serious sustainability policy at RBI and for continued development of its corporate strategy. Secondly, it enables investors to assess the impacts of their investments in terms of environmental, social and economic issues and to identify potential risks. This is why in 2023 we used the UNEP FI's Investment Portfolio Impact Analysis to also analyze Raiffeisen KAG's investment portfolio in a first step.

### Impact analysis (UNEP FI Impact Analysis)

The UNEP FI's Investment Portfolio Impact Analysis Tool was used to analyze Raiffeisen KAG's portfolio for the 2023 year (as at 30 June) in relation to its sustainability impact. The underlying process involves two stages. The portfolio analysis firstly covers the actual impacts and then also the potential positive and negative impacts in relation to environment, social and economic matters.

The scope of the analysis included the self-managed part of the assets managed by Raiffeisen KAG, representing 59.3 per cent of the total fund volume of € 41.2 billion. Broken down by asset class, a sum of € 10.4 billion in share volumes, € 8.2 billion in investments in corporate bonds and € 5.8 billion in investments in sovereign bonds was analyzed. The remaining portion of the managed assets was not analyzed as the assets are not self-managed assets, meaning that not all of the sustainability aspects propagated by Raiffeisen KAG apply.

The principal negative impact areas revealed by the analysis related to waste and resource intensity, collectively referred to as "circularity". Indirect negative impacts relating to "climate stability" were also identified. A positive impact was established in the areas of "healthy economies" and "livelihood" or "employment".



### Objective and implementation

Raiffeisen KAG has addressed the topics of climate stability and circularity through initiatives. With regards to climate stability, joining the Net Zero Asset Managers Initiative (NZAM) set an example both internally and to the outside world. The clear reduction targets for the overall portfolio are followed by analyses and targets for individual portfolios in order to reduce negative impacts in relation to climate stability. In terms of circularity, figures on waste and water consumption have been determined and analyzed as part of a KPI calculation since 2016. In addition to the aforementioned commitment and the KPIs, engaging with companies and issuers presents an opportunity to reduce

negative impacts. Each year, Raiffeisen KAG conducts a number of discussions and is actively involved in the annual general meetings of those companies in which it has invested (see also “comprehensive stakeholder engagement” on page 24).

For Raiffeisen KAG, the United Nations' Sustainable Development Goals represent a further opportunity to analyze the impacts of investments. Analyses are continuously performed at fund level and incorporated into the management of the respective funds. The areas of climate stability and circularity are covered by SDGs 6, 7, 8, 9, 11, 12, 13, 14 and 15.

Generally, the analysis is performed using the UNEP FI's Impact Analysis Tool, based on a sector analysis. Active management and the selection of appropriate securities enable a significant reduction in negative impacts. Stock picking for Raiffeisen KAG's sustainability fund is based on an investment process that covers the various aspects of sustainability. The specific findings from the analysis are considered both when selecting individual stocks and also in the activities described – such as joining the NAZM, the consideration of KPIs, engagement, and the analysis of the relevant SDGs.



The result of the data analysis based on the UNEP FI's Investment Analysis Impact Tool and consideration of the results of the credit analysis (see pages 68-69) revealed two impact areas of strategic importance for Raiffeisen KAG:

Climate stability/SDG 13, 7, 9, and 12  
Circularity/SDG 11, 12, 6,7, 8, 9, 14, and 15

In terms of climate stability, Raiffeisen KAG has joined the Net Zero Asset Managers Initiative and is pursuing clear reduction targets for its portfolio. In terms of circularity, KPIs on waste and water consumption have been determined and analyzed since 2016.

GRI G4-DMA  
(former FSS)

TCFD



## Main causes of the negative impact

The principal causes of direct negative impacts according to the UNEP FI tool are listed in the table below. The impact area “climate stability” is not included since, based on UNEP FI data, the association can be described as only indirectly negative. For the asset class investments in sovereign bonds a detailed presentation is missing, as it cannot be broken down further into sectors.

Asset class		Sector of industry	Impact topic	
Investments in corporate bonds	Securities volume		Resource intensity	Waste
x	x	10 Energy	x	x
x	x	15 Materials	x	x
x	x	20 Industrials	x	x
x	x	25 Consumer discretionary	x	x
x	x	30 Consumer staples	x	x
	x	86 Human health activities	x	x
x	x	K Financial and insurance activities		x
x	x	45 Information technology	x	x
x	x	J Information and communication	x	x
x	x	D Electricity, gas, steam and air conditioning supply	x	x
	x	60 Real estate	x	x

List of sectors categorized by ISIC codes. Sectors/industries that have a direct negative impact on circularity (resource intensity and waste) are marked. If a sector is not marked, it either has no connection or only an indirect connection to these areas of impact.

## Risks and opportunities

Investments based on ecological and social aspects exhibit risk aspects associated with their specific nature. Sustainability funds and other sustainable investments that do not meet the product-specific and also ESG-related expectations in terms of product quality and related communication can result in reputation risks. By ensuring clear evidence and statements on product quality as well as sufficient activities in the field of sustainability, we endeavor to counter the risk of accusations of greenwashing as far as possible.

An absence of available adequate content-based and qualitative ESG evaluations as a quality analysis for potential investments can result in economic risks when selecting securities – such as investments with below average profitability, or higher default rates for fixed-interest investments. We mitigate this risk by conducting in-depth internal and external sustainability research.

Investments in securities that are undergoing ESG transformation may also lead to reputation risks due to a lack of suitable product definitions. Like all investments, sustainable investments harbor performance risks. In addition to general performance risks, sustainable products include relative performance risks based on potential underperformance. Such risks are derived from scientific studies. Where they do occur, they are, however, likely to be only temporary. Also linked to the risk of potential underperformance are risks relating to the sale of the products in question.

Sustainability-related reputation and performance risks may result in temporary but also long-term pressures. They may have a negative impact on product sales and result in redemptions of fund units. With the topic of sustainability now having assumed major significance within the investment market, market participants need a corresponding presence in this segment. Insufficient sustainable product portfolios may result in a market risk for the relevant providers if they are unable to satisfy the demand from investors. As well as considering the topic of sustainability at the product level, it is also important to address ecological and social aspects at the corporate level. Financial market participants are also exposed to environmental and social risks as part of their own business operations, and can mitigate these through appropriate CSR initiatives.

On the other hand, a positive approach to sustainability, the general change among the population in values with regard to ESG and the increasingly more extensive regulatory requirements for investments in terms of sustainability act as strong drivers of demand.

It is therefore increasingly possible to expand the product range for sustainable investments. Firstly, it is now possible to design investment products for a wide range of asset classes and sub-asset classes, while opportunities also exist for expanding the product range to include ESG-related topics. Restrictions compared to a traditional product range have gradually reduced thanks to improved research coverage in recent years.

Alongside market and sales-related opportunities, the positive impact of sustainable investments also plays a role. The impact of sustainable investments is not only an important argument when selling sustainable investments, but is also an important factor for society itself. Impacts are achieved directly through the investments – for example through the impact a company has on the environment and society (impact compatibility). In addition, investors can themselves achieve an impact by positively affecting the companies or issuers through their engagement (impact effectiveness).

# Management

PRB 2,5

## Raiffeisen Kapitalanlage-Gesellschaft m.b.H.

Sustainable investing of customer deposits at RBI AG is in large part effected via Raiffeisen KAG, which offers securities and real estate investment funds as well as asset management products to institutional and retail customers both in Austria and abroad under the brand name Raiffeisen Capital Management (RCM). Sales are focused on Austria, and the key markets also include Italy, Germany and CEE. In Austria, sales are also effected via Raiffeisen Banking Group Austria. In other countries, sales cooperations exist with local partners.

With a managed fund volume of € 39.1 billion and a 19.4 per cent share (according to OeKB statistics) of a fund market with a volume of € 202 billion (Austrian asset management companies), Raiffeisen KAG is one of Austria's leading asset management companies. An additional sum of € 3 billion is managed in advisories (mandates for third parties, partly abroad). In addition, Raiffeisen Vermögensverwaltung, which is integrated into Raiffeisen KAG, manages a volume of € 911 million.

The Raiffeisen Capital Management umbrella brand unites Raiffeisen KAG as well as Raiffeisen Immobilien KAG and Raiffeisen Salzburg Invest. At year-end, Raiffeisen Immobilien KAG managed € 682 million across two real estate funds, and Raiffeisen Salzburg Invest managed customer deposits of € 341 million. The total volume of Raiffeisen Capital Management's assets under management (AuM) was thus just under € 44 billion.



In a continuing highly volatile and challenging market environment in 2023, the volume of sustainable securities funds increased to almost € 23 billion (for details see Metrics and ambitions). The share of the total volume therefore grew to 54 per cent. In the retail segment (mutual funds), around 83 per cent of the volume is already attributable to sustainable funds.

GRI G4-FS11

After the climate targets were first defined in 2017, Raiffeisen KAG adopted a new climate strategy in 2022. This includes reduction targets over three periods: until 2025, until 2030 and finally, until 2050. The 2019/20 period was selected as the base year for the calculations. The assets covered by the climate strategy are all equity holdings and corporate bonds in funds managed by Raiffeisen KAG. The reduction targets are -25 per cent by 2025 and -50 per cent by 2030. The ultimate goal is to achieve climate neutrality by 2050.

Raiffeisen KAG is a member of the Net Zero Asset Managers Initiative (NZAM). The initiative comprises a group of international investors that are committed to supporting the goal of net-zero greenhouse gas emissions by 2050 or sooner. Meeting the climate targets of the Paris Agreement also plays a key role in determining the types of investments in the portfolios of the investors participating in this initiative, including Raiffeisen KAG.

GRI 2-29

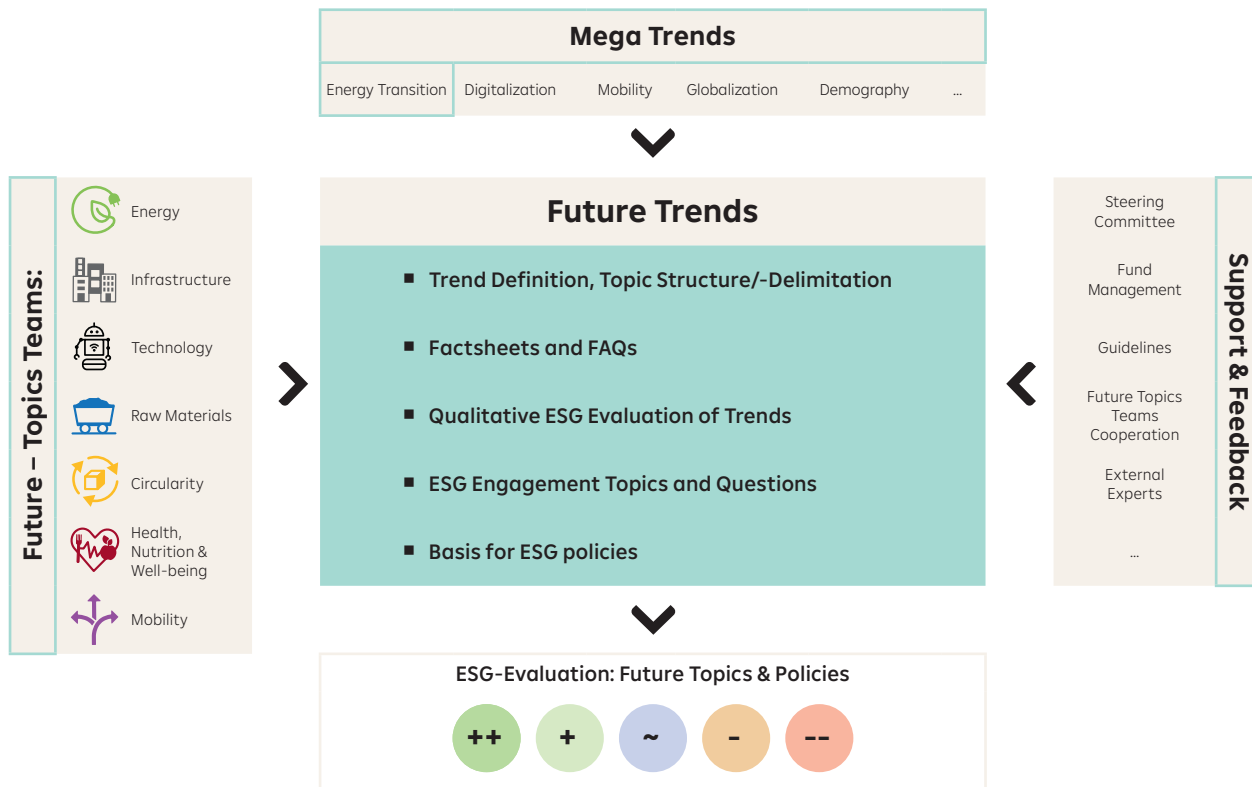


In 2023, Raiffeisen KAG signed the Finance for Biodiversity (FfB) Pledge. The FfB initiative, which was established in 2020, aims to increase transparency regarding biodiversity-related risks and opportunities within the finance sector and business and to contribute towards protecting and restoring biodiversity through finance activities and investments. This actively supports targets 14 and 15 of the Global Biodiversity Framework. As a member of the FfB Foundation, Raiffeisen KAG participates in the building and transfer of knowledge between financial institutions and in the development of relevant industry standards. In addition, Raiffeisen KAG is a founding member of Nature Action 100, a global engagement initiative by investors who have committed to protecting and restoring species diversity.

GRI 2-29



In recent years, Raiffeisen KAG has expanded its sustainable investment process to include a qualitative analysis by the future issues teams on ESG topics and on the ESG transformation process by companies and sovereigns. The analysis by the future issues teams of global trends and their impacts on the fields of activity and sectors of energy, infrastructure, commodities, technology, health/nutrition/wellbeing, circularity and mobility is carried out at the start of the investment process. The list of future issues is based on the main geopolitical and global economic developments and can be extended on an ongoing basis. Internal research is conducted to look at key trends and issues, and derive ESG analyses and issues as well as topics relating to ESG engagement. The interdisciplinary future issues teams are networked with each other and also provide a central basis for general policies, key information and discretionary analyses for the fund management investment and engagement process.



Find more at: [a.storyblok.com/f/107885/x/776d6673ed/wirkungsreport\\_at\\_retail\\_de.pdf](https://a.storyblok.com/f/107885/x/776d6673ed/wirkungsreport_at_retail_de.pdf)

The aforementioned topics considered material by Raiffeisen KAG are of environmental, social and societal relevance. Another particular focus area is the topic of human rights. KPIs on the impacts have been calculated on a fund basis by Raiffeisen KAG for many years and published on Raiffeisen KAG's website. The focus is on the KPIs for reducing CO<sub>2</sub> emissions, saving water, reducing waste and reducing accidents at work. The issue of reducing CO<sub>2</sub> emissions includes in particular the topics of energy, infrastructure and commodities. Saving water and reducing waste are closely linked to the topic of circularity. The area of technology is highly relevant to society and our employees. A positive consequence of new technologies is the focus on health and wellbeing in the workplace. The topic of human rights is addressed in the investment process of Raiffeisen KAG by applying positive and negative criteria, while company dialogs are also an effective tool for triggering impacts among the companies or issuers concerned.

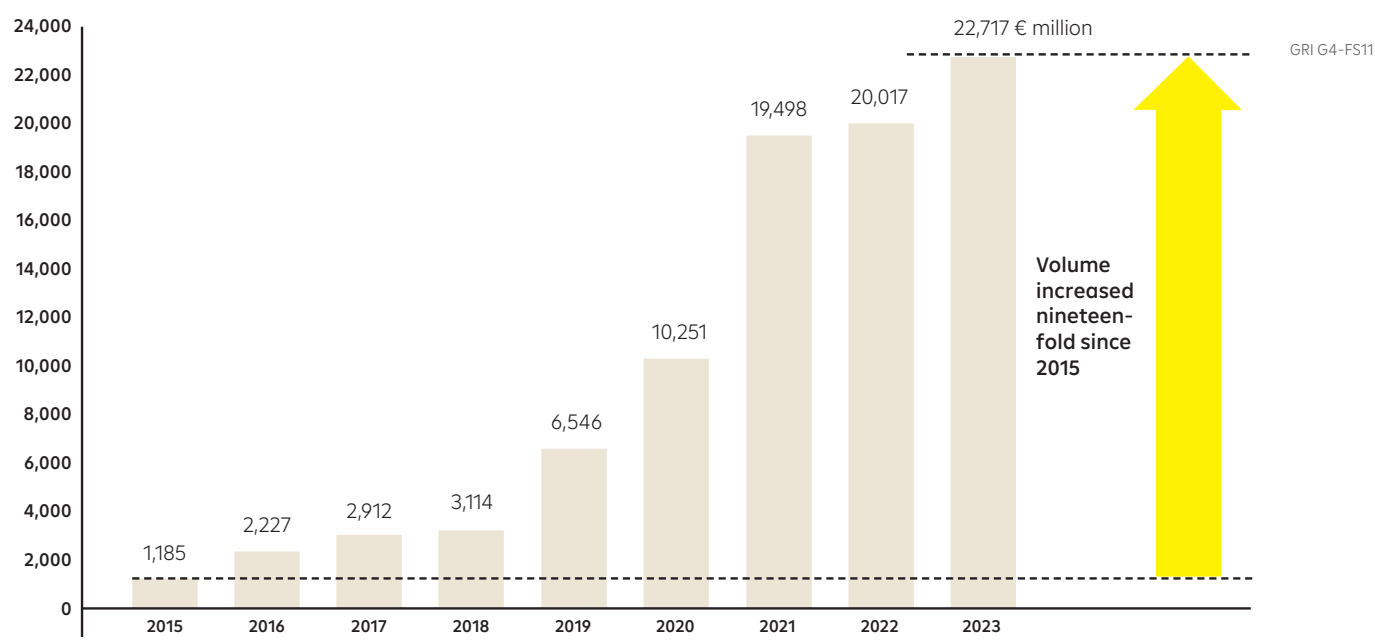
## Development of sustainable funds and asset management

### Sustainable funds

The degree to which sustainable investment funds are being accepted by investors is illustrated by the statistics since 2015. Since then, the volume of sustainable investments has increased nineteenfold. The growth trend continued in 2023 despite the generally difficult capital market conditions.



**Development of sustainable fund volumes since 2015**



Source: Raiffeisen KAG, data as December 31 2023

In the Austrian Raiffeisen banks, the sustainability funds product portfolio is offered via financial advisors. Since 2016, the "ÖGUT-zertifizierte(r) Berater:in für Nachhaltige Geldanlagen" training course to become an ÖGUT-certified advisor for sustainable investments has been organized in cooperation with the Austrian Society for Environment and Technology (ÖGUT). Individuals who successfully complete the course receive a corresponding certificate and are also able to apply to the Austrian certification body for financial planners, Österreichischer Verband Financial Planners, for the title of EFPA ESG Advisor®.

GRI G4-DMA (former FS4)

**Regulatory developments**

GRI G4-DMA (former FS15)

In June 2023, Raiffeisen KAG published its first statement on the principal adverse impacts of investment decisions on sustainability aspects, for the 2022 calendar year. The consideration of sustainability indicators for Raiffeisen KAG's individual investment products is determined in relation to the investment strategy selected.

Find more at: [issuu.com/raiffeisen-capital-management/docs/202305\\_policy\\_pai\\_de\\_final?fr=sY-jQ5YjU5Mjg-0NDk](https://issuu.com/raiffeisen-capital-management/docs/202305_policy_pai_de_final?fr=sY-jQ5YjU5Mjg-0NDk)

The EU Taxonomy Regulation, which enables the classification of economic activities in terms of their contribution to the aim of climate protection or adaptation to climate change, and subsequently facilitates disclosure of the corresponding percentages of the volume in financial market products, came into force in 2022. In 2023, regulation followed on the remaining four environmental targets: sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, and protection and restoration of biodiversity and ecosystems. Due to the severe delay in the technical details for implementing the regulation, only very limited company data is available. A significant improvement is expected for 2024, which will then also lead to a marked expansion in the disclosure of taxonomy data at product level.

The ESG-related regulation is still very much in a state of flux. In fall 2023, the EU Commission launched a comprehensive consultation process on the Disclosure Regulation, which could lead to a significant change in disclosure obligations. Among other things, the process is considering introducing a categorization system for sustainable products.

Adaptation of the funds product range to ensure an ESG-compliant portfolio was largely completed in 2023. The coming year will focus on continuing to develop the ESG-related investment process and on the disclosure of key performance indicators.

## Asset management

Through "Raiffeisen VIPnachhaltig", Raiffeisen KAG has for some years already provided sustainable asset management geared towards affluent retail customers. It combines the sustainability expertise and the extensive capital market knowledge of Raiffeisen KAG. Raiffeisen VIPnachhaltig invests solely in funds of Raiffeisen KAG and of international third-party fund companies that are classified as sustainable. Together with Raiffeisen Salzburg Invest, the managed customer assets within sustainable asset management grew to a total of € 482 million by the end of 2023. This equates to around 39 per cent of the total volume under management. New contracts are concluded only in the sustainable product line. Customers of Raiffeisen VIPnachhaltig receive an annual impact report which they can use as a basis to identify the sustainable impact of their respective investments based on the 17 SDGs (Sustainable Development Goals).

GRI G4-DMA  
(former FS4)

To ensure the quality of advice given at local level, Raiffeisen KAG offers Raiffeisen advisors two training programs relating specifically to VIPnachhaltig, each spanning two days. The first part, "Let's Go", focuses on product structure, the sustainable investment concept, and service quality. The second part, "Let's Grow", also provides training on, for example, specific consulting scenarios.

Raiffeisen Banking Group Austria also offers the digital asset management service, "WILL". As the asset manager of this wholly sustainable form of investment, Raiffeisen KAG managed a volume of almost € 184 million for the Raiffeisen Banking Group (excluding Upper Austria) at the end of 2023. This equates to growth of some € 42 million compared to the end of 2022. Customers of WILL digital asset management receive a twice-yearly impact report on the basis of the portfolio data and the 17 SDGs.

## Real estate funds

In 2023, the sustainability focus of Raiffeisen Immobilien KAG was on further implementing its sustainability strategy and the continued development of the requisite tools. In terms of properties, the real estate portfolio as a whole – excluding strategic exceptions such as project developments and newly acquired real estate – has sustainability certification in accordance with the criteria of Deutsche Gesellschaft für Nachhaltiges Bauen (German Sustainable Building Council, DGNB) or a comparable institution in the various usage types (hotel, logistics, office, retail, residential) in Germany, France, the Netherlands, Austria and Poland. At the end of 2023, around 82 per cent (some € 538 million) of the real estate volume of the institutional real estate funds had a corresponding certificate (with some German real estate undergoing recertification at the time).

The future viability of the properties has been and continues to be monitored on the basis of assessment standards in line with sustainability criteria. The assessment system for existing buildings focuses on building operation and user satisfaction in particular. The aim is to ensure sustainable building operation (operating costs and processes, user satisfaction, mobility services and social sustainability strategies) for every building. Since 2018, Raiffeisen Immobilien KAG has also been a member of the Austrian Society for Sustainable Real Estate (ÖGNI) and is one of the first Austrian companies in residential real estate to receive an ÖGNI taxonomy certificate. The existing portfolio is currently being examined accordingly. In addition and as part of the ESG strategy, the requisite tools are gradually being rolled out and integrated into the existing processes. The investments underlying the financial products of Raiffeisen Immobilien KAG do not follow the EU criteria for environmentally sustainable economic activities.

GRI 2-23, -24  
GRI G4-DMA  
(former  
FS1, FS2, FS9)

## Responsible management of sustainable funds

The process underlying the management of sustainability funds is described in detail in Raiffeisen KAG's sustainability policy. Irrespective of individual product specifications, Raiffeisen KAG's overall mutual funds product range is subject to company-wide negative criteria. A core element in this process is the voluntary commitment to exclude investments that permit or support food speculation, investments in controversial weapons and companies that pose reputational risks, and in companies whose business largely comprises the provision or use of thermal coal. ESG research is also generally integrated into the management of all funds as a means of improving the ESG indicator of the respective fund.

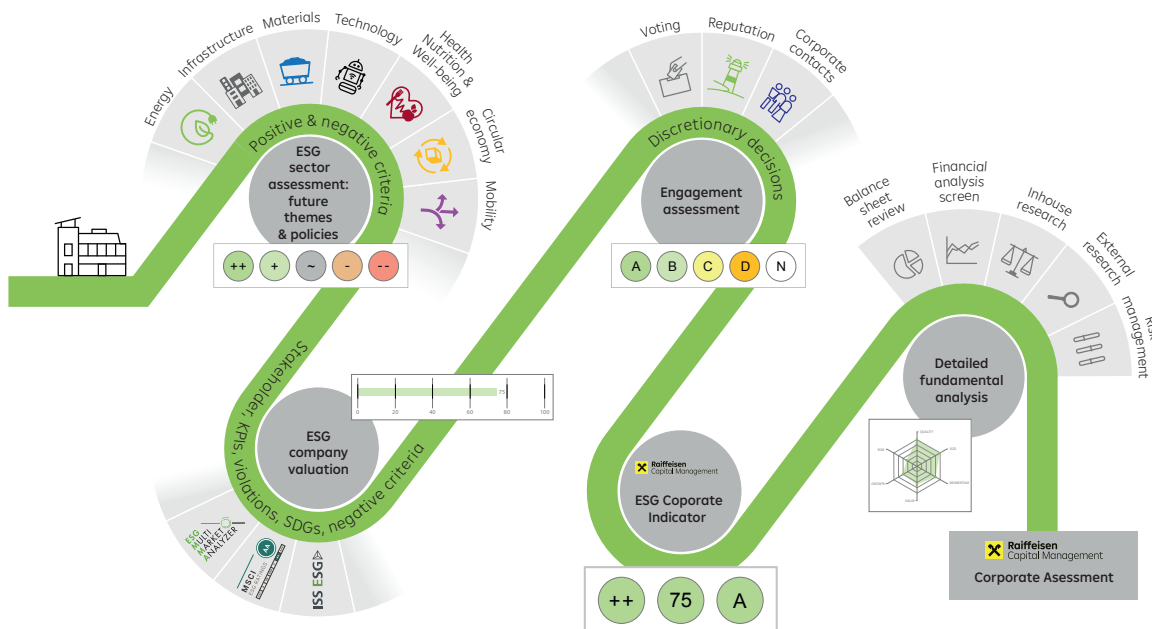
The sustainable securities funds have a total volume of € 22.7 billion and are subject to a combination of strictly defined, explicit environmental and social criteria that are both positive and negative (avoidance) and comply with the EU regulation on sustainability-related disclosure obligations (Article 8 and in part also Article 9 of the EU Sustainable

Finance Disclosure Regulation, SFDR).

The investment processes for all asset classes are constantly updated to reflect the respective most recent developments on the sustainable investments market. Among other things, greater emphasis has been accorded to the issue of transformation.

In the sustainable investment process, the traditional analysis is linked with the ESG analysis at multiple levels. The aim is to integrate economic, ecological and social aspects (ESG) throughout. Management is extremely active from both a fundamental and also a sustainable perspective and aims to assume social responsibility in the investment process alongside risk and return aspects.

### The investment process for sustainable funds as an integrated approach



The investment process for sustainable funds epitomizes fund management’s consistent approach in terms of ESG integration, engagement and fundamental analysis, and results in actively structured portfolios. Based on internal and external ESG data, an internally developed ESG indicator is calculated for companies and sovereigns that represents the key decision-making criterion in the investment processes of the sustainability funds. The main pillars of the ESG indicator are based on topic/sector assessments and the company assessment, as well as engagement; for sovereigns, the indicator is based on a multidimensional sustainable perspective.

The starting point for investment decisions is provided by findings on future issues that are considered material; these initially include the areas of energy, infrastructure, commodities, technology, health/nutrition/wellbeing, circularity and mobility. All aspects within this universe that are of relevance to a sustainable investment are carefully analyzed and processed, and are reflected in a topic or sector-based assessment. Sustainability research agencies are also used where further company-related ESG data is required. A stakeholder assessment, an assessment of ESG risks, a corporate governance assessment, an assessment of contentious issues and also an SDG assessment are then produced. The data are also incorporated in the assessment of the negative criteria defined by Raiffeisen KAG. This step is used to preselect the entire investment universe. The negative criteria are subject to continuous monitoring and can be supplemented or adjusted based on new findings and developments. The strict criteria framework aims to avoid contentious areas of business and criminal actions that can lead to extensive damage for the environment, society and the company.

The engagement analysis is another key pillar of the investment process and assesses various dimensions ranging from the company’s willingness to communicate to the implementation of engagement targets. This assessment is also incorporated into the ESG corporate indicator. The concluding detailed fundamental analysis forms the starting point for portfolio construction. All levels of the described process involve the clear assignment of a possible investment into pre-

defined assessment scales. An investment must comply with the specified minimum threshold. No investment is made where a defined negative criterion is infringed.

Consideration of the principal adverse impacts (PAI) is embedded in the three pillars of the investment process described above. This is achieved through the use of negative criteria, by integrating ESG research into the investment process, and through the selection of securities (positive criteria). The use of positive criteria includes the absolute and relative assessment of companies with regard to stakeholder-related data, for example in terms of employees, society, suppliers, business ethics and the environment. In addition, in terms of companies, engagement in the form of company dialogs and in particular the exercising of voting rights aims to reduce negative sustainability impacts.

GRI 2-12 The Sustainability Office is responsible for sustainability-related policies and is involved in advancing the sustainable investment process. Its responsibilities also include engagement and company dialogs, impact measurement, collaborations with universities, and certification. In addition, the Sustainability Office assists the operational fund management team with the sustainability assessment of individual securities and the analysis of their investment suitability.

As mentioned above regarding the prioritization of material topics, Raiffeisen KAG has defined future issues that are particularly relevant in light of the climate crisis and other challenges facing society. These issues undergo a structured analysis by interdisciplinary teams in fund management, taking investor considerations into account. The common denominator that links the overarching issues highlighted by the individual teams is the meta topic of sustainability. Accordingly, an assessment based on ESG factors is a central aspect of the analysis. The list of issues is by no means static, as it is oriented towards the main geopolitical and global economic developments and can be extended on an ongoing basis.

By interlinking topics and teams in this way, the aim is to promote dialog and knowledge building at Raiffeisen KAG, establish an informed company opinion on the main individual topics and, ideally, develop innovative (impact) products for investors, such as the Raiffeisen-SmartEnergy-ESG-Aktien fund. This accumulation of knowledge allows us to provide coherent arguments for taking particular positions – such as our current clear avoidance of nuclear energy.

The starting point for selecting sustainable external funds is the sustainability policy of Raiffeisen KAG, which in addition to illegal weapons and food speculation also defines coal as an exclusion criterion. In the case of the latter, Raiffeisen KAG has committed to significantly reducing its investments in coal as of now and over the course of the coming years, as set out in a development plan for 2030. On the basis of this development plan, climate-relevant impact factors are taken into account when selecting sustainable external funds. This process is purely quantitative in the initial stage and is rounded off by a qualitative analysis of the individual external funds in the form of manager meetings and conference calls. Monitoring the selection of sustainable external funds ensures compliance with our requirements.

## Engagement process

The future issues are also a major factor in the continuous deepening and expansion of sustainability expertise within Raiffeisen KAG. This is reflected in our consistently intensified commitment to exercising our right to vote or actively communicating with listed companies. The exercise of voting rights is an important element of the investment approach for sustainability funds, not least because corporate governance is an important pillar of the sustainability analysis. Accordingly, these funds exercise voting rights for the majority of holding companies. In 2023, 681 active company dialogs (engagement activities) were undertaken and 516 votes were cast either directly at general meetings or via specific platforms. An annual engagement report as well as the principles for the engagement process and the exercise of voting rights are published on our website.

All engagement activities are recorded in the engagement database of Raiffeisen KAG. This allows the effectiveness of the engagement activities to be assessed over time. As other investors are also engaged in similar issues and activities in most cases, it is very difficult to measure our own contribution to the effectiveness of a particular investor group in precise terms. Thus, the results of the progress made in the respective engagement activities are assessed by fund management and the Sustainability Office on a discretionary basis using a coordinated approach.

GRI 2-29  
GRI G4-DMA  
(former FS5,  
FS12)  
GRI G4-FS10

Find more at:  
[www.rcm.at/  
at-en/retail/  
topics/sus-  
tustainability/](http://www.rcm.at/at-en/retail/topics/sustainability/)

One of the focus areas in the current engagement activities is the progress made by companies in terms of climate protection. For example, in the course of the engagement activities on principal adverse impacts (PAI), the largest emitters of greenhouse gases in the energy funds of Raiffeisen KAG are surveyed on their climate protection strategies. Information about their planned technological progress and details of precise long-term strategies, including interim targets, are requested and evaluated by Raiffeisen KAG, and the corresponding results are monitored. Every company surveyed in this process is treated individually, although the average target is a 7 per cent reduction in greenhouse gases per year, with the aim of reaching net-zero greenhouse gas emissions by 2050. These targets correspond to the targets of the Net Zero Asset Managers Initiative (NZAM), which Raiffeisen KAG joined in December 2022.

GRI 201-2

The progress and results of these engagement activities are documented in the engagement database, before being discussed and evaluated in departmental and interdepartmental meetings. As the results of this process feed into the Raiffeisen ESG indicator, they have a material influence on the investments in the funds managed by Raiffeisen KAG. The results of these engagement activities are shown in the suffix of the Raiffeisen ESG indicator. The dimensions "communication", "intensity" and "impact" are assessed and rated by means of a letter code (A, B, C, D, N).

These engagement activities, issues and selected results are published in an annual engagement report, which customers and stakeholders can view on our website.

Raiffeisen KAG considers the exercise of shareholder voting rights as a key task of an asset manager. Voting rights are exercised either in person at the respective annual general meetings or via proxy voting. Raiffeisen KAG has entered into a cooperation with Glass Lewis, an international specialist for proxy voting, to conduct the proxy voting process on a professional basis. The principles for exercising voting rights defined by Raiffeisen KAG and followed by Glass Lewis are based on a transparent and sustainable corporate governance policy and are set out in Raiffeisen KAG's proxy voting policy. By communicating the proxy voting principles to its partner, Raiffeisen KAG ensures that voting takes place in accordance with the principles at the annual general meetings. Under the climate strategy of Raiffeisen KAG, the proxy voting principles are being adapted to allow voting on climate-relevant items at annual general meetings in line with the climate targets of the Paris Agreement.

GRI 2-23, -24

The number of engagements relating to the environment is documented in the latest engagement report published on the website of Raiffeisen KAG. However, details of activities specifically relating to climate protection are not provided even though the topic has been directly addressed in most cases. In 2023, a total of 681 meetings were held with companies in the form of individual discussions, group discussions or collaborative engagement activities. 572 of these meetings (i.e. 84 per cent) were dedicated to sustainability aspects. In many cases, the issues raised related to the climate strategy of the respective company.

## Raiffeisen KAG and funds with sustainability awards

GRI G4-DMA  
(former FS15)

The Austrian daily newspaper "Kurier" again awarded Raiffeisen KAG the quality label "Sustainable Engagement 2024".

For around 2,000 of the largest Austrian companies, the IMWF Institute for Management and Economic Research collected and conducted a detailed analysis of more than 195,000 statements from several million public online sources. The results were presented by "Kurier" as a media partner of the study.



In August 2023, the Berlin-based Scope Group, a provider of independent ratings, research and risk analyses, issued the fund management team of Raiffeisen KAG an AAA rating for the second time in succession for its outstanding quality and expertise in the management of sustainable fund strategies.

Find more at: [a.storyblok.com/f/107885/x/eadcc85bdf/scope-report-esg-capability-rating.pdf](https://a.storyblok.com/f/107885/x/eadcc85bdf/scope-report-esg-capability-rating.pdf)

For Scope, Raiffeisen KAG excels because the high motivation of the people involved means that it manages the sustainable fund strategies collaboratively and in the best possible way at all levels and continuously allows new findings and improvements to be incorporated into the processes. Scope writes in its justification for the rating: "The multidimensional investment process, which has been expanded this year, ensures that all tangible aspects of sustainability are considered in the allocation decision, without losing sight of financial aspects. The comprehensive, inclusive, sophisticated quantitative and high-quality investment process is reflected in the allocation of the target portfolios and, in Scope's opinion, creates the prerequisites for reducing the investment risk and guaranteeing responsible management of the entrusted assets." Scope's detailed rating report can be found on the Internet.



Top marks awarded to "Raiffeisen VIPnachhaltig 50" by the Institut für Vermögensaufbau: Since 2020, the Raiffeisen asset management team at Raiffeisen KAG has had its sustainably oriented portfolio strategy Raiffeisen VIPnachhaltig 50 evaluated by the renowned institute for wealth building, Institut für Vermögensaufbau (IVA), based in Germany. It analyses both the risk-return profile and also (since the end of 2021), the sustainable focus of the portfolio strategy. In the two assessment processes (which take place voluntarily on a quarterly basis), the strategy pursued by Raiffeisen VIPnachhaltig 50 received the best respective mark from the Institut für Vermögensaufbau: 5 stars for the risk return profile and 5 trees for the sustainability approach underlying the strategy. The latter is analyzed using data from the three independent research agencies ISS ESG, Refinitiv and CSRHUB, each of which adopt different assessment approaches. A strategy is only awarded 5 trees if it demonstrates a higher than average share of securities with a very positive sustainability rating.

Raiffeisen KAG works continuously to improve its sustainability investment processes both internally and with external partners. The growing number of national and international certifications we have already obtained are visible evidence of this. These include the "FNG seal" and the "Austrian Ecolabel".



With 18 funds awarded the highest rating by the Sustainable Investment Forum (Forum Nachhaltige Geldanlage, FNG), Raiffeisen KAG is still today the fund company with the most "FNG 3-star" products in its portfolio. This top rating was issued to a total of 130 funds (from the submissions by a total of 89 asset managers). A "3-star" seal is only awarded to high-quality sustainability funds that perform outstandingly well in the categories of "institutional credibility", "product standards" and "portfolio focus" (selection of securities, engagement and KPIs).



18 Raiffeisen sustainability funds also carry the Austrian Ecolabel that is awarded by the Austrian Federal Ministry of Climate Action, Environment, Energy, Mobility, Innovation and Technology following a corresponding external audit.

Thanks to their excellent performance over many years and first-class ratings from external agencies, some of the sustainability funds have already become flagships of Raiffeisen KAG.

Sustainability means handling resources responsibly. This responsibility for the environment and society is presenting all of us, and the financial industry in particular, with new challenges. In 2013, the signing of the PRI (Principles for Responsible Investment) and the simultaneous expansion of management expertise and capacity represented a milestone in the integration of sustainability elements into our overall investment approach. Furthermore, Raiffeisen KAG is a founding member of the Raiffeisen Sustainability Initiative, an active member of the Sustainable Investment Forum, the professional association for sustainable investment in Germany, Austria, Liechtenstein and Switzerland and, since 2016, a member of the Italian counterpart "Forum per la Finanza Sostenibile".

The advisory board for sustainable investment that was established in 2017 meets regularly, delivering valuable input and an exchange of opinions from different scientific or societal perspectives. The advisory board acts as a specialized body representing the key stakeholder groups for sustainable investments. As part of our continuous development toward the vision of being a climate-neutral asset management company, the consistent expansion of our product range is accompanied by extensive investments in management expertise, data services and, not least, customer communication including support from advisors.

GRI 2-29  
GRI 4-DMA  
(former FS5)

## Kathrein Privatbank Aktiengesellschaft

GRI 2-6  
GRI 4-DMA  
(former FS1)  
GRI 4-FS11

Kathrein Privatbank is one of the leading private banks in Austria and offers services relating to asset management, "Family Konsult" family consulting services, and financing. The topic of sustainability, including diversity, is firmly enshrined in the corporate philosophy of Kathrein Privatbank as an Austrian subsidiary of RBI AG. Kathrein Privatbank aims to actively shape a better future through its range of sustainable fund products. Sustainable investments are a fast-growing market. 52.52 per cent of Kathrein's total fund volume is now sustainable. We have been committed to this issue since 2012. Since then, we have been supporting our customers in elaborating sustainable solutions and developing customized investment strategies, and thereby demonstrating that sustainable investments and returns are a perfect fit. The global political commitment and the growing interest from investors show that this form of investment belongs to the future.

Find more  
at: [www.kathrein.at/en/private/sustainability/sustainable-investment/](http://www.kathrein.at/en/private/sustainability/sustainable-investment/)

### Our sustainable funds

- follow the criteria of renowned quality labels,
- ensure minimum standards through exclusion criteria
- ensure increased quality through positive criteria and
- thanks to the best-in-class strategy, we elevate industry pioneers and thus generate sustainable added value.



To reduce the complexity of the issue of sustainable investment, a wide range of certifications and quality labels have been agreed worldwide. Kathrein customers can also rely on numerous such orientation aids for the funds it manages. Well-known examples include the FNG seal and the Austrian Ecolabel for Sustainable Financial Products. Kathrein (Kathrein Privatbank and its subsidiary Kathrein Capital Management) has received the Austrian Ecolabel for Sustainable Financial Products for ten funds. Eight funds have been awarded the FNG seal.



Moreover, selected funds comply with the "Ethical Investment Guidelines" of the Austrian Bishops' Conference and the Religious Orders of Austria (FinAnKo).

## Sustainable funds management

GRI 2-23, -24  
GRI 4-DMA  
(former FS2)

The sustainable investment policy of Kathrein Privatbank is implemented in the investment process for sustainable investment funds in accordance with Article 8 of the Disclosure Regulation by ensuring the continuous integration of ESG. In addition to economic factors including traditional criteria such as profitability, liquidity and security, environmental and social aspects as well as responsible corporate governance are integrated into the investment processes.

The investment universe is created by using a defined set of exclusion criteria for avoiding investments in specific controversial business areas and companies with controversial business practices. By applying a best-in-class approach, investments are only made in companies that attach high importance to sustainability within their respective industries and therefore consider environmental, social and corporate governance standards to be an integral part of their business policy. This is implemented using the ISS ESG sustainability ratings.

The rating for companies encompasses ESG risks, opportunities and impacts across the entire business value chain, including a dedicated SDG-based component that measures the positive and negative impacts of products and services. Both the topic-specific and also the overall ratings take into account the existence and severity of controversies as well as breaches of global standards.

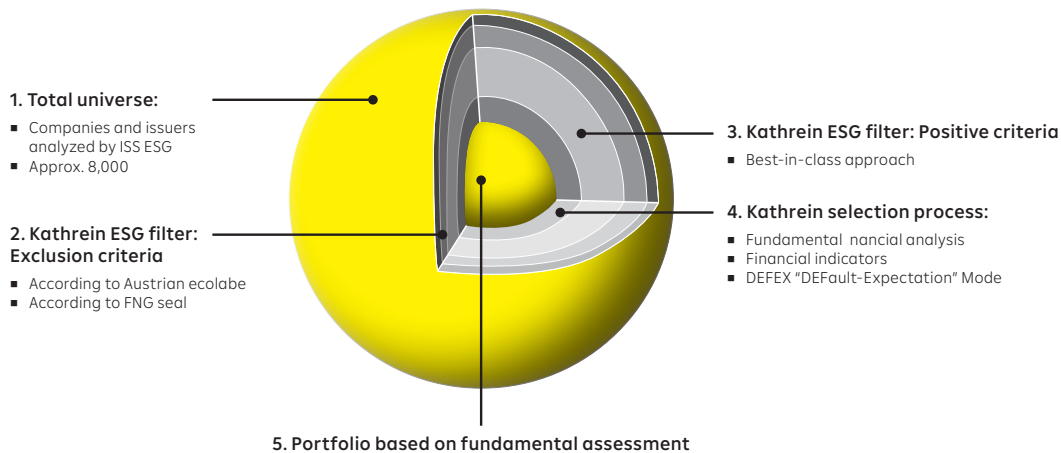
The rating for sovereigns expresses a sovereign issuer’s positioning with regard to dealing with material risks relating to ESG themes such as climate change, loss of biodiversity, violations of human rights and labor rights as well as political and social instability.

Exclusion criteria are applied in combination with a best-in-class approach. The exclusion criteria were tightened significantly with effect from 1 September 2017. As of September 2019, the exclusion criteria were amended again to meet the requirements of the FNG seal. The profiles were harmonized in September 2020 to satisfy the requirements of the Austrian Ecolabel guidelines, the FNG seal and other standards that are important to us. Since then, our standard profile has applied to the sustainable mutual funds outlined in this document.

Violations relating to business practices are classified according to a four-level scale (possible – moderate – severe – highly severe). Companies are excluded starting from the “severe” level. These include violations in connection with human rights, labor rights, environmental conduct and business management (such as accounting, money laundering and corruption).

All of Kathrein’s exclusionary and positive criteria such as rigorous exclusions of companies, exclusion criteria depending on the share of revenues in business areas, exclusion criteria for sovereigns, positive criteria for companies of social and governance or environmental relevance and positive criteria for sovereigns of social and governance relevance are published on the website under “ESG Concepts”.

Exclusion criteria are applied in combination with a best-in-class approach. The investment sustainability process is summarized in the following chart:



### Engagement policy

In its engagement policy, Kathrein has defined principles for exercising voting rights in connection with investments in shares of listed companies in which it invests for the investment funds or asset management mandates it manages. To safeguard investors’ interests when implementing the engagement policy and fulfill its associated responsibility in the spirit of good corporate governance, Kathrein Privatbank monitors these companies in respect of key issues such as strategy, financial and non-financial performance, risk, capital structure, social and environmental impact, and corporate governance. It does this by drawing on internal analyses and external research materials, where corresponding data and documents of the respective listed company are available.

Where possible, dialog with the companies is also sought as far and as comprehensively as possible in order to make the issue of sustainability more center stage. This dialog may take place in the form of direct or indirect contact, company visits, meetings, one-to-one phone calls or conference calls.

For more information on the engagement policy, including the voting rights policy, please see our website.

Find more at: [kathrein.at/en/private/sustainability/sustainable-investment/](https://kathrein.at/en/private/sustainability/sustainable-investment/)

GRI G4-DMA (former FS5, FS12)

Find more at: [kathrein.at/en/private/legal-and-announcements/](https://kathrein.at/en/private/legal-and-announcements/)



## Raiffeisen Bausparkasse Gesellschaft m.b.H.

GRI 2-6

Building societies support the economic cycle through savings and financing, enabling the construction of residential projects that also benefit the coming generations. The core cooperative principle of Raiffeisen is expressed very clearly here: one group saves for the financing of residential construction, renovation plans, education and care for others who currently need this funding (see also "Sustainable financing at Raiffeisen Bausparkasse Gesellschaft m.b.H.", page 109-110). The capital saved by customers is thus made available for the public interest in the form of loans for socially and societally relevant fields. Savers benefit from the secure investment of their assets as well as government incentives and can also assume that their capital is being invested in useful projects. As building societies offer security, planning ability and access to cost-effective building society loans, they regularly rank highly among the most popular forms of saving and investment in Austria. For many people, a building society account is the first step towards accumulating wealth and saving funds that can be used for constructing or renovating residential property in the future. Home savings deposits totaled € 6.7 billion in 2023 (2022: € 6.7 billion; 2021: € 6.3 billion).

## Raiffeisen Certificates

GRI 2-6  
GRI G4-DMA  
(former FS1)

The certificate business of Raiffeisen Centrobank AG has been integrated into RBI AG since December 2022 as the "Certificates, Retail Bonds & Equity Trading" division. "Raiffeisen Certificates" is the product brand RBI has used since then to issue investment and leveraged products for retail and institutional customers and to act as a key market maker for equities, equity derivatives and certificates at German stock exchanges and at the Vienna Stock Exchange, as well as at various stock exchanges in CEE countries. The trading centers in Eastern Europe include the stock exchanges in Warsaw, Prague, Budapest and Bucharest. Sustainable investment is no longer a niche field in the CEE region, either. In 2023, bespoke subscription products were again launched on sustainable indices and individual securities were successfully issued for Raiffeisen retail customers in Slovakia, Hungary, the Czech Republic, Croatia and Kosovo.

Sustainability has been part of the product range for more than 18 years, and sustainable investment products have grown in importance ever since. Raiffeisen first issued index certificates with a focus on sustainability back in 2005. These were followed by capital protection certificates on various STOXX® ESG-based indices in order to make it easier for investors to address the topic of sustainability and make investments featuring capital protection.

Strong momentum first became apparent in 2014, prompting continuous expansion of the product range involving capital protection certificates on broad sustainability indices. Since 2021, bespoke indices from MSCI® have been used as underlying instruments for investment products with or without capital protection to meet the heightened demand for sustainable financial products. Since then, the share (open interest) of sustainable Raiffeisen certificates in the product range as a whole has risen to 30.7 per cent. Sustainable certificates from Raiffeisen meet a sustainability standard according to which the underlying assets for sustainable Raiffeisen certificates are subject to an audit in line with clear and unequivocal criteria. Whether or not a certificate is sustainable according to these rules is determined via a process of elimination. The sustainable approach followed by Raiffeisen Certificates is therefore based on three pillars: "sustainable issuer – sustainable underlying asset – sustainable investment product". In 2021, the Zertifikate Forum Austria (ZFA) association passed its sustainability code, which was revised in 2022. The Raiffeisen Certificates team played an active role in developing these uniform product and transparency standards for the Austrian sustainable structured securities market and is committed to upholding them as a member of the ZFA.

GRI 2-23, -24  
-29  
GRI G4-DMA  
(former FS5,  
FS15)  
GRI G4-FS11

Sustainable investments with certificates on shares have been available since 2021. These are considered to be especially sustainable based on ESG criteria. Our cooperation with Raiffeisen Research provides the basis for this. In the sustainability rating "ESG scoring", companies are analyzed with regard to environmental, social and governance factors and then assigned an ESG score between 1 and 100. The leading companies that are among the top 30 per cent in their sector are used as the underlying assets for sustainable Raiffeisen certificates. All of these are ESG-compliant certificates in the investment products category with hedging mechanisms for the invested capital. These additional sustainable certificates on individual securities have enabled Raiffeisen to press ahead with expanding its ESG offering.



At the “Zertifikate Award Austria” ceremony in 2023 to present the leading accolade for the best providers and products on the Austrian certificate market, Raiffeisen Certificates was named as the best certificate provider in Austria for the 17th time in a row. In the sustainable investment context, the MSCI World Climate Change Bond 113% capital protection certificate (AT0000A34DE0) was honored as winner in this category. The underlying instrument is the MSCI® World Climate Change Top ESG Select 4.5% Decrement Index. The index, which was developed by Raiffeisen Certificates in cooperation with MSCI®, stands out thanks to its highly sophisticated and forward-looking ESG criteria for stock selection (rating and best-in-class selection) and the MSCI climate score. This enables the MSCI® World Climate Change Top ESG Select 4.5% Decrement Index to achieve a performance close to that of the benchmark with positions exclusively in sustainable global companies. Furthermore, this product was awarded the Austrian Ecolabel, confirming its status as one of the innovations on the Austrian certificates market.



In April 2022, Raiffeisen became the first (and still remains the only) Austrian provider of certificates to receive the Austrian Ecolabel. This certifies ethically oriented projects and businesses that generate profits by means of sustainable investments. Various Raiffeisen capital protection and bonus certificates on the MSCI® World Climate Change Top ESG Select Index have been awarded the Austrian Ecolabel since February 2022.



Sustainable Raiffeisen certificates take principal adverse impacts (PAIs) on sustainability factors into account. This enables investment products of Raiffeisen Certificates to consider the main groups of PAIs. Consideration is given to PAIs at the level of the issuer (based on the Raiffeisen Bank International Sustainability Report) and that of the underlying asset (via minimum exclusions in accordance with the sustainability standard for Raiffeisen certificates and adherence to a dedicated ESG strategy).

GRI 2-6

## Sustainable investment products at the subsidiary banks in Central and Eastern Europe

GRI G4-FS7, -FS8

The year 2023 was characterized by a persistently unfavorable macroeconomic environment with central bank key rates reaching their final levels and further escalations of geopolitical tensions, which increased risk premiums across all asset classes. Consequently, a large proportion of our clients turned their attention to less risky asset classes such as money market funds and short-term bond funds, where the ESG product offering is limited. Despite these strong headwinds we still succeeded in increasing the assets under management in ESG investment products (owned by retail customers) from approximately € 1.2 billion in 2022 (and € 720.5 million in 2021) to approximately € 1.47 billion in 2023 across all subsidiary banks at which ESG investment products are offered.

On the fund side, the front-runners were the Slovakian, Hungarian and Czech operations thanks to continuous organic growth and new product launches. In the certificates business, the most successful subsidiaries were the Czech Republic and Slovakia, outpacing the other NWBs by a very large margin and accounting for 90 per cent of all gross sales for this product group. The ESG bond business was very limited in 2023 due to a very low volume of new issuances.

At year-end 2023, we had ESG product offerings in the majority of the countries in which we have a retail investment offering (Czech Republic, Slovakia, Hungary, Croatia, Russia, Belarus, Bosnia and Herzegovina, Serbia, Romania).

We continuously enhanced the ESG fund product range across multiple risk categories as well as the underlying structures of ESG certificates and new issues of green bonds and ESG funds in several subsidiary banks in CEE. Our target for 2024 is to generate gross sales of ESG-compliant investment products of € 425 million.

# Metrics and ambitions

## Raiffeisen Kapitalanlage Gesellschaft m.b.H.

GRI 305-3, -4, -5  
GRI G4-FS7, -FS8

Sustainability funds of RKAG	Funds volume in € million			Carbon emissions <sup>1</sup> (tons of CO <sub>2</sub> e)			Carbon intensity <sup>2</sup> (tons of CO <sub>2</sub> e/€ million in sales)		
	2023	2022	2021	2023	2022	2021	2023	2022	2021
<b>Equity funds</b>									
Raiffeisen-Nachhaltigkeits-Aktien	1,490.0	1,381.6	1,668.5	51,180	46,124	51,785	86.2	97.6	91.0
Raiffeisen-MegaTrends-ESG-Aktien	631.7	541.7	547.0	60,115	40,019	32,522	123.4	126.7	140.9
Raiffeisen-Nachhaltigkeit-US-Aktien	600.2	463.9	422.2	15,649	16,071	11,453	58.6	113.9	106.2
Raiffeisen-Nachhaltigkeit-Europa-Aktien	441.9	402.3	471.3	26,147	21,382	25,351	68.1	79.0	89.5
Raiffeisen-Asia-Opportunities-ESG-Aktien	402.8	418.1		13,086	24,009		69.8	112.9	
Raiffeisen-SmartEnergy-ESG-Aktien	293.3	356.7	163.8	18,618	17,461	7,732	125.8	148.1	192.0
Raiffeisen-Nachhaltigkeit-Momentum	290.1	306.8	492.6	30,163	34,350	32,849	64.8	76.3	81.9
Raiffeisen-Nachhaltigkeit-EmergingMarkets-Aktien	284.2	309.7	280.8	11,284	9,500	8,707	68.4	77.9	99.1
Raiffeisen-HighTech-ESG-Aktien	267.8	169.0		3,026	2,672		19.1	37.9	
Raiffeisen-Health and Wellbeing-ESG-Aktien	208.9	203.3	197.7	1,920	1,834	1,670	23.6	27.1	30.9
Raiffeisen-GlobalDividend-ESG-Aktien	197.4	172.8		26,001	30,776		137.0	176.5	
Raiffeisen-Nachhaltigkeit-ÖsterreichPlus-Aktien	104.9	126.8	157.1	29,252	28,482	25,080	108.7	146.0	171.3
Raiffeisen-Zentraleuropa-ESG-Aktien <sup>4</sup>	118.0			29,559			114.5		
Raiffeisen-NewInfrastructure-ESG-Aktien <sup>6</sup>	63.9			13,173			222.3		
Raiffeisen-PAXetBONUM-Aktien	22.8	19.9	27.3	623	603	1,319	70.3	83.7	80.4
19 Large investor funds, special funds and advisories	693.5	612.1	1,891.0	5)	5)	5)	5)	5)	5)
<b>Mixed funds</b>									
Raiffeisen-Nachhaltigkeit-Mix	5,275.3	5,045.9	5,481.1	368,237	214,908	346,703	88.9	103.5	100.9
Raiffeisen-Nachhaltigkeit-Solide	725.1	711.7	787.4	75,170	83,378	79,261	92.4	108.4	112
Raiffeisen-ESG-Income	358.9	343.9		3)	3)		3)	3)	
Raiffeisen-§ 14-ESG-Mix	265.2	239.9	278.8	5)	5)	5)	5)	5)	5)
Raiffeisen-§ 14-ESG-MixLight	148.0	141.1	177.8	5)	5)	5)	5)	5)	5)
Raiffeisen-Nachhaltigkeit-Wachstum	122.5	87.3	62.1	4,264	3,148	1,776	77.5	94.0	79.1
Klassik Nachhaltigkeit Mix	44.8	36.8	43.5	2,829	2,579	3,658	87.1	118.4	137
Raiffeisen-Nachhaltigkeit-PIC + PAC	20.7	22.1		5)	5)	5)	5)	5)	5)
19 Large investor funds, special funds and advisories	1,457.8	1,370.6	654.2	5)	5)	5)	5)	5)	5)
<b>Bond funds</b>									
Raiffeisen-Nachhaltigkeit-Rent	917.3	925.9	948.9	134,714	144,163	153,935	88.0	89.4	90.4
Raiffeisen-ESG-Euro-Rent <sup>4</sup>	332.0			3)			3)		
Raiffeisen-GreenBonds	259.5	246.0	333.7	4)	4)	4)	4)	4)	4)
Raiffeisen-ESG-Global-Rent <sup>6</sup>	250.8			3)			3)		
Raiffeisen-Österreich-Rent	232.4	213.8	275.2	3)	3)	3)	3)	3)	3)
Raiffeisen-§ 14-ESG-Rent	221.7	220.8	357.6	23,513	22,041	25,574	92.9	90.4	85.9
Raiffeisen-ESG-Euro-Corporates	208.9	196.0		30,552	32,177		127.4	161.1	
Raiffeisen-EmergingMarkets-ESG-Transformation-Rent <sup>4</sup>	193.3			3)			3)		
Raiffeisen-Nachhaltigkeit-EmergingMarkets-LocalBonds	124.6	148.1	139.5	3)	3)	3)	3)	3)	3)
Raiffeisen-Nachhaltigkeit-ShortTerm	75.1	72.7	136.5	3)	3)	6,046	46.0	69.1	67.9
Raiffeisen-Mehrwert-ESG 2028	40.3	35.0		7,437	9,639		105.7	144.3	
Raiffeisen-Mehrwert-ESG 2028 II	39.6			4,550			64.1		
Raiffeisen-PAXetBONUM-Anleihen	35.1	22.6	18.8	3)	3)	1,489	116.7	78.8	47.2
Raiffeisen-Nachhaltigkeit-Dollar-ShortTerm-Rent	26.1	26.6		3)	3)	3)	10.8	32.9	3)
Raiffeisen Valore Aggiunto ESG	5.2			1,513			117.4		
19 Large investor funds, special funds and advisories	3,245.0	3,032.7	1,682.7	5)	5)	5)	5)	5)	5)
<b>Fund administration (21 mandates)</b>	<b>1,943.7</b>	<b>1,393.1</b>	<b>809.7</b>						
<b>Total</b>	<b>22,716.6</b>	<b>20,017.4</b>	<b>19,497.9</b>						
<b>Comparable data Index globale funds (MSCI)</b>							<b>106.2</b>	<b>141.7</b>	<b>129.2</b>

1) Carbon emissions are calculated from the scope 1+2 emissions of the companies based on the share of market capitalization in the portfolio ("owner view"). The carbon emissions depend on the fund volume and have only limited informative value in the case of bonds.

2) CO<sub>2</sub> intensity is reported in tons of CO<sub>2</sub>e/€ million revenue, regardless of fund volume, and follows the question of how high the portfolio's exposure to emissions intensive companies is: CO<sub>2</sub> emissions per company's revenue, weighted by the proportionate value in the portfolio. This indicator is separate from market capitalization. It is therefore easier to include bonds.

3) Coverage ratio too low (below 50 per cent)

4) This concept is not applicable to green bonds.

5) No data available.

6) Changed to Sustainable in 2023.

Advisory means that Raiffeisen KAG performs the management role for the fund of a third-party provider. Fund administration means that all typical fund services are carried out by Raiffeisen KAG, except for portfolio management in the narrower sense.

In joining the Net Zero Asset Managers Initiative (NZAM) in 2022, Raiffeisen KAG committed to complying with carbon dioxide reduction targets in its investment portfolio, which will lead to net-zero emissions by 2050. This investment portfolio includes all corporate bonds and equities in all self-managed investment funds which are authorized for sale to the general public. The method chosen was that of the Net Zero Asset Owner Target Setting Protocol (NZAO TSP), which considers the relative emission intensity ( $\text{TCO}_2/\text{sum invested in € million}$ ) under Scope 1&2 starting from the base year of 2019.

Raiffeisen KAG has committed to convert its investment portfolio to net-zero greenhouse gas emissions by 2050, which equates to a maximum rise in global temperatures of 1.5° by 2050. Interim targets have been set of a reduction in emission intensity of at least 25 per cent by 2025 (base year: 2019) and a reduction in emission intensity of at least 50 per cent by 2030 (base year: 2019) through a portfolio of listed corporate bonds and equities. In addition, Raiffeisen KAG has undertaken to engage with the 20 largest issuers in its investment portfolio which have not yet made any commitments to switching their business activities in line with the climate targets of the Paris Agreement or with the 20 companies with the highest emissions in the portfolio.

## Kathrein Privatbank AG

The umbrella brand Kathrein includes Kathrein Privatbank AG and Kathrein Capital Management GmbH. At year-end, the total managed volume of the securities funds was around € 3.7 billion. Kathrein has already been offering a sustainable funds product range and sustainable special fund solutions for a number of years. The managed assets in the sustainable mutual funds rose to € 572 million and to € 1,366 million in the sustainable special funds. This already equates to an investment of 52.52 per cent of the total managed volume in fund products.

Detailed sustainability concepts for mutual funds with the Austrian Ecolabel are available on Kathrein Privatbank's website. Kathrein Privatbank sets strictly defined exclusion and positive criteria, implementing them systematically as part of the investment process in the respective funds. The goal is to be able to offer a comprehensive range of ESG fund products and thus make a clear commitment to ESG.

The mutual funds are sustainable funds within the meaning of Article 8 of Regulation (EU) 2019/2088 (Disclosure Regulation). The funds promote social, ethical and ecological characteristics. The selection process considers exclusion and quality criteria (negative and positive criteria). However, no sustainable investments within the meaning of the EU Taxonomy and no sustainable investment targets are pursued.

To calculate the carbon emissions for the sustainable funds, in fall 2022 Kathrein Privatbank intensified its working relationship with its longstanding, respected partner ISS ESG in the field of sustainability. This also enabled Kathrein Privatbank to prepare calculations for other funds. Insight into the underlying data ensures transparency and plausibility.

The respective CO<sub>2</sub> emissions are calculated on a quarterly basis and are published at regular intervals on Kathrein's website [www.kathrein.at](http://www.kathrein.at). Publication of the CO<sub>2</sub> emissions primarily serves to increase transparency; no reduction target has been set.

Find more  
at: [www.kathrein.at/  
en/private/  
home/](http://www.kathrein.at/en/private/home/)

Sustainability funds	Funds volume (in € million)			Carbon emissions* (tons of CO <sub>2</sub> e)			Carbon intensity** (tons CO <sub>2</sub> e/€ million sales)		
	2023	2022	2021	2023	2022	2021	2023	2022	2021
<b>Equity funds</b>									
Kathrein Sustainable Global Equity	117	80	139	2,768	2,553	6,746	79	97	110
Kathrein Sustainable Global Megatrends	25	21	22	925	1,532	***	102	157	***
<b>Mixed funds</b>									
MI Multi Strategy SRI	16	18	32	485	664	***	63	108	***
Kathrein Sustainable Dynamic Value	18	17	20	777	741	***	91	128	***
<b>Bond funds</b>									
Kathrein Sustainable Euro Bond	87	84	116	***	***	***	***	***	***
Kathrein Sustainable US-Dollar Bond****	51	48	****	***	***	***	***	***	***
Hypo Rent	89	89	115	***	***	***	***	***	***
Kathrein Sustainable Bond Classic	35	35	47	2,277	2,259	***	119	164	***
Kathrein Sustainable Bond Select	54	49	55	4,547	6,158	19,777*****	125	208	262
Kathrein Sustainable EM Local Currency Bond	79	45	42	***	***	***	***	***	***
<b>Total volume</b>	<b>572</b>	<b>486</b>	<b>588</b>	<b>11,779</b>	<b>13,907</b>	<b>26,523*****</b>	<b>***</b>	<b>***</b>	<b>***</b>

\* For the CO<sub>2</sub> footprint, the total amount of carbon dioxide emissions (or equivalent of other greenhouse gases) of the funds is calculated in tons of CO<sub>2</sub> equivalent (tCO<sub>2</sub>e). Scope 1&2 emissions are the absolute carbon dioxide emissions caused by production and operating a company. To calculate emissions at the portfolio level, the respective stake in the company is multiplied by the company's emissions (Scope 1&2) and added up for all the fund holdings.

\*\* For the CO<sub>2</sub> intensity, a company's Scope 1&2 emissions are expressed in relation to its sales – this involves calculating the emissions produced in generating revenues of € 1 million. This indicator shows the portfolio's efficiency in terms of CO<sub>2</sub> emissions per million euro in sales for the businesses held in the portfolio. The company's weighting in the fund is multiplied by this indicator to calculate the weighted CO<sub>2</sub> intensity. This provides an overview of how exposed the portfolio is to CO<sub>2</sub>-intensive companies.

\*\*\*\* n.a.

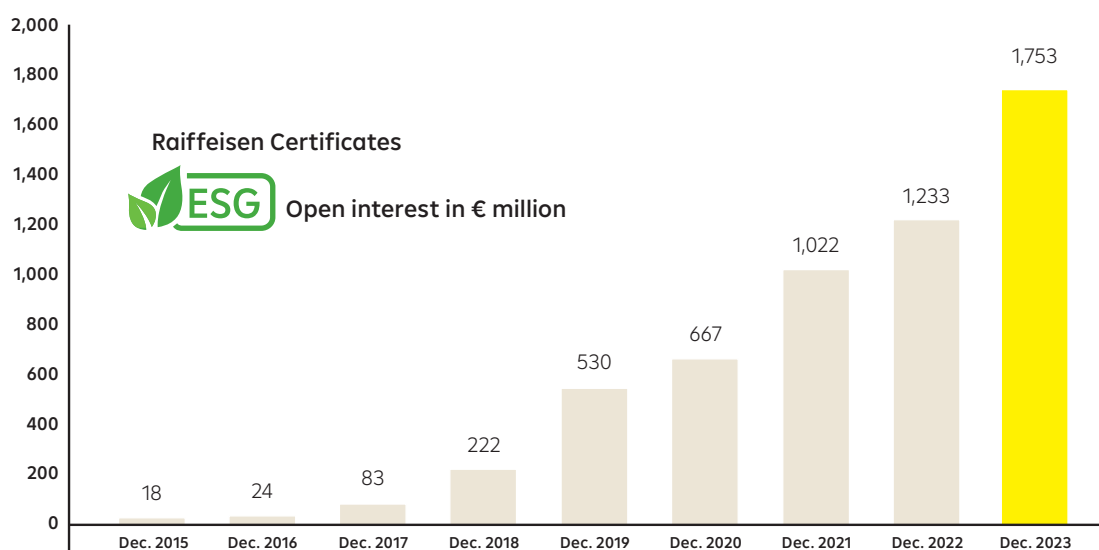
\*\*\*\*\* New fund; no comparable figures were available in 2021.

\*\*\*\*\* Restatement in line with GRI 2-4: the CO<sub>2</sub> emissions in 2021 (tCO<sub>2</sub>) for the Kathrein Sustainable Bond Select fund are now shown correctly following a historic printing error.

Due to a change of provider, there may be variations relating to the underlying data and the methodology used in the values for 2021 versus those for 2022.

## Raiffeisen Certificates

As at the end of 2023, more than 782 sustainability-related investment certificates were available for investors. With an outstanding volume of € 1,753 million, which accounts for around 36.1 per cent of the total volume of all Raiffeisen certificates, the proportion increased by 42.8 per cent compared to the beginning of the year.



Source: Raiffeisen Certificates

One milestone in this regard was the expansion of the product range, making additional sustainable underlying assets available for the sustainable certificates. To this end, 2021 saw sustainability indices being developed and launched for the first time in collaboration with index provider MSCI®, and the offering was further expanded in 2022. In 2023, the outstanding volume of certificates on these MSCI® sustainability indices exceeded 50 per cent of the total volume of sustainable certificates for the first time, testifying to the popularity of the benchmarks. There are now seven benchmarks for ESG stocks from Europe, the emerging markets or worldwide that are among the best in the fields of environment, social and governance. They all fully comply with Raiffeisen Certificates' sustainability standard, and these indices are therefore made available on an ongoing basis via sustainable investment products.

## Sustainable investment at the subsidiary banks in Central and Eastern Europe

The managed assets in ESG investment products owned by retail customers increased from around € 1.2 billion in 2022 (and € 720.5 million in 2021) across all subsidiary banks at which ESG investment products are offered to around € 1.47 billion in 2023. The aim for 2024 is to achieve gross sales of € 425 million from ESG-compliant investment products.

# ➤ Additional sustainable services and products

## Impacts

### Concrete sustainable impacts of RBI AG's green bond issue portfolio and its sustainable deposits

The environmental impact of RBI AG's green bonds underlying loan portfolio is calculated each year for the Allocation and Impact Report and published on the website. The latest report refers to the reporting date 31 December 2022.

AG also published the first Allocation and Impact Report for Sustainable Deposits in July 2023, which can be found on RBI AG's website. Sustainable Deposits products empower RBI customers to invest their short-term cash resources in a manner that aligns with their values and contributes positively to a greener future. The report demonstrates RBI AG's commitment to providing clear insights into the positive influence customers can have on the world through their investment choices.

Find more  
at: [www.rbiinternational.com/en/corporatesolutions/sustainable-solutions.html](http://www.rbiinternational.com/en/corporatesolutions/sustainable-solutions.html)

## Risks and opportunities

Please see our explanations on "Risks and Opportunities" on page 70 in the "Sustainable Finance" chapter, which are also valid for additional sustainable services and products.

## Management

RBI offers a wide range of other sustainable products and financial services that complement the traditional lending and investment business. Group-wide product competence centers are constantly working on the further development of product solutions that are tailored to the various needs and business models of customers and respond to trends and developments in the market.

## Metrics and ambitions

### Green guarantee facility

A green guarantee facility agreement is based on the concept of the proper use of funds for eligible green projects, and relates directly to the investment to be financed. The project to be financed must meet specific criteria in order to qualify as a fundable “green” investment. Green criteria are generally derived from the EU taxonomy or the RBI Green Bond Framework. For each guarantee that qualifies as green, a report setting out the associated environmental impacts is issued once a year. In conjunction with other forms of sustainable financing, the green guarantee facility helps our customers with their net-zero strategy while also ensuring greater transparency as to how the companies intend to achieve their targets. RBI is committed to responsible banking and sustainability, and is therefore keen to support its customers with sustainable finance products and extensive expertise.



### ESG-linked derivatives

RBI began offering ESG-linked derivative hedging instruments for interest rate and currency risks in 2021. These are linked to the customer’s sustainability targets – ESG key performance indicators or the ESG rating. An incentive system motivates the customer to achieve the set targets. If these targets have not been met at the end of the term, the customer makes a payment to a good cause. At the customer’s request, the experts at RBI advise on the selection of possible ESG KPIs, and help customers to develop their sustainability strategy.

### Sustainable deposit (fixed-term deposit)

Since July 2022, RBI AG’s sustainable deposit has for the first time provided its customers with the opportunity to use a sustainable format to invest their short-term cash resources (1 to 12 months). The Framework is aligned with the 2022 Loan Market Association Sustainability-Linked Loan Principles (“LMA SLLPs”). RBI AG also obtained a second party opinion from Carbon Trust Assurance Limited, which assesses the Framework’s alignment with the SLLP. RBI AG uses an amount equivalent to the Sustainable Deposit proceeds to finance and/or refinance, in part or in full, new and/or existing eligible sustainability-linked financial products with a positive ESG impact in RBI’s core markets.

Eligible sustainability-linked financial products meet the criteria and/or requirements of the RBI Sustainable Deposit Framework. The objective of the Framework and subsequent Sustainable Deposits issued based on it is to incentivize the borrower to achieve ambitious, predetermined sustainability performance objectives. RBI AG published the first Allocation and Impact Report for Sustainable Deposits in July 2023. The report can be found on RBI AG’s website. It covers the allocated loan portfolio from 1 July 2022 to 31 May 2023. As of the end of May 2023, Sustainable Deposits amounted to € 100 million. At the same time, RBI AG had financed € 415.8 million of eligible sustainability-linked loans or 12 loans, which complied with the necessary eligibility criteria defined within the Framework.

Find more at: [www.rbinternational.com/en/customers/corporate-customers/products-and-services/sustainable-finance.html](http://www.rbinternational.com/en/customers/corporate-customers/products-and-services/sustainable-finance.html)

## Sustainable debt instruments for corporate and institutional customers

The global volume of new financing of sustainable finance instruments fell for the second year in a row in 2023 and thus reached a lower volume than in 2022. This is reflected, for example, also in the share of sustainable/ESG-bonds in the overall bond market in Europe, which dropped from 14 per cent in 2022 to 11 per cent in 2023. Nevertheless, sustainable financing solutions remain an important part of the exchange with customers and also in the financings that have been concluded.

In the field of debt financing (bonds, Schuldschein loans and syndicated loans), RBI AG Debt Capital Markets has supported its customers in numerous sustainable financial transactions. In 2023, RBI AG acted as lead manager of 11 sustainable<sup>1</sup> bond transactions with a total volume of € 4.9 billion: two transactions for corporate customers and nine transactions for institutional customers. In 2023, eleven per cent of RBI AG's lead-managed corporate bond volume and nine per cent of the lead-managed bond volume for institutional customers (including sovereigns) was in a sustainable<sup>1</sup> format. In addition, RBI AG was lead arranger of three sustainable<sup>1</sup> Schuldschein loans totaling € 600 million and five sustainable<sup>1</sup> syndicated revolving credit facilities/term loans totaling € 2.2 billion.

RBI AG has not achieved its targets in 2023 in terms of lead managing sustainable<sup>1</sup> bonds and Schuldschein loans. In 2023, RBI AG Debt Capital Markets' percentage share of the transaction volume in sustainable<sup>1</sup> format of leadmanaged bonds and Schuldschein loans of relevance for target achievement was 10 per cent versus a target of 12.50 per cent.

In 2023, we maintained our position as a well-recognized arranger for sustainable<sup>1</sup> bonds in RBI's home market (No. 2 measured on the basis of the number of transactions, No. 4 measured on the basis of the pro-rata volume of transactions).

## Sustainable retail products/services

In 2023 we further developed the carbon footprint application of retail customers.

- In 2023, RBI provided CO<sub>2</sub> emission insights to our retail customers in Albania, Bosnia and Herzegovina, Romania, Kosovo and Belarus, either in the form of monthly snapshots or directly accessed in the mobile banking app. In Romania and Belarus, our customers are now able to track their carbon footprint in the palm of their hands, based on their spending behavior. The solution will be further deployed in some additional markets in 2024, including Hungary, Serbia and Croatia.
- Carbon footprint measurement took on relevance during 2023. In many markets now, ESG functionalities are available in the mobile banking apps, allowing customers to understand their contribution to environmental and social responsibility by performing daily banking activities through their debit card transactions.

Since 2022, sustainable business operations in retail are part of a Group-wide roadmap with a focus on implementing recycled PVC cards. All banks in the Group provide customers with recycled PVC cards, thereby significantly decreasing CO<sub>2</sub> emissions compared to cards manufactured from common plastic.

## RBI AG green bond issues

In 2018, RBI AG set up its green bond issue program aimed at promoting sustainable lending in Austria and Central and Eastern Europe. With a total volume of just above € 2 billion in Austria as of December 2023, RBI AG is currently the largest sustainable bond issuer in the country among financial institutions, and has now established itself as a regular issuer of green bonds on the international capital markets and in the retail segment in Austria and Central and Eastern Europe.

GRI 2-23, -24

<sup>1</sup> includes the following instruments: green, social, sustainability and ESG-linked products



In 2022, to further strengthen the link between RBI sustainability and financing strategies and to expand the eligible assets to include social loans, RBI AG created a new Sustainability Bond Framework, which replaced the 2018 RBI Green Bond Framework on 22 February 2023.

RBI AG's Sustainability Bond Framework was verified by the external second party opinion provider Sustainalytics. Both the Sustainability Bond Framework and the second party opinion were published on RBI's website in the first quarter of 2023. As mentioned above, the Allocation and Impact Report is published annually.

By issuing green bonds and using sustainable customer loans to refinance the Group, RBI directly combines sustainability with the bank's commercial success, thus creating a greater awareness throughout the entire organization. In order to promote the long-term development of our sustainable loan portfolio, RBI AG expanded the incentive program for social and environmentally friendly projects (which had been introduced as early as 2019) in June 2022, and now also offers incentives for projects which comply with the requirements of the EU taxonomy. The incentive program aims to expand RBI's portfolio in the field of green, social and ESG-linked corporate financing, as well as expanding financing in compliance with the EU taxonomy.

RBI AG pursues the following portfolio approach in its green bond program: The green credit portfolio is allocated on a pro-rata basis to all green bonds that are issued in line with the RBI AG Green Bond Framework. As of December 2023, RBI AG had issued green bonds with a total volume of just above € 2 billion. This equates to 21 per cent of RBI AG's total outstanding issued volume as at 31 December 2023.

As of December 2023, RBI AG's green bond issuance placed with retail customers in Austria and in the neighboring countries totals the equivalent of € 66 million. From 2019 until December 2023, RBI AG has thus sold 19 green bond products in five different currencies with a total nominal value of € 280 million to retail customers. In 2023, the high interest rate environment and volatile stock markets encouraged retail investors to increasingly purchase bonds. The green component additionally increased the attractiveness of such bonds. Particular mention should be made here of the sale of green inflation bonds with a total nominal value of € 58 million in Austria.

In 2021, RBI AG rolled out its green bond program to its subsidiary banks in CEE. RBI AG is supporting its subsidiary banks in the establishment of a sustainability bond framework and in obtaining external verification by the second party opinion provider. The banks mainly use the issue proceeds to finance projects relating to energy-efficient buildings, renewable energies, energy efficiency, clean transport, and water and wastewater management.

During 2023, four green and sustainable bonds have been issued by our subsidiary banks in CEE: three sustainable bonds from Raiffeisenbank in the Czech Republic and Raiffeisen Bank in Romania, as well as one green bond from Tatra banka in Slovakia.

As of December 2023, subsidiary banks in CEE had issued green and sustainable bonds with a total volume of € 2.921 billion. As of December 2023, the RBI Group was the second largest issuer among financial institutes of sustainable bonds in CEE.

Find more  
at: [www.  
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tors-ratings/  
green-bonds.  
html](http://www.rbinternational.com/en/investors/debt-investors-ratings/green-bonds.html)



## Other sustainable products of Raiffeisen-Leasing

### EIB true sale securitizations for green leasing finance (retrocession for RL's ABS)

Of the funds made available to Raiffeisen-Leasing in 2021 within the context of the true sale securitization by the EIB Group, comprising the European Investment Bank (EIB) and the European Investment Fund (EIF), investments amounting to € 50.8 million have already been made in the areas of e-mobility and green technologies.

### Advice on sustainable mobility in fleet management



In order to provide domestic companies with optimum support during their switch to more environmentally friendly electric mobility, Raiffeisen-Leasing Fuhrparkmanagement GmbH (RLFPM) is placing a special focus on providing individual consultation services for companies as well as a precise analysis of their mobility requirements. This is then used as a basis to devise a comprehensive mobility concept which, in addition to selecting vehicle models, includes proposals for suitable charging infrastructure and sustainable energy generation (such as photovoltaic facilities on the company's roof) and presents everything in customized financing and service packages.

As part of the consultation process, RLFPM has also specialized in TCO calculations. These consider the total costs of ownership (TCO) of a specific vehicle. Due to the lower maintenance and fuel costs as well as the possibility of government subsidies, the economic benefit of electric vehicles compared to vehicles with combustion engines can be clearly shown, thus providing the companies with a basis for structuring their own vehicle fleets.

RLFPM also offers its corporate customers a digital reporting platform ("Mein FUHRPARK"), which provides an overview of CO<sub>2</sub> emission values as well as data for energy audits. Company car drivers benefit from their own RLFPM app which, for example, displays an interactive map of fast charging stations throughout Austria.

### Advice on charging solutions

Through its focus on the topic of electric mobility, RLFPM quickly recognized that customers need specific advice on suitable charging solutions. In collaboration with partners, an analysis of the current situation is undertaken and a target definition is set (based on the customer's environmental ambitions). These are then used to work out the optimum solution, which can range from the charging infrastructure or load management to a photovoltaic system with buffer battery.

### Cooperation with electric car manufacturers



Raiffeisen-Leasing GmbH has been an active, expert partner of electric mobility manufacturers for years. In 2023, the overall number of electric vehicles rose again. Throughout Austria, 47,621 (2022: 34,165) new electric vehicles were registered for use between January and the end of December, with around 12 per cent (2022: 10 per cent) financed via Raiffeisen-Leasing (of which 35 per cent was consolidated according to IFRS).

### Energy-efficient construction and renovation & sustainable life-cycle models

With its energy-efficient building and renovation (EEBS) product, Raiffeisen-Leasing assumes the coordination of building and/or renovation measures as well as the financing of public buildings, such as schools, nurseries or care homes. The focus is on sustainable and energy-saving construction methods, and the use of ecological materials.

However, PPP (public private partnership) models are also being increasingly used in cities for larger infrastructure projects. These are based on a permanent life-cycle perspective, with the consequential effects and costs also included in the evaluations for all decision-making processes. For these sustainable life-cycle models, Raiffeisen-Leasing collaborates with technical partners in the fields of buildings and facilities management.

## High-quality construction of residential accommodation

The real estate developer Raiffeisen WohnBau, a 100 per cent subsidiary of Raiffeisen-Leasing GmbH, specializes in the construction of high-quality owner-occupied apartments. The use of environmentally friendly air source heat pumps is particularly important for the provision of energy in apartment buildings, with recent examples including the projects at Rosentalgasse 21 and Versorgungsheimstraße 17 (both 1140 Vienna), Raffelspergergasse 26 and Greinergasse 19 (both 1190 Vienna), and Sonnenstraße 25 (4852 Weyeregg am Attersee). Air source heat pumps and pellet heating systems are due to be installed at Krottenbachstraße 182, while the projects at Klenaugasse 3 in the 22nd district of Vienna, Bahnhofstraße 58 + 60 in Deutsch-Wagram, and Haller Straße 172 in Innsbruck will be connected to the respective public district heating networks.

## Greenhouse gas bonus

In accordance with the Austrian national emissions certificates trading law, Raiffeisen-Leasing has developed a digital service that enables all beneficiaries (registered owners of electric vehicles) to process rewards relating to certificates trading for the respective calendar year. The aims of the greenhouse gas bonus are to increase the share of renewable energies in the EU and reduce CO<sub>2</sub> emissions. In Austria, the relevant EU Directive (Renewable Energy Directive – RED II) is enshrined in the fuel ordinance (Kraftstoffverordnung, KVO), which came into force on 1 January 2023. Mineral oil companies in particular are required to reduce their fuels' CO<sub>2</sub> footprint. The options currently available to these companies in order to meet their reduction targets include the purchase of CO<sub>2</sub> certificates, which are collected via intermediaries and verified and issued by Environment Agency Austria.

As at the cut-off date of 31 December 2023, 3,117 electric vehicle owners had benefited from this service and applied for their bonus using the Raiffeisen Leasing online application process.

# > Valida Vorsorge Management

GRI G4-DMA  
(former FS9)

GRI 2-6 As the competence center for occupational pension provision in the Raiffeisen Banking Group, Valida Vorsorge Management is responsible for managing the contributions paid into, and providing advice on staff provision funds ("Abfertigung neu" or "new" severance pay scheme) and pension funds.

The Valida Group uses different approaches to the topic of "sustainability in the investment strategy" within both the pension fund and the staff provision fund. The staff provision fund follows clear exclusion and positive strategies, while the pension fund focuses mainly on engagement and applies a "best in class" approach. Both funds have proven their commitment to sustainability by signing up to the UN Principles for Responsible Investment (UNPRI).

## Impacts

Find more at:  
[www.valida.at/de/warum-valida/as-set-management.html](http://www.valida.at/de/warum-valida/as-set-management.html)

The Valida Group is conscious of its particular responsibility to respect the principles of security and profitability in its investment policy. The investment strategies of the Valida staff provision fund and pension fund are therefore designed to achieve the best possible investment result to create wealth and ensure financial security for its beneficiaries and prospective beneficiaries in future. The staff provision fund also has a legal obligation to guarantee full disbursement of the contributions paid in by the employer. Moreover, the staff provision fund and pension fund reflect Valida's commitment to its social and environmental responsibilities. Economic, environmental and social criteria are therefore taken into account in the respective investment decisions.

Valida Vorsorge Management uses a target-based sustainability management system in its investment strategy to manage potential environmental and social impacts. Exclusion and positive criteria are defined for the investment strategy of the Valida staff provision fund to ensure that investments are made in companies and countries that contribute to a more sustainable future. For example, the Valida Group supports sustainable energy generation by including this in its positive criteria for the staff provision fund's investments. Conversely, investments in nuclear energy, coal, and countries that are not signatories of the Paris Agreement are excluded.

Find more at:  
[www.valida.at/de/vorsorge-management/rechtliches.html](http://www.valida.at/de/vorsorge-management/rechtliches.html)

The CO<sub>2</sub> footprint of the main components of the Valida staff provision fund and pension fund portfolios is regularly assessed to monitor compliance with the targets. An overview of the Valida pension fund's key negative impacts and investment strategy as at 30 June 2023 is available on the Valida website.

## Risks and opportunities

Sustainable investment is highly important to the Valida Group and many of its customers. For this reason, a dedicated procedure for the holistic management of ESG risks has been incorporated into the investment process. This identifies sustainability risks (e.g. climate change, employment standards, avoidance of corruption) and translates them into existing risk types (e.g. market risk).

In the staff provision fund, there is no risk of capital losses to customers due to the statutory gross capital guarantee. The aspects of security, profitability, liquidity as well as appropriate asset mix and diversification are taken into consideration in the investment process. Investments are continuously monitored in the Valida staff provision fund and calculated projections of future performance are provided on a regular basis.

The Valida pension fund entails the social risk that pensions can be reduced as a result of the contribution-based pension fund system. In line with § 25 of the Austrian Pensionskassen Act, the Valida pension fund therefore invests assets according to the general principle of prudence, while maximizing the benefit to customers and ensuring security, liquidity and profitability. Investments are primarily made via investment funds to ensure the diversification of investment risks. When introducing new investment products, a stringent selection process is performed to verify whether the target funds take ESG criteria into account in their investment processes. Tools such as external ESG databases are used to validate the fund managers' sustainability ratings.

The sustainability risk that applies to the entire Valida Group in its role as investor is the possibility that investments made via funds will include individual stocks from issuers with an inadequate track record of ESG management. In order to avoid this, Valida regularly assesses key sustainability figures for the portfolios' main components. This ensures the timely identification, monitoring and management of risks. In addition, an analysis (including stress scenarios) is performed once annually to establish the impact of sustainability risks on the business model, including the aspects of capitalization and liquidity. More details on sustainability risks will be available in Valida's sustainability report as of July 2024 ([valida.at/nachhaltigkeitsbericht2023](https://valida.at/nachhaltigkeitsbericht2023)), and at [valida.at/dvo](https://valida.at/dvo) for the Valida pension fund in accordance with Regulation (EU) 2019/2088 on sustainability-related disclosures.

Find more at:  
[www.valida.at/de/warum-valida-nachhaltigkeit.html](https://www.valida.at/de/warum-valida-nachhaltigkeit.html)

## Management

### Business area – staff provision fund – “Abfertigung neu”

The “Abfertigung neu” new severance payment scheme was introduced in 2003. Every employer is now required to transfer 1.53 per cent of every employee's monthly gross salary into a selected staff provision fund (BVK). The Valida staff provision fund provided services to some 2.7 million employees and self-employed persons as at 30 September 2023 (31 December 2022: 2.66 million; 31 December 2021: 2.56 million). Compared to 2022, assets under management were up by around nine per cent (from € 4.016 billion as at 31 December 2022) to € 4.381 billion as at 30 September 2023 (assets as at 31 December 2021 also totaled € 4.016 billion). Further information on the Valida staff provision fund will be available in Valida's annual report as of July 2024. ([valida.at/gb2023](https://valida.at/gb2023))

Download at:  
[www.valida.at/de/warum-valida-nachhaltigkeit.html](https://www.valida.at/de/warum-valida-nachhaltigkeit.html)

The principles of sustainable investing are set out in the “Valida staff provision fund: Sustainability concept”. This contains positive and exclusion criteria for investments that apply to all of the Valida staff provision fund's invested assets. The concept was reviewed in 2022. In this context, criteria were tightened, the investment universe was extended and targets were defined for various key figures.

Find more at:  
[www.valida.at/nachhaltigkeitskonzept](https://www.valida.at/nachhaltigkeitskonzept)

Exclusion criteria:

1. Weapons
2. Nuclear power
3. Violation of human and employee rights
4. Tobacco and spirits
5. Prostitution and pornography
6. Gambling
7. Controversial genetic engineering
8. Controversial business practices
9. Offensive weapons and foreign policy
10. Severe democratic deficits
11. Inadequate human rights standards
12. Passive climate policy
13. FCoal, oil and natural gas production

Positive criteria:

1. Sustainability in terms of principles and strategies as well as management systems
2. Investments in areas offering high sustainability benefits
3. Sustainability by incorporating economic, social and environmental aspects

### Control



The consultancy firm Reinhard Friesenbichler Unternehmensberatung (rfu), a specialist in sustainable investment, reviews the level of sustainability for the entire corporate assets of the Valida staff provision fund twice yearly. The individual investments are rated on a scale of 0 to 200 and assigned to one of the following four asset classes:

1. Sustainability funds
2. Sustainable individual instruments
3. Sustainably oriented funds
4. Conventional funds (not sustainable)

At 157 points, the Valida staff provision fund's overall portfolio comfortably exceeded the target of 150 points as at 30 April 2023. 99 per cent of the assets are invested in the three sustainable asset classes described above.

## ÖGUT certification



In 2023, the Valida staff provision fund received the ÖGUT Gold Award from the Austrian Society for Environment and Technology for 2022. This is its eleventh ÖGUT Gold certification in succession.

## Business area – company pension schemes

Find more at:  
[www.valida.at/de/warum-valida/organe.html](http://www.valida.at/de/warum-valida/organe.html)

Unlike severance payment schemes, pension fund solutions are optional as opposed to legally prescribed. As at the cutoff date of 30 September 2023, 274,277 retired employees and prospective beneficiaries had a company pension account with Valida Pension AG, corresponding to an increase of 1.5 per cent compared to the previous year (31 December 2022: 269,115; 31 December 2021: 281,274 retired employees and prospective beneficiaries). Compared to 2022, assets under management in the Valida pension fund were up by around four per cent from € 6.22 billion as at 31 December 2022 to € 6.47 billion as at 30 September 2023 (assets as at 31 December 2021: € 7.4 billion). Further information will be available in Valida's annual report as of July 2024.

The Valida pension fund has taken sustainability factors into account in its investment strategy for a number of years. In order that investment decisions can be implemented using the best possible instruments, the exclusion criteria are not explicitly defined (with the exception of generally established criteria such as controversial weapons, breach of international standards etc.). The focus of the sustainability concept is therefore on "engagement" rather than "exclusion". The Valida pension fund continuously analyzes the sustainability level of existing assets and planned investments. The analysis of the products intended for portfolio use or invested in is supported by the database of ISS ESG – one of the leading providers of sustainability data.

The Valida pension fund and staff provision fund regularly measure the following key sustainability figures for individual sections of the portfolios via an independent, external data provider (ISS ESG):

- The CO<sub>2</sub> footprint indicates the level of CO<sub>2</sub> emissions for all companies in which the fund invests.
- The SDG Solutions Score indicates the extent to which the companies represented in the portfolios contribute to the United Nations Social Development Goals.
- The ESG Performance Score shows how well the companies represented in the portfolios are performing according to environmental, social and governance criteria.

Find more at:  
[www.valida.at/de/warum-valida/nachhaltigkeit.html](http://www.valida.at/de/warum-valida/nachhaltigkeit.html)

At the end of 2022, both the pension fund and staff provision fund scored better than an international peer portfolio. The key figures for 31 December 2023 will be published in the Valida Group's annual sustainability report in July 2024.

Find more at:  
[www.valida.at/de/warum-valida/organe.html](http://www.valida.at/de/warum-valida/organe.html)

Valida Vorsorge Management defines measurable sustainable targets for the Valida pension fund and staff provision fund on an annual basis. These relate to the topics of "sustainable investment", "protection of customer data" and "compliance". A detailed analysis including an overview of target attainment for 2023 will be available in Valida's sustainability report as of July 2024 ([valida.at/nachhaltigkeitsbericht2023](http://valida.at/nachhaltigkeitsbericht2023)).

# ➤ Societal aspects in the core business

## Impacts



As a financial service provider and operator of essential services (critical infrastructure), we are aware of the impact of our business activities on society. A reliable supply of financial products and services is a prerequisite for a functioning economy and society. By guaranteeing a reliable and secure infrastructure, RBI plays a contributory role in safeguarding the stability and integrity of the financial system, protecting the digital economy from threats and further reinforcing the trust of our customers.

It is important to our customers that we consider their requirements and concerns in the design, sale and use of our products and services. This also includes the particular requirements and concerns of disadvantaged groups of people. Similarly, the security of our products and of our customers and their data is a crucial consideration. Responsible sales practices and marketing, as well as objective and understandable advice, are extremely important. Along with access to all the relevant information regarding products and services, we value the verifiability of claims, explanations of the possible risks associated with products or services, and appropriate information on topics such as risk reduction. For example, a customer's ability to repay a loan is carefully considered prior to lending (see page 91). We carefully investigate any complaints which are brought to us and respond as soon as possible (see page 146). We also strive to provide disadvantaged groups of people with comprehensive barrier-free access to our financial services. Protecting customer data is also part of our social responsibility (see following chapter "Protection of customer data and data security").

## Risks and opportunities

It is an essential prerequisite for us to properly and reliably fulfill the concerns described above, in order to uphold the trust that society as a whole and our customers in particular place in us. If these expectations are not adequately met or are disappointed, depending on the level of severity this can not only lead to a loss of reputation for our Group with the resultant migration of customers (loss of earnings) and investors, as well as to considerable penalties. It can also lead to long-term damage because of a resulting loss of confidence in the banking and financial services system.

On the other hand, we see it as an opportunity to further expand the high levels of trust that we traditionally enjoy in the RBI Group, thereby strengthening our market position. Due to the strict review of all activities in which personal data is processed, RBI's business activities can help maintain a reliable financial and economic system and fulfill the financial needs of customers in a reliable and secure manner, and without compromising rights and freedoms of natural persons.

RBI places great value on the protection of personal data and the fundamental rights this entails.

## Management

### Security of our products

A broad range of products and continuous innovation are important prerequisites for a positive customer experience and the satisfaction and loyalty of our customers. This is ensured by Group-wide product competence centers on the one hand and the Group Strategy team on the other.

All new products, product combinations and variations across the entire network are also subject to a formal Product Approval Process (PAP) that is designed to ensure that each product is optimized as far as possible, all risks and potential controversies associated with the product are identified, and that products are consistent with the bank's risk strategy and risk appetite as well as the regulatory requirements. Naturally, we offer products or services only when we have the corresponding expertise, the necessary infrastructure and the required license, and when the product or service is approved for the relevant markets. Trends and developments on the market are taken into account during product development.

From the product concept to the final approval, the PAP is a process that always needs to be followed when a new product or service is set to be offered. The PAP ensures compliance with the institution's risk strategy and risk appetite as well as regulatory requirements (Austrian Banking Act, Austrian Financial Market Authority, European Banking Authority, Austrian Anti-Money Laundering Act, Markets in Financial Instruments Directive/ MiFID). The PAP is approved by the management body and needs to be thoroughly documented and verified/supported by the bank units responsible. The PAP process is run using a digital solution, the PAP tool.

## Protection of customer data and data security

The comprehensive protection of all data provided or made available to RBI, particularly from natural persons (e.g. customers or employees), is an integral part of RBI's business activities and one to which it attaches an extremely high degree of importance. The recording, storage, processing and transmission of personal data of natural persons at RBI is subject not only to the mandatory statutory requirements, but also to mandatory internal principles and processes that are set out in a specific organizational and process structure for data protection and enhanced as required in coordination with the Data Protection Officer. Compliance is managed by the Group Data Privacy, Group Information & Cyber Security and Group Resilience Management organizational units, and monitored by the Group Data Protection Office unit, headed by the Data Protection Officer. The position of Group Data Protection Officer was introduced in the RBI Group on 1 August 2023. Its role is to harmonize and monitor data protection within the Group and implement it in the best possible way.

RBI also services, supports and monitors its Group subsidiaries in Austria and abroad with regard to the requirements of the GDPR and the internal principles and processes that are required to be observed within the Group. In addition to the GDPR, the applicable national laws in the respective countries must be observed. This involves supplementary or differing provisions in some cases, particularly in countries outside the EU.

Additional information on the processing of personal data by RBI can be found in the RBI data protection declaration.

In order to further promote awareness of data protection and data security at RBI and its Group companies, employee training includes a mandatory eLearning package aimed at generally improving the careful handling of personal data, as well as classroom-based training to enable practical implementation for the respective target group (e.g. business analysts, product owners). The eLearning campaign constitutes mandatory periodic training across all employee levels. Employees whose activities regularly involve processing personal data receive training at shorter intervals and as required.

For greater transparency purposes, data protection violation can be divided into three groups. Violations can be caused by human error, technical deficiencies or criminal behavior by third parties. In 2023, data protection violations were caused exclusively by human error, largely carelessness (incorrect email recipients). All cases of data protection violation were concluded. There were no cases pending at the end of the 2023 financial year. In addition, no significant penalties were imposed in the RBI Group this year by the data protection authorities. However, RBI submitted 27 reports in 2023 (29 in 2022) to the responsible data protection authorities, with one report sent by RBI AG. The reports contain cases such as a leak and loss of personal data. The data protection authorities or other parties made no data protection complaints to RBI in the 2023 financial year (15 in 2022).

GRI 2-23, -24  
GRI G4-DMA  
(former FS1)

GRI 2-13

Find more at:  
[www.raiffeisen.com/en/raiffeisen/legal/data-protection-cookies.html](http://www.raiffeisen.com/en/raiffeisen/legal/data-protection-cookies.html)



GRI 418-1



Complaints and data protection violations are monitored, reviewed, processed, and documented at RBI and all domestic and foreign subsidiaries. The reasons for the respective complaint or data protection violation are investigated and all necessary measures are taken to protect the data subject (including targeted refresher training for employees).

RBI AG was audited in 2023 by the responsible authority as part of a coordinated audit conducted by the European data protection authorities. The official audit was discontinued, as RBI AG answered all the questions posed by the data protection authority in full and in a comprehensible manner.

## Cybersecurity and resilience

Information and cybersecurity are key issues for RBI and are given top priority. Customers' and business partners' data is treated with utmost care. Consideration is always given to the way in which the factors that influence information security are changing, such as the threat landscape, technology, the regulatory environment or corporate strategy.

The Group Chief Information Security Officer is responsible for the definition, continuous development and implementation of RBI's information security strategy. The Group head office processes are certified according to ISO 27001, the de facto international standard for information security management. The scope of the certification comprises core banking processes, business-critical support processes, banking products, required IT infrastructure, locations and employees, as well as the security governance for the RBI Group and security processes for subsidiaries. RBI has taken strategic measures to strengthen cybersecurity, in order to guarantee maximum customer data protection and to recognize possible threat scenarios for the bank at an early stage and manage them in the best possible way.

GRI 2-13

Most of the attack attempts on RBI, such as phishing emails, DDoS attacks (Distributed Denial of Services – an organized attack that overburdens the IT infrastructure) or social engineering, are prevented by the security measures and tools that have been implemented. As a preventive security concept does not offer absolute protection, it is extremely important to us to continuously improve our detection and response abilities and adapt them to the very dynamic threat landscape. This is also reflected as a focal area of the security strategy 2023. In addition to the improvements and refinements to preventive cybersecurity, particular emphasis was placed on optimizing the detection ability. This was implemented in the Raiffeisen Cyber Defense Center with enhanced measures, such as simulating real attacks to reviewing the IT security measures.

In the 2023 financial year, we experienced broadband DDoS attacks aimed at overburdening systems, the disclosure (publication) of internal documents by authorized persons and incidents caused by third parties (suppliers). All incidents were processed, analyzed and addressed according to the defined processes. The rectification measures within the scope of "lessons learned" are material for RBI, so that it can guarantee a sustained increase in the level of security. The DDoS attacks resulted in short-term system failures. The other incidents did not lead to any significant losses for the RBI Group.

RBI implements technical and organizational measures to protect its customers data from unauthorized access, cyberhacking attempts, malware infections, DDoS attacks, ATM fraud, data leaks, phishing attempts, disclosure of sensitive information and a variety of other threats. Measures are taken to guarantee an appropriate level of risk with regard to the confidentiality, integrity, availability and resilience of all systems. The rapid changes in technology require constant adaptation and improvement of security measures from a technical as well as an organizational point of view. Furthermore, RBI is continuously improving its governance for information and cybersecurity in order to keep pace with the rapidly changing technological and regulatory environment and to be prepared for threats at all times. This includes periodic training for all employees at least once a year to raise awareness of information and cybersecurity.

Employees who are observant and aware play a crucial part in protecting the bank against threats to its security. Awareness campaigns, targeted training sessions and regular information through internal media are some of the measures taken to support employees. This enables us to protect internal data and business partners' data from potential threats. Cyber and IT security risks are covered by a Group-wide fidelity/crime insurance policy. This policy covers direct losses from cyberattacks such as withdrawals of bank deposits. Wherever possible and reasonable, RBI's other insurance policies (professional liability insurance, transporting valuables, etc.) also include cover components for cyber and IT risks.

## Responsible sales practices and marketing

Surveys consistently show that trust remains at the top of the list when it comes to choosing the right banking partner. Since trust is based on honesty, it is important to RBI that its products and services are communicated clearly and transparently to all customers and stakeholders. When advertising and marketing our products, we therefore apply strict guidelines aimed at providing our customers with comprehensive, easily intelligible information and protecting them from losses. Furthermore, false or misleading information is not permitted under any circumstances, to guarantee that customers are protected from making the wrong decisions or from high costs that could at worst lead to bankruptcy. Risks that may be associated with our products must therefore be clearly demonstrated and explained to customers, while taking care that all information is accessible to all. When it comes to recommendations, our main focus is on objectivity.

Three cases of violations of regulations and voluntary codes of conduct concerning product and service information and labeling leading to the imposition of fines were identified in 2023. All these cases relate to our subsidiary banks in CEE. Although these three cases relate to one legal entity (Hungary) and cover a wide spectrum of products and processes, RBI and its subsidiary takes these cases extremely seriously and strives to continuously improve the advice it provides to customers. Cases that are classified as operational risks are monitored and controlled on a Group-wide basis within the scope of operational risk management by the Operational Risk Controlling team as part of integrated risk management. Within the operational risk strategy, scenarios and plans of action are analyzed and early warning indicators developed together with the operational risk managers.



Furthermore, in our advertising we operate in accordance with the principles of the code of ethics of the Austrian advertising industry. In doing so, we undertake to adhere to quality criteria which – above and beyond statutory provisions – have been drawn up collectively by the advertising industry. For this reason, the Raiffeisen Banking Group Austria (and hence also RBI AG) was once again awarded the Pro-Ethics Seal of the Austrian Advertising Council for 2023 to 2025.

Companies are recognized for marketing measures that

- support the ethical and moral principles of the code of ethics of the Austrian advertising industry (for ethical advertising),
- reflect the community, social and ethical ideals of the communications industry (for self-regulation), and by so doing
- stand up for freedom of advertising and against advertising bans.

All of the marketing measures performed by RBI AG as the Group head office and by the individual subsidiary banks in Central and Eastern Europe comply with the ICC Advertising and Marketing Communications Code published by the International Chamber of Commerce. This is intended to ensure a transparent and fair market presence that is oriented toward internationally recognized guidelines.

In addition to protecting customers, our responsible marketing managers ensure that marketing activities are carried out only if they are consistent with the company's values. Strict compliance guidelines and the Code of Conduct also help to achieve this goal.

RBI's international advertising and marketing campaigns are exclusively developed and commissioned by the Group Marketing division of the Vienna head office. Internal policies also specify that all broad-scale campaigns of the subsidiary banks in Central and Eastern Europe must be approved by RBI Group Marketing.

RBI considers a functioning capital market and public confidence to be just as important as its own reputation as a

professional player on the market. Any action that endangers this principle would have serious consequences for RBI and the employees involved. The need for integrity also applies in the fight for market share. This means that no unauthorized agreements should be entered into and that it is necessary to abide by the rules of fair competition and the standard international rules of market behavior (MiFID).

During the reporting period of 2023 there were no new cases of anti-competitive behavior. With regard to violations of regulations and/or voluntary codes in connection with marketing and communications, including advertising, sales promotion and sponsorship, one case was identified across the Group in 2023. This concerned the bank in Russia but with a penalty range of just over the € 1,000 accumulated limit.

GRI 206-1  
GRI 417-3

Here, too, RBI takes all cases extremely seriously – especially where penalties and legal actions are concerned – and uses them as an opportunity to improve its internal processes.

## Customer satisfaction

GRI 2-26, -29

The satisfaction of our customers and outstanding customer relationships are our top priority. Customer satisfaction at RBI is therefore regularly measured in both the retail and corporate customer business. Measures for achieving additional improvements are derived from the insights gained in this way.

In our business with retail customers, small enterprises and micro businesses, as well as with our corporate and institutional customers, measuring customer satisfaction and service quality has been an integral component of our business management for a number of years. Since 2012, we have also employed a number of different methods to gain insight into the quality, duration and consistency of our customer relationships. In 2023, our NPS (net promoter score) maintained the positive trend recorded in previous years. Our NPS across all customer segments is well above the market average in most markets in which we have subsidiary banks.

This is also reflected indirectly in the awards that RBI and some of its subsidiary banks received again in 2023 from internationally renowned financial journals (see page 39).

We have set ourselves the target of being the “most recommended financial institution” in all of our markets and segments by 2025. The NPS measurement is carried out locally at all subsidiary banks in Central and Eastern Europe based on a standardized method for the entire Group. We also conduct a brand performance analysis at least once a year. This measures brand awareness, trust and attractiveness compared with local competitors. Most of the subsidiary banks in CEE rank above the market average in this analysis. Fast, professional services, high-quality products and a stress-free customer experience are key among the most frequently cited reasons for a willingness to recommend us. We have invested in establishing customer experience management at all subsidiary banks in CEE. This entails developing competence in improving the customer experience, establishing measurement and control criteria and anchoring customer satisfaction within the strategy of the subsidiary banks in CEE.

Regular measurements of customer satisfaction and the customer experience are used to document and analyze changes. We continuously collect customer feedback on our most important products, the customer journey and personal sales channels (branch, ATM, customer center). Digital channels (website, internet banking, mobile banking and social networks) are continuing to enjoy rapid growth in popularity and have also become an integral part of all measurements. Results are carefully evaluated and corresponding measures put in place. Objective criteria, such as the ratings for our apps in app stores, show that the services we offer via digital channels are meeting with an extremely good response among customers.

Back in 2019, we set ourselves the ambitious target of becoming the most recommended financial institution in all of the markets in which we operate. With this in mind, we regularly revise the existing Customer Experience Framework (CEF). The updated version of the CEF contains five strategic areas for improvement, each with specific measures assigned. These five areas for improvement still apply and we are making continuous progress.

GRI G4-DMA  
(former FS15)

- Understand: We strive to systematically collect feedback from our customers across all customer journeys and contact points so that we know with a high degree of certainty where we need to make improvements. To achieve this, we will also expand and standardize our journey mapping activities by applying uniform best-in-class methods in all our markets. Another leverage factor for this strategic area is the introduction of a multichannel platform for

customer experience management following on from the successful test runs in some markets.

- **Prioritize:** We decide on what needs to be improved and how by reference to transaction-specific customer feedback, additional business insights and a range of statistical methods in order to maximize the impact of our improvement measures wherever customers see the greatest barriers to smooth interaction with us. To achieve this, we develop and prepare a range of use cases for customer experience analytics at our subsidiary banks in CEE so that we can further optimize the way in which we measure and record customer satisfaction.
- **Act:** Analyze and respond to customer feedback: To this end, we have developed and launched a dedicated Customer Experience Academy to provide training at various hierarchical levels, from customer-facing employees through to product and general management.
- **Mobilize:** The aim of this strategic area is to ensure that our entire organization is geared toward a shared objective and a shared understanding of the customer experience, which we achieve by conducting extensive management training and in-house communication campaigns.
- **Structure:** In 2022 we started to structure the working relationship between our customer experience teams and the agile product teams by means of defined processes to ensure that improvements in the customer experience are implemented more quickly.

All the aforementioned activities are underpinned by specific execution plans with targets and KPIs that must be met over the next few years.

Direct customer feedback is also an important indicator for RBI in the business with corporate and institutional customers. In May/June 2023, customers in these segments supported from Austria were surveyed as part of a customer satisfaction analysis conducted on behalf of RBI AG. The results were presented in August 2023: RBI AG received top marks from its customers in the recommendation and cooperation categories. RBI AG was once again able to significantly improve its results compared to the previous year, particularly in the areas of sustainability and responsibility. We fundamentally view criticism and complaints from our customers as an opportunity to improve our products and processes, reduce errors and enhance customer benefit from our services. The importance of taking customer complaints seriously is unquestioned throughout the entire Group (see following chapter "Complaint management").

In the first half of 2023, Raiffeisen in Austria was once again the most successful banking group in terms of customer share in the retail customer segment. A regional focus, security and sustainability have been among the guiding principles of the Raiffeisen Banking Group since it was founded, and these principles have a special meaning during economically challenging times. Alongside a focus on customers and the provision of highly competent advice, security and trust are the most important criteria when choosing a bank. According to the 2023 Austrian brand value survey carried out by the European Brand Institute, Raiffeisen has a total brand value of € 2 billion, placing it seventh among all the brands surveyed.

## Complaint management

GRI 2-23, -24,  
-25, -26

As part of the implementation of the Joint Committee Final Report on guidelines for complaints-handling for the securities (ESMA) and banking (EBA) sectors (JC 2014 43, published on 27 May 2014), RBI established a central complaints management function and adopted corresponding head office and Group directives. In accordance with the extension of the Joint Committee Guidelines (JC 2018 35, published on 4 October 2018), a complaint is defined as a statement of dissatisfaction addressed to RBI by a natural or legal person relating to the provision of

- (i) an investment service provided under MiFID, the UCITS Directive or the AIFMD; or
- (ii) a banking service listed in Annex I to the Capital Requirements Directive (CRD); or
- (iii) a service of collective portfolio management under the UCITS Directive; or
- (iv) a payment service as defined in Article 4 (3) of the PSD; or
- (v) issuing electronic money as defined in Article 2 (2) of the EMD; or
- (vi) a credit agreement as defined in Article 4 (3) of the MCD; or
- (vii) credit intermediation activities as defined in Article 4 (5) of the MCD.

Central responsibility for complaint management lies with RBI Group Compliance. In line with RBI's internal rules, complaints that are not specific to compliance are processed and resolved by the department addressed in accordance with the prescribed process steps depending on the type of complaint.

In line with RBI's internal rules, all potential complaints in the sense of an expression of dissatisfaction addressed to the bank or its employees must be examined in order to establish whether it satisfies the definition of a complaint. Legitimate complaints must be documented immediately in RBI's web-based complaint management system and the person who registered the complaint must be notified of its receipt and the next steps in handling the complaint. The next step involves consulting the affected department(s) or employee(s) in order to determine whether the content of the complaint is objectively justified. The result of this analysis must be immediately communicated to the person who registered the complaint and documented in the complaint management system. In addition, the department responsible for handling the complaint must conduct an examination of the causes. The Management Board and Supervisory Board are kept informed about the latest developments in complaints management at regular intervals.

Find more at:  
[www.raiffeisen.com/en/raiffeisen/rbi-group/leadership-governance/compliance/management-of-customer-complaints.html](http://www.raiffeisen.com/en/raiffeisen/rbi-group/leadership-governance/compliance/management-of-customer-complaints.html)

Within RBI, complaints are seen as a valuable opportunity to identify potential process and product optimizations, and increase customer satisfaction. This attitude is held by all employees, especially those who come into contact with customers. RBI takes all concerns and feedback raised by its customers seriously and endeavors to find solutions to improve its processes/products and to increase customer satisfaction.

## Financial inclusion and other measures

GRI G4-FS14



In order to ensure social equilibrium in society, it is important that all sections of the population are given equal opportunity to access financial services. The term financial inclusion not only means merely having access to useful and affordable financial services and products, but also the actual use of the various services and products. Important components in this context are therefore the safe handling of money, saving a partial amount and investing in one's own financial well-being. The focus is on people with disabilities, people in specific regions, youths, women and older people, as well as micro businesses and small enterprises, and people with low incomes or who are in financial need.

By giving consideration to the topic of financial inclusion, banks at the same time also offer financial stability to society and are important pioneers for numerous Sustainable Development Goals. Furthermore, studies have consistently found that financial inclusion facilitates a greater number of investments, increases control over money (especially for women) and helps households to deal better with difficult situations by enabling them to draw on their savings and insurance policies.

Financial literacy is an important prerequisite for this (see page 204 ff. for our financial education initiatives) because only those who understand financial products and services can deal with them appropriately.

In this respect, financial knowledge also reduces the risk for us as a bank that the disadvantaged groups of people will no longer be able to repay their loan installments. RBI's reputation could be damaged if it does not actively seek to allow everyone to participate in the financial system. Another potential risk that could arise for RBI, for example because of a simplified customer onboarding process, would be the possible increase in the crime rate. On the other hand, by including other customer groups, RBI could expand the diversity of its target groups as well as increasing its business volume in the long term. Finally, acting responsibly when dealing with all people and developing close customer relationships could strengthen confidence in RBI as a bank.

## Austria

The following table provides an overview of the measures that were taken in Austria in the area of financial inclusion. It is apparent that many measures in Austria are not relevant, as RBI AG does not have a traditional retail banking operation in the country. In addition, with the exception of Kathrein Privatbank, the Austrian subsidiaries do not have direct contact with retail customers but sell their products via the regional or local Raiffeisen banks (primary level). RBI AG and the Austrian subsidiaries do not have branches or ATMs either.

GRI G4-DMA  
(former FS4)

Training initiatives						
Measure	RBI AG	RBSK	RKAG	RL	Valida	Kathrein
Guidance/training for dealing with people with disabilities	✓	n.r.	n.r.			
Training measures to avoid discrimination of any kind when dealing with customers	✓	n.r.	n.r.			

Special needs of people with disabilities						
Measure	RBI AG	RBSK	RKAG	RL	Valida	Kathrein
Barrier-free branch access	n.r.	✓	n.r.	✓	n.r.	✓
Barrier-free access to ATM*	n.r.	n.r.	n.r.	n.r.	n.r.	n.r.
Website adaption for people with visual impairment	✓	✓	✓			
Adaptation of ATMs for people with visual impairment	n.r.	n.r.	n.r.	n.r.	n.r.	n.r.
Availability of sign language translators for retail customers with hearing impairment	n.r.		n.r.			✓

Products and services						
Measure	RBI AG	RBSK	RKAG	RL	Valida	Kathrein
Special conditions for students and/or youths	n.r.	✓	n.r.	n.r.	n.r.	
Special products/services for female customers	n.r.		n.r.		n.r.	
Special conditions for retirees	n.r.		n.r.		n.r.	

Further measures						
Measure	RBI AG	RBSK	RKAG	RL	Valida	Kathrein
Multilingual ATMs*	n.r.	n.r.	n.r.	n.r.	n.r.	n.r.
Free donation transfers	n.r.	n.r.	n.r.	n.r.	n.r.	✓
Special conditions for defined NGOs/charitable institutions	✓	n.r.	n.r.		n.r.	✓

n.r. = not relevant

\* Is considered implemented when at least 90 per cent of this is the case. Please see the list of abbreviations for the complete company designations.

Against this backdrop, there are individual measures that can be allocated to the area of financial inclusion: RBI AG offers its employees training on the Code of Conduct with regard to measures for avoiding discrimination of any kind when dealing with customers. Kathrein Privatbank AG provides its customers with a sign language interpreter if required and Raiffeisen Bausparkasse Gesellschaft m.b.H. offers a special youth savings rate to its building society customers up to the age of 25. It is pleasing to see that all RBI Austria sites offer barrier-free access.

At RBI AG, our websites clearly meet all legal requirements regarding accessibility (Web Content Accessibility Guidelines WCAG). WCAG 2.0 consists of twelve guidelines that are assigned to four principles: perceptibility, usability, comprehensibility and robustness. Each guideline has a three-level set of verifiable success criteria: A, AA, and AAA, with each level progressively more difficult to achieve. RBI AG not only meets the level-A requirements; approximately 75 per cent of the AA-level and 50 per cent of the AAA-level requirements are implemented. Its website is accessible using screen readers and it has larger buttons and images for people with limited hand mobility. Thanks to responsive design, the website is automatically modified to suit the end device.

The contrast settings on the Raiffeisen Bausparkasse website can be adjusted to allow visually impaired people to use it. The high-contrast function can also be used on the Raiffeisen Kapitalanlage website since April 2022.

## Subsidiary banks in Central and Eastern Europe

Financial inclusion measures carried out in the subsidiary banks in Central and Eastern Europe include training initiatives, special products and services for vulnerable target groups and measures concerning people with disabilities.

Trainings initiatives												
Measure	CE			SEE						EE		
	TBSK	RBCZ	RBHU	RBAL	RBBH	RBKO	RBHR	RBRO	RBR5	RBBY	RBRU	RBUA
Guidance/training for dealing with people with disabilities			✓		✓		✓	✓		✓	✓	
Training measures to avoid discrimination of any kind when dealing with customers	✓	✓	✓			✓		✓				

GRI G4-DMA  
(former FS4)

Please see the list of abbreviations for the complete company designations.

To assist people with disabilities and to be able to better serve their needs, Raiffeisen Bank Zrt. in Hungary offers new colleagues basic training on removing any physical barriers to access and providing customers with support in setting up their accounts. A guideline is also available for the customer-facing Hungarian employees. Raiffeisen BANK d.d. Bosna i Hercegovina offers its special training via an eLearning platform. Raiffeisen Bank S.A. in Romania takes a similar approach, where all its employees undertake training via the "Easyclass" eLearning platform, where they can retrieve training material on dealing with people with various disabilities including practical guidelines.

A number of subsidiary banks undertake specific training measures to avoid discrimination of any kind, some of which we have outlined below: To make employees at Tatra banka, a.s. in Slovakia aware that no discrimination of any kind will be tolerated, ethical behavior is not only included in the Group-wide Code of Conduct but is also an integral element of the bank's principles. The principles of the Code of Conduct, including the topic of discrimination, constitute part of the training for all new employees, regardless of their hierarchical level within the bank. Employees of Raiffeisen Bank S.A. in Romania can access numerous training sessions on human rights issues on the "Easyclass" eLearning platform, which are aimed at counteracting, for example, unconscious bias.

Products and services												
Measure	CE			SEE						EE		
	TBSK	RBCZ	RBHU	RBAL	RBBH	RBKO	RBHR	RBRO	RBR5	RBBY	RBRU	RBUA
Special conditions for students and/or youths	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Special products/services for female customers					✓	✓	✓					
Special conditions for retirees				✓	✓	✓	✓	✓	✓	✓	✓	✓

Please see the list of abbreviations for the complete company designations.

Digitalization makes it much easier to access products and services. However, it is also important to ensure they are affordable. The special conditions are currently focused on the following target groups: youths, women and retirees. Some subsidiary banks also offer favorable conditions for micro businesses. These include the following:

Tatra banka a.s. in Slovakia offers a free account with € 30 starting capital to youths/students. Raiffeisenbank a.s. in the Czech Republic also offers youths/students up to the age of 26 a free bank account under the name "Aktivní účet". In response to demographic change in Hungary, Raiffeisen Bank Zrt. launched an offer for the 14-18 age group for the first time. This is in addition to its offer for those aged 18-25. Raiffeisenbank a.s. in the Czech Republic offers account packages aimed specifically at youths, which are based on the most frequently used products and services in this customer group, with different discounted fees and commissions. The CLUB package offered by Raiffeisen BANK d.d. Bosna i Hercegovina to youths aged 15 to 26 is also free of charge until their 26th birthday or when they receive their first income. The "Young & Free" account package of Raiffeisenbank Austria d.d. in Croatia offers youths a 50 per cent discount on domestic online transfers.

Raiffeisen Bank S.A. in Romania offers students and youths aged 18 to 25 a special check account package, comprising a check account, the associated debit card and mobile banking services, which are all free of charge

In addition, three subsidiary banks have special offers for women. Raiffeisen BANK d.d. Bosna i Hercegovina offers women in small and medium-sized enterprises a special package that incurs no service charges for 12 months. Furthermore, women often find it challenging to access funding. We want to counter this in the SME segment with the "Women in Business" loan offered in conjunction with the European Bank for Reconstruction and Development (EBRD). Besides the loan, women can avail of webinars and seminars, networking events, consultation meetings, coaching courses and advisory services for workshops. Particular attention is also paid to women at Raiffeisenbank Austria d.d. in Croatia, which offers the "ONA zna za RBA" program to small and medium-sized enterprise owners and members of "Women in Adria". The program not only offers special conditions for lending and in day-to-day business, but also provides networking opportunities. Through its collaboration with the Kosovo Credit Guarantee Fund (KCGF) as part of the "Women in Business Window", Raiffeisen Bank Kosovo J.S.C. offers businesswomen easier access to finance and financial knowledge. The favorable lending conditions for this project will continue until 2025. This support aims to have a positive influence on women's financial security and their financial and independent status.

Sustainable inclusion also involves taking the different phases of life into consideration. The world population is aging rapidly and at least one quarter of the population in many regions around the world will be over 60 years of age by 2050. The financial inclusion of retirees will therefore become increasingly important. Raiffeisen Bank Sh.a. in Albania has offered the "Relax" package for quite some time now, with products and services at special conditions. At Raiffeisen BANK d.d. Bosna i Hercegovina, retirees also pay a reduced monthly fee for the package, which includes a free savings account. Raiffeisenbank Austria d.d. in Croatia also offers a similar package, where it can be chosen between the „ORYX Assistance" or an UNIQA Insurance (Additional health insurance or accidental death/illness insurance) on top. Different packages were put together in Kosovo containing the products and services most frequently used by the target group. Retirees can avail of lower fees for these packages. Raiffeisen Bank S.A. in Romania offers retirees the free account package "Zero Simplu". No fees and commissions are charged, if at least one monthly electronic transaction is made. In Serbia, Raiffeisen Banka a.d. offers special conditions on loans to retirees up to the age of 75, where the bank rather than the customer pays the life insurance premiums for the entire repayment period.

Furthermore, three subsidiaries already offer favorable conditions for micro businesses: Raiffeisen Bank Zrt. in Hungary supports the subsidized "Széchenyi Max+" program since January 2023. The government-run program not only offers favorable conditions to SMEs. Under this program, Raiffeisen Bank introduced a new green investment loan for micro business and SME customers in June 2023. The green product is available for zero-emission car purchases and investments in solar panels. To implement the subsidy program as part of a National Recovery and Resilience Plan (NRRP), Raiffeisenbank Austria d.d. in Croatia signed an agreement with the Croatian Bank for Reconstruction and Development (Hrvatska Banka Za Obnovu i Razvitak (HBOR)), under which micro businesses and small and medium-sized enterprises are also to be financed in EU projects, among other things. By signing a guarantee from the United States International Development Finance Corporation in 2023, Raiffeisen banka a.d. in Serbia plans to boost economic growth in rural Serbian areas too, by lending to micro businesses, and small and medium-sized enterprises.

#### Special conditions for Ukrainians

Measure	CE			SEE					EE			
	TBSK	RBCZ	RBHU	RBAL	RBBH	RBKO	RBHR	RBRO	RBRB	RBBY	RBRU	RBUA
Support with Banking services	✓	✓		✓			✓		✓			

Please see the list of abbreviations for the complete company designations.

In light of the current situation in Ukraine, some subsidiary banks continue to provide support for banking services. These range from opening bank accounts free of charge, free foreign transfers, to using the transfer fees for humanitarian measures provided to Ukrainian citizens.



Here are two examples:

At Tatra banka, a.s. in Slovakia, for example, Ukrainian citizens have access to financial resources. This applies in particular to card payments and ATM withdrawals. It is also useful that English or Ukrainian can be selected as a language at the ATMs. The fees for the "Account for blue planet<sup>TB</sup>" included free account management until the end of 2023.

Find more at:  
[www.tatrabanka.sk/en/forblueplanetinpeace/](http://www.tatrabanka.sk/en/forblueplanetinpeace/)

Raiffeisenbank Austria d.d. in Croatia also wanted to make it easier for Ukrainian refugees who currently reside or have applied for residency in Croatia, to stay in Croatia and to facilitate simple access to their cash. It offered a free basic account with other additional services until the end of 2023.

Special needs of people with disabilities												
Measure	CE			SEE						EE		
	TBSK	RBCZ	RBHU	RBAL	RBBH	RBKO	RBHR	RBRO	RBR5	RBBY	RBRU	RBUA
Barrier-free branch access*	✓			✓		✓	✓	✓				
Barrier-free access to ATMs*	✓		✓	✓	✓	✓	✓	✓				
Website adaption for people with visual impairment	✓	✓	✓						✓	✓		✓
Adaptation of ATMs for people with visual impairment*			✓		✓						✓	✓
Availability of sign language translators for retail customers with hearing impairment		✓							✓			

\* Is considered implemented when at least 90 per cent of this is the case.  
Please see the list of abbreviations for the complete company designations.

Funding needed by people with disabilities is often intended for home renovations, purchasing a guide dog or other measures. Some customers can independently carry out banking transactions but others may need to call in a witness to give the customer security during a transaction, depending on the type and severity of the disability.

One important basic requirement for persons with disabilities is providing barrier-free physical access to as many branches and ATMs as possible. Five of our twelve subsidiary banks in Central and Eastern Europe are already equipped with at least 90 per cent barrier-free branches, and eight subsidiary banks are also able to guarantee barrier-free access to more than 90 per cent of their ATMs.

Investment is needed in some subsidiaries to fit ATMs with corresponding keyboards and headphone jacks for persons with visual impairments, as these facilities are currently not standard in all banks. A web presence including digital product information with the option of switching to high-contrast colors, as well as the use of screen readers, which are already available in some subsidiaries, represent a significant improvement for many visually impaired people. Likewise, the use of screen readers for digital publications and contract documents, as well as bank cards adapted to the needs of visually impaired people, is becoming increasingly important. A special workflow offered by Raiffeisen Bank S.A. in Romania allows visually impaired customers to register, open and manage the check account package. Documents sent by email can be read with special apps.

The option of installing hearing loops or arranging for a sign language interpreter to attend consultations on financial services can make things considerably easier for people with hearing impairments. One positive example is our cooperation with the provider "DeafCom", which allows deaf or hearing-impaired customers in the Czech Republic to contact Raiffeisenbank a.s. via their mobile phone. This collaboration makes it easier for the hearing-impaired to obtain access to an account and other financial products and services. The bank also established the "Quiet connection" service in 2023, which allows hearing-impaired customers to communicate using a tablet. Raiffeisen Bank S.A. in Romania provides its hearing and speech-impaired customers with support from sign language interpreters, who visit the relevant branch if required. At Raiffeisenbank Austria d.d. in Croatia, all new branches have contacts who can help and assist people with disabilities.

### Other measures – overview

Language barriers for immigrants can be overcome by using technology with language selection, at least at ATMs. This was already implemented in all subsidiaries.

The following is an overview of the other measures taken:

Measure	CE			SEE					EE			
	TBSK	RBCZ	RBHU	RBAL	RBBH	RBKO	RBHR	RBRO	RBRB	RBBY	RBRU	RBUA
Multilingual ATMs*	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Free donation transfers		✓**				✓	✓		✓	✓	✓	✓
Special conditions for defined NGOs/charitable institutions	✓								✓	✓	✓	✓

\* Is considered implemented when at least 90 per cent of this is the case.  
 \*\* In RBCZ transfers are free of charge as standard.  
 Please see the list of abbreviations for the complete company designations.





































## Metrics and ambitions

We have set ourselves the target of further promoting awareness of data protection and data security at RBI and its Group companies and to reinforce the careful handling of personal data. The RBI Group believes it is extremely important to meet the latest requirements of data protection law and it implements the necessary changes swiftly. We also aim to automate standard data protection processes to guarantee an even more efficient process. Moreover, we want to further improve the level of security maturity throughout the Group by adapting to the evolving threat landscape and new attack scenarios.

We have also set ourselves the target of being the most recommended financial institution in all our markets and segments by 2025.

### Sustainability program

SDG	PRB	Objective	Measure
<b>Responsible banker – primary objective: Positioning as a responsible banker</b>			
	1-6	Implementing UNEP FI's six Principles for Responsible Banking (PRBs)	2021 to 2024: Continuous implementation of the six principles and the associated tasks
	2	ESG-Impacts analysis	In 2023, conducting an impact analysis of the self-managed portion of Raiffeisen KAG's managed assets (in addition to the 2022 existing portfolio impact analysis of the Consumer, Business and Corporate Banking business activities)
	2; 5	Addressing the impact area „Climate Change“	<ul style="list-style-type: none"> <li>Annual calculation and analysis of financed emissions according to the PCAF approach</li> <li>Reduction of financed emissions in line with the SBTi commitment</li> <li>Achievement of the CO<sub>2</sub> reduction targets of RKAG's investment portfolio according to the Net Zero Asset Managers Initiative (NZAM)</li> </ul>
	2; 5	Further development of group's sectorspecific strategies and policies in the most CO <sub>2</sub> -intensive industries	Monitoring of internally set portfolio targets and engagement criteria for 2025 and 2030 (based on the ESG evaluation for customers) and further development of the transition path for oil and gas, steel, real estate and construction, and in 2024 for mobility, agriculture and utilities
	2; 5	Addressing the impact area „Circular Economy“	Group-wide introduction of a qualification process for the circular economy with the goal of identifying at least € 200 million in circularity-eligible assets or meaningful KPIs for the circular economy

SDG	PRB	Objective	Measure
 	2; 5	Addressing the impact area „Biodiversity“	Building and transferring knowledge within the group, as well as developing relevant industry standards as part of RKAG's commitment to the „Finance for Biodiversity (FfB) Pledge“
   	1; 6	Inclusion of ESG components in the business strategies/remuneration regulations of the executive boards	Annual update of the ESG KPIs of the executive board for performance management and the remuneration report for RBI AG and the subsidiary banks in CEE
    	3; 5	Increasing ESG knowledge and awareness within the group	Increasing awareness among relationship managers through training (participation in e-learning modules of the RBI's ESG Academy, product training on green and social finance products, and special skill-up modules)
 			
    	3; 4	Positioning as the preferred bank for ESG consulting and financing in our markets	Advanced ESG consulting/customer retention concept
 			
   	3	Expansion of the range of sustainable products	<ul style="list-style-type: none"> <li>▪ Innovation and further development of sustainable products and services</li> <li>▪ Increase in sustainable "Assets under Management", especially through the launch of new sustainable products and concepts by RKAG</li> </ul>
 	3	Pioneer in ESG bond issue	<ul style="list-style-type: none"> <li>▪ Further portfolio expansion for future green bonds and social bonds</li> <li>▪ Increased customer engagement and ESG management intensification program</li> </ul>
  	3	Strengthening of the ESG component in retail business	Expansion of green mortgage loans and unsecured loans with social and/or green loan purpose (to ten per cent of retail loan volume)
    	1; 5	Comprehensive consideration of human rights concerns related to the core business	Further establishment of the necessary processes within the framework of the internal human rights policy
 	1; 4	Use of Artificial Intelligence AI technology to support sustainability and ESG measures	<ul style="list-style-type: none"> <li>▪ In 2024, first case studies on ESG performance and reporting based on an AI-supported analysis</li> <li>▪ In 2024, organization of an "AI for Good" event in collaboration with Mastercard and Fintech Ladies as part of the ViennaUp Festival</li> </ul>

SDGs

 No poverty	 Zero hunger	 Good health and well-being	 High quality education	 Gender Equality	 Clean water and sanitation	 Affordable and clean energy
 Decent Work and Economic Growth	 Industry, innovation and infrastructure	 Reduced inequalities	 Sustainable cities and communities	 Responsible consumption and production	 Climate action	 Life below water
 Life on land	 Peace, justice and strong institutions	 Partnerships for the goals				



**Field of action Fair partner – Employees:**  
for inclusion and empowerment

# Interesting facts at a glance

## Business Loans

### Five Principles for Diversity & Inclusion Strategy



**Our engagement** and commitment to diversity and inclusion begins at the very highest level of management



**Our management** teams are diverse and aware of the importance of diversity



**We empower** all employees to contribute to an inclusive work culture



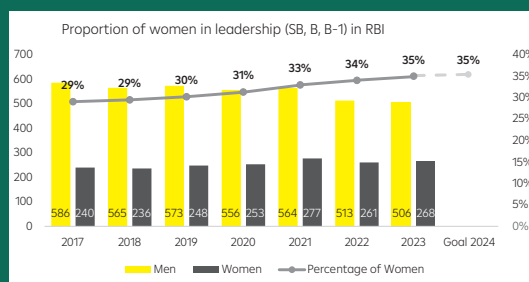
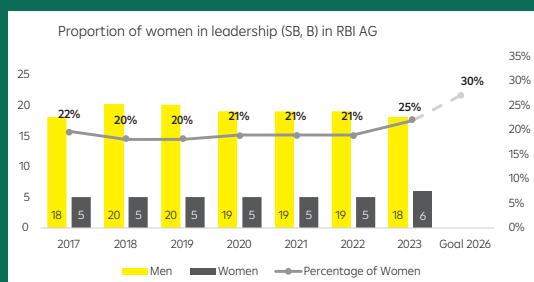
**We actively** integrate diversity and inclusion into HR processes and practices



**We work** transparently and on the basis of data



## Increase of the share of women in top management as an important goal

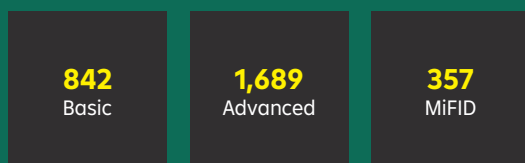


**Marie-Valerie Brunner;**  
First female board member in RBI AG

## RBI as learning organization with focus on ESG competence

### RBI ESG Academy

Sustainability competence training certificates



### New Moduls 2023



### Training hours

**1,407,200**  
hours in total



### RBI Employer Awards

RBI AG:

- **Top Employer 2023** by LinkedIn
- **Top IT Employer** by WeAreDevelopers
- **eLearning AWARD 2024** in the category „Compliance“ „RBI Group Code of Conduct“



**Raiffeisen Bank a.s. Czech Republic:**

- „Top Responsible Company in Diversity“

### Think and Act RBI

Think RBI as a guiding principle

Think and Act RBI learning journey:

- Promoting company-wide collaboration
- Reinforcing effective communication
- Strengthening self-confidence and emotional intelligence
- Increasing individual success
- Boosting team success

# Fair partner – Employees

Our employees and our shared culture are the foundations of RBI. It is extremely important for us to act sustainably not only with regard to natural resources but also in terms of how people management is implemented at RBI. Trend analyses show that more employees than ever before are considering changing their job. Flexibility, meaningful work, development opportunities, personal relationships with colleagues and good managers are essential when choosing a job and for remaining within a company. We are addressing these topics in a targeted and long-term manner.

## > Impacts

RBI bears a considerable social responsibility in its role as the employer of more than 45,000 people. There is a continuous balance to be struck between our expectations of our employees, partners and stakeholders, and the question of what we can give and offer in return. We take everyone's needs into account, from shareholders, employees, customers and suppliers through to the wider public. Creating and maintaining jobs – with positive socioeconomic benefits for individuals and regions – is a central concern of RBI within Austria and its twelve markets in Central and Eastern Europe. This has an indirect impact on security, stability and prosperity in society. RBI embraces this role with a great sense of responsibility. At the same time, RBI cannot escape technological changes and rising cost pressures. Customers have every right to expect us to offer high-quality products, including a growing number of digital products at competitive prices. "Customer ease" is our promise – we want to make the experience of RBI's customers as comfortable and straightforward as possible. This also includes making changes within RBI. Along with alterations to our technical infrastructure, we are also changing the way we work – for example, through automation. Our employees need a range of different skills and experience.

GRI 403-1 RBI considers a responsible approach to the topic of change to be important, as change can also lead to uncertainty and make people fearful. The physical and mental health of our employees is extremely important to us and becomes even more relevant in times of change. We seek to prevent the potential negative effects of stress and sedentary office work through a variety of provisions and opportunities in the areas of health care, personal well-being and sports.



Even with all of the necessary changes, we believe that meaningfulness plays an important role in our employees' resilience and motivation. We focus on the question of how individuals can contribute to the company's success. Within the Sustainable Development Goals (SDGs) and goal number eight defined therein (SDG 8), the transformation to "good jobs", RBI works towards achieving this goal. As an international company, we are aware of our role-model function in the CEE region. RBI is committed to being a good employer and hence contributing to a quality competition in terms of "good jobs" in all of the regions in which it is active.

RBI can also contribute to reducing inequality in society through professional diversity management with a focus on empowering women and employing people with disabilities and members of the LGBTIQ+ community. Here, too, we believe that we perform an important function within society and serve as a role model. We believe that diversity goes hand in hand with a richness of perspectives and that this has a positive influence on business decisions and the company's results. Adequate vocational education and training not only contributes to the success of RBI, but also motivates employees. The sum of all vocational education and training measures provided by the company also influences the potential of our society. This is why RBI offers comprehensive learning opportunities for all its employees.

Although most of the employees have an employment contract with RBI, there are those who work for RBI as external employees. External employees can be a great help, especially on project-related tasks or in times of temporary personnel bottlenecks. However, it takes time to train and familiarize employees, which is often not possible for short-term assignments. This means that if external employees are used mainly for simple tasks that have an end date, the aspect of further training is sidelined. External employees also find it difficult to develop a sense of belonging and to identify with the company. RBI therefore takes great care to ensure that, in the few cases where external employees are engaged, they are involved in the processes and with what is going on at RBI in the same way as all other employees.

GRI 2-8

Employee participation is of great importance for RBI as well as for the employees. Capturing the mood among employees and their needs offers an opportunity to address these, reveal possible problems and take measures to improve employee satisfaction. For employees, it means having a voice, being heard and thereby enhancing employee engagement and loyalty. At RBI AG, there are several options to ensure employee participation, such as through the Staff Council, the ombudsperson or in regular CEO calls, giving employees the opportunity to ask questions anonymously.

GRI 2-29

## ➤ Risks and opportunities

Our employees are our greatest asset. RBI can only continue its success if it has satisfied, motivated and healthy employees. The risks arising from a strategy that has not been developed fully should not be underestimated. Given that the work undertaken in banks is subject to high regulatory requirements for which highly qualified employees are needed, the emphasis must be placed on well-qualified and well-trained employees who can successfully accomplish the tasks assigned to them. As a learning organization, RBI is conscious of the need for continuous further development to maintain the high standards.

RBI's employees are highly qualified. This can lead to the risk of a brain drain in the countries in which RBI operates. It is interesting for well-educated employees in the emerging markets in particular to relocate their workplace to, for example, Austria. This can lead to Austria acquiring qualified workers but can cause a shortage of experts in their home countries. As a consequence, the quality of work declines or expensive know-how has to be bought in.

An additional risk can arise from the absence of a diversity policy. Diversity is considered a success factor. Various teams work more effectively and make more diverse and better decisions. A lack of diversity can lead to financial losses due to wrong decisions being made in day-to-day work or to production inefficiency because of reduced motivation. Legal requirements, such as the representation of people with disabilities or the share of the underrepresented gender, which can entail fines if they are not met, must not be disregarded.

A good work-life balance must be respected in order to retain motivated staff over a long period. In addition, workplaces, working hours and conditions must be designed in such a way that the health of all employees is preserved. Failure to do so can lead to staff shortages due to physical and mental illnesses, which mean loss of quality and know-how as well as financial outlays.

# > Management

GRI 2-12, -13

Although Group People & Organisational Innovation is a Group function, the subsidiary banks in Central and Eastern Europe operate with a high degree of autonomy and decentralization. Management takes the form of the exchange of expertise, sharing experiences and joint work on topics. This serves to reflect the considerable diversity within RBI. In some areas, there are regulatory or strategic reasons that require greater centralization. For example, when it comes to compensation or selecting Management Board members and managing directors, and also succession planning, Group head office takes responsibility, takes decisions, issues policies for the Group, supports processes with policies and ensures that they are observed.

GRI 2-7, -8

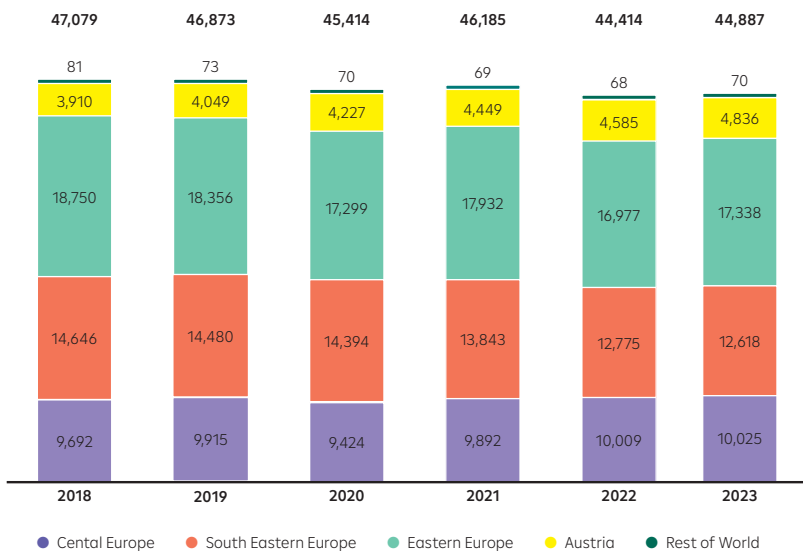
## Number of employees and employment relationships

As of December 31, 2023, RBI had 44,887 employees (full-time equivalents). 473 people more than at the the end of the previous year. The largest increases were recorded in Russia (plus 405), Group headquarters (plus 148) and Hungary (plus 91). The largest decrease was in Serbia (minus 236).

The following chart shows the development in the number of employees over the past five years (in full-time equivalents):

### Development of personnel

Number of staff at end of year\*



\* Includes the employees of all companies of the IFRS consolidation scope (according to RBI Annual Report 2023, pp. 241-244).

In addition to the permanent employees, there are also people who are not in an employment relationship with RBI AG but who perform work for RBI AG. In such case, the work instructions or the control and evaluation of the work resources and methods used are the responsibility of RBI AG. A distinction is made between those persons who come to RBI AG under a service contract between RBI AG and another company in order to provide the work defined in the service contract, and those individuals who have concluded a contract with a temporary employment agency. In the second case, RBI AG is responsible for defining and structuring the remit.

Raiffeisenbank a.s. in the Czech Republic and Raiffeisen Bank Sh.a. in Albania also have employees, mainly within IT, who are hired via a temporary employment agency.



During the summer months June to October, RBI AG concludes a number of temporary employment contracts with seasonal trainees. The traineeships can last between one and four months. The seasonal trainees undertake supportive and administrative tasks without any independent responsibility.

Seasonal traineeships can be undertaken by both school pupils and university students.

RBI AG also offers the opportunity to conclude internship contracts. Such internships are limited to a maximum period of six months, with the option to extend. An individual who takes up a internship must be enrolled on a course of study. Interns also carry out supportive and administrative work without any independent areas of responsibility. Many seasonal trainees and interns work 38.5 hours a week. It is also possible to agree fewer hours per week.

RBI AG only enters into fixed-term contracts for regular members of staff in exceptional cases. At most of the subsidiary banks in Central and Eastern Europe such as, for example, Raiffeisen Bank Zrt. in Hungary, Raiffeisen Bank Sh.a. in Albania or Raiffeisen Bank Austria d.d. in Croatia, the proportion of fixed-term contracts is consistently less than ten per cent.

Raiffeisen Bank S.A. in Romania and Raiffeisen Bank Sh.a. in Albania offer fixed-term employment contracts when replacing employees who are on parental leave. The contracts are concluded for the duration of the parental leave being taken by the employee who is being replaced. This model can also be applied in other Group companies, if required.

At Raiffeisen Bank Kosovo J.S.C., employees who have a fixed-term contract under which they may work a maximum of 120 days per year are not entitled to insurance, vacation and preferential rates. At Raiffeisenbank Austria d.d. in Croatia, all employees are entitled to the same benefits; only students are excluded from the benefits offered. At Raiffeisen Bank Sh.a. in Albania, staff with fixed-term contracts and agency workers are not entitled to social security and pension insurance. However, they are entitled to meals, annual leave and other absences under labor law. In Austria, there are no differences between full-time and part-time employees.

GRI 401-2

## Employee development

The following chart provides an overview of the employee development measures that are being implemented at the individual companies.

### Overview of measures

Topic	Measure	Austria						CE			SEE					EE			
		RBIAG*	RBSK	RKAG	RL	Valida	Kathrein	TBSK	RBCZ	RBHU	RBAL	RBBH	RBKO	RBHR	RBRO	RBR5	RBBY	RBRU	RBUA
Employer branding	Executive training on work-life balance	✓	✓		✓			✓	✓				✓	✓	✓		✓	✓	✓
	Performance management	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Talent management	✓	✓	✓			✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Trainee programs	✓					✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Please see the list of abbreviations for the complete company designations.

\* RBI AG only includes the head office here.

As learning and development are material factors for career satisfaction, continuous lifelong learning and learning from and alongside each other should be established as a matter of course in day-to-day work in RBI as a learning organization. Current labor market trends show higher fluctuation worldwide since the COVID-19 pandemic and an increased willingness to change jobs. The shortage of skilled labor is also widely talked about. New skills are needed as a result of retirement, the new expectations of Gen Y and Gen Z of the workplace as well as the advance of technical and regulatory changes. According to a survey carried out in RBI AG as part of the "Career Dimensions@RBI" project together with the Vienna University of Economics and Business (WU Wien), many employees think about whether their career expectations are being met. The most important dimensions of career success stated were financial security, work-life balance, learning & development and positive working relations. The opportunity to develop further and learn was seen as the most important dimensions of career satisfaction.

Personal and professional development is one of the greatest motivators for our employees. We therefore continuously focus on the "learning organization". Learning is placed at the core and will be integrated into workflows and work processes. It means taking proactive responsibility for one's own learning journey – guided by the question of whether we are doing and learning the right thing, in order to be successful over the long term.

The learning organization will create the framework for living out our values so that our employees view lifelong learning as a positive, established aspect of their working lives and an opportunity for growth. In other words: Learning is seen not as something we do in addition to our work, but as a part of our work and an established and accepted habit.

New learning formats and technologies are only the tip of the iceberg where the learning organization is concerned. Above all, it requires each and every individual and team to adopt new habits and rituals in order to be able to tailor their behavior to changing conditions. The learning organization requires us to question our own assumptions and convictions and continuously develop.

Learning has become an effective tool for RBI's future business success. It opens up the potential for harnessing the diversity of personality and talent within RBI – and for all employees to shape their own progress.

Development and learning take place continuously, combined with feedback and retrospective analyses as an integral part of day-to-day work. With regard to the learning journey for talented individuals, special care was taken to establish a supportive process that serves to promote sustainable learning agility where the talents themselves play an active role in their own career development. This is in line with the principle that the learners are at the heart of their development. More than 80 per cent of RBI's employees have an individual learning target documented in writing.

As well as helping us to adapt to change as an organization in the future, learning also allows us to actively shape this change and hone the skills that make RBI a unique partner to its customers on the market. First of all, this demands clarity about the direction of the company, and the knowledge and expertise that is needed in order to achieve the corporate objectives RBI is creating the framework and the scope for this expertise to be acquired and built up. However, the individual level is no less important. This requires people to take responsibility for their own development, because learning is a highly individual matter.

RBI is proud of its employees and the skills they have built up and developed in the past. Giving each and every individual the opportunity for personal and professional development is a way of persuading more employees to remain with RBI for the long term. "Working is learning, learning is working" is a principle that RBI actively pursues. It means that employees set their individual learning priorities and actively build their own learning success, while also contributing to the success of the company.

GRI 2-23, -24 In contrast to many global companies, RBI pursues a largely decentralized approach. Within a Group-wide framework that sets the standards and methods for performance management, talent management, succession planning and development of management staff, the subsidiary banks in Central and Eastern Europe have developed practices tailored to their specific local requirements so that they can attract, develop and retain talented employees. Our "Group Learning, Development and Talent Management Policy" sets out the principles for this approach.

GRI 2-23, -24 At RBI AG, the regulations are set out in a company guideline, the "RBI Learning & Development Policy". Furthermore, the development meeting and personal development plan of each employee constitute the structured foundations of the individual development measures.

The following section presents some local initiatives on the basis of our decentralized approach.

## Initiatives

### Transitional assistance programs to maintain employability

GRI 404-2

Within the context of part-time working for older employees, Austria offers the opportunity for employees to reduce their working hours five years before commencing retirement, in order to facilitate the transition from working life to retirement. The agreement is concluded individually between RBI in Austria and the respective employees.

In the case of continuous sick leave of at least six weeks and an uninterrupted period of employment of at least three months, RBI AG offers its employees the option of part-time reintegration. This makes it easier for them to return to the workplace and may also speed up the process. Working hours can be reduced by at least 25 per cent up to maximum 50 per cent for a six-month period, with at least twelve hours worked per week. In order to implement the part-time reintegration, an agreement must be reached between the company and the employee on the framework conditions (duration, extent of the reduction). Authorization must also be sought from Occupational Health Services and the national health insurance scheme (ÖGK). To support employees affected by job losses in reintegrating themselves into working life quickly, RBI AG participates in the Branchenstiftung Finance (BAST-FIN II) foundation scheme for the finance sector. Where the employment relationship is terminated by mutual agreement, former employees of RBI AG who are registered as unemployed, can provide evidence of formal qualifications, and are interested in a new, higher or further qualification which is of relevance to the job market, can join the waff-Stiftung (Wiener Arbeitnehmer:innen Förderungsfonds [Vienna Employment Promotion Fund]). The foundation works with the former employees to draw up a plan of action to ease the process of reintegration into working life and offers a "foundation-based unemployment benefit" as well as a grant payment which is linked to training. However, this offer was not taken up in 2023.

### Resilience as an important element of a learning organization and learning as a key driver of resilience

RBI AG is increasing its focus on resilience in order to create a sustainable working environment, i.e. the ability to deal effectively with change, stress and experiences in a constantly shifting environment and so maintain a state of well-being. Resilience is an important element of a learning organization and learning is a key driver of resilience.

In 2023 too, employees were offered a broad range of measures to train and strengthen their resilience. The different resilience learning initiatives are tailored to the various needs, levels and time resources of the employees.

Two "curiosity sessions" with external experts were held in 2023 to allow employees to explore the topic of resilience in more depth. In these 60-minute online lectures, employees were able to advance their knowledge on the topics of "managing focus and energy levels" and "power of self-awareness".

The two-hour interactive "bite-size resilience" session provides learners with basic knowledge and practical tools within our cHaRLie learning management system. This system can be used by all employees on a self-directed basis at any time. In addition, the Healthy Organization Playlist was developed and aimed at those who wish to delve into specific topic areas and address issues such as managing emotions, dealing with stress, the power of breathing, optimism, and mindfulness. For those who prefer to learn with like-minded people, we offer additional group activities in the form of "WorkOuts". Learners who participate in WorkOuts invest four hours over two weeks, comprising a kick-off meeting with a short introduction to the subject and some warm-up exercises. They meet again in a feedback meeting in order to exchange experiences and define the next steps. Seven of these resilience Workouts were held in 2023.

Our resilience learning journey also offers a six-month program for learners to get to know and experience tools and methods for promoting effective resilience as well as a platform for self-reflection and exchange of information. The journey comprises topic-based meetings followed by group coaching meetings, combined with self-directed learning in the form of additional resources, a guided app program and an active community in our cHaRLie learning management system. It is a journey with numerous dedicated and practical meetings, supported by external and internal coaches. The first group already successfully completed the program in 2023 and a second group had started.

## Focus on employees' sustainability/ESG expertise

To meet the growing demand for knowledge in the area of sustainability – particularly with regard to sustainable finance – the Group ESG & Sustainability Management department established two important learning formats.

Among other things, an ESG Academy (via the SharePoint function) developed internally includes internal documents, videos and podcasts on the subject of ESG from business areas such as Corporates and Markets & Investment Banking, as well as important links and documents on the Principles for Responsible Banking and statutory provisions. The information is continuously updated.

The main component of this ESG Academy is the Group-wide sustainability competence online training, which is offered as an eLearning module and is updated every year. It now comprises 13 modules covering all areas of sustainability and two special modules on ESG trends and green and social bonds. Three additional modules were added in 2023. On the one hand, there is now a mandatory module for employees in the retail segment to give them an even better understanding of ESG in the private customer business and enable them to implement it there too. On the other hand, we want to step up the focus on "S" in ESG and extend competencies in the area of human rights. One model therefore addresses the foundations of ethics, while another includes an introduction to the subject of human rights. It addresses the legal and historical basis, the contents of the RBI Group human rights policy and its implementation in RBI.

Online training participants can earn one of three different certificates (Basic, Advanced, MiFID). Advanced training was rolled out as a mandatory requirement for Risk employees. In 2023, again a large number of employees had obtained one of the certificates (Basic: 842, 2022: 3,810; Advanced: 1,689, 2022: 1,735; MiFID: 357, 2022: 620). The new retail module, which was rolled out in the fourth quarter of 2023, has been completed by 594 employees. Likewise, the module on human rights, which rolled out in December 2023 to mark the seventy-fifth anniversary of the Universal Declaration of Human Rights, has already been completed by 356 employees.

Regular Microsoft Teams meetings were held with the ESG ambassadors in the different board areas. During these meetings, different experts reported on the latest internal and external business developments and a lively exchange on best practice was held. Comprehensive training initiatives were held, especially in the Corporate board area (see page 99).

### SkillUp!

Based on the expertise of the eLearning module, SkillUp! training was introduced as a learning initiative for all Corporate Banking employees, in order to make learning a part of RBI AG's day-to-day business and encourage the understanding of ESG. In close coordination with senior management and on the basis of competence evaluations, a series of learning journeys focused on key strategic topics was launched. Learning opportunities have been introduced since then and further knowledge conveyed to all employees on the topics of collaboration, innovation, ESG and presentation skills, corresponding to their learning requirements, skills gaps and level of seniority.

The offering was expanded in 2023 and now covers up to 20 competencies. SkillUp! has now been scaled and will be made available to all colleagues in Corporate and Investment Banking due to the transformation of the corporate clients business and the Markets & Investment Banking business.

In accordance with the principles of a learning organization, SkillUp! continues to evolve in close cooperation with the representatives of the board areas and POI experts, and offers flexible and needs-based learning opportunities.

### GoIT Academy

The goal of the GoIT! Academy is to introduce training opportunities at RBI to cover the learning requirements of IT employees/IT environments. The contents of the training programs, which follow the business goals, reflect the IT strategy and the exchange with internal experts who have a good understanding of current market innovations.

The GoIT! Academy covers training in the areas of cloud, data science, agile engineering, integration management, test automation and business analysis. The GoIT! Academy also supports the product owner with a comprehensive training program that further expands the agile principles throughout the entire organization.

It acts as a learning accelerator for modern and emerging new technologies, and continuously improves the training programs offered, in line with RBI's demand and requirements.

## Agile learning coaching

The goal of learning must be to resolve problems in the work process creatively and on a self-organized basis. As such, contemporary learning is increasingly aimed at supporting work with the primary aim of resolving problems in day-to-day working life.

To enable employees to define and document specific learning transfer goals, the learning agility concept will be established for employees, managers and teams. It will be supported by the continual development of the necessary tools (e.g. learning agility toolbox) and ongoing advice from learning drivers.

We are trying out the concept of agile learning coaching with the objective of improving our employees' learning agility. Agile learning coaching is where a learning process is assisted by an agile learning coach who supports the learners in formulating learning transfer goals. The coach structures and implements the learning process in a targeted manner so that what has been learned can be applied quickly in practice.

Ten employees from different areas at RBI AG have started their training to become an agile learning coach, with three having already completed the training. 13 coaches give regular agile learning coaching to the 32 participants in the Spark/Ignite Think Act RBI journeys.

## Think and Act RBI

"Think RBI" is a learning principle that was launched at the end of 2022. It provides orientation and stability to all RBI employees in Austria and reinforces the cooperation of all employees. Following a call on the intranet as to what "Think RBI" means for the individual employees, the "Think Act RBI" program launched in spring of 2023 to help participants develop important competencies and power skills. The imparted competencies comprise, among other things, effective communication, self-awareness and emotional intelligence aimed at strengthening the individual success of the employees and the achievements in the team.

To optimize diversity, this learning experience is offered for junior and senior levels, with each group comprising 15 employees with different backgrounds and abilities.

## Artificial Intelligence

Changing times also entail technological changes, not least the use of artificial intelligence in many aspects of working life. AI (artificial intelligence) has the potential to change the way we work and boost efficiency. Here at RBI, we are therefore engaged intensively with possible application cases and aim to familiarize as many employees as possible with this technology and encourage them to experiment with it. Since October 2023, RBI AG can use an RBI-specific ChatGPT and explore what fields of application there are for the respective area of work. Learning formats (including eLearning) are offered to enable employees to gain an understanding of AI, machine learning, the possibilities, but also the limits and potential difficulties of AI and chatbots. There is a lot of interest among employees and the experiences with the RBI ChatGPT are promising.

## Employee development in the subsidiaries in Central and Eastern Europe

At Raiffeisen Bank Zrt. in Hungary, individual development goals are now agreed for all employees. This provides the opportunity for employees and managers to discuss the future of the employees and work out the corresponding training needs. After completing training, follow-up meetings are held with the managers to recap what knowledge the employees have acquired and how it can be implemented in day-to-day working life.

An individual development plan was also introduced at Raiffeisen Bank S.A. in Romania, which can be used by all employees to plan their further development and achieve the defined goals.

Talent management was defined as one of the five initiatives of the Strategic Roadmap 2025 at Raiffeisen Bank Kosovo J.S.C.. The performance management tool that has been in use since 2022 continues to offer flexibility and support.

## Talent management and development of management staff

We believe that we create a working environment that is future-proof and which supports the achievement of our corporate vision, in that we address future challenges and opportunities and define how management can make a difference.

We are also convinced that managers and their mindset are a key lever for cultural development and successful transformation. We want to place them in a position to create a psychologically safe, committed and healthy working environment.

We continued to work intensively with senior management on management topics in 2023 too. A Group-wide leadership model was developed to provide orientation and direction for all management staff. In the first step, we started in 2023 to activate the model in collaboration with the Management Board and incorporate it into the succession planning process.

Particular emphasis was placed in 2023 on the "Leading in Uncertain Times" program. The initiative is aimed at supporting management staff in meeting the expectations and needs of RBI in times of uncertainty and change. It is essential that managers convey stability, direction and security, particularly in times of uncertainty. This initiative is also designed to provide a safe space for reflection and to supply energy.

"Leading in Uncertain Times" is a practical workshop with the following objectives:

- Reinforcing the awareness and resilience of management staff, by engaging with the current (uncertain) reality and learning from it.
- Devising concrete measures and initiatives together based on real cases and developing a personal management style.
- The goal for the change team is to get a feeling for sentiment and listen systematically in order to integrate findings into change management measures.

## Recruiting

We see recruitment as a strategic process for identifying and appointing candidates who possess the unique skills, competencies, potential and experience to contribute towards the Group's continuous growth. Management recruitment is a significant challenge and one of the most important tasks. It has a pronounced impact on the leadership and organizational culture we want to promote.

The core objective of the employer branding strategy is to remain in contact both internally and externally, and to encourage interaction and direct dialog with specialists, talented individuals, young professionals, graduates and students. To find the best talent for open positions efficiently and effectively, we focus on employer branding and recruiting with the following measures:

1. Developing a Group-wide employer brand – employer value proposition (EVP)
  - Overarching EVP for the RBI Group with uniform employer promise and branding
  - EVP for RBI AG with a focus on IT specialists
  - EVP for Raiffeisen Tech
2. Adapting recruiting to the changing conditions
  - Internalization of executive recruiting: Filling 22 top management positions in the RBI Group
  - Internal IT sourcers: Filling nine IT positions
  - New referral program: Employees receive a cash bonus if they successfully recommend candidates for hard-to-fill vacancies

At RBI, we endeavor to promote upcoming talent and our employer branding strategy for students has proven to be a valuable breeding ground for future professionals. We welcome more than 300 students to RBI every year in various functions; they include interns, student assistants and junior team members (overall, more than 400 students work at RBI every year).

In order to build up a talent pipeline that matches our future needs, we maintain strategic partnerships with six universities: WU Vienna (various focus areas such as CEMS MIM and Top League, where we are a main sponsor), FH BFI Vienna, FH WKW Vienna, University of Vienna (with a focus on economics and banking students) and TU Wien, FH Technikum, University of Vienna (for IT and technology students). We also work on projects with LBS (London Business School) and IMC Krems, and are a sponsor of 42 Vienna, the Austrian branch of School42, a renowned French coding school. Our collaboration with these universities covers a variety of activities, including participating in career fairs, organizing inhouse days, hosting speed dating events, guest lectures by our experienced business representatives and organizing business case competitions under the guidance of our experts.

These initiatives serve to meet the following objectives:

- Positioning as a preferred employer for future career opportunities (employer attractiveness)
- Developing a solid pipeline and recruiting the best for student positions
- Explaining our industry to students while collaborating with universities on internal projects at the same time

We also had a stand at twelve student job fairs in 2023.

## Performance management

Further development is a central part of the process and enhances our efforts to make learning an integral part of our day-to-day work. Consequently, the 2023 planning process placed significant emphasis on the agreement of development goals – firstly, to enable us to offer the best possible service to our customers, but also and above all else to ensure we are an attractive employer to our employees. In this way we want to ensure that during these highly volatile times, we create a stable environment for customers and employees so that we can grow together and thereby contribute to the long-term success of the company. The guiding principles are set out in the Group policy "Performance Management RBI Group" and in the supplementary document "The Book of Group Performance Management". As outlined therein, they are based on our corporate values and the RBI Group Code of Conduct. Furthermore, we have defined Group-wide obligatory minimum requirements that provide the framework for the local policies that are adapted to the country-specific conditions.

Since the beginning of 2020, our performance process has been accompanied by a strategic roadmap. This roadmap translates our vision/mission into priority initiatives with a planning horizon of two years. The progress of these initiatives is determined and communicated on a quarterly basis. All the information on the roadmap is available to all employees via the RBI intranet. The relevant Management Board members also report on progress in their area of responsibility as part of internal Microsoft Teams events. This ensures that our strategy is familiar to all employees and that their own goals are geared toward the strategy. Since October 2023, all areas are involved in developing the strategic roadmap for 2024-2025 that should be finalized at the end of the year.

The quarterly review and analysis of our strategic roadmap is accompanied by rolling objectives, which were introduced in 2020 and are well received by employees. It allows us to respond to new market conditions in a timely manner, which is a particularly important factor for ensuring sustainable success when faced with rapidly changing underlying conditions. In addition to flexible objectives, progress towards target attainment can be documented at any time and adjustments made as required.

The progression towards transparency, which started with the introduction of an internal remuneration policy for the Management Board members of RBI AG and which was also communicated externally via the publicly available remuneration report, has been consistently continued. The remuneration reports of the last two years are published on the website.

GRI 2-12, -19,  
-23, -24

ESG Pillar 3  
ER g, i

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Find more  
at: [www.rbiinternational.com/en/investors/governance/remuneration.html](http://www.rbiinternational.com/en/investors/governance/remuneration.html)

The provisions for Management Board remuneration are presented in detail in the remuneration report and the remuneration policy. The provisions for senior executives are described in the following paragraphs.

## GRI 2-19 Remuneration policy for senior management<sup>1</sup>

The remuneration for senior management is based on four underlying principles:

1. The remuneration principles promote the business strategy and long-term development of the company and are consistent with the objectives, values and long-term interests of the company.
2. Clear and transparent rules concerning remuneration and performance measurement serve to guarantee objective decision-making and ensure that the interests of the senior managers are aligned to the company's long-term interests.
3. The remuneration principles are compatible with and instrumental to solid and effective risk management and do not encourage senior managers to take risks in excess of the tolerated level.
4. They set out clear responsibilities concerning the definition, review and implementation of the remuneration policy, and define rules to prevent conflicts of interests.

The salary mix (the ratio of variable and fixed remuneration) is designed such that each manager can live adequately from a fixed income. This allows the variable remuneration policy to be designed flexibly.

The fixed remuneration is based on predefined criteria and is not performance-related. The fixed remuneration includes the base salary and additional and fringe benefits. With regard to the variable remuneration, the allocation and payment of the respective bonus is subject to the fulfillment of the regulatory and performance-related step-in criteria. The amount of the bonus is based on the degree of fulfillment of the performance targets defined for the respective financial year at the level of RBI and the individual company and is calculated on the basis of the two bonus-relevant key performance indicators, ROE and CIR. Payment is made in line with the respective payment model for identified staff. Depending on the amount of the bonus, at least 40 per cent of the bonus is deferred. Final allocation and payment take place on a pro-rata basis over a period of up to five years. In the case of identified staff with a material influence on the risk profile of the RBI Group and the respective company, half of the total bonus is also granted in the form of non-cash instruments (share-based remuneration in the form of "phantom shares") with a retention period of one year (deviations based on local requirements are possible).

The value is paid out in cash at the end of the retention period. The number of phantom shares allocated and the respective (payout) value is calculated on the basis of RBI's average share price for the respective year. No other share-based remuneration is granted.

Where recruitment premiums are granted, care is taken to ensure that the payment does not exceed the amount required to secure the most suitable candidate for the role. It is also ensured that the recruitment premium is designed in such a way that it does not conflict with the interests of the company's shareholders.

Managers' claims in the event of termination of their function or employment are governed by the respective statutory and regulatory provisions. The malus/clawback review is governed as follows: In accordance with the regulatory provisions, ex-post risk adjustment is ensured on the basis of corresponding clawback regulations and agreements as well as an annual review process. If the performance underlying the bonuses granted to members of senior management proves to be unsustainable or there is a deterioration in the company's financial position and results of operations, the deferred remuneration may be reduced by the company or canceled altogether.

As far as contributions to the pension scheme are concerned, members of senior management are subject to the same provisions as other employees. Within the RBI Group, Supervisory Board members are not granted variable remuneration, but instead receive appropriate fixed annual remuneration.

<sup>1</sup> Disclaimer: The information in this section relates to "managers" in the sense of "senior management" as defined in section 2 no. 1 of the Austrian Banking Act (BWG). Deviations to reflect specific regulations and requirements in the local legislations of the countries in which the subsidiary banks in Central and Eastern Europe operate and other company-specific deviations are possible.



## Employee involvement

RBI believes it is extremely important that the concerns of our employees are listened to and taken seriously.

Valued communication platforms within RBI AG include tried and tested, effective formats for interaction from the time of the COVID-19 pandemic, such as the "Update from the CEO" calls. These one-hour calls start with a report by the CEO on the current situation before giving employees the opportunity to ask questions anonymously or using their name. These questions are then answered live by the CEO. We use Microsoft Teams live events for this platform so that all employees can participate – all Management Board members and heads of Human Resources & Public Relations from the subsidiaries are also invited to join in these calls. This format has proved extremely popular. Up to 2,000 employees participate in the calls, with several hundred people watching the calls on catch-up. All subsidiaries in Central and Eastern Europe also have platforms for exchanging information and experiences – in some cases with the entire Management Board – at monthly or quarterly intervals.

GRI 2-16, -29  
GRI 407-1

The "Whispli" tool is available to all employees and can be used to report incidents of a commercial or social nature. Corporate misconduct or breaches of the Code of Conduct such as bribery and corruption, conflicts of interest or harassment in the workplace, bullying and discrimination as well as fraud and theft can be reported via an anonymous and secure mailbox. The reports are processed by a case manager.

GRI 2-26

All employees of RBI AG, irrespective of their status or role, can approach the ombudsperson in confidence in order to clarify questions, obtain information, discuss matters and situations informally, and seek help. The independence and neutrality of the position is guaranteed. This position not only offers an additional option for addressing potential social risks in a confidential manner. It also serves as a knowledge hub that draws the organization's attention to problems and therefore promotes the development of a sustainable culture in a preventative and transformative way. This systemic structural pillar is ensured by the fact that the content of these cases is documented, analyzed and collected (anonymously, of course, and without the possibility of identifying the persons concerned). Conclusions for the entire organization are subsequently drawn on the basis of this material. The compiled data is currently being analyzed and processed in order to then make it available to the relevant stakeholders, such as Group People & Organisational Innovation, Compliance, the company doctor and the Staff Council.

GRI 2-25  
ESG Pillar 3 SR f  
ESG Pillar 3 GR c

As an international financial services company that works in accordance with high social, ecological and ethical standards, RBI is aware of its duty of care and is committed to observing and complying with all internationally recognized civil and human rights. Conscientious protection of these rights is an ongoing mission for RBI as a whole.

## Employee representation

GRI 407-1

RBI seeks to ensure trust-based cooperation with the employee representatives as a key element of its corporate culture, which is founded on cooperation at all levels and is intended to shape the relationship between all partners, both internally and externally. We act in accordance with the relevant statutory regulations and the agreements concluded and take into account the respective operating conditions.

The active participation of employees is also made possible via their interest group, the Staff Council, which initiates a wide range of activities throughout the year. This includes employees' suggestions being processed in the various working groups of the Staff Council of RBI AG, some of them with the company physician and Group People & Organisational Innovation, and measures being taken on an ongoing basis. The goal is to identify and promote the economic, social, health and cultural interests of the employees in the course of business. Some working groups are set up to run on a permanent basis (e.g. workplace conditions/health, work/family, nutrition, culture). Others are put together at short notice and work on a project-by-project basis. However, cost-intensive issues are only rarely discussed here.

In addition to the Staff Council's co-determination prescribed under labor law, co-determination and the exchange of information are also guaranteed through participation in various committees such as the Supervisory Board, the health and safety committee, the environmental committee as well as at individual "jours fixes", which are held several times a year by the Chairman of the Staff Council and the various members of the Management Board.

The Staff Councils are networked within the Group (the Group Staff Council was constituted in November 2020), within the Raiffeisen Staff Councils in Vienna and in Austria and also internationally (via the European Staff Council).

Our aim is to be an attractive employer to a wide variety of people with a broad range of abilities and to offer social benefits that are contemporary, sustainable and fair. The company agreement that was in place in RBI AG in this regard was terminated as of 31 December 2023. In January 2024, an agreement was reached on the content following negotiations between the Management Board and the Works Council. A revised version of the social benefits at RBI is being worked on.

GRI 407-1

## RBI with European Staff Council

12 representatives from seven EU countries (Hungary, Croatia, Austria, Poland, Romania, Slovakia and the Czech Republic) are represented in the European Staff Council (ESC) of RBI.

The ESC has the right to be informed and consulted about matters affecting the interests of employees of at least two RBI companies in different EU/EEA countries. In 2023, the ESC met twice in the form of hybrid meetings.

RBI remains committed to the principle of direct and open communication with employees. The good cooperation with existing local and/or national employee representative bodies is complemented, but not replaced, by the ESC. The ESC is an important additional platform for ongoing dialog and the structured exchange of information between company management and employees through their elected representatives.

GRI 402-1

## Information periods for significant operational changes

Austrian law does not stipulate any minimum notification periods that must be granted to employees and their representatives before significant operational changes that may have a major impact on them can be implemented. The legal formulation concerning such periods is not concrete, as the law states that information must be provided "in an appropriate period". In the event of such changes, RBI in Austria informs its employees and their representatives immediately.

Before major operational changes are implemented at Raiffeisen Bank S.A. in Romania, the affected employees and their representatives are informed in accordance with national legal provisions. Depending on the nature of the operational change affecting employees, legislation may or may not stipulate a certain period. In the case of mass redundancies, for example, the notice period for the employer under national legislation is 30 days following the decision. In the event of mass redundancies, an employee has a period of five days in which to respond to the employer's offer regarding new jobs that are available.

The Albanian legal situation stipulates specific conditions which are applied by Raiffeisen Bank Sh.a. in Albania. In the event of major operational changes, the bank applies a minimum period of two weeks if the employment relationship has been in existence for up to six months; one month if the employment relationship has existed for between six months and two years; two months if the employment relationship has been in existence for between two and five years, and three months if the employment relationship has been ongoing for more than five years.

In Hungary, redundancies involving more than 30 employees require that the Staff Council is informed at least seven days before negotiations commence. At least 15 days before the final agreement, the employer must negotiate with the Staff Council on the conditions. The national employers' association must be informed of the proposed mass redundancies 30 days before the decision; and the affected employees must also be informed 30 days in advance.

GRI 2-29

## Employee surveys

We endeavor to remain in constant contact with our employees by using different formats such as live events with questions and answers, discussions with individuals and other opportunities for listening. Health topics, work-life balance and mental health are also extremely important in developing staff retention and employee commitment, and are therefore a top priority at RBI.

No employees surveys were carried out in RBI AG in 2023, as we were working very intensely to introduce an optimal survey tool that is tailored to our needs and can be used across the entire Group. The tool should be user-friendly and offer special technical solutions in order to record, analyze and deliver a large variety of survey data. This tool is Medallia, for which the responsible persons are now being trained in RBI AG and across the Group, with the first employee surveys expected to be conducted at the start of 2024.

## Diversity management and work-life balance

The 18.6 million customers of RBI in Austria and in 12 markets of Central and Eastern Europe, as well as around 45,000 employees represent a diverse range of perspectives, skills, experiences and needs. 78 nationalities, five generations, 63 per cent women, people with different abilities and needs, and a strong LGBTQI+ community are represented at RBI. We appreciate this diversity, and we aim to be an inclusive workplace that offers an environment and working conditions that are equally attractive to all employees and that benefit them equally.

Due to RBI's international character, diversity is a reality, and also represents a competitive advantage. This is reflected in the extremely diverse workforce at RBI AG in Vienna: The Group's language is English, ensuring equal opportunity for employees to be understood in all international teams. Diversity as regards internationality and age is reflected across all business areas and hierarchical levels. In the area of gender diversity, there is still a need for improvements within some higher management levels, although progress can be seen in all countries. We would like to highlight the female CEOs in our subsidiary banks in Kosovo and in Croatia, as well as the gender-diverse management boards in Croatia, in Kosovo, in Slovakia, and in Ukraine. The common goal is for women to make up at least 35 per cent of senior management at RBI by 2024 and to have women account for at least 30 per cent of senior management at RBI AG by 2026, whereby senior management at RBI AG means members of the Management Board and the Supervisory Board and at Group level also refers to members of the second management tier.

RBI is actively committed to equal opportunities for all employees irrespective of age, gender, nationality, sexual orientation and identity, disability, religion or belief. We are aware of our role-model function as a large organization and our ability to shape the lives of employees, customers, other stakeholders, and society as a whole. We take our societal responsibility seriously by systematically addressing the topic of diversity and inclusion.



As a sign of our active commitment to ensuring a respectful and prejudice-free working environment, we have signed up to the Diversity Charter – not just at RBI AG, but also at the subsidiary banks in Romania, Slovakia and the Czech Republic.

An inclusive work culture also includes taking measures to combat discrimination, bullying, and sexual harassment. By creating a trusted point of contact at head office – the ombudsperson – the Group is embodying our values and promoting an environment in which employees treat each other with mutual respect and appreciation. The ombudsperson supports employees on topics such as misconduct, discrimination or harassment in the workplace, offering a safe environment in which concerns and complaints can be expressed freely and solutions can be found by working together. To lend even more weight to the seriousness of this issue, we worked with the Staff Council

to train the ombudsperson and several employees at the Vienna sites to become "harassment representatives". Expertly trained members of staff provide competent points of contact on the issues of stress and burnout.

This attitude is also set out in the Code of Conduct and describes the general principles of ethical behavior that all employees are required to observe. Violations of the Code of Conduct can be reported via an anonymous platform.

GRI 2-23, -24:  
Seite 169-170  
GRI 406-1



GRI 2-25, -26

GRI 2-26

Over the course of several weeks, the “Bring corporate misconduct to light” campaign used events, mails, flyers and podcasts to raise awareness of the fact that harassment in the workplace, bullying and discrimination also constitute violations of the Code of Conduct that should be reported accordingly. Annual Code of Conduct training is mandatory for all employees throughout RBI (see also pages 44 f.).

## The RBI Group Diversity & Inclusion Strategy

The RBI Group Diversity and Inclusion Policy was revised in 2021. It defines the attitudes, roles and responsibilities concerning the topic and sets out the principles for implementing a diversity and inclusion strategy within the Group. Diversity and inclusion officers have been appointed and local strategies have been adopted at all key RBI subsidiaries. The policy is based on EU Directives (2013/36/EU and 2014/65/EU) and on the EBA/ESMA Guidelines on the assessment of the suitability of members of the management body and key function holders (EBA/GL/2017/12). It also considers Directive 2014/95/EU and Regulation 575/2013 EU as well the Austrian Sustainability and Diversity Improvement Act in conjunction with the Corporate Governance Code.

Key elements of this policy include the RBI Diversity Vision and Mission and the guidelines that are intended to provide guidance for dealing with the topic on a day-to-day basis: “For RBI, diversity means added value. Leveraging the opportunities provided by diversity offers sustainable benefits for our company and employees as well as the economy and society. By promoting diversity, RBI is continuing Raiffeisen’s 130-year success story. As a strong partner, we harness the potential of diversity actively and professionally in order to best support our clients and to present ourselves as an appealing employer.”

The objective of the Diversity and Inclusion Strategy is to enshrine the topic throughout the entire organization. We aim to move from individual initiatives driven by Group People & Organisational Innovation or the diversity officers to an integrated approach in which diversity and inclusion are embodied in all processes and driven by our management teams. Instead of focusing on the different dimensions of diversity individually, we work on the basis of five principles in which the dimensions are integrated:

1. Our engagement and commitment to diversity and inclusion begins at the very highest level of management.
2. Our management teams are diverse and aware of the importance of diversity.
3. We empower all employees to contribute to an inclusive work culture.
4. We actively integrate diversity and inclusion into HR processes and practices.
5. We work transparently and on the basis of data.

### Engagement and commitment to diversity and inclusion begins at the very highest level of management

#### Commitment of the board members to the LGBTQI+ network

One important step is the sponsorship of the LGBTQI+ topic by a Management Board member who engages in regular dialog and offers active support for our LGBTQI+ employee network EMBRACE. In June 2023, the members of the Management Board sent out a further signal when they again raised the rainbow flag, together with members of EMBRACE, representatives of the Staff Councils of RBI AG and the Austrian subsidiaries, as well as colleagues from several business areas. The rainbow flag flew at both of the Group head office locations in June. This gave a strong signal that our Group practices diversity and solidarity. The RBI Group is committed to promoting the motivation and engagement of its employees in an inclusive working environment – irrespective of sexual orientation or gender identity.



Diversity Congress © Raiffeisen Campus

In May 2023, the second Raiffeisen Diversity & Co-Creation federal conference was organized by Raiffeisen Campus and held at Raiffeisenlandesbank OÖ. One of the program items was a session by EMBRACE entitled “LGBTIQ+:Diversity=Success!”, which highlighted RBI AG’s LGBTQI+ Employee Resource Group (ERG). Hannes Mösenbacher, Member of the Management Board, and other core EMBRACE members gave insights into the establishment of ERG, its various initiatives and the commitment of RBI AG’s management staff.

### Management focus on the proportion of female employees

GRI 405-1



We aim to contribute to the implementation of SDG 5 and SDG 8 with our measures in the area of diversity and inclusion management. Specifically, this means working effectively to prevent all forms of discrimination towards women and ensuring that women can fully and effectively participate and that they have equal opportunity in taking on management roles at all levels of decision-making.

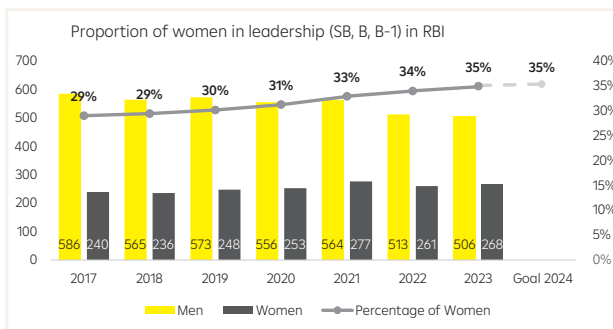
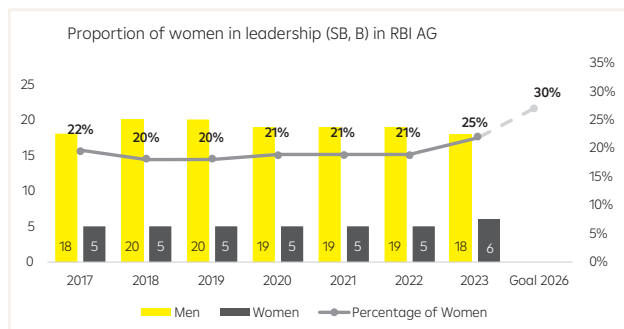
GRI 2-19

RBI considers it essential to achieve permanent gender equality at all hierarchical levels and has set itself the goal of removing all barriers for women in their careers. In addition to cultural work and gender-sensitive design of the working structure, other steps in this context include offering measures to specifically attract women as part of recruitment processes or to internal women's networks, and mentoring schemes. In the area of gender diversity, the members of the Management Board of RBI AG set Group-wide targets that demand clear improvements to the status quo. Other objectives exist for ensuring "skills of the future". All of the initiatives relating to the aforementioned focus areas are supported and implemented by head office in Vienna. Group People & Organisational Innovation (P&OI) is the driver behind this process. It offers the conditions and the expertise required for the implementation of the corporate and people strategy. This goal was expressed in specific figures and due to its importance for us as a company was made part of our CEO's target agreement.

GRI 2-19

In the first quarter of 2023, the Supervisory Board resolved to change the target for women in management positions in the target groups Supervisory Board and Management Board at RBI AG. The relevant target was set at 30 per cent by the end of 2026. The previously agreed quota of women of 35 per cent in the Supervisory Board, Management Board and B1 management in RBI by 2024 remains unchanged. By the end of 2023, the quota for RBI had reached 35 per cent (2022: 34 per cent; 2021: 33 per cent) and 25 per cent for RBI AG (2022: 21 per cent; 2021: 21 per cent). In addition to a three-part package of measures for achieving the target quotas, the focus was on breaking down the target of 35 per cent for women in senior management at RBI Group level and 30 per cent for women at RBI AG into annual targets for each RBI AG board area. In addition, gender diversity was integrated into the goals of the RBI AG Management Board members. The Management Board members are responsible for defining target quotas for their own area of responsibility and developing a strategy for increasing the proportion of women in first and second-level management. To this end, workshops were piloted in two board areas, with Management Board members working with first-level managers and Group People & Organisational Innovation to develop dedicated strategies and specific measures for their areas.

With the appointment of Valerie Brunner as the first woman on RBI AG's Management Board, a major milestone was reached in November 2023 on the way towards reaching balanced gender diversity in the Management Board.



### Engagement for the inclusion of people with disabilities

3 December is International Day of Persons with Disabilities. RBI AG supports the global #PurpleLightUp campaign, which uses the color purple around the world to draw attention to economic self-determination, economic participation and the special contribution of people with disabilities. RBI AG's website and LinkedIn page was decorated with purple banners and purple donuts were handed out in the canteens on 5 December. This not only aims to convey our commitment to inclusion and to breaking down barriers, but also to creating awareness and fostering a culture of trust.



PurpleLightUp, © RBI AG



PurpleLightUp, © RBI AG

### myAbility

Another highlight in 2023 was the continued cooperation with “Specialisterne Austria”, an organization that matches talented individuals on the autism spectrum and companies that urgently require their special talents in areas such as IT, quality or data management, and in finance and controlling. Specialisterne is an outstanding partner that has already helped us to find several talented employees and is continuing to assist us in this process. In addition to this cooperation, RBI AG is a member of the Disability Business Forum of myAbility.



The Valuable 500 is a global movement that aims to put the inclusion of people with disabilities on the business leadership agenda. RBI has signed up to this movement and Johann Strobl is a member of this extensive network of global CEOs. RBI has thereby committed itself to the continued pursuit of its goal of being an inclusive employer and supporting the creation of an inclusive society.

### Our management teams are diverse and aware of the importance of diversity

One important element of the diversity and inclusion strategy is the efforts to ensure diverse management teams that not only act as role models, but themselves work to strengthen awareness of diversity and inclusion within the company. Two central aspects of this are increasing the representation of the underrepresented gender in management teams and increasing management awareness of diversity, inclusion, and unconscious bias.

### Increasing the representation of the underrepresented gender in management teams



There are many reasons for the low representation of women in leading positions. These stem from the personal and societal environment, but also from the company itself. As such, any strategy to increase the proportion of women must encompass a wide range of different actions, while also recognizing that organizational measures alone are not enough to fix certain causes. We believe it is necessary to change the structural conditions within the company in order to encourage women to apply for management positions.

The first package of measures is aimed at work culture with a view to enabling a healthy work-life balance and ensuring that the “new world of work” is designed in a gender-sensitive manner. When new working methods are developed, for example, the societal values and norms of stereotypical role models are scrutinized with a critical eye and measures are taken to break down barriers. As part of this package of measures, RBI AG has conducted the “berufundfamilie” audit since 2020 and intensified its work on active parental leave management. The “berufundfamilie” audit is a tailored certification process for companies that is supported by qualified consultants, who assist with the definition, evaluation and planning of family-friendly measures. The package of measures also includes support for women in management positions and talented female employees in the form of networking, coaching and mentoring. The aim is to create a working environment in which men and women have equal career opportunities, and talented female employees are motivated and given support to apply for leadership positions. Recertification for the years 2024-2026 was given in October 2023.

The second package of measures is focused on the selection and development of female talents in order to establish a pipeline of female internal succession candidates for management positions. The board areas have each adopted targets

for a gender-balanced succession pipeline and are working on individual strategies in order to increase the proportion of women in first and second-level management.

The third package of measures relates to the selection of senior managers (at the first and second level below the Management Board) and aims to enshrine an increase in the proportion of women as a management task and to improve the quality and transparency of the selection processes in order to increase the number of qualified female candidates and potential female managers. The measures cover the entire selection process, including job advertisements (gender-appropriate wording) with predefined selection criteria, anonymized selection of candidates, working with personnel consultants with a focus on the female talent pool, structured interviews and hearings with at least one female and one male person in the interview team, and decision-making based on predefined criteria. In addition to the selection process, the measures are aimed at ensuring a management focus on increasing the proportion of female employees. Each board area has defined its own targets and a strategy for increasing the proportion of women in first and second-level management.

## We empower all employees to contribute to an inclusive work culture

Inclusion at RBI is not restricted to specific dimensions of diversity. Instead, it aims to enable all employees to participate fully and equally in all areas, thereby promoting diversity. RBI AG has several employee resource groups with the aim of strengthening awareness of diversity and inclusion and empowering all employees to take action („EMBRACE“ for the LGBTQI+ community and allies; several groups for women, such as the IT Ladies Table). We also focus on communication and anti-discrimination measures that affect all employees.

### “EMBRACE“ employee resource group



Team members Embrace – LGBTQI+ employees Resources Group RBI,  
© Alexander Sommer



The employee empowerment is reflected in the numerous initiatives driven and supported by employees. One example is EMBRACE, which comprises members of the LGBTQI+ community and straight allies (heterosexual people who actively support LGBTQI+) and is dedicated to the topic of LGBTQI+ diversity and inclusion. The EMBRACE team comprises an ally and sponsor from the RBI Management Board, ten core members and 180 EMBRACE allies from the RBI Group. EMBRACE's main objective is to enlighten all employees about the positive impact of diversity and LGBTQI+ inclusion. This is achieved through workshops, events with external speakers, interviews, podcasts, and content on the intranet.

EMBRACE is also an active member of BRich, a network of Austrian companies with LGBTQI+ business resource groups.



RBI signed up to the #positivarbeiten initiative in 2020. With this voluntary commitment, we are standing alongside Austrian AIDS charities and more than 100 other companies to signal our opposition to the discrimination of HIV-positive people in the employment market.

## The Power of Inclusive Culture

The "Power of Inclusive Culture" event was held in the RBI Raiffeisensaal in October 2023. All employees were invited to attend. Hans van Dijk gave an inspiring keynote speech, in which he pointed out that an inclusive corporate culture helps employees to be happier and more productive, and that inclusion takes place in the small daily actions. This was followed by an exciting panel discussion that also addressed the personal experiences of the panelists.

## Women Empowerment Cercle

Since 2017, the Women Empowerment Cercle has pursued the aim of institutionalizing the networking of women. It is organized by female employees within Group IT Delivery, arranges events tailored to specific target groups and promotes dialog with subsidiaries. Particularly successful formats include the Women Empowerment Journey and the "clubhouse" with exciting podium discussions and keynotes. In addition to these formats set out below, a visit was also made to Caritas Haus Miriam in May, where food was cooked for the formerly homeless women living there and an exchange took place with the management team. A keynote on storytelling was organized in October 2023, in which participants were able to learn how to impart content in presentations and meetings using an exciting and relevant story.

With the Women Empowerment learning journey, a guided self-development program for female CIO/COO employees was implemented at Group head office as of March 2023. The program comprises an opening session, five training nuggets and a final module. The training nuggets cover topics such as inner drivers, handling stress and building resilience, engaging stakeholders and conflict resolution strategies as well as assertiveness & clear communication. The participants keep learning diaries in all sessions and put into practice what they have learned in their day-to-day work. Their progress will be shared in subsequent learning journey sessions and in feedback rounds. The program is also aimed at networking with each other and promoting further personal development.

With the "Clubhouse – the stage is yours!" we offer women a platform through which they can share professional experiences and personal insights with a view to inspiring and encouraging women to leave the confines of their own comfort zone. The participants largely set the agenda themselves and organize the structure of the events.

This includes exciting discussions and presentations by colleagues as well as by external key note speakers.

In addition to these formats, RBI AG also offers extensive eLearning opportunities on the topic of diversity & inclusion on its internal learning platform. These are available to employees free of charge at any time.

## We actively integrate diversity and inclusion into HR processes and practices

### Work-life balance

GRI 2-23



In order to further improve the framework conditions for profession and career, RBI is constantly working to optimize the work-life balance. Work models, such as flexible working hours, part-time working and teleworking are offered in accordance with statutory provisions. Where possible, company childcare with employee-friendly hours of operation is offered. These models are intended to enable targeted parental leave management that promotes re-entry into working life. RBI has a positive attitude towards paternity leave, which it sees as being an important way to advance equality. There is also the "berufundfamilie" audit, for which RBI AG completed recertification for the years 2024-2026 in 2023 (see page 172).



Information materials on the topic of rights and deadlines under employment law is sent to employees on parental leave under the motto "Let's stay in touch". Employees are also offered the opportunity to contact their responsible P&OI colleagues as well as Staff Council members if they have individual questions.

In order to be able to better support employees in their changing needs at different stages of life, RBI offers sabbatical programs. Several models are available at Group head office, providing various time frames and thus an attractive recreational and relaxation model for people's different needs. Any of these sabbatical models can be further tailored to the individual.



Not least due, the internationality of the workforce also led to an increase in the desire to work abroad. Since summer 2023, RBI AG is the first bank in Austria to facilitate "remote work within the EU". Employees can work remotely within the EU but outside Austria for up to 30 working days within one year, for a maximum of ten working days at a time. The offer is accepted across all hierarchical levels. The prerequisites are the consent of the manager in coordination with the job and team requirements as well as the guarantee of Business Continuity Management. 252 applications for a total of 21 different countries were approved in the period from June to August 2023.

### Fair compensation

Salaries are regularly analyzed within RBI. As a result of continuous efforts in previous years to give equal compensation for equal work, irrespective of gender, there are no significant differences between the salaries of men and women. The internal "RBI Total Rewards Management" policy provides a comprehensive framework for shaping the Group-wide compensation management system. This includes, in addition to all specifications for implementing statutory and regulatory requirements, a structured job evaluation system and regular market benchmarks of the salaries in the countries in question. An internal job evaluation system forms the basis for position-related and – as a result of this – gender-neutral compensation.

### We work transparently and on the basis of data

The effective implementation of the diversity and inclusion strategy requires all decision-makers to be aware of their responsibility. Recording and evaluating hard and soft factors is the only way to demonstrate successes and define additional areas of action that are derived from and backed up by actual data.

At present, KPIs such as the number of women in leadership positions are visualized using dashboards and reported to managers on a quarterly basis. Among other things, this means that managers have an overview of the number of men and women in leadership positions and can take specific action in order to implement the defined targets.

### Diversity at the subsidiary banks in Central and Eastern Europe.

The subsidiary banks in Romania, Slovakia and Croatia have each signed the Charter of Diversity.

Raiffeisenbank S.A. in Romania offers various training courses on its eLearning platform, for example, on topics such as overcoming and understanding unconscious bias, bridging the gender gap, its role in workplace diversity, dealing with and managing diversity, maintaining a cohesive multi-generational workforce, together with various courses on emotional intelligence. In addition, the subsidiary bank offers a mandatory course entitled "Inclusion and Diversity Pillars". Part of this course is a training for all employees on the topic of "Code of conduct when dealing with colleagues", which deals with unconscious bias, discrimination and harassment, diversity and integration.

A workshop on the advantages of diversity at the workplace was held at Raiffeisenbank Austria d.d. in Croatia for all management-level employees.

Raiffeisen Bank Zrt. in Hungary has created the "Young Generation" program, with the aim of creating a network for young people, better understanding their needs, and offering them a forum where they can meet and develop. The program's main aims include establishing a young community within the bank, enabling professional learning and development, strengthening corporate values, and offering a platform for young colleagues to communicate with each other.

The women's network program that was started in 2021, is promoted by the Diversity Officer and has 30 female managers as participants, was also continued. Among other things, the structured training program includes creating awareness of possible differences between male and female management characteristics and how they can be optimized/balanced in management functions. A further aim is to develop a community where problems that are encountered by female managers can be discussed.

In Raiffeisen Bank S.A. in Romania, the topic of diversity was addressed via the monthly communication on diversity (monthly internal newsletter). A cross-departmental project was also launched with a view to becoming more disabled-friendly for customers. Since 2023, all employees must complete mandatory training on the topic of diversity and inclusion.

The diversity strategy for 2023 at Raiffeisen Bank Kosovo J.S.C. includes the retention of 35 per cent of female managers, the inclusion of people with disabilities in internships, and diversity and inclusion training.

The following chart provides an overview of the measures that are being implemented in order to promote a healthy work-life balance and in diversity management.

## Overview of measures

Topic	Measure	Austria						CE			SEE						EE		
		RBI AG*	RBSK	RKAG	RL	Valida	Kathrein	TBSK	RBCZ	RBHU	RBAL	RBBH	RBKO	RBHR	RBRO	RBRS	RBBY	RBRU	RBUA
Work life balance	Part-time-work (parents)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Part-time-work (other than parents)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Teleworking	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Flexi-time models (regular)	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓
	Flexi-time models (long term)	✓	✓	✓	✓	✓	✓	✓	✓	✓				✓	✓	✓			✓
	Company kindergarden or similar	✓	✓	✓	✓	✓			✓										
	Time off for fathers in event of a birth (statutory requirement)	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓
	Time off for father in event of a birth (beyond statutory requirement)	✓	✓	✓	✓	✓				✓	✓	✓	✓				✓	✓	✓
	Paid parental leave (beyond legal requirement) – paid by the company									✓		✓	✓		✓				✓
	Dependent care programs	✓	✓	✓	✓	✓	✓		✓	✓		✓	✓	✓		✓	✓	✓	
	Semi-retirement programs	✓	✓	✓	✓	✓	✓			✓					✓				
	Educational leaves	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Other sabbaticals	✓	✓	✓	✓	✓		✓	✓	✓	✓				✓	✓			
	Work and family balance audit	✓				✓				✓								✓	
Diversity	Diversity Officer – Formal Governance Structure	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Diversity – external memberships	✓						✓	✓		✓		✓	✓					
	General diversity trainings	✓	✓	✓	✓	✓	✓	✓	✓		✓		✓	✓	✓	✓		✓	
	Woman empowerment programs	✓	✓	✓	✓	✓	✓		✓	✓			✓	✓					
	Equal Pay Report – internal	✓	✓	✓	✓	✓	✓	✓	✓	✓				✓	✓		✓	✓	
	LGBTQI+ programs	✓	✓	✓	✓	✓	✓	✓	✓				✓	✓					

Please see the list of abbreviations for the complete company designations.

\* RBI AG only includes the head office here.

# Health and safety

GRI 3-3  
GRI 403-1



Healthy and efficient employees are the basis for success for every company. Health care is also a central issue in the various countries in which RBI is active. RBI offers provision and support in the form of a range of initiatives and facilities. In addition to the legally prescribed measures in the area of health care, we offer numerous additional programs. In some cases, the range of services varies greatly, depending on what is needed and what can be provided locally in the individual countries.

GRI 403-8

The statutory standards for occupational health and safety are complied with in all countries, and the corresponding committees and officers set up and appointed. These standards and the resulting measures apply to all RBI employees. Responsibility for health management lies with People & Organizational Innovation and the local human resources departments. They are supported by the local facility and safety units, company doctors or the members of the Staff Council and external service providers.

Remote working and working from home have become a matter of course, significantly changing the corporate culture in the process. This topic has been addressed by corresponding "new world of work" teams.

At its head office locations in Vienna, RBI is subject to the statutory provisions set out in the Austrian Employee Protection Act. In addition to the law, many subsidiaries have manuals or policies containing detailed regulations on occupational health and safety.

GRI 2-23

At Group head office, RBI performs professional occupational health management. As part of this, the most important key performance indicators (e.g. prevention times, workplace inspections, reintegration agreements, health-related training days) are defined for each pillar (see illustration). The Austrian Employee Protection Act sets out prevention times for occupational health professionals and safety experts. These are covered by pillar 1, "Safety & protection". The other three pillars/focal areas were included in occupational health management on a voluntary basis in line with RBI AG's corporate policy.

GRI 2-23



The following illustration provides an overview of the measures that are being implemented at the individual companies in the area of health management and welfare.

### Overview of measures

Topic	Measure	Austria						CE			SEE						EE		
		RBI AG*	RBSK	RKAG	RL	Valida	Kathrein	TBSK	RBCZ	RBHU	RBAL	RBBH	RBKO	RBHR	RBRO	RBRB	RBBY	RBRU	RBUA
GRI 403-2, -3, -4, -5, -6, -8	<b>Occupational health and safety management system</b>	Systematic Occupational Health and Safety Management (OHS)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Legal requirement	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Qualified process for identifying hazards/ incidents	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Assurance of qualified process	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Evaluation and ongoing improvement	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Employee participation	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Formal joint Management-employee committees	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Reporting process on hazards/incidents	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Grievance system	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Investigation process on incidents	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Health management trainings	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	General health consulting	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Consulting on ergonomics	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	First aid	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Access to non-occupational medical and health care services	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
GRI 403-6	Voluntary health services	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
GRI 403-6	<b>Health services offered</b>	Safety management system	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Programs for mental health	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Burn-out prevention and support	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Bank robberies – psychological support	n.a.	n.a.	n.a.	n.a.	n.a.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Health checks	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Promotion of sport and wellness activities	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Return to work programs	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
GRI 403-6	<b>Social benefits</b>	Promotion of the company canteen	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Reimbursement public transport cost	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Promotion of private health insurance	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Promotion of pension fund	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Promotion of cultural events	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	

Please see the list of abbreviations for the complete company designations.  
 \* RBI AG only includes the head office here.

## Hazard identification, risk assessment and incident investigation

GRI 403-2,-3,-10

Potentially serious work-related dangers relate in particular to the psychological consequences of threats and robberies. In addition, physical accidents on the way to and from work are naturally unavoidable. The corresponding KPIs can be found under the heading Parameter and ambitions (see page 182 ff.).

GRI 403-9

The safety experts at the Group head office locations in Vienna continuously evaluate potential risk areas and resolve any issues immediately. All employees are able to report any risk situations within the organization to the "health@RBI" team, to the Staff Council, or directly to the security center at any time. The telephone numbers for the security center are imprinted on the employee identity cards. The "Workplace Conditions/Health" working group also provides additional information on health and safety from the workforce.

A statutory prevention and safety concept for the companies in Austria managed by Group head office is processed via ZHS Office & Facilitymanagement GmbH (ZHS). All preventive measures are proposed, evaluated and implemented by trained and qualified safety experts, occupational physicians and occupational psychologists. Risks are analyzed by ZHS safety experts in accordance with international standards.

All workplaces and work procedures are examined with a view to health risks (workplace evaluation), protective measures are adopted and implemented and their effectiveness is monitored. The methods used are based on the statutory provisions, the state of the art, and the statutory accident insurance models (in Austria: AUVA [Austrian Workers' Compensation Board]). Preventive staff (e.g. occupational health professionals, safety experts, occupational psychologists) and safety representatives are appointed and tasked with implementation and controlling. At individual subsidiaries, these measures are performed by external experts who possess all of the qualifications and certifications required by law.

The occupational health professionals and safety experts have the necessary qualifications and undergo continuous training in their respective specializations in line with the statutory prevention times. Employees who perform services are given the necessary training. The processes applied and their implementation are recorded by government bodies to the extent required by law and are also included in internal audits depending on the local or central circumstances.

GRI 403-5

## Monitoring, evaluation and improvement

GRI 2-29  
GRI 403-2,-3,-4,-10

The processes are accompanied by ongoing monitoring and corresponding evaluation, which follow a risk-based approach. Every month, the „health@RBI“ team at Group head office evaluates the measures defined with the respective officers and implements any necessary changes as quickly as possible. Reported or identified risks are processed and resolved. To this end, a pillar 1 meeting ("Safety and protection"; see chart on page 177) is held with representatives of Occupational Health Services, Occupational Psychology and the safety experts as well as the Staff Council and Group People & Organisational Innovation. The meeting discusses current challenges, new services and risks in the areas covered. These are then evaluated, documented, and resolved.

The "Workplace Conditions/Health" working group of the Staff Council provides additional impetus for activities across all of the pillars of occupational health management. This working group primarily consists of Staff Council members and is headed by the Deputy Chair of the Staff Council. At some companies, monitoring is performed by external partners who then perform the final evaluation together with company representatives and derive measures as necessary. In addition, all employees can contact Occupational Health Services, the safety experts, the Staff Council as well as People & Organisational Innovation to offer input for improvements.

The subsidiary banks in Central and Eastern Europe use various formats for including employees in the process. Some countries have committees in which employees also participate. The employees typically contact these committees to contribute proposals for improvements.

GRI 403-3 RBI provides its employees with various options for action if they observe risk situations or wish to contribute improvements. Proactively identifying and reporting risks allows them to be evaluated rapidly and eliminated as necessary. At the Group head office locations, all employees can open a ticket with the helpdesk by email or using an app on the intranet. Alternatively, all employees can contact Occupational Health Services and/or a respective safety expert. Contact details (telephone number, email) can be found on the intranet. The Staff Council also acts as a point of contact in order to prevent potential risk situations. Additionally or alternatively, employees of other Group companies may contact their manager or refer directly to the union or another government body. Reports can also be submitted anonymously via the whistleblowing hotline.

With regard to the subsidiary banks, at Raiffeisenbank Austria d.d. in Croatia, for example, employees participate via their representatives on the Committee for Workplace Occupational Health and Safety, to whom they can submit direct suggestions for improving working conditions. Information, risk assessments, instructions for safe working, certificates of competence for employees and certificates concerning equipment are available to all employees on the company's network drive. The employees of Raiffeisen Bank S.A. Romania report dangerous situations concerning their safety via a special email address. Corporate risks are determined using the INCDPM method (method for assessing risks of workplace injuries and illnesses).

GRI 403-3, -10

## Preventive measures and health services

"Safety and Protection", the first pillar of health management at RBI's Group head office locations (see chart on page 177) encompasses all the structures whose purpose is to ensure safety and protection in the workplace. This includes medical care and rapid assistance for emotional problems as well as trained first-aiders and safety and fire protection officers, who are available in case of emergency and who take action to ensure that emergencies do not occur in the first place. In addition to dealing with acute (individual) cases, Occupational Health Care and Occupational Health Services are increasingly focusing on preventive measures with a view to avoiding risks/accidents in order to limit the number of acute cases and problems. Employees can contact Occupational Health Services by email. The services of Occupational Health Care can be found on the intranet.

RBI is also committed to ensuring ergonomically correct workplaces that help employees to maintain their health. At RBI's Group head office locations, Occupational Health Services and the safety experts provide guidance on how to set up monitor-based workstations to ensure they are ergonomically appropriate. There are two possibilities in this regard: Employees can arrange a personal appointment for visiting the new "Ergo Lab" or consult information on the intranet. In addition to allowing employees to view and try out the various forms of ergonomic work equipment, the Ergo Lab offers eye tests. Group-wide information on mobile working is available on the intranet and in the form of eLearning, especially as mandatory training for all new employees.

The committee analyses and puts forward proposals regarding the prevention and protection plan and monitors its implementation, including assigning the resources required to realize its provisions effectively in terms of improving working conditions.

Raiffeisen Bank JSC in Ukraine organizes free online consultations with an external psychologist. In addition, several external training programs were run that were adapted to the reality of war.

Furthermore, the Voluntary Health Insurance Program (VHIP) is available to all employees. Since 2023, it also offers support in dealing with the consequences of military operations as well as psychological and legal support, among other things.

In Hungary, Raiffeisen Bank Zrt. offers psychological advice and online crisis intervention programs for those requiring help in dealing with mental health or family problems or those who need other support. An experienced team of psychologists is available to staff online for one to three 50-minute sessions. In addition, three soft skills training sessions for 25 participants were run on the topic of mental wellbeing up to September 2023. Raiffeisen Bank Kosovo J.S.C. offers a sports room for employees to participate in yoga, pilates and kickboxing. Additional activities, such as hiking, cycling and climbing were offered as part of #FeelGoodOctober.

At most of the subsidiary banks in Central and Eastern Europe, there are various measures in place to support staff affected in the event of bank robberies. Kathrein Privatbank AG, Tatra banka a.s. in Slovakia, Raiffeisenbank a.s. in the Czech Republic, Raiffeisen Bank Kosovo J.S.C., Raiffeisen Bank S.A. in Romania and Raiffeisen Bank Zrt. in Hungary all offer support in the form of psychological assistance. Furthermore, Raiffeisenbank Austria d.d. in Croatia offers crisis management workshops, individual advice and the option for all staff affected to spend a week's paid vacation at any spa hotel in Croatia.

## Training on health topics

GRI 403-5

At RBI, learning and development also includes the topic of health. We see creating awareness of health topics such as work-life balance, mobile work, resilience, and coping with stress as part of our occupational health management. To this end, we regularly evaluate and adapt our extensive range of training, coaching, mentoring, as well as talent management and the development of management staff, from the perspective of promoting and maintaining health.

At Raiffeisenbank a.s. in the Czech Republic, for example, the process is described as part of first aid situations in eLearning courses and in the "Occupational Health and Safety Documentation" policy.

Raiffeisen Bank S.A. Romania offers staff training on specific issues relating to the prevention and protection plan. Topics covered include teleworking, road traffic regulations, psychosocial risks and stress in the office, ergonomics in the workplace and first aid in the event of a heart attack.

Every office of Raiffeisen Bank Austria d.d. in Croatia with at least 20 employees must have one employee who is trained to provide first aid. A further person must be nominated for every additional 50 employees. The company provides them with the necessary first aid equipment.

ZHS safety experts at Group head office in Vienna are in charge of the regular induction and instruction of first-aiders, as well as verifying the number of first-aiders and their qualifications.

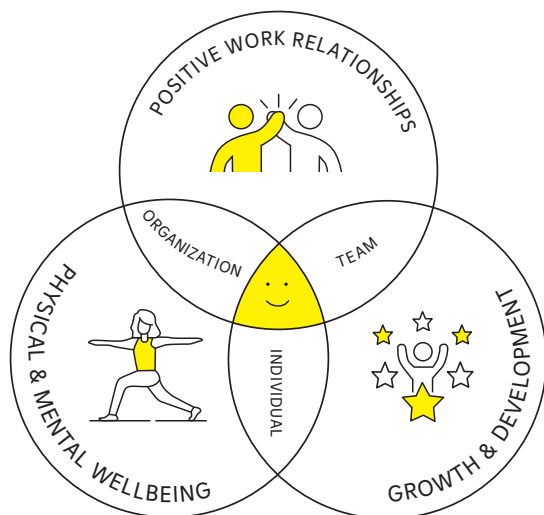
## Health promotion

GRI 403-6

In order to promote good health among its employees, RBI offers a wide range of preventive and health initiatives. Voluntary services with the aim of promoting employees' physical and mental health are offered at all of RBI's Group head office locations. These services are published on the intranet. To this end, a self-service portal named "health@RBI" was launched at Group head office in 2022. This is where employees can find all the offerings relating to physical and mental wellbeing as well as training for individuals and teams. As part of occupational health management, these services are regularly evaluated by the responsible parties (Staff Council, People & Organisational Innovation) and adapted as necessary. Among other offerings, they include subsidized fitness center membership, healthy food in the canteen, hypnosis for stopping smoking, help with staying active in the workplace (lunchtime yoga, vitality coaching and back exercises), health check-ups, self-help groups and help for addiction. A particular focus is placed on maintaining mental health. The employee assistance program, which is free of charge, provides employees with support for dealing with psychological strain in their professional or private lives. The service is provided by an external specialist who can be contacted anonymously by employees wishing to obtain advice on burnout prevention and stress management. In addition to the measures on prevention deployment times (Occupational Health Services staff and safety experts) set out in the Austrian Employee Protection Act, support from an occupational psychologist is available.

We offer our employees the option of part-time reintegration to make it easier for them to return to the workplace following a lengthy illness. Employees, People & Organisational Innovation, managers, the Staff Council and Occupational Health Services work together to develop the best possible options for returning to work within the scope of the law.

## Healthy Organization initiative



The challenges encountered over the past few years mean that the significance of factors such as resilience, psychological safety and wellbeing, as well as cooperation and team management, is continuing to grow. The launch of the Healthy Organization initiative at Group head office in 2022 saw the focus being placed on the holistic health and resilience of RBI employees.

The measures taken under the Healthy Organization banner pay off on multiple levels: employees, teams and the organization. Besides the well-established offerings for physical health referred to above, the focus of this initiative is on mental wellbeing and creating a sustainable working environment that strengthens employees' abilities and resilience. Alongside investing in power skills at the level of individuals and teams, this includes supporting team development as well as developing and empowering managers.

Raiffeisen Bank Sh.a. in Albania has established that the most common work-related dangers include physical risks such as falls and slips as well as ergonomic risks such as tired eyes and problems with vision due to spending a lot of time working at computer screens. Employees are trained and empowered to make a responsible and informed contribution to the health and safety program. Controls have been adapted to the risk level of the respective work process.

For its part, Raiffeisen Bank S.A. in Romania constantly evaluates risks based on risk assessments and statistical data with a view to recommending corresponding risk prevention measures. Risk assessments and evaluations such as these are also conducted at the other subsidiary banks in Central and Eastern Europe.

The Healthy Employee/Healthy Company program was launched at Raiffeisen Bank Zrt. in Hungary. The program has its own intranet page on which new content is published regularly, thus helping to promote health awareness.

## > Metrics and ambitions

GRI 2-7, -8  
GRI 401-1, -3  
GRI 404-1, -3  
GRI 405-1, -2

	RBI*			RBI AG**		
	2023	2022	Change over previous year	2021	2023	2022
<b>Employees by gender, type of occupation and employment contract</b>						
<b>Employees total</b>	<b>42,587</b>	<b>41,631</b>	<b>2.3 %</b>	<b>43,630</b>	<b>3,786</b>	<b>3,650</b>
Male	15,803	15,182	4.1 %	15,486	2,026	1,970
Female	26,784	26,449	1.3 %	28,144	1,760	1,680
Male	37 %	36 %	1 PP	35 %	54 %	54 %
Female	63 %	64 %	-1 PP	65 %	46 %	46 %
<b>Full-time employees total</b>	<b>40,100</b>	<b>39,306</b>	<b>2.0 %</b>	<b>41,315</b>	<b>2,783</b>	<b>2,620</b>
<b>Full-time employees total</b>	<b>94 %</b>	<b>94 %</b>	<b>0 PP</b>	<b>95 %</b>	<b>74 %</b>	<b>72 %</b>
Male	15,180	14,637	3.7 %	14,919	1,734	1,649
Female	24,920	26,669	1.0 %	26,396	1,409	971
Male	38 %	37 %	1 PP	36 %	62 %	63 %
Female	62 %	63 %	-1 PP	64 %	38 %	37 %

\* The values include the figures from the companies listed in the Overview chapter (Report scope and data collection, page 11, first paragraph).

\*\* RBI AG only includes the figures of the head office.



	RBI*			RBI AG**		
	2023	2022	Change over previous year	2021	2023	2022
<b>Employees by gender, type of occupation and employment contract</b>						
Central Europe	8,545	8,583	-0.4 %	n.a.		
Central Europe	21 %	22 %	-1 PP	n.a.		
South Eastern Europe	11,929	11,265	5.9 %	n.a.		
South Eastern Europe	30 %	29 %	1 PP	n.a.		
Eastern Europe	16,117	16,154	-0.2 %	n.a.		
Eastern Europe	40 %	41 %	-1 PP	n.a.		
Austria	3,509	3,304	6.2 %	n.a.	2,783	2,620
Austria	9 %	8 %	0 PP	n.a.	100 %	100 %
<b>Part-time employees total</b>	<b>2,487</b>	<b>2,325</b>	<b>7 %</b>	<b>2,315</b>	<b>1,003</b>	<b>1,030</b>
<b>Part-time employees total</b>	<b>6 %</b>	<b>6 %</b>	<b>0 PP</b>	<b>5 %</b>	<b>26 %</b>	<b>28 %</b>
Male	623	545	14.7 %	567	292	321
Female	1,864	1,780	4.7 %	1,748	711	709
Male	25 %	23 %	2 PP	24 %	29 %	31 %
Female	75 %	77 %	-2 PP	76 %	71 %	69 %
Central Europe	559	547	2.2 %	n.a.	n.a.	
Central Europe	22 %	24 %	-1 PP	n.a.	n.a.	
South Eastern Europe	167	222	-24.8 %	n.a.	n.a.	
South Eastern Europe	7 %	10 %	-3 PP	n.a.	n.a.	
Eastern Europe	464	237	95.8 %	n.a.	n.a.	
Eastern Europe	19 %	10 %	8 PP	n.a.	n.a.	
Austria	1,297	1,319	-1.7 %	n.a.	1,003	1,030
Austria	52 %	57 %	-5 PP	n.a.	100 %	100 %
<b>Employees with fixed contracts total</b>	<b>38,542</b>	<b>36,800</b>	<b>4.7 %</b>	<b>38,541</b>	<b>3,158</b>	<b>3,020</b>
<b>Employees with fixed contracts total</b>	<b>91 %</b>	<b>88 %</b>	<b>3 PP</b>	<b>88 %</b>	<b>83 %</b>	<b>83 %</b>
Male	14,462	13,640	6.0 %	13,919	1,728	1,666
Female	24,080	23,160	4.0 %	24,622	1,430	1,354
Male	38 %	37 %	1 PP	36 %	55 %	55 %
Female	62 %	63 %	-1 PP	64 %	45 %	45 %
Central Europe	8,714	8,370	4.1 %	7,659		
Central Europe	23 %	23 %	0 PP	20 %		
South Eastern Europe	11,161	10,496	6.3 %	12,307		
South Eastern Europe	29 %	29 %	0 PP	32 %		
Eastern Europe	14,550	13,991	4.0 %	14,724		
Eastern Europe	38 %	38 %	0 PP	38 %		
Austria	4,117	3,943	4.4 %	3,851	3,158	3,020
Austria	11 %	11 %	0 PP	10 %	100 %	100 %
<b>Employees with limited contracts total</b>	<b>4,045</b>	<b>4,831</b>	<b>-16.3 %</b>	<b>5,089</b>	<b>628</b>	<b>630</b>
<b>Employees with limited contracts total</b>	<b>9 %</b>	<b>12 %</b>	<b>-3 PP</b>	<b>12 %</b>	<b>17 %</b>	<b>17 %</b>
Male	1,341	1,542	-13.0 %	1,567	298	304
Female	2,704	3,289	-17.8 %	3,522	330	326
Male	33 %	32 %	1 PP	31 %	47 %	48 %
Female	67 %	68 %	-1 PP	69 %	53 %	52 %
Central Europe	390	760	-48.7 %	818		
Central Europe	10 %	16 %	-6 PP	16 %		
South Eastern Europe	935	991	-5.7 %	926		
South Eastern Europe	23 %	21 %	3 PP	18 %		
Eastern Europe	2,031	2,400	-15.4 %	2,686		
Eastern Europe	50 %	50 %	1 PP	53 %		
Austria	689	680	1.3 %	659	628	630
Austria	17 %	14 %	3 PP	13 %	100 %	100 %
<b>Employees with non-guaranteed hours</b>	<b>18</b>	<b>27</b>	<b>-33.3 %</b>	<b>n.a.</b>	<b>0</b>	<b>0</b>
Male	9	16	-43.8 %	n.a.	0	0
Female	9	11	-18.2 %	n.a.	0	0
Central Europe	0	0	0 %	n.a.		
South Eastern Europe	0	0	0 %	n.a.		
Eastern Europe	18	27	-33.3 %	n.a.		
Austria	0	0	0 %	n.a.	0	0
<b>Workers who are not employees</b>	<b>4,241</b>	<b>4,236***</b>	<b>0.1 %</b>	<b>n.a.</b>	<b>1,206</b>	<b>1,335***</b>

\* The values include the figures from the companies listed in the Overview chapter (Report scope and data collection, page 11, first paragraph).

\*\* RBI AG only includes the figures of the head office.

\*\*\* The 2022 figure was corrected as the figure for Austrian companies was incompletely reported.

	RBI*				RBI AG**	
	2023	2022	Change over previous year	2021	2023	2022
<b>Employees by region</b>						
<b>Central Europe</b>	<b>21 %</b>	<b>22 %</b>	<b>-1 PP</b>	<b>19 %</b>		
Male	41 %	40 %	1 PP	40 %		
Female	59 %	60 %	-1 PP	60 %		
<b>South Eastern Europe</b>	<b>28 %</b>	<b>28 %</b>	<b>1 PP</b>	<b>30 %</b>		
Male	28 %	28 %	0 PP	28 %		
Female	72 %	72 %	0 PP	72 %		
<b>Eastern Europe</b>	<b>39 %</b>	<b>39 %</b>	<b>0 PP</b>	<b>40 %</b>		
Male	38 %	36 %	2 PP	35 %		
Female	62 %	64 %	-2 PP	65 %		
<b>Austria</b>	<b>11 %</b>	<b>11 %</b>	<b>0 PP</b>	<b>10 %</b>	<b>100 %</b>	<b>100 %</b>
Male	52 %	52 %	0 PP	53 %	54 %	54 %
Female	48 %	48 %	0 PP	47 %	46 %	46 %
<b>New hires</b>						
<b>Employees total</b>	<b>8,237</b>	<b>8,280</b>	<b>-1 %</b>	<b>8,831</b>	<b>555</b>	<b>715</b>
<b>Employees total</b>	<b>19 %</b>	<b>20 %</b>	<b>-1 PP</b>	<b>20 %</b>	<b>15 %</b>	<b>20 %</b>
Employees under 30 years of age	4,018	4,420	-9.1 %	4,908	336	383
Employees between 30 and 49 years of age	3,800	3,575	6.3 %	3,671	205	293
Employees over 49 years of age	419	285	47.0 %	252	14	39
Employees under 30 years of age	9 %	11 %	-2 PP	11 %	9 %	10 %
Employees between 30 and 49 years of age	9 %	9 %	0 PP	8 %	5 %	8 %
Employees over 49 years of age	1 %	1 %	0 PP	1 %	0 %	1 %
Male	3,265	3,212	1.7 %	3,435	277	364
Female	4,972	5,068	-1.9 %	5,396	278	351
Male	8 %	8 %	0 PP	8 %	7 %	10 %
Female	12 %	12 %	0 PP	12 %	7 %	10 %
Central Europe	1,190	1,711	-30.5 %	1,333		
Central Europe	3 %	4 %	-1 PP	3 %		
South Eastern Europe	2,413	2,189	10.2 %	1,934		
South Eastern Europe	6 %	5 %	0 PP	4 %		
Eastern Europe	3,960	3,575	10.8 %	4,878		
Eastern Europe	9 %	9 %	1 PP	11 %		
Austria	674	805	-16.3 %	686	555	715
Austria	2 %	2 %	0 PP	2 %	15 %	20 %
<b>Fluctuation (former employees)</b>						
<b>Employees total</b>	<b>7,750</b>	<b>8,510</b>	<b>-9 %</b>	<b>9,117</b>	<b>446</b>	<b>517</b>
<b>Employees total</b>	<b>18 %</b>	<b>20 %</b>	<b>-2 PP</b>	<b>21 %</b>	<b>12 %</b>	<b>14 %</b>
Employees under 30 years of age	2,887	3,078	-6.2 %	3,519	247	242
Employees between 30 and 49 years of age	4,105	4,674	-12.2 %	4,747	153	230
Employees over 49 years of age	758	758	0.0 %	851	46	45
Employees under 30 years of age	7 %	7 %	0 PP	8 %	7 %	7 %
Employees between 30 and 49 years of age	10 %	11 %	-1 PP	11 %	4 %	6 %
Employees over 49 years of age	2 %	2 %	0 PP	2 %	1 %	1 %
Male	2,610	2,861	-8.8 %	3,133	235	270
Female	5,140	5,649	-9.0 %	5,984	211	247
Male	6 %	7 %	-1 PP	7 %	6 %	7 %
Female	12 %	14 %	-2 PP	14 %	6 %	7 %
Central Europe	1,285	1,789	-28.2 %	1,608		
Central Europe	17 %	21 %	-4 PP	18 %		
South Eastern Europe	1,793	1,705	5.2 %	2,394		
South Eastern Europe	23 %	20 %	3 PP	26 %		
Eastern Europe	4,141	4,409	-6.1 %	4,594		
Eastern Europe	53 %	52 %	2 PP	50 %		
Austria	531	607	-12.5 %	521	446	517
Austria	7 %	7 %	0 PP	6 %	12 %	14 %
<b>Parental leave</b>						
Male employees entitled to parental leave	15,803	15,191	4 %	n.a.	2,026	1,970
Female employees entitled to parental leave	26,784	27,362	-2 %	n.a.	1,760	1,680
Male employees on parental leave	21	26	-19 %	n.a.	3	4
Female employees on parental leave	2,865	3,240	-12 %	n.a.	55	72
Male employees who returned after parental leave	142	104	37 %	n.a.	10	18
Female employees who returned after parental leave	1,643	1,665	-1 %	n.a.	43	46
Share of male employees who returned to work after parental leave	97 %	95 %	2 PP	n.a.	100 %	15 %

\* The values include the figures from the companies listed in the Overview chapter (Report scope and data collection, page 11, first paragraph).

\*\*\* RBI AG only includes the figures of the head office.

	RBI*			RBI AG**		
	2023	2022	Change over previous year	2021	2023	2022
<b>Parental leave</b>						
Share of female employees who returned to work after parental leave	77 %	81 %	-4 PP	n.a.	100 %	51 %
Male employees with current employment one year after parental leave	73	43	70 %	n.a.	19	100
Female employees with current employment one year after parental leave	2,613	2,756	-5 %	n.a.	41	98
Share of male employees with current employment one year after parental leave	86 %	90 %	-4 PP	n.a.	95 %	100 %
Share of female employees with current employment one year after parental leave	93 %	92 %	1 PP	n.a.	98 %	94 %
<b>Average number of training hours for employees, by position</b>						
<b>Employees total</b>	<b>33</b>	<b>34</b>	<b>-3.7 %</b>	<b>34</b>	<b>21</b>	<b>19</b>
Male	31	33	-6.0 %	32	23	21
Female	34	35	-2.9 %	35	19	16
B-1 (second tier of management)	45	30	52 %	37	46	19
B-2 (third tier of management)	37	34	10.4 %	43	32	19
Other managers	44	39	13.1 %	43	37	18
Other employees	32	34	-6.2 %	33	20	19
<b>Share of employees with Performance Management</b>						
<b>Employees total</b>	<b>84 %</b>	<b>82 %</b>	<b>2 PP</b>	<b>82 %</b>	<b>90 %</b>	<b>89 %</b>
Male	89 %	87 %	2 PP	85 %	91 %	90 %
Female	81 %	79 %	2 PP	80 %	88 %	87 %
B-1 (second tier of management)	100 %	100 %	0 PP	99 %	100 %	100 %
B-2 (third tier of management)	100 %	100 %	0 PP	99 %	100 %	100 %
Other managers	97 %	97 %	0 PP	95 %	100 %	100 %
Other employees	82 %	80 %	2 PP	80 %	89 %	88 %
<b>Diversity</b>						
<b>Share of women</b>						
Board (first tier of management)	20 %	18 %	2 PP	16 %	17 %	0 %
B-1 (second tier of management)	39 %	38 %	1 PP	37 %	37 %	35 %
B-2 (third tier of management)	47 %	47 %	0 PP	47 %	28 %	26 %
Other managers	64 %	63 %	1 PP	64 %	19 %	15 %
Managers total	55 %	54 %	1 PP	55 %	28 %	26 %
<b>Employees total</b>	<b>63 %</b>	<b>64 %</b>	<b>-1 PP</b>	<b>65 %</b>	<b>46 %</b>	<b>46 %</b>
<b>Share of minority groups</b>						
<b>Employees with foreign citizenship</b>						
Board (first tier of management)	29 %	31 %	-2 PP	31 %	33 %	33 %
B-1 (second tier of management)	4 %	5 %	-1 PP	5 %	22 %	24 %
B-2 (third tier of management)	3 %	3 %	0 PP	3 %	23 %	21 %
Other managers	1 %	1 %	0 PP	1 %	17 %	15 %
Other employees	5 %	5 %	0 PP	4 %	43 %	40 %
<b>Age groups</b>						
Board (first tier of management)						
Board under 30 years of age	0 %	0 %	0 PP	0 %	0 %	0 %
Board between 30 and 49 years of age	47 %	48 %	-1 PP	50 %	17 %	17 %
Board over 49 years of age	53 %	52 %	1 PP	50 %	83 %	83 %
B-1 (second tier of management)						
Employees under 30 years of age	0 %	0 %	0 PP	0 %	0 %	0 %
Employees between 30 and 49 years of age	66 %	69 %	-3 PP	73 %	57 %	55 %
Employees over 49 years of age	33 %	31 %	2 PP	27 %	43 %	45 %
B-2 (third tier of management)						
Employees under 30 years of age	1 %	2 %	-1 PP	2 %	1 %	1 %
Employees between 30 and 49 years of age	75 %	76 %	-1 PP	79 %	65 %	67 %
Employees over 49 years of age	24 %	22 %	2 PP	19 %	34 %	32 %
Other managers						
Employees under 30 years of age	4 %	4 %	0 PP	4 %	0 %	0 %
Employees between 30 and 49 years of age	74 %	75 %	-1 PP	76 %	83 %	80 %
Employees over 49 years of age	23 %	21 %	2 PP	20 %	17 %	20 %
Other employees						
Employees under 30 years of age	24 %	25 %	-1 PP	25 %	24 %	24 %
Employees between 30 and 49 years of age	61 %	61 %	0 PP	62 %	57 %	58 %
Employees over 49 years of age	15 %	14 %	1 PP	13 %	19 %	18 %

\* The values include the figures from the companies listed in the Overview chapter (Report scope and data collection, page 11, first paragraph).

\*\* RBI AG only includes the figures of the head office.

GRI 2-30 42 per cent (status: 44 per cent in 2022 and 2021) of Group employees are covered by collective bargaining agreements. Those employees who are not covered by the Austrian collective banking agreement have their place of work abroad and are subject to the respective labor law provisions applicable there, as a result of which the Austrian collective banking agreement does not apply.

GRI 403-9 There was one fatality as a result of work-related injuries at RBI in 2023, corresponding to a rate of 0.0026 (2022: zero; 2021: zero). The number of work-related injuries with serious consequences was one person, corresponding to a rate of 0.0026 (2022: 0.0027; 2021: 0.0000). There were a total of 71 (2022: 26; 2021: 18) documentable work-related injuries, corresponding to a rate of 0.1834 (2022: 0.0708; 2021: 0.04656). The rates are calculated per 200,000 hours worked.

GRI 405-2

Ratio of basic salary and remuneration of women to men*								
Ratio basic remuneration women/men					Ratio total remuneration women/men			
	B-1 (second tier of management)	B-2 (third tier of management)	Other managers	Other employees	B-1 (second tier of management)	B-2 (third tier of management)	Other managers	Other employees
RBCZ	86	77	69	69	84	76	72	67
TBSK	93	83	71	73	92	84	78	72
RBHU	89	87	91	78	87	86	90	78
RBAL	98	91	98	82	98	91	99	82
RBBH	102	88	105	80	115	87	106	81
RBKO	96	89	99	81	96	78	96	81
RBHR	94	92	82	81	95	93	80	81
RBRO	94	92	93	73	94	91	93	71
RBRS	103	98	84	81	107	98	87	80
RBBY	80	89	87	64	76	89	84	72
RBRU	101	77	70	52	92	73	75	57
RBUA	90	73	72	60	88	76	69	59
<b>Austria</b>	<b>95</b>	<b>88</b>	<b>101</b>	<b>86</b>	<b>96</b>	<b>86</b>	<b>102</b>	<b>87</b>

GRI 2-4 \* The calculation methodology was adjusted to the extent that salaries are converted to full-time equivalents if the actual working hours deviate from this. The figures are therefore not directly comparable with those in the RBI 2022 Sustainability Report.

Regular salary analyses are conducted to uncover and address gender-specific differences. The table "Ratio of basic salary and remuneration of women to men" reveals a discrepancy in remuneration, primarily attributable to a career gap. This difference is observed within employee categories, with higher-paying positions tending to be occupied by men more frequently. We are aware of this and engage in regular evaluation to strengthen our efforts in addressing this disparity.

GRI 2-21 The ratio of annual total compensation is described as follows:

For RBI AG, the ratio of the annual total compensation of the highest-paid person to the median of the annual total compensation of all employees (excluding the highest-paid person) for 2023 is 26 to 1 (2022: 27 to 1; 2021: 24 to 1).








For RBI, the ratio of the annual total compensation of the highest-paid person to the median of the annual total compensation of all employees (excluding the highest-paid person) is 111 to 1 for 2023 (2022: 142 to 1; 2021: 129 to 1).

For the purposes of the calculation, RBI comprises the companies listed in the "About the Report" chapter (page 9 onwards). The annual total compensation includes the base salary, the role-based allowance and – where applicable – the annual variable target remuneration.

The total compensation of the highest-paid person at RBI AG increased by 3 per cent compared to 2022, while the median of the annual total compensation of all employees at RBI AG (excluding the highest-paid person) rose by 8 per cent.

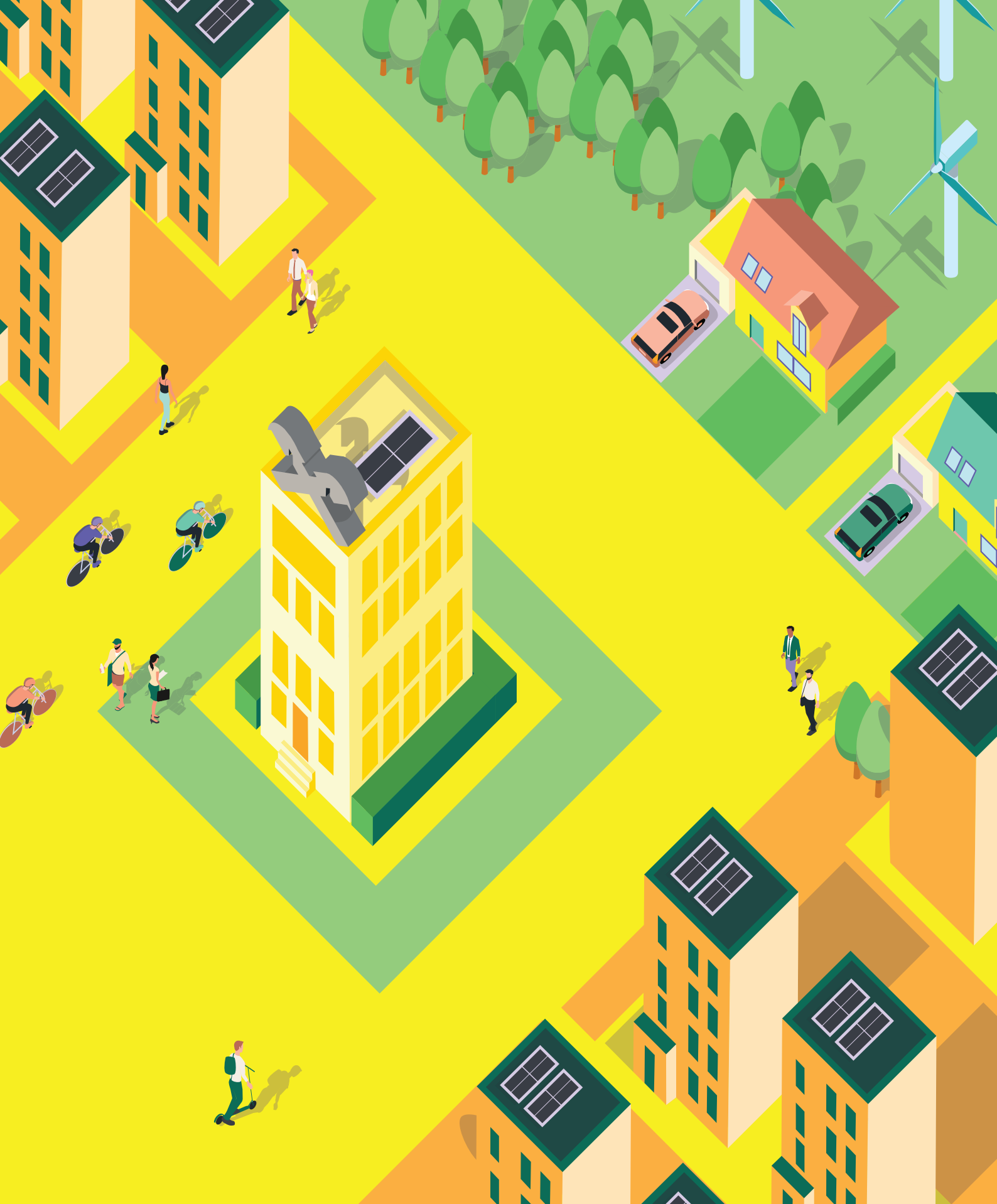
The total compensation of the highest-paid person at RBI fell by 13 per cent compared to 2022, while the median of the annual total compensation of all employees at RBI Group (excluding the highest-paid person) rose by 12 per cent.

## Sustainability program

SDG	PRB	Objective	Measure
<b>Fair Partner/Employees – primary objective: Inclusive employer, high employer attractiveness</b>			
	5	Implementation of the Group-wide diversity and inclusion policy, thereby establishing RBI as an inclusive employer	2023: Implementation of local diversity strategies  2024: Diversity events at RBI AG and at some network banks with the participation of Group P&OI members of the Management Board of RBI
	1	Increase in the proportion of women in RBI's senior management to 35 per cent by 2024	2023: Creation of an international women's network for female senior managers and female Management Board members in the RBI Group; continuous, diversity-conscious recruitment by executive recruiters; targets for women in management positions in 2023 exceeded.  2024: We will heighten prejudice and discrimination awareness in the organization in order to promote the culture of integration and inclusion. To promote gender-specific diversity in management positions, we will determine a streamlined agenda for female resource groups, which will be followed up with agreed implementation measures.
	1	Inclusion of people with disabilities	2023: RBI AG: Raising employee awareness during training; close cooperation in recruitment with companies that work with people with disabilities  2024: Training talent acquisition and human resources professionals on the topic of disability, agreement on disability targets and start implementation of supporting measures (raising awareness, community, job platforms, etc.)
	5	Employee enablement and engagement: achieving the target rate per company	2023: Development and implementation of packages of measures based on the employee surveys conducted in 2022; implemented successfully in 2023  2024: New survey tool, initial launch in NWBs in 2023, in the entire Group in 2024. A first survey in RBI AG is planned for Q1 2024.
	1	Transformation of RBI into a learning organization	2023: Increasing the learning aptitude of individual people and teams; creation and maintenance of an environment that is conducive to learning; using learning to promote the company's strategic priorities; establishing learning governance  2024: Increasing the learning aptitude of teams; maintenance of an environment that is conducive to learning; using learning to promote the company's strategic priorities; establishing learning governance.
	5	Comprehensive consideration of human rights concerns in relation to employees	2023: Publication of a human rights policy and further establishment of the necessary processes as well as expanding the sustainability competence training to include modules on ethics, morals and human rights
	4; 5	Raising awareness of sustainability among employees	2023: Expanding the sustainability competence training to include the three modules of retail, ethics and morals as well as human rights and continuation of the RBI ESG Academy and the ESG learning journey at head office  2024: Continuation of the developed formats

SDGs





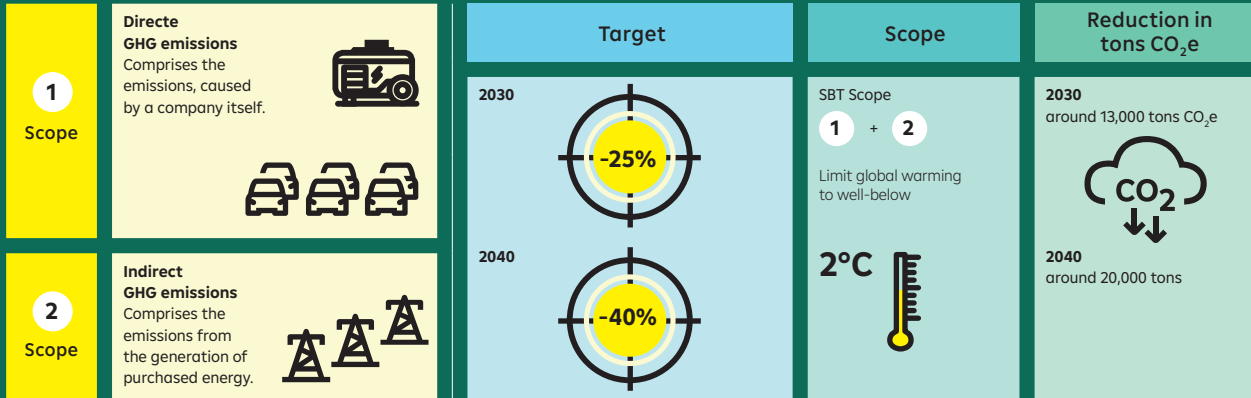
## Field of action Fair partner – Inhouse ecology:

for a climate-friendly and resource-efficient future

# Interesting facts at a glance

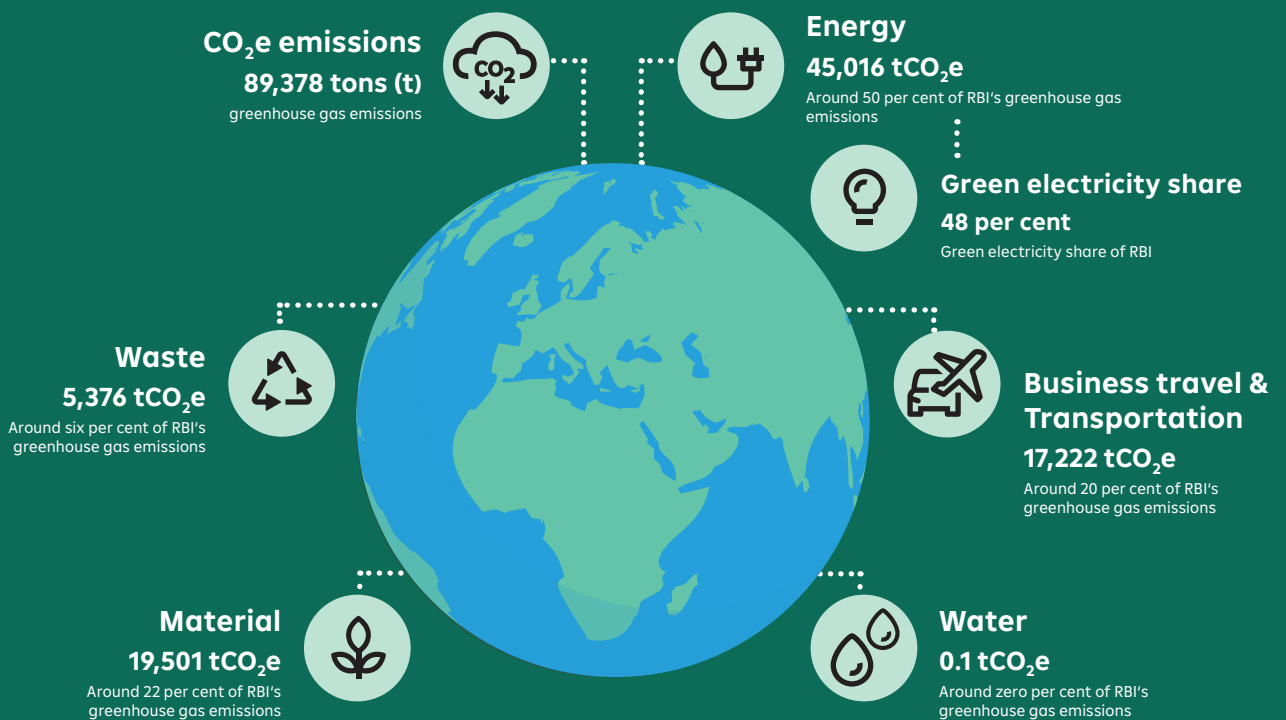
## Science Based Targets (SBT)

RBI set itself the goal of limiting its greenhouse gas emissions to well below 2 degrees Celsius by 2040.



GHG: Greenhouse gas emissions

## CO<sub>2</sub>e emissions of RBI 2023\*



\* Due to rounding, the figures may add up to greater or less than 100 per cent.

## Reductions 2023 to the previous year 2022



GRI 3-3 a-f

# Fair partner – Inhouse ecology

GRI 201-2  
PRB 2, 5, 6

At RBI, we view environmental and climate protection as part of our responsibility to society, and we see ourselves as a fair partner to the environment. The direct environmental impacts of our operational activities are limited compared with those of production industries. Nevertheless, RBI has the goal of limiting negative environmental impacts at all of its sites.

GRI 201-2

## > Impacts

In terms of inhouse ecology, the double materiality principle entails understanding and taking into account the impact of a company's own activities on the environment and the implications of environmental issues for the respective company.

At RBI, the key materiality indicator is the volume of absolute greenhouse gas emissions (Scope 1-3) that are caused by various activities, such as energy consumption and business trips. These emissions have an adverse impact on the climate. As the changes in the world's climate have far-reaching consequences which extend beyond national borders, there is no regional limitation of effects in the context of the inside-out approach. Although the impact of greenhouse gas emissions on the climate is entirely negative, aspects such as the use of renewable energy and the promotion of energy efficiency can mitigate the adverse effects.

GRI 201-2

## > Risks and opportunities

In its Global Risks Report 2023, the World Economic Forum identified climate action failure as the most severe global risk. Effective climate protection has therefore become a competitive factor in the capital market. The management of climate risks – not just in inhouse ecology – is an increasingly important task for the economy.

TCFD

The risks of operational activities are closely related to the environmental concerns set out in the Austrian Sustainability and Diversity Improvement Act (NaDiVeG). The biggest risk to the economy, society and the environment is the unwillingness of companies to counteract climate change. This leads to increased global warming with the known negative impacts.

GRI 3-3 a  
TCFD

In addition to external environmental risk, RBI and its operating locations are subject to physical, regulatory and reputational risks (outside-in perspective). In the area of physical risks, for example, natural disasters could result in damage to property. These risks are minimized by selecting the right locations and ensuring suitable property insurance (adaptation strategy).

They can be managed on the cost side by continuously observing the internal and external environment and by consulting specialists in controlling the respective measures. Risks are classified as material when they endanger the achievement of RBI's medium to long-term climate targets – particularly with regard to energy consumption – or when stakeholders classify them as material for RBI. The measures set out are currently heavily focused on the area of energy, with



examples including targeted increases in energy efficiency and structural alterations to building shells.

The physical risks of climate change, such as greater and more frequent temperature fluctuations, often result in higher operating costs, e.g. due to the increased need for cooling as the number of days with extreme heat increases. Risk management is based on a combined bottom-up and top-down approach in which all employees also play a significant role in risk minimization in their respective working area.

RBI is making a positive contribution to society with concrete steps relating to environmental management. We are contributing to meeting the goals of the UN Climate Change Conference in Paris (COP 21) by working to reduce greenhouse gas emissions, as well as promoting the renewable energy sector of the economy. RBI therefore submitted environmental targets for the whole Group to the Science Based Targets initiative (SBTi) in 2022, which were officially confirmed in the autumn. 2020 was determined as the base year for meeting the targets. The medium-term goal is to cut emissions by 25 per cent by 2030 and to save around 13,000 tons of CO<sub>2</sub>.

Consistent cost-cutting in areas such as business travel and energy consumption represents a particular opportunity for RBI in the area of inhouse ecology. Furthermore, reputational risks are minimized and resilience in the face of the consequences of climate change is increased. New collaborations in research and development and investment in energy efficiency measures can also play a role in promoting the transformation to a sustainable economy.

## ➤ Management

GRI 305-5

RBI continuously strives to improve the main environmental parameters in the most relevant areas. The environmental management system in Austria is based on international standards (ISO 14001).

In general, energy efficiency, renewable energy and environmentally friendly mobility are particularly important in RBI's inhouse ecology. In terms of its carbon footprint, energy consumption/building management, material consumption and mobility are the most important areas of action. These are also crucial with regards to achieving the climate targets (see page 196).

The Group ESG & Sustainability Management department at Group head office, the Environmental Committee, Facility Management and the sustainability officers at the subsidiary banks in Central and Eastern Europe are primarily responsible for implementing the measures envisaged and evaluating the degree of target attainment. The task of the Environmental Committee (see page 34) is to pass on new findings with regard to greenhouse gas emissions and the environmental effects of the main impact categories from Group head office to the subsidiary banks in Central and Eastern Europe. Employees are trained on the key action areas and information is available on the intranet at all times. The main objective of all the measures taken is to reduce CO<sub>2</sub> emissions.

GRI 2-13

RBI's due diligence process is diversified and includes, among other aspects, compliance with internationally recognized ISO standards, building certification and environmental labels. In addition, energy audits and management systems are used not only in Austria, but also at some subsidiary banks in Central and Eastern Europe (see page 193).

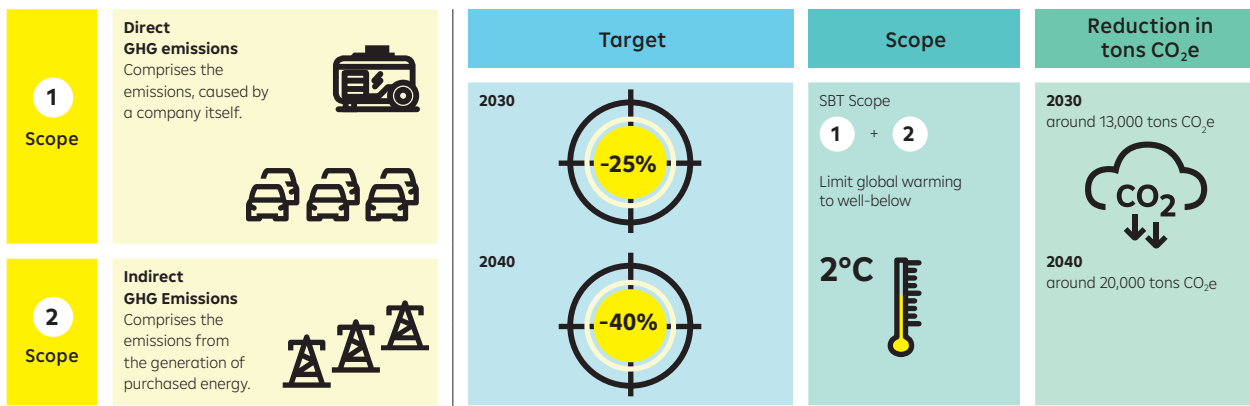
## Science Based Target Initiative (SBTi)

As far as inhouse ecology is concerned, climate change is the overriding consideration in a sustainability materiality analysis. This is primarily caused by man-made CO<sub>2</sub> emissions. To counter this, the management of greenhouse gas emissions is crucial at RBI.

The emissions are divided into three "Scopes" according to the guidelines of the Greenhouse Gas Protocol:

- Scope 1 comprises all greenhouse gas emissions produced directly in the company, e.g. from the combustion of stationary sources (such as power plants, boilers), the combustion of mobile sources (such as from the company's own fleet), the production processes and from transient emissions.
- Scope 2 comprises indirect emissions that arise from the company being supplied with energy – for example, when an energy supplier provides a company with power or heat.
- Scope 3 comprises all other emissions generated within the limits of the system, e.g. by business travel, office supplies (including paper) and waste. However, the use of energy also causes Scope 3 emissions due to transmission losses, for example. In this chapter, only Scope 3 emissions from inhouse ecology are reported.

GRI 2-23 In a further step towards combating climate change, RBI signed its science-based targets (SBT) in 2022 and set itself the goal of limiting its greenhouse gas emissions to well below two degrees Celsius by 2040. In its approach to inhouse ecology, RBI is therefore focusing on its biggest drivers of greenhouse gas emissions, which are energy and business travel.



GHG: Greenhouse gas emissions

GRI 2-23, -24

GRI 3-3 c

TCFD



## Environmental policy

RBI published its own environmental policy in 2022, which details the key action areas. Among other areas, RBI is committed to continuously improving its environmental performance – and as far as possible and reasonable – above and beyond the legal requirements. In addition, the policy sets out that in the "environment" area RBI has defined the thematic areas of "carbon footprint", "energy efficiency" and "renewable energy" as material. This is intended to ensure that the commitment to sustainability is specifically focused on where we as a company have the biggest influence via our office locations. The environmental policy is continuously revised and extended in line with new developments and the latest scientific findings.

GRI 2-23, -24

GRI 3-3 c



## Travel policy

RBI's travel policy contains rules for traveling to events and conferences and defines general conditions for business trips in Austria and abroad. The travel policy was revised in accordance with environmental factors in October 2013. The choice of means of transport must take into account economic and environmental considerations. This applies to the Austrian units including the Austrian subsidiaries, and also provides a framework for the subsidiary banks in Central and Eastern Europe. To save costs and protect the environment, business trips should be replaced by available technologies, such as web and video conferences, where possible. The mode of transport to be used should result in the lowest costs, taking travel time into consideration. Furthermore, environmentally friendly means of transport (e.g. public transportation) are preferred.

## Environmental targets

GRI 3-3 d

A variety of options are available to enhance sustainability within the company. At RBI, these range from building management and energy reduction measures, to increasing the share of material recycled and staging information campaigns for employees.

The implementation rate of the various measures is consistently high, especially in the field of energy saving and energy efficiency. This provides an important contribution to climate protection and additionally reduces costs at our sites.

The use of public transport is encouraged to reduce CO<sub>2</sub> emissions associated with business trips and travel to work. Bicycle storage facilities are also offered at all sites.

Training courses and information platforms for employees are also offered to improve awareness of climate protection and heighten the commitment to sustainability issues within the company.

All measures in the environmental areas that are material to RBI are outlined in the overview below.

### Overview of measures

GRI 305-5

Topic	Measure	Austria						CE			SEE					EE			
		RBI AG**	RBSK	RKAG	RL	Valida	Kathrein	TBSK	RBCZ	RBHU	RBAL	RBBH	RBKO	RBHR	RBRO	RBR5	RBBY	RBRU	RBUA
Environmental certificates	ISO 14001	✓*	✓*	✓*	✓*	✓*		✓	✓	✓									
	ISO 50001									✓									
	External energy audit		✓	✓	✓	✓		✓	✓	✓			✓	✓					
Energy savings and efficiency	LED	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Light sensors	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Evening/weekend mode	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Computer/printer with energy labels	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Adaptions in heating/cooling	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	IT with environmental standards	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Adjustments in building envelope	✓	✓	✓	✓	✓			✓		✓	✓	✓	✓	✓	✓	✓	✓	✓
Renewable energy	Purchasing renewable electricity	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓			✓	
Business travel & commuting	Support of public transportation	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓		✓	✓	✓		✓	
	Bicycle parking spaces	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
Fleet	CO <sub>2</sub> reduction measures	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓	
	E-cars, hybrid vehicles	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	
Paper consumption	Measures for reducing consumption	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Paper with an environmental label	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
Waste	Waste separation	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Waste management system	✓	✓	✓	✓	✓		✓		✓		✓		✓	✓	✓	✓		
	Increase of recycling waste	✓	✓	✓	✓	✓	✓	✓	✓			✓	✓			✓	✓		
	Measures to waste reduction	✓	✓	✓	✓	✓	✓	✓	✓			✓	✓	✓		✓	✓		
Water	Measures for reducing consumption	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
Employee information	e.g. in the form of training and via intranet	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	

GRI 302-4

\* ISO 14001 Facility Management.

\*\* RBI AG only includes the head office here.

Please see the list of abbreviations for the complete company designations.

## > Metrics and ambitions

The inhouse ecology indicators of RBI and Group head office are shown in the following table. The environmental indicators of RBI include data for both Group head office as well as the branches of the subsidiary banks in Central and Eastern Europe, thus covering more than 90 per cent of all employees. Data on waste, water and paper consumption are included in the Scope 3 calculation as not material and are therefore not listed as GRI indicators. However, as the indicators are of interest to numerous rating agencies and stakeholders, they are listed in the table below.

	RBI*					RBI AG**	
	2023	2022	Change to previous year	Basisjahr 2020	Change from 2023 to 2020	2023	2022
<b>Material</b>							
Non-recycled paper in t	275,952	344,684	-20 %	510,158	-46 %	10,236	5,120
Recycled-paper in t	628,040	768,345	-18 %	1,117,367	-44 %	19,011	9,509
Total paper in t	903,992	1,113,029	-19 %	1,627,525	-44 %	29,247	14,629
Paper consumption in sheets/employee	4,254	5 358	-21 %	7,502	-43 %	1,548	803
<b>Energy</b>							
Total energy consumption in MWh	184,470	189,176	-2 %	210,999	-13 %	5,421	15,082
Share of renewable energy in MWh	36,239	38,122	-5 %	40,404	-10 %	1,742	10,087
Share of non-renewable energy in MWh	148,231	151,054	-2 %	170,595	-13 %	3,679	4,995
Total electricity consumption	90,356	101,458	-11 %	127,011	-29 %	24	7,738
Externally procured cooling	1,304	1,459	-11 %	1,684	-23 %	590	684
Total heating consumption (excluding district cooling)	70,509	70,760	0 %	66,766	6 %	3,865	5,719
Business travel and transportation	22,302	15,498	44 %	15,538	44 %	941	941
Share of renewable electricity	48 %	47 %	-2PP	43 %	2 PP	58 %	100 %
Total energy consumption in kWh/employee	4,332	4,544	-5 %	4,853	-11 %	1,432	4,132
<b>Water</b>							
Water consumption in million liters	284	255	11 %	344	-18 %	28	20
Water consumption in liters/employee	6,658	6,121	9 %	7,913	-16 %	7	5
<b>Waste</b>							
Hazardous waste for incineration in t	1	35	-97 %	0	2,676 %	0	0
Hazardous waste for landfill in t	3	0		4	-17 %	0	0
Hazardous waste for recycling in t	1	24	-95 %	3	-61 %	0	1
Non-hazardous waste for incineration in t	1,264	940	34 %	1,135	11 %	237	241
Non-hazardous waste for landfill in t	4,195	4,358	-4 %	4,860	-14 %	0	0
Non-hazardous waste for recycling in t	1,044	1,100	-5 %	980	7 %	166	161
Old electronic devices for recycling in t	290	126	129 %	221	31 %	1	5
Total hazardous waste in t	6	59	-90 %	7	-19 %	0	1
Total non-hazardous waste in t	6,508	6,399	2 %	6,979	-7 %	404	402
Waste in kg/employee	153	155	-1 %	161	-5 %	107	110
<b>Business travel</b>							
1,000 pkm total	51,425	32,470	58 %	43,902	17 %	8,914	5,108
Business travel in pkm/employee	1,208	780	55 %	1,010	20 %	2,355	1,399
<b>CO<sub>2</sub> emissions<sup>1</sup></b>							
Scope 1 emissions in t	12,403	6,049	105 %	6,392	94 %	235	292
Scope 2 emissions location-based in t	33,526	36,991	-9 %	47,194	-29 %	203	349
Scope 2 emissions market-based in t	36,914	40,208	-8 %	49,844	-26 %	203	1,737
Scope 3 emissions in t	43,450	26,690	63 %	30,521	42 %	2,607	1,681
Scope 1+2 emissions location-based in t	45,928	43,040	7 %	53,585	-14 %	438	641
Scope 1-3 emissions location-based in t	89,378	69,730	28 %	84,106	6 %	3,044	2,322
Scope 1+2 emissions location-based in kg/employee	1,078	1,034	4 %	1,232	-12 %	116	175
Scope 1-3 emissions location-based in kg/employee	2,099	1,675	25 %	1,934	8 %	804	636
<b>Fleet</b>							
CO <sub>2</sub> emissions of the fleet in g/km	85	112	-24 %	111	-24 %	93	114

\* The values include the figures from the companies listed in the Overview chapter (Report scope and data collection).

\*\* RBI AG only includes head office.

<sup>1</sup> The CO<sub>2</sub> emissions for all years are calculated on the basis of the ecoinvent v.3.8 factors. This is an updated factor and can therefore lead to slight discrepancies between the 2022 figures in the table compared to the figures published in the Sustainability Report 2022.

# Greenhouse gas emissions in detail

GRI 3-3 e  
GRI 302-4

TCFD

The data is collected for RBI, which includes the subsidiary banks in Central and Eastern Europe, Group head office and the material Austrian subsidiaries (see page 194).

Average CO<sub>2</sub>e emissions (calculated using the emission factors ecoinvent v3.8) for 2023 amounted to 89,378 tons (t) (location-based), an increase of 6 per cent compared to 2020 (the base year). Of this total, 12,403 tons or 14 per cent of CO<sub>2</sub>e emissions are attributable to Scope 1, 33,526 tons (38 per cent) to Scope 2 (location-based) and 43,450 tons to Scope 3 (49 per cent).<sup>1</sup> The biggest reduction compared to 2020 was in Scope 2 (down 29 per cent). In Scope 3, emissions have increased by 42 per cent since 2020, while Scope 1 has seen an increase of 94 per cent. Scope 1-3 emissions rose by 28 per cent compared to the previous year.



As in the previous year, quantitative data relating to inhouse ecology was collected using the "ESG Cockpit" software. The environmental indicators include data for both Group head office and the branches in CEE, thus covering more than 90 per cent of all employees. To enable optimal support for corporate environmental management, the measures taken and the consumption data are regularly analyzed using appropriate company-specific key figures. One important way of achieving the environmental targets is to reduce consumption before emissions occur. Energy efficiency plays an important role in achieving this.



In the energy and paper categories, 4,483,158 kilograms of CO<sub>2</sub>e were saved compared to the previous year. CO<sub>2</sub>e savings of 17,237,021 kilograms have been achieved since the base year of 2020.

GRI 302-1, -4

Data quality is collected on the basis of three grades: The best data quality is 1 (exact), followed by 2 (calculated) and 3 (estimated). For RBI's inhouse ecology data, the value is exact and calculated. No areas are classified in the lowest category 3 (estimated) in terms of their data quality. The following section contains a brief illustration of the CO<sub>2</sub>e emissions of the inhouse ecology indicators as well as further details:

TCFD



At 45,016 tCO<sub>2</sub>e, energy consumption accounts for around 50 per cent of location-based emissions (down 8 per cent compared to the previous year and 27 per cent compared to 2020) and is the biggest source of emissions for RBI. Despite the stricter calculation factors and a renewed increase in the use of office buildings, energy consumption has decreased significantly. The emissions arise in Scope 2 in particular, but also in Scopes 1 and 3. RBI's total energy consumption was around 184 GWh in 2023. The average energy consumption per employee per year is 4,332 kWh. RBI's proportion of green electricity is 48 per cent.



At 19,501 tCO<sub>2</sub>e, material consumption accounts for around 22 per cent of emissions (up 224 per cent on the previous year and 156 per cent compared to 2020), making it the second biggest source of emissions. The impacts are solely in Scope 3. The proportion of recycled materials in paper purchasing is 69 per cent. In total, RBI used around 904 tons of paper in 2023, which is down on the previous year's level. Paper consumption per employee therefore amounted to only 4,254 sheets per year.



Business travel generates 17,222 tCO<sub>2</sub>e, which equates to around 19 per cent of emissions (97 per cent more than in the previous year and 70 per cent more than in 2020). As a result, this became the third-ranking source of emissions at RBI in 2023. It arises in both Scope 1 and Scope 3. Business travel at RBI amounted to around 51 million pkm in 2023 (passenger kilometers; pkm are calculated on the basis of the number of persons carried and the distance covered). The average per employee per year is 1,208 pkm, an increase of 55 per cent.



At 5,376 tCO<sub>2</sub>e (26 per cent more than in the previous year and 24 per cent more than in 2020), waste accounts for around six per cent of emissions. The impacts are solely in Scope 3. The quantity of waste produced at RBI in 2023 amounts to around 6,800 per year or 153 kg per employee, of which around 96 per cent is non-hazardous waste. Around 62 per cent of waste is taken to landfill sites, approximately 19 per cent is incinerated and around 15 per cent is recycled.



Electrical devices account for approximately four per cent. Waste disposal is performed by external companies under the terms of contractual agreements. Subcontractors must present the certificates and

<sup>1</sup> Due to rounding, the figures may add up to greater or less than 100 per cent.

permits that qualify them for this task. In addition, contractual partners in most countries are required by law to protect the environment and handle waste with due care. Waste values are collected using calculations as well as by reference to the capacity of the waste containers. Waste reduction measures range from regularly informing employees and purchasing recyclable goods (e.g. replacing plastic plates in the canteens) and longer-life items (e.g. LED lights) through to providing bins for waste separation. Some subsidiary banks in Central and Eastern Europe are already seeing a reduction in waste. Unfortunately, the infrastructure at some subsidiary banks in Central and Eastern Europe is still not sufficiently advanced. Precise waste data is only available for smaller locations in some cases and for large office buildings in others.



Parcel delivery and the transport of goods account for one per cent of emissions at 860 tCO<sub>2</sub>e (14 per cent more than in the previous year and 18 per cent more than in 2020). The km/tkm values reported in the supplier survey were collected internally but not included due to insufficient verifiability. The impacts of the emissions are primarily in Scope 3.



Water use takes last place at 0.1 tCO<sub>2</sub>e, thereby causing almost zero per cent of all emissions (11 per cent more than in the previous year and 18 per cent less than in 2020). The effects are exclusively apparent in Scope 3. Total water consumption in 2023 amounted to 284 million liters, or 6,658 liters per employee per year, which was a marginal increase. The primary objective of water management is to reduce water consumption in order to minimize the physical risk that the municipal water supply could be insufficient for the locations to operate in the event of low rainfall. The water reduction targets are implemented through employee information and technical controls, such as sensors in sanitary installations to regulate water consumption.

## Environmental targets

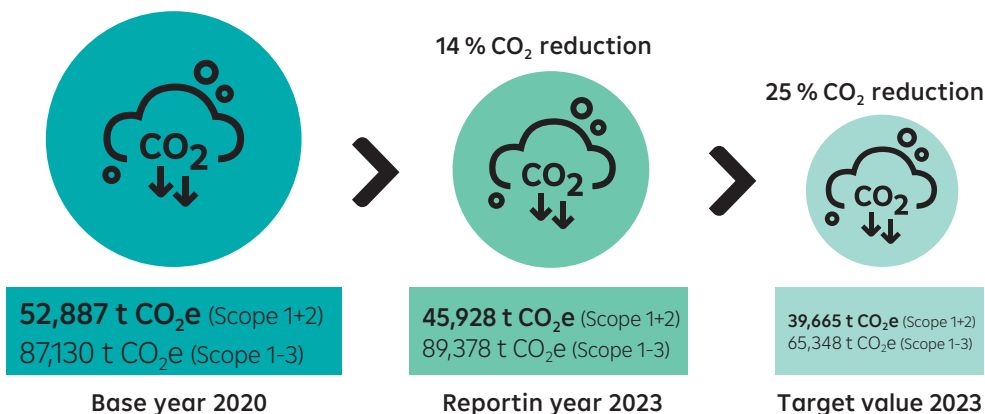
GRI 3-3 d-e  
TCFD

In line with its commitment to the Science Based Targets initiative (SBTi), RBI has set reduction targets for its inhouse related CO<sub>2</sub> emissions of 25 per cent by 2030 and 40 per cent by 2040, with 2020 as the base year. This applies to Scope 1+2 and, separately, to Scope 3. The target will be achieved via a combination of an annual reduction in CO<sub>2</sub> emissions by at least 2.9 per cent, greater energy efficiency, a higher proportion of green energy, a reduction in business travel and corresponding measures to inform employees.

Find more at: [www.raiffeisen.com/en/sustainability-esg.html](http://www.raiffeisen.com/en/sustainability-esg.html)

Due to the return to standard working conditions and the resumption of business travel, RBI has recorded a reduction in CO<sub>2</sub> emissions in Scope 2 (down 9 per cent) compared to the previous year, as well as increases in Scope 1 and 3. CO<sub>2</sub> emissions have therefore increased by 6 per cent since the base year of 2020.

### RBI target path for Scope 1+2 CO<sub>2</sub> reduction in accordance with science-based targets commitment



The breakdown of Scope 1-3 emissions shows that CO<sub>2</sub> emissions were reduced in Scope 2 in particular in 2023. Scopes 1 and 3 posted an increase compared to the previous year. This is due to a widespread return to standard, pre-pandemic working practices and an increase in travel activity.

In addition, the calculation factors have changed, which influences the weighting of the respective emissions. On account of its size, Group head office has a considerably lower carbon footprint than the group as a whole. It has also purchased exclusively green electricity for more than ten years and continuously implements energy-saving measures. As such, there is limited capacity for a further reduction in emissions. The biggest action area at Group head office is business travel, while the biggest action area for the whole group is energy.

The central tool for the implementation and further development of the environmental targets is the environmental management system in Austria, which is operated in accordance with the requirements of ISO 14001 (certified since 1998). In addition, greenhouse gases have been validated for Group head office in accordance with ISO 14064-1:2019 since 2013. The Environmental Committee (see page 34), Group ESG & Sustainability Management, Facility Management and sustainability officers at the subsidiary banks in Central and Eastern Europe are primarily responsible for implementing the inhouse related environmental targets and evaluating the degree of target attainment.

TCFD

## Sustainability program

SDG	PRB	Objective	Measure
<b>Fair partner/Inhouse ecology – primary objective: Reduction in environmental impacts</b>			
	2	Energy reduction	Increase energy efficiency and the proportion of renewable energy
	2	Increase the proportion of energy-efficient office locations	Consideration of energy efficiency in new buildings or rent of a building
	2	Increase the share of renewable energy	Foster the purchase of green electricity as far as available and feasible
	2	Environmentally friendly vehicle fleet	Conversion of fleet to more environmentally friendly vehicles with lower CO <sub>2</sub> emissions
	2	100% share of paper with an eco-label	Increase the share of paper with an eco-label
	2	Waste management systems at all sites	Implementation of waste management systems at all sites
	2	Increase in proportion of recycled materials in waste	Cooperation with partner companies offering corresponding waste recycling
	4	Expansion of employee awareness	Integrate awareness raising information on the intranet and produce an info screen with the most relevant action fields for employees
	5	Audit of CO <sub>2</sub> emissions	Collection of inhouse related key figures for calculating the CO <sub>2</sub> e emissions of RBI
	4	Increase ESG know-how among employees	Update established ESG online training incl. control questions
	6	Contribute to UN climate goals in accordance with the commitment to the Science Based Targets initiative (SBTi)	Scope 1 and 2 reduction targets: RBI's commitment to a 25 per cent reduction in Scope 1 and 2 GHG emissions in absolute terms by 2030, starting from the base year of 2020
	6	Implementation of an environmental policy	Environmental policy measures are part of our sustainability agenda and form the basis of our environmental management system

SDGs





## Field of action Engaged citizen:

As a designer of a sustainable society and the environment



# Interesting facts at a glance

## Investments in the community



\*In some subsidiaries in Central and Eastern Europe it is usual that part of the taxes can be paid in the form of donations. According to the new legislation (OPANAF 1679/2022) in Romania, companies registered in Romania that didn't use the full tax credit for donations contracts with NGOs in 2022 were eligible to redirect via the National Agency of Fiscal Administration (ANAF) the full amount of tax credit. Therefore, the amount includes an increase of donations from Raiffeisen Bank S.A., Romania.

## RBI's mission with respect to its Sponsorship and Donations Policy

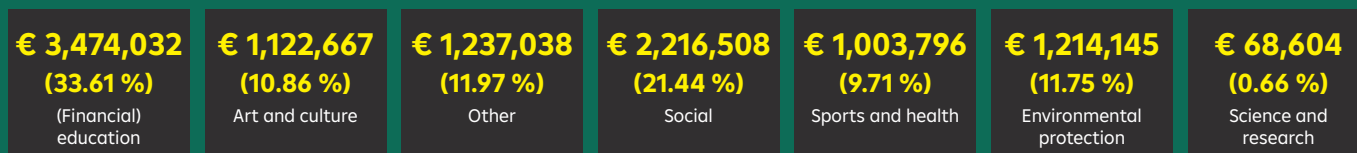
RBI works to **strengthen democracy, the rule of law, and social cohesion and diversity.**

RBI is engaged in advancing international exchange and understanding with a strong focus on the European Union in general and CEE in particular ("**bridging**").

RBI **promotes progress in society** – be it in civic, economic, academic or cultural life.

RBI supports initiatives that address **social causes.**

## Allocation of monetary donations by the RBI in 2023, by topic\*



\* Breakdown as recorded in the "ESG Cockpit" monitoring tool

## Brighter Future Initiative



**Brighter Future Initiative**

"We want to have a positive impact on the future of society in our core region. When providing support, we focus on people and their needs, in order to shape a better future."

The bundling of RBI's measures in the area of social and environmental protection has been taking place in the Brighter Future Initiative since spring 2023. Starting with RBI AG's social commitment in Austria, the scope of topics will gradually be extended to all subsidiaries.

## Stepic CEE Charity



The Stepic CEE Charity supports children, young people, and women in Central and Eastern Europe through educational activities.

By reducing administrative costs to a minimum, it was possible to spend over 90 per cent of donations directly on projects and to support more than 10,100 people.

Since 2022 RBI head office donates sustainability premiums for charitable causes.

In 2023 the resulting premiums were donated to the Stepic CEE charity.



**Total number of beneficiaries in 2023**

Albania	218	Romania	1,388
Bosnia and Herzegovina	840	Serbia	859
Bulgaria	104	Slovakia	930
Croatia	15	Republic of Moldova	80
Hungary	15	Ukraine	4,533
Kosovo	1,130		
<b>Total</b>			<b>10,112</b>

# Engaged citizen – Environmental and social aspects

The mission defined by RBI in 2019, which includes the promise to the public to “act in a socially responsible manner and contribute to the long-term wellbeing of people and companies in our markets”, also clearly shows that RBI puts people at the heart of all its activities. In addition, RBI considers environmental and climate protection to be part of its social responsibility.

## > Impacts

The considerable importance of engagement with society and the environment and the high expectations of internal and external stakeholders in this respect have been repeatedly confirmed in various surveys over the years. Due to the direct impact which RBI as a bank has on millions of people's lives, the topic “Commitment to society and the environment” is classed as essential (see page 21). In addition to the impact resulting from its core business, RBI makes a positive contribution to society and to environmental protection with its corporate engagement in all of the countries in which it operates. It works to combat poverty and campaigns for integration and solidarity. Building on the cooperative principle and the motto of “helping others to help themselves”, RBI views its role as contributing to the preservation of positive societal values. Among other things, its engagement takes the form of support for an extremely diverse range of social and cultural projects. RBI also engages in numerous activities to strengthen the regional economic and societal structures of the markets in which it operates. Through its numerous initiatives, it supports the achievement of the Sustainable Development Goals. In addition, RBI initiates corporate volunteering projects and enters into longstanding partnerships with NPOs and NGOs.

## > Risks and opportunities

RBI considers all of its activities as an engaged corporate citizen to involve opportunities, such as a positive impact on its reputation, but no significant risks. As a player in the financial industry and a signatory to the UN Principles for Responsible Banking, RBI is committed to helping people to learn more about handling money (see page 147). Accordingly, it actively supports initiatives in this area with a view to improving the economic autonomy of individuals, regardless of whether they are customers or not. Improving the financial situation of each and every individual has a positive impact not only on the person concerned, but also in the context of the resulting impacts on the overall economic situation. Our commitment to imparting financial knowledge provides RBI with an opportunity to increase people's trust in banks. RBI also offers sustainable financial products and services in a way that supports its customers toward a sustainable future, thereby at the same time making a positive contribution to society. By interweaving social and entrepreneurial benefits, social-corporate commitment offers RBI the opportunity for a future “win-win” situation.

# Management

GRI 2-23  
GRI 3-3 a-f

Within our value system, corporate engagement is a fixed element of our culture. Many of RBI's products and services are also relevant to the economy as a whole. RBI considers itself to be an engaged corporate citizen that actively champions sustainable development in society. Our engagement ultimately reflects our customers' expectations and what our employees demand of us as a modern employer. RBI's commitment as a corporate citizen goes beyond its core business and is embodied within its markets by the responsible employees at the subsidiary banks, at the national foundation, the Tatra banka Foundation, as well as at the Stepic CEE Charity. Voluntary work by employees is supported by giving them the necessary leave of absence as part of corporate volunteering schemes as well as through employee matched giving programs, where employers double the donations made by employees. The various initiatives are managed in different departments. Depending on the scope of investment, new project proposals are approved in the local teams and/or by the Management Board. Sponsorship projects also form part of RBI's marketing mix and serve our business and communication objectives. RBI aims to counteract social problems, promote cultural life, and protect the environment. In many cases, its voluntary contribution to the development of society is characterized by longstanding partnerships. While national rules are in place at the subsidiary banks in Central and Eastern Europe, the Code of Conduct (details can be found starting on page 44) forbids any Group employee from using charitable contributions as a condition or means of influencing decisions or public officials under any circumstances.

Climate change and environmental degradation with their sometimes massive impacts on people are issues that require current attention. In addition to the ongoing energy crisis, the war in Ukraine and in the Middle East are a burden on society. As an engaged citizen, and especially in view of the fact that Europe is aiming to become the first climate-neutral continent by 2050, RBI champions issues that are essential to becoming a sustainable society. In this context, sustainability is not limited to environmental protection, but rather combines this with economic progress and social justice. As an internationally active banking group, we see ourselves as a driving force when it comes to the future-oriented topic of ESG (details can be found starting on page 64 ff.).

Cooperation with relevant socio-political representatives and stakeholders is extremely important, because new systems that also mean a new quality of economic activity can only be created through cooperation (see pages 213-215). Another important aspect of this transformation is the advance of digitalization. The digital shift is being accompanied by extensive changes in society. From RBI's perspective, digitalization as a societal process can be successful only if people are included at every stage. As an example, this has led to the partnership with the "fit4internet" platform, which is implementing various projects under the motto "Road to Digital Austria".

At RBI, the procedure for donations, sponsorship and advertising requests as well as memberships is governed by a policy that applies to all employees. Most recently revised at Group head office for RBI in 2022, this regulation again underlines the fact that RBI strives to promote the long-term wellbeing of people and companies in the markets in which it operates. RBI links its financial success to social responsibility and views its role as being based on the following three pillars:

- the understanding to act in harmony with the cooperative mission of its owners, and towards sustainable entrepreneurship, active civil society and an environmentally friendly society;
- the assertion of the Group's own set of principles and beliefs;
- consideration of the specific regional requirements of RBI's subsidiary banks in Central and Eastern Europe.

RBI defines its mission with respect to its Sponsorship and Donations Policy as follows:

- RBI works to strengthen democracy, the rule of law, and social cohesion and diversity.
- RBI is engaged in advancing international exchange and understanding with a strong focus on the European Union in general and CEE in particular ("bridging").
- RBI promotes progress in society – be it in civic, economic, academic or cultural life.
- RBI supports initiatives that address social causes.

## Social-corporate commitment

In addition to its donations, RBI supports numerous projects and activities through sponsorship as part of its social and cultural commitment. As the projects supported in this way are in a position to make a positive contribution to societal development, they are also included in this report.

In line with the principle of "helping others to help themselves", RBI works with various NGOs. In total, around 765 partners received support through donations and sponsorship in 2023.

RBI sees it as particularly positive that many of its employees not only make the projects supported by RBI possible through their personal commitment, but also take on social activities in their free time.n.

An overview of the topics supported through donations and sponsorship in the individual countries within the Group can be found below.

GRI G4-DMA  
(former FS16)

### Overview of measures

Topic	Austria						CE			SEE					EE			
	RBIAG	RBSK	RKAG	RL	Valida	Kathrein	TBSK	RBCZ	RBHU	RBAL	RBBH	RBKO	RBHR	RBRO	RBRS	RBBY	RBRU	RBUA
Financial education/Financial literacy							✓	✓	✓	✓			✓	✓	✓		✓	✓
Other education initiatives	✓			✓			✓	✓	✓	✓	✓	✓	✓	✓		✓		✓
Cultural initiatives	✓		✓			✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
Social initiatives	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Corporate volunteering	✓	✓	✓		✓	✓	✓	✓	✓		✓		✓	✓	✓		✓	
Sports and health initiatives	✓		✓			✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Environmental initiatives			✓				✓		✓		✓	✓	✓				✓	✓
Science and research initiatives	✓								✓				✓	✓	✓			
Other initiatives	✓						✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓

Please see the list of abbreviations for the complete company designations.  
The data of RBAL also includes Raiffeisen INVEST.

## War in Ukraine

In 2023, RBI AG and some of its Austrian subsidiary banks continued to be involved in aid measures for Ukrainians. Many of the projects supported by RBI AG or the donations made by it were connected with the war in Ukraine. For example, donations were in particular made to social institutions such as Caritas Austria in Ukraine, but also to provide technical equipment for school pupils.

In October 2023, the total number of all refugees from Ukraine registered in European countries was around 5.8 million. In Austria, some subsidiaries of RBI supported several refugees by offering them residential accommodation. For example, Raiffeisen-Leasing GmbH made a house with seven rooms available until the beginning of April 2023, and also assumed the associated running costs for around one year. This provided shelter for young mothers and their children. A 70-year-old couple was provided with a 2-room apartment. Valida Vorsorge Management helped a further two refugee families by providing apartments in the Oberlaa district of Vienna, and has assumed all running costs since then.

In addition, the donation from Kathrein Privatbank AG for Ukrainian refugee children in Austria was given to Verein Juhu, an association which provides language support as a prerequisite for successful social and community integration.

### Aid within Ukraine

At local level, Raiffeisen Bank JSC is committed to selected projects with a view to providing different types of support to as many people as possible during these difficult times. For example, it decided to support the charitable organization "Dobrobut Foundation". Since the start of the war, this organization has been helping adults and children from Bucha, Irpin, Gostomel and other cities within the Kyiv region who have been injured by shelling during the war.

The "Oberig" clinic is a multidisciplinary clinic which offers modern, highly specialized medical care for adults and children. In summer 2022, it launched an initiative, at its own expense, for the treatment and rehabilitation of war casualties with mine injuries. Raiffeisen Bank JSC has provided the clinic with financial and charitable support. Its financial aid spans two years and will enable the continuous treatment and rehabilitation of around five patients per month until the start of 2025.

With the war resulting in serious psychological consequences such as trauma, stress and anxiety, Raiffeisen Bank JSC became involved in a voluntary project "How are you, Brother?", which teaches people, both civilians and military personnel, how they can support themselves and also each other in overcoming the emotional and psychological challenges of the war. Raiffeisen Bank JSC financed the printing of 20,000 copies of the handbooks "How are you, Veteran?" and "Talk to me", which are available free of charge from petrol stations and from branches of our subsidiary bank. Among other things, the guideline provides information on how best to talk to war veterans.

In addition, Raiffeisen Bank JSC also gave around € 37,800 to the charitable organization "ICF 'ATO VOYIN'". It addresses problems faced by the population relating to safety and disaster control by attempting to increase protection for the civilian population within war zones.



© Raiffeisen Bank JSC

To contribute to food security in Ukraine during times of war, Raiffeisen Bank JSC has supported the "BORSCH" initiative. Over a total area spanning 3 million hectares, around 3.5 million Ukrainians cultivate vegetable gardens of up to one hectare. Among other things, they grow the main ingredients for their national dish, "borscht" soup, in their own gardens. The "borscht set" mainly includes what is needed to grow cabbage, carrots, onions, beetroot and potatoes. Providing vegetable seeds to people especially in the regions of Chernihiv, Sumy, Kyiv, Poltava, Kharkiv and Dnipro aims either to enable individuals to supply themselves with the necessary food items, or to give them the opportunity to earn an additional income for their families. In April and the first half of May 2023, 105,000 households received seeds and fertilizer from "BORSCH".



© Raiffeisen Bank JSC

Europe's biggest environmental disaster for decades – the destruction of the Kakhovka hydroelectric power station's dam in Ukraine – threatened nature and the lives of hundreds of thousands of people and animals. In response to this, the charity platform "UNITED24" launched a fundraising appeal "Help the Rescuers" to purchase the equipment that was urgently needed for the humanitarian mission in the Kherson and Mykolaiv regions. Thanks to the support totaling around € 125,900 from Raiffeisen Bank in Ukraine, more than 70,000 people were rescued or relocated, or were able to receive other forms of help.

## Launch of the Brighter Future Initiative



RBI has a long tradition of social engagement, and compared to its peers, has in past years spent large amounts of capital on social causes. In the spring of 2023, the "Brighter Future Initiative" was launched in order to bundle measures and immediately achieve an even greater social impact while also making it more visible. Its aim is firstly to focus RBI's social engagement on specific social issues. Impact measurement and the ability to show what has actually been achieved will also be made a prime focal point.

The initiative firstly defined five thematic areas which form the focus of RBI's social engagement. These are: Corporate Volunteering, Youth & Education, Innovation, and Arts & Culture. The initiative's content is coordinated by a Steering Committee comprising representatives from European & Public Affairs, Marketing, Communications, Sustainability Management and CEO Office. This ensures the involvement of all departments within RBI AG that deal with issues relating to donations and sponsorship and their communication. The Steering Committee is supported by the Advisory Board. This Board is itself part of the RBI Sustainability Council.

As a first step, the Brighter Future Initiative is addressing the social engagement of the head office within Austria. The scope of topics will gradually be expanded to include the Austrian subsidiaries and those in Central and Eastern Europe. Our guiding principle is: "We want to have a positive impact on the future of society in our core region. When providing support we focus on people and their needs, in order to shape a better future." The initiative will gradually sharpen its focus in terms of content and expand reporting to include the supported projects.

## Education and financial education initiatives

GRI G4-DMA (former FS16)



Education remains one of the most important issues of the 21st century and an important tool in the fight against poverty. RBI is involved in numerous projects with the aim of improving education and hence ensuring equality of opportunity and inclusion.



### School 42 Vienna – supporting IT talent around the world

As a key cooperation partner of School 42, RBI AG is helping shape tomorrow's society, offering talented students the opportunity to utilize technological progress and put their knowledge into practice.



© School 42

RBI's building in Muthgasse in the 19th municipal district of Vienna is home to the School 42 campus, where IT talents learn coding. The innovative coding school offers free education for students from 18 years and trains them to become successful programmers. The curriculum places particular emphasis on project-based learning where students can deepen their knowledge through practical work. School 42 also promotes peer-2-peer learning, where students learn from each other and evaluate each other's projects.

The joint objective pursued by RBI AG and School 42 is to pave the way for young people to follow a career in the IT sector. RBI AG also offers talented students the opportunity to complete an IT internship at RBI, gaining valuable experience and ideally securing a job within the IT department. RBI AG's commitment is not, however, merely limited to training and internships, as the bank also provides financial support to School 42 in order to ensure that the educational program remains accessible to all those interested.



© RBBH

As a member of the American Chamber of Commerce, Raiffeisen BANK d.d. Bosna i Hercegovina continued its support for the "Amcham Leader Roots" project. This unique educational program aims to help young people develop leadership qualities and experience and so realize their full professional potential. At the masterclass for this year's program, future leaders in Bosnia & Herzegovina had the opportunity to learn more about the importance of employer branding and the role of internal and external communication in this field.



© RBKO

For five years, Raiffeisen Bank Kosovo J.S.C., in cooperation with the charity Stepic CEE, has donated schoolbags, school materials and tablets to assist online learning. Recipients to date have included schools in the cities of Pristina, Prizren, Gjilan and Mitrova. The cooperation with the CEE charity was continued in 2023, with 530 schoolbags and useful school materials being distributed to pupils from 26 schools in the Peja district.



© RBHR

Raiffeisenbank Austria d.d., Croatia, sponsored the national campaign for equality within education. This was based on projects to encourage teachers to serve as actors and role models for equality in schools. The main objective in 2023 was to impart widespread awareness among local and regional school administrations, teaching staff, parents and local media, as well as experts and the general public, about the importance of equality in education. It involved making people aware of unconscious prejudices and of gender-specific stereotypes, as well as the extent to which each and every individual can help contribute towards equal treatment of girls and boys. The campaign also aimed to show how primary school affects future choices surrounding education and career and the employability of future employees.

### Focus on financial education

RBI actively promotes an understanding of financial products and services and imparts banking expertise as part of its day-to-day advisory role. The nature of its core business means it has close links with the subject of financial education, i.e. the competent handling of money and financial matters, also known as "financial literacy". Although a wide range of activities are available, it is difficult to stimulate an interest in financial literacy.

RBI therefore endeavors to appeal to various age groups and integrate employees into corporate volunteering programs in order to reach everyone from schoolchildren and students to the wider public via a variety of channels, including gamification or apps. Across various projects, considerable effort goes into improving individuals' everyday lives through financial education and to laying the foundations for the responsible handling of money in the future.



#### Minecraft game "My Finance Quests" for schools

We believe that learning the fundamental principles of money, good financial habits and other important financial matters is one of the most crucial skills a teenager can acquire. However, in today's age of digitalization and gamification, new approaches and innovative methods are needed to equip young people with knowledge. With "Minecraft Education Edition", RBI AG has developed an interactive and attractive method to teach pupils important financial issues and terms relating to monetary life. The Minecraft game "My Finance Quests" combines valuable information relating to the topics of banking, saving, budgeting and online safety with age-appropriate entertainment. Each topic features its own level, with a respective storyline, unique game mechanics and engaging quests.

The game is designed for classroom use with pupils from ten to 15 years and can be played under the guidance of a teacher or a moderator.

RBI AG believes this initiative offers a better opportunity for pupils of learning complex issues in a unique and interactive way and thus improve their financial literacy. Initial feedback discussions with secondary school pupils in Austria and Slovakia have confirmed this belief.

As early as 2020, Tatra banka, a.s. developed a virtual reality (VR) app for iOS and Android smartphones in order to promote financial topics among Slovakian secondary school pupils. The basis was provided by numerous studies which showed that the country has a very low level of financial literacy, with very little success to date in improving the situation. Tatra banka therefore decided to follow the recommendations of the National Bank of Slovakia and focus on the topic of financial literacy for generation Z, as these individuals will have to make their first own financial decisions sooner or later.



© Dominika Koronovská

The virtual reality app facilitates a focused look at the subject, as the VR role play is played out from a first-person perspective. Virtual reality offers a high level of immersion that is unmatched by any other technology. The app uses a smartphone's display to enable a VR experience. Thus, the only thing needed is a smartphone, the Tatra banka app, and a "cardboard", a holder made of cardboard that serves as the virtual reality glasses. Where necessary, pupils can also use a non-VR version without the "cardboards". However, using a "VR cardboard" is beneficial as the pupils cannot then use their smartphones for other things and are thus more focused.

Ego, a popular Slovakian rapper, guides the pupils through the virtual educational journey. He combines the financial literacy experience with attractive activities (e.g. with a helicopter flight, a boat trip, a drive in a Ferrari or a rap session in a recording studio). This enables pupils to learn new things about finance in a simple and memorable way.

A minor update to the app content based on a new technology is planned for 2024, promising an even more immersive VR experience. We will also launch a new campaign in 2024 to reach out to more secondary schools.



© RBCZ

The financial literacy online education platform "Zlatka.In", a project by Raiffeisenbank a.s. in the Czech Republic, is run in collaboration with the charitable organization Matika.In. It meets the standards for financial literacy and is included in the national register for financial education projects – and can thus be officially used in school lessons. Since 2017, Raiffeisenbank a.s. has financed the development of the website, which is also available free of charge to pupils and teachers in English and Slovakian. As well as teaching financial literacy in a fun way, the website also promotes a humanistic mindset. Among other things, children learn how to handle money using virtual "zlatky" (gold coins), that they earn for solving tasks

and which they can choose to collect and donate, or spend on items. At the end of 2023, Raiffeisenbank converted the amount donated by the children into "real" money and supported the charitable organization "Spolu dětem" ("Together for Children") by donating a total of 200,000 "zlatky" as part of its annual charity event. Spolu dětem forwards the donated monies to children in care homes to enable them to participate in extracurricular activities such as sport, sing in a choir or attend pottery classes in their neighborhood.





© RBHU

colleagues gave their time as part of corporate volunteering, visiting schools throughout the country.

In 2023, "PÉNZ7", a Hungarian educational initiative managed by the Hungarian Banking Association to develop financial and entrepreneurial skills among pupils, was held for the ninth time. This time, the event focused on "Modern money management and digital security" as well as "Thinking and doing business". The program attracted a great deal of interest, with 145,000 pupils from more than 1,100 schools attending around 12,000 classroom hours and the participation of more than 500 volunteers from banks operating in Hungary. High-quality teaching and preparatory materials for the different age groups were provided online. Employees of the Hungarian Raiffeisen Bank Zrt. also participated in the initiative for the ninth time. 24



© Edin Đumišić

On World Savings Day, Raiffeisen BANK d.d. Bosna i Hercegovina welcomed over 2,000 children from more than 50 kindergartens and primary schools throughout Bosnia and Herzegovina to its branches and its head office. The young guests were told about the importance of saving and the key considerations. Employees talked to the young visitors about their work at the bank and showed them their workplaces.



© RBHR

In April 2023, Raiffeisenbank Austria d.d. in Croatia launched the campaign "Financial ABC: How to make ends meet". Despite the campaign's humorous note, it also highlighted the relevance of financial literacy. A book containing illustrations together with expert but simple explanations of banking products was developed to explain complex financial topics in a creative, authentic and understandable way. The illustrations were provided by the successful Croatian artist Tisja Kljaković Braić. She used her famous married couple "Oni" ("The Two of Them"), who are primarily known for their funny, everyday short dialogs. "The Two of Them" find themselves in 26 comical situations relating to finance, such as buying a new apartment or paying in installments.

In addition to the book, the official website contains a blog with specialist articles about financial terms and situations, compiled by the macroeconomist Vedrana Pribičević and the business psychologist Andrijana Mušura Gabor, as well as a quiz. In total, more than 14,000 books were downloaded (the average edition of a book in Croatia numbers between 300 and 1,000 copies). More than 16,000 people completed the quiz and around five million hits were generated via the social media drawing attention to the campaign.



© RBRO

spending a total of more than 105,240 hours on learning and application tasks relating to financial literacy. The financial literacy experience was supplemented through a number of classroom and online activities involving 31 corporate volunteers from Raiffeisen Bank.

For the sixth time, Raiffeisen Bank S.A. in Romania supported the program "I support financial literacy in my community", an initiative of Junior Achievement (JA) in Romania. In the 2022/23 school year, 29,560 pupils from more than 300 secondary schools and 140 municipalities completed the digital course "My Finances". This enabled them to acquire fundamental financial knowledge for responsible handling of money through saving, investments or the use of financial instruments. Using the platform JA Inspire™, the pupils obtained information and completed exercises and quizzes on budgeting, modern payment instruments and the capital market,



© RBBH

Some time ago, Raiffeisen BANK d.d. Bosna i Hercegovina realized that female company founders and managers need support to ensure continued business growth and to aid their financial literacy. This led the Raiffeisen bank to join the “Women in Adria” project. Its aims include networking and the mutual exchange of information among female entrepreneurs, irrespective of whether this involves the establishment and growth of a business or their personal professional development.

The project offers participation at conferences, networking breakfasts, and events to recognize the best female entrepreneurs. More than twenty such events were held throughout the country in 2023. At each event, experienced speakers shared their knowledge with the participants on specific topics, such as the key elements that are important for a profitable business, or strategies for cost optimization. (Raiffeisen BANK also offers benefits for female entrepreneurs who use its services see also page 150).

## Social initiatives

A large part of the donation projects carried out during the reporting period were social initiatives.

In addition to the philanthropic donations, 2022 saw the first use of a further opportunity to do good for others. Since then RBI Group headquarter donates sustainability premiums received to charitable causes. Certain ESG-linked financing offers one of the strongest incentives for borrowers to improve their sustainability performance in terms of environmental, social and governance aspects. Generally, the margin is linked either to the borrower’s ESG rating or to the fulfillment of agreed sustainability indicators. If the borrower’s ESG performance improves, the margin improves (sustainability discount), and vice versa (sustainability premium). The primary aim of such a mechanism is for the borrower to (over) achieve the defined ratings or key performance indicators and thus secure a positive ESG impact. At the same time, however, RBI does not wish to profit financially if borrowers do not achieve their ESG targets. RBI Group headquarter has itself therefore committed to donate all of its sustainability premiums resulting from its corporate customer loans. In 2023 the resulting premiums were donated to the Stepic CEE charity. RBI will continue this initiative in 2024 and will extend the applicability of the scheme to ESG-linked financing of institutional clients at the head office. Thus, a systematic approach to donations is adopted.

In addition, RBI has for many years sponsored and donated to projects initiated by the Stepic CEE charity association.



### Stepic CEE Charity – Powered by RBI Group



© Andrej-Anton Golnaz

Founded in 2006 by former RBI CEO Herbert Stepic, the Stepic CEE Charity supports children, young people and women in Central and Eastern Europe through educational activities. Thanks to its deep local roots, its pragmatic approach and the active support of the subsidiary banks in Central and Eastern Europe, the charity gives people the prospect of an independent life away from poverty. All of the charity’s projects are realized in cooperation with renowned local or international partner organizations and managed by voluntary employees of RBI in Vienna – as part of the corporate volunteering program since 2015 – and at its locations in Central and Eastern Europe. This serves to minimize administrative costs, with almost all of the financial contributions going directly to the projects. This was also the case in 2023: Over 90 per cent of donations were spent directly on projects. The Compliance Committee of the CEE Charity monitors both incoming and also outgoing transactions and ensures that potential conflicts of interest are identified and immediately resolved.

Even though support is tailored to the needs of the beneficiaries, care is always taken to ensure that education is the key to a financially independent life. The CEE charity provides children with a sheltered home in a family-like environment, implements educational projects for street children and builds the basis for self-reliance of young people by providing access to educational and vocational training. It also supports numerous young people from low-income communities by giving them the opportunity to learn, earn money and continue to develop. The charity thus contributes to long-term change in Central and Eastern Europe. After all, the only way to make inequality a thing of the past is for society to enable education for all. This principle is reflected in the United Nations Sustainable Development Goals (SDGs). Together with RBI, the CEE Charity implements the SDG goals in practice – in particular the goals concerning No Poverty (SDG 1), Quality Education (SDG 4), and Reducing Inequalities (SDG 10).

The three countries where the most projects were supported in 2023 were Ukraine, Serbia, and Romania. 2023 was once again dominated by aid for Ukraine. As well as continuing its collaboration with longstanding local and international project partners, the CEE Charity also supported other organizations. Aid was in particular provided to women and children in Odessa, Uzhgorod, Moldavia and Slovakia. Among other things, the children were provided with educational materials, were able to participate in summer camps, and received psychosocial support. The women also received psychosocial support and were, for example, able to participate in vocational retraining programs. The CEE Charity also focused on three new projects in Kosovo, in Romania and in Serbia.

**Stepic CEE Charity – Total number of beneficiaries in 2023**

Albania	218
Bosnia and Herzegovina	840
Bulgaria	104
Croatia	15
Hungary	15
Kosovo	1,130
Romania	1,388
Serbia	859
Slovakia	930
Republic of Moldova	80
Ukraine	4,533
<b>Total</b>	<b>10,112</b>



© RBSK

In 2023, employees of Raiffeisen Bausparkasse Gesellschaft m.b.H. enjoyed participating in the first corporate volunteering day. In mid-April, 20 employees of Raiffeisen Bausparkasse, including management, helped at the "Am Himmel" day care center run by Caritas on the outskirts of Vienna. Each day, the center cares for around 25 people with mental and/or physical disabilities. The day center is surrounded by fields, forest and meadows and is ideally suited for garden and agricultural projects. It is also a wonderful place of work for the clients. They do everything from setting plants, harvesting fruit and flowers and cultivating the meadows and fields to maintaining the fences. Through this work, the clients learn about plants and nature while at the same time receiving the support they need from professional carers. During the corporate volunteering day, the Raiffeisen Bausparkasse employees helped to preserve fruit and carry out urgent work in the on-site wood workshop.





© RBSK

From 27 November to 31 December, 2023, Raiffeisen Bausparkasse again supported the Kindertraum Foundation with each building savings contract concluded. The charitable private foundation was founded in 1998 and gives children with serious illnesses or disabilities renewed courage and hope. To date, the dreams of around 3,900 children have been fulfilled over a period of more than two decades.

Thanks to the numerous building savings contracts concluded, the proceeds donated totaled € 50,000. This will enable children with serious illnesses or disabilities to see their dreams fulfilled. These range from special therapies or farm holidays through to training materials, sports equipment or an assistance dog.



© Andreas Scheiblecker

Lichtblickhof is a place for children with serious and life-limiting illnesses, disabilities or traumatic experiences. The team at Lichtblickhof and the specially trained therapy animals provide support for children and their families. Regardless of diagnoses and forecasts, they are able to experience moments of joy and lightness, and gather strength for the challenges that still lie ahead.

Raiffeisen Capital Management has been collaborating with Lichtblickhof since 2019, and employees can also contribute by participating in corporate volunteering. In 2023, an event was organized for the first time at the

Lichtblickhof Wald site near Böheimkirchen in Lower Austria. Around 30 employees, including Managing Director Dieter Aigner, gave their help for two days, cutting trees, trimming hedges, erecting fencing, filling in walls and painting the old house and building a horse shelter.



© Valida

The Luise house for mothers and children operated by Caritas of the Archdiocese of Vienna offers shelter to mothers who do not have their own accommodation and who need support. A total of 20 residential units are available to accommodate 20 adults and around 50 children.

The volunteers participating in Valida Vorsorge Management's "Social Team Day" in April 2023 included Management Board members, who joined divisional head Sabine Koszteczy, in painting the house's pram and pushchair room.



© Kathrein

With high prices prevailing in Austria and the resulting huge increase in demand for food currently outstripping the supply on social markets, Kathrein Privatbank AG supported the "Samariterwagerl" fundraising campaign of the Vienna Samaritan Association for the first time in 2023. In response to the campaign motto "Buy one, give one", employees filled the shopping trolley provided on the company's premises with non-perishable foodstuffs such as rice, pasta, flour, oil, tinned foods and hygiene products. Donations from employees and from Kathrein Privatbank enabled two shopping trolleys to be filled with a variety of foodstuffs and other donations in kind. These were collected by the Vienna Samaritan Association

and given to social markets and homeless centers to help people living on the breadline.



© Kathrein

Kathrein Privatbank AG invited guests to attend its eighth traditional charity golf tournament in aid of children with Down's Syndrome. The 3x21 support center provides specialist pedagogical support for children with Down's Syndrome aged one year and older, helping them to acquire basic skills in various areas such as visual and audio perception (colors, shapes and noises) and also in counting or early reading. More than 100 golfers contributed to the net proceeds of € 21,700 to help toward the costs of running the support center and further expanding its services.



© RBBH

Since 2012, Raiffeisen BANK d.d. Bosna i Hercegovina has donated money in lieu of buying and sending greeting cards for religious holidays and New Year in order to support organizations which help children and disabled people.



In 2023, Raiffeisen BANK again supported eight organizations that work with children and people with special needs by donating a total sum of around € 37,800. This money benefited the associations "Leptir" "ADA" and "Osmijeh nade".



© David Jovnas

In the town of Stara Pazova, Raiffeisen banka a.d. in Serbia donated money for the renovation and redesign of the green spaces surrounding three secondary schools in the town attended by a total of 1,500 pupils. The works, which were completed in June 2023, included painting, the erection of a protective fence, the installation of tables and benches, and the planting of grass and trees.

### Cultural initiatives

Commitment in the field of art is diverse and focused on different art forms as well as on national and international projects in order to promote widespread interest in art. It also focuses on the local art and culture communities.



© H. Smejkalova

Raiffeisenbank a.s. in the Czech Republic has been a partner of the National Theater for many years. The cooperation is based on the common values shared by the National Theater and the Raiffeisen brand. Each year, up to 1,100 performances take place on the theater's stage, watched by more than 650,000 people. These figures show that the topic of culture in society remains relevant and should be supported. In October 2023, Raiffeisenbank extended the partnership until the end of the 2025/2026 theater season, thus supporting all ensembles performing under the National Theater brand.





© RBKO

Raiffeisen Bank Kosovo J.S.C. supported the Pristina International Film Festival ("PriFest") for the fifteenth time in succession. This festival serves as a gathering place for everyone involved in the film industry, allowing them to develop ideas, explore new possibilities and advertise their services. In 2023, the festival opened with the premiere of the film "The Land Within", bringing together film producers and fans from many countries in Kosovo's capital city Pristina. The festival offered a diverse film program as well as workshops, discussion forums and nights filled with music.

## Sports initiatives

For RBI, sports are not only part of a brand's self-image. For many decades it has also promoted sportspeople – from upcoming talent to sports stars – through donations and sponsorship. Regular movement plays a key role in maintaining good health and also supports mental balance among individuals. In competitive sport, ambition, professionalism and team spirit are essential prerequisites for achieving great things. The selected sponsorship partners embody precisely these attributes.



© Joka Gemesi/MLS Raiffeisen 5050

Raiffeisen Bank Zrt. in Hungary continued its strategic partnerships in sailing sport as this offers a good opportunity to increase market awareness and to combine company values such as tradition, innovation, fair competition and sustainability. At the same time, the bank endeavors to encourage people to live a healthy and active life, and to appreciate and protect nature.

## Environmental initiatives

RBI has the goal of minimizing the negative environmental impact of its business activities and at its sites. It works continuously to improve the main environmental parameters in the relevant areas. As an engaged citizen, it also seeks to contribute not only through its memberships, but also by actively supporting a wide range of environmental protection projects – including with the help of its employees – and by engaging in recovery efforts following natural disasters.



© RBHR

For the fifth year in succession, Raiffeisenbank Austria d.d. in Croatia provided around € 8,300 in sponsorship to the largest reforestation campaign following the forest fires of 2018 that devastated large parts of Dalmatia. The "Boranka" initiative is organized by the Scout Association of Croatia in cooperation with "Croatian Forests" and the Croatian Mountain Rescue Service. Thousands of hectares of destroyed forests are being repopulated by volunteers with the assistance of sponsors. More than 11,000 people have taken part in the campaign in recent years, with more than 115,000 new trees being planted as seedlings, saplings and acorns. In 2023, employees of Raiffeisenbank Austria were part of a team of around 100

volunteers who planted various saplings.

The project "CO2MPENSATING BY PLANTING" is a non-profit program aimed at companies, organizations and everyone who wants to minimize or totally eliminate their carbon footprint by planting trees and set a positive example for environmental protection and the good of society. As the main organizer of the program, HEARTH thinking&doing has set itself the aim, with the Scout Association of Croatia and "Croatian Forests", of organizing continuous reforestation, regenerating and expanding the fund for the maintenance of the forest, and raising awareness of the importance of forests and the impact of climate change among the population in general and young people in particular. This program, which was launched in November 2021, is intended to provide additional support for the "Boranka" project. The amount

of CO<sub>2</sub> emitted by Raiffeisenbank that it wishes to offset is converted into the number of tree saplings that will be planted throughout Croatia. As a result of its participation in the program, Raiffeisenbank was awarded the CO<sub>2</sub>COMPENSATING BY PLANTING label. In 2023, Raiffeisenbank provided support in the form of around € 18,300 and compensated for around 100 tons of CO<sub>2</sub> with 4,000 saplings. Raiffeisenbank Austria d.d. plans to offset its entire Scope 1 emissions within five years.



© Sandra Biscic

In collaboration with the Ministry of Environmental Protection of the Republic of Serbia and the Association of Serbian Banks, Raiffeisen banka a.d. participated in a project to preserve nature conservation areas within the country and financed the installation of solar panels in the "Zasavica" nature conservation area. The bank donated around € 25,600 for the installation of solar panels on the land. The solar energy generated by the solar panels is now being used to operate the visitor center. The project aims to reduce the consumption of coal-fired electricity and facilitate energy production in accordance with sustainable and ecological standards.



## Sustainable entrepreneurship and sustainable innovations

GRI G4-DMA (former FS5)

### Commitment to sustainable framework conditions

We maintain a culture of open dialog with a focus on the future issues of a sustainable financial sector. In doing so, RBI takes a stance against corruption and economic crime. It also seeks out active dialog with politics and public administration.

RBI also shares specific types of knowledge and experiences with others outside the Group in order to implement innovative ideas for charting a path into the sustainable future of the financial sector and our companies alike.

Since the pandemic, much of the information exchange in the public debate has taken place online. Companies are increasingly encouraged to speak out in their role as corporate citizens on issues of importance to society. With its "Banking made for CEE" platform, RBI aims to contribute to the public debate with ideas, beliefs, facts and figures and discuss the impact of its business on society. At the same time, it attempts to show how banking contributes to prosperity, sustainability and European integration in the RBI Group's home market – Central and Eastern Europe. In this context, the topics of anti-money laundering, digitalization and the EU Neighborhood Policy are in the foreground. We call our overall approach corporate advocacy. And this is not just about what we expect others to do for us. Being open to dialog also means learning from people with different perceptions and beliefs.

Find more at: [www.banking-madeforcee.com/en/home.html](http://www.banking-madeforcee.com/en/home.html)

A further component of our commitment is collaboration with governmental and non-governmental organizations.

We stand for the promotion of sustainable thinking and action. We are strengthening the drive for sustainable development in our own sphere of influence by lobbying (details can be found starting on page 54) and signing up to the Principles for Responsible Banking (starting on page 47) where topics such as sustainability and safeguarding the future are concerned.



© RBCZ

Raiffeisenbank a.s. in the Czech Republic was a partner of the largest ESG conference in the CEE region, the 2023 CEE Sustainable Finance Summit, organized by ISFC. The ISFC (International Sustainable Finance Centre) is an independent nonprofit think tank specializing in sustainable finance. The center focuses on improving local interest groups' knowledge of sustainability issues through research, publications, capacity building and networking meetings. Employees of Raiffeisenbank participated on the panel on the topic of "Financing the Transition", where they gave their opinions on the macroeconomic situation and the current challenges within the European market and in the CEE region. Another panel in which Raiffeisenbank employees

took part in was entitled „The European Banking System“ and dealt with topics such as price stability and long-term sustainable growth in the EU.



© RBHR

Raiffeisenbank Austria d.d. in Croatia sponsored the Greencajt Festival, the largest regional sustainability festival for the general public and commercial enterprises. It brought together numerous national and international experts, who shared their experiences and successful practices in speeches and podium discussions. They also offered their own visions for overcoming the current and future challenges facing our society. The festival aimed to show that the global challenges caused by the climate crisis must be tackled not only at international level but also at local level.

To us, sustainable entrepreneurship means an awareness of responsibilities on the one hand, and on the other support for sustainable innovations among our customers (details can be found starting on page 65 f.) and in society:

- We promote this awareness among our customers. We provide information and give advice on which opportunities companies can embrace in order to become economically successful and to make their contribution to protecting the environment and taking social responsibility.
- We promote companies and organizations that act in a sustainable manner. This takes the form of partnerships and events, among other things.
- We encourage long-term success, competitiveness, and innovative strength in companies, which in turn boosts the regional economy.



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In the age of digital technologies, Raiffeisen BANK d.d. Bosna i Hercegovina supports numerous investments in information technologies and their use in the banking sector. Against this backdrop, in 2023 the bank supported the "FIT Coding Challenge" (FITCC), a programming competition organized by the Faculty for Information Technologies of University Džemal Bijedić in Mostar. The FITCC was established in 2008 to give students the opportunity to demonstrate their programming knowledge in a competition. In 2023 the competition offered participation in four categories: Programming, Game Programming, Innovations and Cyber Olympics. In addition to financial support, IT experts from the bank passed on their experiences to the young participants.





© RBRO

Raiffeisen Bank S.A. in Romania is a founder member of the "Leaders Experience" program, which was held for the ninth time. It is designed as a six-month accelerator program that aims to impart key leadership skills.

25 young people with proven leadership potential (final year students, university graduates, "young talents" or young entrepreneurs in the initial phases of their project) and an average age of 26 were selected. The participants came from throughout Romania and had already gained experience in

NGOs or in business sectors such as technology, corporate client business and the automotive industry. In addition to coaching modules, bootcamps and a 24-hour challenge (in which the participants were given the task of renovating a classroom at a school in Gârcini/Săcele), the program also included community projects completed in teams.

As well as supporting four participants from the NGO sector with grants, the Raiffeisen bank also provided support by supplying three volunteers, who acted as mentors and led the teams in implementing their projects in the field of "commitment within the community".

As part of the "Leaders for Heroes" project, in the last two months of the program, the participants collected donations for Ajungem MARI, an organization supporting children living in children's homes. They also organized a charity event with classical music. At the "School of Sustainability", they taught pupils at a school in the municipality of Săvinești/Piatra Neamt about sustainable development and renewable energies, and endeavored to organize funds for the purchase of photovoltaic systems. The third team worked in collaboration with "Caravana cu Medici" (Caravan with Doctors) to offer "Three Minutes for Life" first-aid courses, and collected donations to enable the installation of defibrillators in Rosia.



© RBUA

"Common Help UA" is a charity project for Ukrainian people with interesting business ideas or company founders. The project provides internally displaced entrepreneurs with cash grants, legal and accountancy advice, or enables them to found their companies or develop a corresponding strategy. The project is implemented by Raiffeisen Bank JSC in collaboration with Astarta-Kyiv Agricultural Holding and the charity foundation "Believe in Yourself". The bank provided around € 377,780 to support small businesses in municipalities that accept internally displaced persons (for example in the

administrative districts of Poltava, Vinnytsia and Khmelnytski).

The competition for grants of small sums (each amounting between around € 760 and € 2,010) that was organized as part of the project attracted 203 applications for the categories microenterprises and self-employment, of which 25 applicants received support in the form of business equipment. Three workshops in Hradyzka, Globinska and Bilytska for the production of tinned food and aid packages containing tinned food were financed to assist around 3,670 families and internally displaced individuals. The project created a total of 55 jobs.



# > Metrics and ambitions

GRI 201-1 RBI supports projects in the communities in which it is active as a bank. These are diverse and have different focal points depending on the respective countries. RBI's investments in the community in 2023 totaled around € 10.5 million\*.

The table below shows the investments in the community over the last three years:

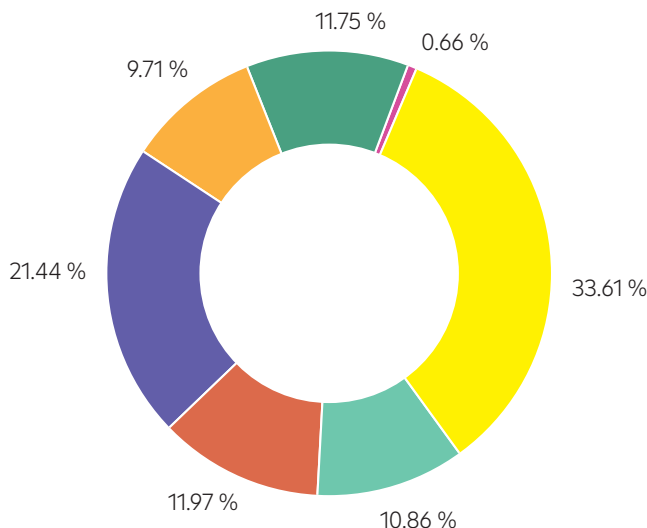
Key indicator (in €)	2023*	2022	2021
Investments in the community	10,519,908	12,678,700	3,797,900

Investments in the community include monetary donations as well as donations in kind or direct costs for social programs.

GRI G4-DMA (former FS16)

A look at the monetary donations by topic by RBI in 2023 shows the following breakdown:

Purely monetary donations by RBI in 2023*		
	in €	in %
(Financial) Education	3,474,032	33.61
Art and culture	1,122,667	10.86
Other	1,237,038	11.97
Social	2,216,508	21.44
Sports and health	1,003,796	9.71
Environmental protection	1,214,145	11.75
Science and research	68,604	0.66



\* In some subsidiaries in Central and Eastern Europe it is usual that part of the taxes can be paid in the form of donations. According to the new legislation (OPANAF 1679/2022) in Romania, companies registered in Romania that didn't use the full tax credit for donations contracts with NGOs in 2022 were eligible to redirect via the National Agency of Fiscal Administration (ANAF) the full amount of tax credit. Therefore, the amount includes an increase of donations from Raiffeisen Bank S.A., Romania.

Numerous measures are also planned for 2024. The Brighter Future Initiative will focus on bundling these measures.

## Sustainability program

SDG	PRB	Objective	Measure
<b>Engaged citizen – primary objectives: Addressing social issues, strengthening democracy, and climate protection measures</b>			
	1; 5	Presenting our understanding of democratic and social rights including the human rights impacts of climate change	Development and publication of a Group human rights policy
	1; 2; 4	Making our social impact visible	Brighter Future Initiative
	3	Strengthening digital literacy in Austria	Prominent companies including RBI are supporting the "fit4internet" association, which for 2024 has again committed to further advancing the proficient use of digital technologies and the broad participation of the whole of society in the digitalization process.
	3; 4	Financial literacy	Prioritization of financial literacy measures for children and young people with the aid of new technologies (e.g. Minecraft, TikTok)
	4	Fostering the relevant progress in society – in civic, economic, academic, and cultural life – and supporting initiatives relating to social causes	Focused use of donation and membership resources in order to satisfy the objective
	4	Strengthening cyber security	Support of the association "Kuratorium Sicheres Österreich"
	4	Fostering international exchange and understanding with a particular focus on the European Union in general and CEE in particular	Focusing of support funding in EU and CEE in cooperation with the subsidiary banks, e.g. support of and participation in the European Movement International (EMI), the Open Medical Institute (OMI) program and the European Forum Alpbach
	4	Strengthening of democracy	The "Banking made for CEE" website, which provides stakeholders with well-founded empirical data and facts on financial service activities in CEE as the basis for shaping political opinion
	4	Steering and management of the corporate volunteering program of RBI AG (migration/integration in Austria, Stepic CEE Charity, education/biodiversity)	Year-round continuation of engagement opportunities, combining teambuilding events with corporate volunteering campaigns; collaboration with other cooperation partners
	4	Intensifying cooperation with NGOs and scientific organizations	Cross-industry cooperation, particularly with NGOs and universities
	4	Innovative education	Focus on financial literacy for children and young people
	4	Involvement in various projects for the protection of the environment	Examples include promoting awareness, the rental of bicycles (e.g. I'Velo Relax & Urban in Romania), reforestation campaigns and memberships

SDGs

No poverty	Zero hunger	Good health and well-being	High quality education	Gender Equality	Clean water and sanitation	Affordable and clean energy
Decent Work and Economic Growth	Industry, innovation and infrastructure	Reduced inequalities	Sustainable cities and communities	Responsible consumption and production	Climate action	Life below water
Life on land	Peace, justice and strong institutions	Partnerships for the goals				



## **Sustainability documented and audited**

for transparency and clarity

# Mandatory and voluntary disclosure requirements

## ➤ Regulatory disclosure requirement in accordance with Article 8 of the EU Taxonomy Regulation

The EU Taxonomy Regulation<sup>1</sup> sets out an EU-wide framework that allows investors and undertakings to determine whether certain economic activities are environmentally sustainable. Article 8 of the Regulation requires undertakings covered by the Non-Financial Reporting Directive (NFRD)<sup>2</sup> to publish information on how and to what extent their economic activities qualify as environmentally sustainable under the Taxonomy Regulation.

RBI Group too is thus required to disclose the Taxonomy eligibility and Taxonomy alignment of its economic activities for the 2023 financial year.

The Green Asset Ratio (GAR) is the benchmark and reporting metric for Taxonomy alignment. It describes the share of the bank's already „green“ Taxonomy-aligned business relative to the covered assets. However, the Green Asset Ratio has limited informative value. Loans to smaller companies and international non-EU business, for instance, are not included, which can distort the picture enormously depending on a banking group's key activities. Furthermore, the Green Asset Ratio does not reflect the fact that RBI focuses on the economic ESG transformation of our customers. We currently support in particular undertakings that are already on the path to sustainability but whose transactions are not yet completely "green" within the definitions of the EU Taxonomy Regulation.

### I. Mandatory disclosure

RBI discloses all relevant reporting indicators (KPIs) in accordance with article 8 and article 10 of the Delegated Regulation<sup>3</sup> supplementing the EU Taxonomy Regulation. For additional information and improved clarity, the disclosure of these quantitative KPIs is supplemented by qualitative information pursuant to Annex XI to the Delegated Regulation. For the first time, RBI also discloses for the 2023 financial year information about the Taxonomy alignment with regard to the first two environmental objectives – "climate change mitigation" and "climate change adaptation" – as well as on the Taxonomy eligibility of the remaining four environmental objectives.

An overview of the relevant key figures and templates to be reported in accordance with article 8 of the EU Taxonomy Regulation and the supplementary Delegated Regulation for the 2023 financial year, is available in the Annex starting on page 225. Following the figures on the main KPI Green Asset Ratio (GAR) Stock and the additional KPI GAR Flow are shown.

<sup>1</sup> Regulation (EU) 2020/852

<sup>2</sup> NFRD = Non-Financial Reporting Directive 2014/95/EU, Corporate Sustainability Directive (CSRD) (EU) 2022/2464.

<sup>3</sup> Delegated Regulation (EU) 2021/2178 nd supplementary (EU) 2023/2486.

## Results for Green Asset Ratio stock and flow

		Turnover GAR KPI	CAPEX GAR KPI
Main-KPI	Green Asset Ratio (GAR) Stock	0.42 %	0.71 %
Additional-KPI	Green Asset Ratio (GAR) Flow	0.43 %	0.78 %

## II. Details about templates and covered exposures as well as information on data sources and current data limitations

In accordance with the legal requirements, the denominator of all quantitative indicators is expressed by the covered assets<sup>4</sup>. This results in a difference compared to last year's reporting, in which the published indicators were based on the RBI Group's total on-balance sheet assets (total assets<sup>5</sup>) in the denominator and not on the covered assets.

In addition, all EU Taxonomy Regulation KPIs are determined in accordance with the legal requirements of the Delegated Regulation for the 2023 financial year, as well as on turnover-based (turnover) and capital expenditure based (CAPEX) information on the client. The economic activities for the first two environmental objectives – "climate change mitigation" and "climate change adaptation" – were also assessed for Taxonomy alignment for the first time in the 2023 financial year.

Furthermore, Taxonomy eligibility information on the four new environmental objectives – "sustainable use and protection of water and marine resources", "transition to a circular economy", "pollution prevention and control" and "protection and restoration of biodiversity and ecosystems" – as well as information on financed nuclear and gas economic activities were reported for the 2023 financial year.

Detailed information of the calculations as per the qualitative disclosures required by Annex XI of the Delegated Regulation can be found separately for each KPI below.

### RBI's approach for determining Taxonomy-eligible and Taxonomy-aligned economic activities, assets and economic sectors<sup>6</sup>

RBI's banking book is used to determine its Taxonomy-eligible and Taxonomy-aligned economic activities. Total covered assets are identified as per requirements of the full Green Asset Ratio disclosure. Exposures towards central banks, supranational institutions, the central government and assets held for trading are excluded. The remaining covered assets form the denominator in the formula for calculating the Green Asset Ratio (GAR).<sup>7</sup>

All the Taxonomy-eligible and Taxonomy-aligned economic activities are included in the numerator for calculating the GAR. They are defined as covered assets additionally belonging to one of the following categories:

- Taxonomy-eligible and Taxonomy-aligned economic activities of NFRD undertakings
- Taxonomy-eligible and Taxonomy-aligned economic activities in retail banking
- Taxonomy-eligible and Taxonomy-aligned economic activities related to local and regional government financing
- Real estate collaterals obtained by taking possession in exchange for the cancelation of the debt and held for sale

In addition to the exposures and assets already excluded from the denominator, derivatives (not held for trading), on-demand interbank loans, cash and cash-related assets and other assets (e.g. goodwill, commodities) are also excluded from the numerator. Further, no exposures to non-EU or to small and medium-sized enterprises may be taken into

<sup>4</sup> In the case of covered assets, exposures to central banks, supranational institutions, the central government and assets held for trading are excluded from RBI Group's total on-balance sheet assets.

<sup>5</sup> The total assets relate here to the total gross assets (excluding cumulative expenditure for debt instruments measured at fair value through profit or loss, and value adjustments from debt instruments measured at amortized cost).

<sup>6</sup> Template 0-2

<sup>7</sup> For retail banking, only the relevant mortgage portfolio as well as home renovation loans and auto financings are included in the denominator.

consideration at present. If the purpose is known at transaction level and is consistent with the defined activities of the EU Taxonomy Regulation or the supplementary Delegated Regulation – for example, a property loan (acquisition and ownership of a building) –, RBI takes into account exposures to the extent that Taxonomy eligibility and Taxonomy alignment can be demonstrated for the underlying transaction.

For transactions conducted for general purposes – for example, for granting a working capital facility– RBI takes into account the relevant Taxonomy KPIs for Taxonomy eligibility and Taxonomy alignment that are provided or disclosed by the counterparties. If exposures can be attributed to more than one environmental objective, the transaction or a percentage thereof is assigned to the most relevant Taxonomy environmental objective only, in order to avoid a double entry.

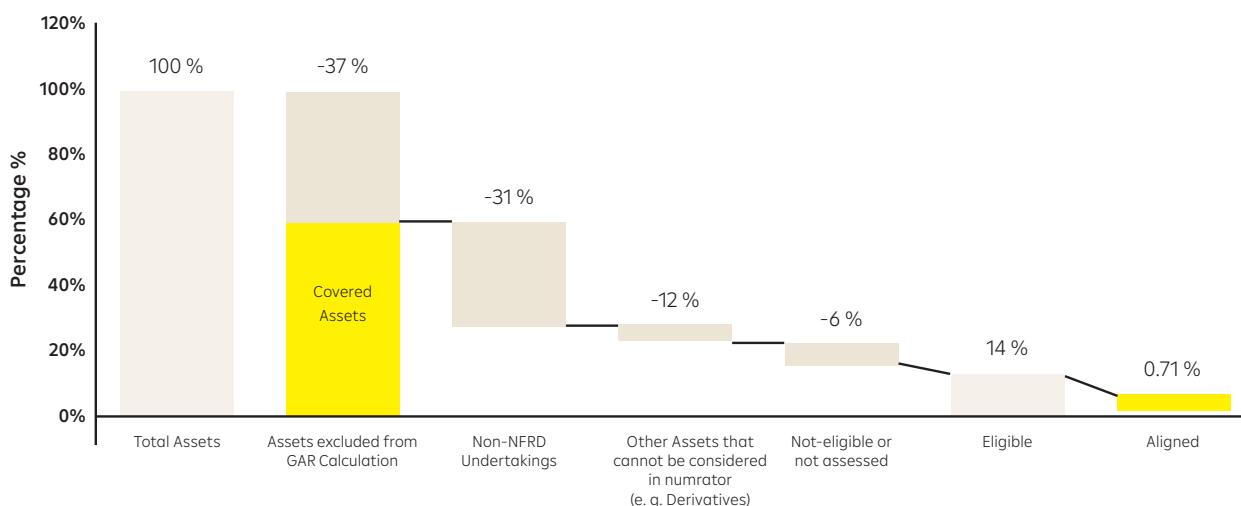
The relevant Taxonomy KPIs for general purpose transactions with regard to investment (CAPEX) and turnover key figures for non-financial counterparties as well as the Taxonomy-specific KPIs of the financial counterparties were collected internally as part of the data collection project (see page 79) and by an external data provider.

Given that financial counterparties do not publish their Taxonomy-aligned information for the 2023 financial year until 2024, these cannot be included for this year's disclosure. A similar limitation can be observed for the Taxonomy eligibility in relation to the four new environmental objectives<sup>8</sup>, because financial and non-financial counterparties only have to disclose official information on Taxonomy eligibility as of 2024 (for the 2023 financial year).

The share of RBI's exposures to non-NFRD undertakings for the 2023 financial year is material, especially considering the proportion of RBI Group activities in non-EU countries. The gradual implementation of the CSRD is expected to improve the KPIs, as it will significantly increase the number of enterprises to be considered too<sup>9</sup>.

Due to still limited structured data availability and the limitations described previously, RBI's entire relevant portfolio could not be considered fully for the GAR assessment. However, the data situation has improved considerably since last year. Further, it is expected that the share of Taxonomy-eligible and Taxonomy-aligned exposures will change accordingly and increase in the future, as more information will be disclosed by customers.

## Derivation of Taxonomy-eligible and Taxonomy-aligned economic activities<sup>10</sup>



The percentage figures in the chart above refer to the share of the respective position in relation to RBI's total assets. For the calculation of the Taxonomy-aligned value (yellow), that is, the green asset ratio (GAR), the number in the qualitative chart refers to covered assets (denominator), not total assets.

<sup>8</sup> "Sustainable use and protection of water and marine resources", "transition to a circular economy", "pollution prevention and control" and "protection and restoration of biodiversity and ecosystems"

<sup>9</sup> In addition, trading book positions, derivatives (not held for trading), on-demand interbank loans, cash and cash-related assets and other assets (e.g. goodwill, commodities) are also excluded from the numerator, but are included in the calculation in the denominator of the Green Asset Ratio.

<sup>10</sup> This chart refers to the disclosure of the Taxonomy-eligible (all six environmental objectives) and Taxonomy-aligned ("climate change mitigation" and "climate change adaptation") economic activities on CAPEX-based indicators.

## Exposures to Taxonomy-aligned economic activities for the “climate change mitigation” and “climate change adaptation” environmental objectives (GAR (stock))<sup>11</sup>

RBI Group's assets with exposures to Taxonomy-aligned economic activities amount to € 893 million (GAR numerator CAPEX). In accordance with the instructions set out in Annex V of the Delegated Regulation, the exposures to be included in the numerator encompass banking book loans and advances to NFRD-relevant clients, households (limited to loans collateralized by residential real estate and loans granted for home renovation purposes), and loans and advances to local governments.

All retail exposures relevant to the EU Taxonomy were analyzed under the understanding until now of the EU Taxonomy objective “climate change mitigation” and included in the CAPEX as well as in the turnover GAR. With regard to compliance with minimum social safeguards (MS), the interpretation of the Platform on Sustainable Finance<sup>12</sup> was followed, which does not provide the application of the MS criteria for retail exposures. The total taxonomy aligned exposure considered under this approach amounts to EUR 158 mio and corresponds to a contribution to the Green Asset Ratio of 0,13 percentage points.

It is assumed that retail customers for auto loans will not be able to provide the necessary information at present, given the detailed and high demands. Such financing is therefore generally recognized as “Taxonomy non-aligned”. For the 2023 financial year, RBI has started to analyze retail exposures in detail, particularly house purchase and home renovation loans. A study was conducted for the most relevant countries in the portfolio with the help of an external provider. Besides identifying thresholds for Nearly Zero Energy Buildings (NZEB) and renovations (e.g. primary energy demand), the focus was also on the analysis of the 15 per cent approach<sup>13</sup> for economic activity 7.7 (acquisition and ownership of buildings). In line with the December 2023 FAQs, no estimates (e.g. year of construction) were included in the calculation when applying the 15 per cent approach for mandatory disclosure. Real data based on energy performance certificates (e.g. primary energy demand) were used instead.

The physical risk assessment for the retail segment was also carried out with the help of an external provider. A physical risk assessment, including a vulnerability analysis, was carried out for the relevant financed properties both within and outside the EU<sup>14</sup>. The physical risk assessment will not be passed if the seriousness of a threat<sup>15</sup> is considered very high and no corresponding risk mitigation measures were taken.

By reference to internally available data, RBI Group's NFRD client base was determined according to the following criteria:

- a) the country in which the counterparty is registered must be an EU country.
- b) the business partner's total assets (on consolidated basis) must be more than or equal to € 20 million or its total revenue (turnover) must be more than or equal to € 40 million. For insurance and reinsurance undertakings, the gross premiums written are used instead of revenue and the gross operating result for the other financial institutions.
- c) the customer is either a capital-market oriented company, a credit institution or an insurance undertaking.
- d) the customer has more than 500 employees on an average basis (on consolidated basis).

According to the Draft Commission Notice from 21 December 2023 we also consider subsidiaries that are fully consolidated under NFRD customers and do not publish/provide Taxonomy KPIs on a stand-alone basis in a sustainability report.

<sup>11</sup> Template 3

<sup>12</sup> [finance.ec.europa.eu/system/files/2022-10/221011-sustainable-finance-platform-finance-report-minimum-safeguards\\_en.pdf](https://finance.ec.europa.eu/system/files/2022-10/221011-sustainable-finance-platform-finance-report-minimum-safeguards_en.pdf)

<sup>13</sup> The EU Taxonomy FAQs refer to the opportunity of carrying out a technical study to estimate the relevant thresholds. As the 15 per cent approach is not yet official, a technical study was commissioned to estimate the relevant thresholds. The mandatory report only included information based on transparent real data, e.g. primary demand, so that no estimates (e.g. year of construction) were included. Estimates, for example, based on the year of construction, were only included in the voluntary report.

<sup>14</sup> In accordance with the regulatory requirements of Annex A of the EU Taxonomy Regulation and the supplementary Delegated Regulations.

<sup>15</sup> In the analysis, acute and chronic risks were examined for all relevant hazards in accordance with Annex A. In consultation with the responsible auditor, an Intergovernmental Panel on Climate Change (IPCC) representative scenario (RCP6.0 scenario) was used as the relevant scenario.



Using a new internal approach and with the support of an external data provider, RBI was able to improve the previous data quality with regard to the identification of NFRD undertakings for the 2023 financial year. According to the interpretation in the frequently asked questions (FAQs)<sup>16</sup> published by the European Commission in December 2021, the disclosure of Taxonomy-eligible and Taxonomy-aligned exposures must be based on actual information provided by the financial or non-financial undertaking. In addition, third party data providers were used to obtain information for the assessment of Taxonomy-eligible and Taxonomy-aligned economic activities.

## Exposures to Taxonomy-aligned economic activities/covered assets for the "climate change mitigation" and "climate change adaptation" environmental objectives (GAR (flows))<sup>17</sup>

The KPI "GAR KPI flow", which is to be reported for the first time for the 2023 financial year, is calculated in line with "GAR KPI stock". However, unlike „GAR KPI stock“, it only takes into account those positions that were newly concluded in the 2023 financial year.

## Off-balance-sheet exposures to Taxonomy-aligned economic activities/covered assets for the "climate change mitigation" and "climate change adaptation" environmental objectives<sup>18</sup>

In 2023, RBI started to examine the assessment of economic activities for purpose known and purpose unknown exposures for its off-balance-sheet exposure for the first two „climate change mitigation“ and „climate change adaptation“ Taxonomy environmental objectives. In the case of the off-balance-sheet exposure Taxonomy disclosure, a distinction is made between financial guarantees and assets under management.

The methodology for calculating the KPI for financial guarantees corresponds to the methodology laid down for loans and credit, and for bonds. However, it is applied to the underlying loans and credit/bonds of the financial guarantees. If RBI has no data on the specific purpose of the underlying transaction, the counterparties' KPIs are used. For the earmarked exposures, the counterparties' taxonomy data were collected internally as part of the data collection project (see page 79) and by an external data provider.

The KPI for assets under management is calculated in line with the methodology determined for asset managers. The numerator comprises the weighted average value of the investments in the Taxonomy-aligned economic activities of the enterprises in which investments are made. Reference is made here to the Taxonomy information on the Taxonomy eligibility and Taxonomy alignment of the respective counterparties (financial and non-financial NFRD undertakings) and the corresponding KPIs are used. For the earmarked exposures, data were also collected internally as part of the data collection project and by an external data provider. Due to the limited structured availability of ESG data for the assets under management, the KPIs for assets under management are reported at zero for the 2023 financial year. We are committed to continuously improving our own processes and the topic of ESG data availability and quality as part of a constructive dialog with the relevant stakeholders. In alignment with our auditor "GAR KPI financial guarantees flow" and "GAR KPI assets under management flow" are not reported.

## Exposures to Taxonomy-eligible economic activities/covered assets for the four new<sup>19</sup> environmental objectives<sup>20</sup>

At present, only earmarked exposures can be included for the Taxonomy eligibility, as financial and non-financial undertakings (NFRD) currently disclose no official Taxonomy-eligible information on the four new environmental objectives. This will start as of 2024. The disclosed Taxonomy KPIs of the financial and non-financial undertakings (NFRD) can therefore not be included until next year. Due to the limited availability of structured data for the four new

<sup>16</sup> [ec.europa.eu/sustainable-finance-taxonomy/faq](https://ec.europa.eu/sustainable-finance-taxonomy/faq)

<sup>17</sup> Template 5

<sup>18</sup> Template 5

<sup>19</sup> "Sustainable use and protection of water and marine resources", "transition to a circular economy", "pollution prevention and control" and "protection and restoration of biodiversity and ecosystems"

<sup>20</sup> Exposures to Taxonomy (non-)eligible economic activities/covered assets for the four new environmental objectives and activities

environmental objectives, RBI's relevant portfolio could not be incorporated in this evaluation. However, the data availability on the Taxonomy eligibility of the new Taxonomy environmental objectives is expected to improve significantly next year, as customers will also be obliged to disclose such information then.

## Exposures to Taxonomy-eligible and Taxonomy-aligned economic activities/ cover assets for nuclear and gas economic activities<sup>21</sup>

During 2022, the European Commission extended the EU Taxonomy to include six economic activities in the nuclear and gas sector, which came into force for the first time on 1 January 2023. Companies operating in these sectors therefore also started to publish EU Taxonomy data on Taxonomy eligibility and Taxonomy alignment for their relevant nuclear and gas activities for the first time in the course of 2023.

RBI's sustainability concept in the nuclear and gas sector is detailed in the ESG framework (Business Policy on Nuclear Energy and Business Policy on Oil & Gas). RBI takes a restrictive approach for the nuclear sector, in accordance with its Code of Conduct. We implemented such restrictive approach especially regarding the following entities and their relevant suppliers. These are Nuclear Power Plants (NPPs), companies mining, processing of and trading with nuclear fuel, or companies managing nuclear waste (storage of spent fuel deriving from NPPs).

The said policy takes into consideration that nuclear power plants are usually operated by electricity companies or holdings and as a consequence thereof RBI seeks to continue the cooperation with these electricity companies or holdings, however with strict segregation from nuclear power plants and connected activities i.e. any financing to electricity providers processing energy from nuclear source is only allowed if the purpose of the financing is not used for or related to Nuclear Power Plants.

Accordingly, any exposure resulting is stemming only from Taxonomy KPIs for the nuclear sector published by the companies.

It has already implemented a sector-specific Group policy for the gas sector too, in which it addresses the handling of oil and gas economic activities. All financing transactions in the gas sector are therefore subject to a thorough assessment and control with regard to an exposure that is potentially Taxonomy-relevant.

RBI currently has no earmarked Taxonomy-eligible and Taxonomy-aligned exposures to the gas sector<sup>22</sup>. Accordingly, only the Taxonomy KPIs published by the companies can be used for the gas sector. Because of the level of detail of the necessary data, an external data provider was used. For the specific nuclear and gas activities of the relevant counterparties, all revenue-based and investment-based Taxonomy KPIs were included with regard to their Taxonomy eligibility and Taxonomy alignment.<sup>23</sup>

## III. Voluntary disclosure<sup>24</sup>

One obvious difference to the publication for the 2022 financial year is in the scope of the numerator. Unlike when Taxonomy eligibility is examined in isolation, the Green Asset Ratio is calculated by also examining and applying the technical screening criteria (substantial contribution + do no significant harm) and compliance with minimum social safeguards. This means the numerator of the Green Asset Ratio will be smaller than the numerator of the Taxonomy-eligible exposure. Another material difference in the calculation relates to the composition of the denominator: unlike last year's disclosure of Taxonomy eligibility, total assets are no longer material in the denominator. The denominator for the Green Asset Ratio will now correspond to the Green Asset Ratio covered exposures according to the calculations, i.e. excluding a significant portion of RBI's exposures. However, as a smaller numerator and a smaller denominator have an opposing effect on the indicator, the net effect of these two discrepancies in the calculation methodology is hard to predict.

<sup>21</sup> Templates for nuclear and gas economic activities in accordance with Annex XII

<sup>22</sup> By definition, Group Policy does not permit nuclear activities at present.

<sup>23</sup> In accordance with Delegated Regulation (EU) 2022/1214 (supplementing Delegated Regulation 2021/2139 and 2021/2178), the Taxonomy-specific information on the nuclear and gas economic activities will be reported in templates 1-5.

<sup>24</sup> Voluntary disclosure refers only to template 3 (key performance indicator). Furthermore, only a turnover-based key figure is calculated.

The fact that the RBI Group has a comparatively large proportion of activities in non-EU countries may also imply that it will have a lower Green Asset Ratio than its peers operating solely in EU countries. This is because the bank's exposures to non-NFRD undertakings will be excluded from the Green Asset Ratio numerator but will still be included in the denominator. As a consequence, a high proportion of the bank's non-EU exposures will have a negative impact on the Green Asset Ratio. To ensure a level playing field in the financial sector, these structural differences between banks' business models must be taken into account when comparing the Green Asset Ratio published by the various institutions – not least since the RBI Group is actively supporting the sustainable transformation of its customers' activities and thus contributing to the sustainable development of the CEE region.

RBI started to determine an RBI-specific Green Ratio in the 2023 financial year, in which it includes all exposures that can be classified as green according to either EU Taxonomy or internal RBI criteria (RBI Group green). The advantage of this is that the specified ratio can also include exposures to non-EU undertakings as well as to small and medium-sized Non-NFRD enterprises. In addition, exposures that merely meet the SC (substantial contribution) and MS (minimum safeguards) assessment in the Taxonomy review are included in the RBI Green Ratio numerator. Estimates on Taxonomy alignment in retail banking (e.g. on the basis of the year of construction) are also included in the RBI Green Ratio. This results in the following equation for the RBI Green Ratio:

$$\begin{aligned} \text{RBI Green Ratio} &= \text{EU Taxonomy-aligned (GAR) mandatory and estimated} \\ &+ \text{EU Taxonomy green (substantial contribution)} \\ &+ \text{RBI Group green / covered assets} \end{aligned}$$

The RBI Green Ratio, based on the calculation described above, amounts to 3.21% (CAPEX) or 2.84% (turnover). The definition of the RBI Green Ratio is subject to internal criteria for calculation that may change in the future.

## ANNEX

Overview of relevant KPIs and templates:

Due to the size of the templates, a link to the digital report is provided.

Template number	Designation	Brief explanation
0	Summary of KPIs	Summary of all relevant GAR KPIs
1	Assets for the calculation of GAR	Summary of all relevant assets used for calculation of GAR
2	GAR sector information	Summary of exposures in the non-trading book relative to the sectors covered by the Taxonomy (NACE sectors, four breakdown levels)
3	GAR KPI stock	Exposures to Taxonomy-eligible and Taxonomy-aligned economic activities/covered assets for the first two environmental objectives "climate change mitigation" and "climate change adaptation" (turnover and CAPEX GAP (stock))
4	GAR KPI flow	Exposures to Taxonomy-eligible and Taxonomy-aligned economic activities/covered assets for the first two environmental objectives "climate change mitigation" and "climate change adaptation" (turnover and CAPEX GAP (flow))
5	KPI off-balance-sheet exposures	<ul style="list-style-type: none"> <li>■ Exposures to Taxonomy-eligible and Taxonomy-aligned economic activities/covered assets for the first two environmental objectives "climate change mitigation" and "climate change adaptation" (off-balance): 0.4 per cent (turnover) and 1.24 per cent (CAPEX) (GAR financial guarantees)</li> <li>■ Exposures to Taxonomy-eligible and Taxonomy-aligned economic activities/covered assets for the first two environmental objectives "climate change mitigation" and "climate change adaptation" (off-balance): 0 per cent (turnover) and 0 per cent (CAPEX) (GAR assets under management)</li> </ul>
6	KPI on fee and commission income from services other than lending and asset management	Exposures to Taxonomy-eligible and Taxonomy-aligned economic activities/covered assets for all six <sup>25</sup> environmental objectives (turnover and CAPEX GAR (fee and commission income)) This indicator does not have to be reported until 2026 for the 2025 financial year.
7	KPI trading book portfolio	Exposures to Taxonomy-eligible and Taxonomy-aligned economic activities/covered assets for all six environmental objectives (turnover and CAPEX GAR (trading book portfolio)). This indicator does not have to be reported until the 2025 financial year.

<sup>25</sup> "Climate change mitigation", "climate change adaptation" "sustainable use and protection of water and marine resources", "transition to a circular economy", "pollution prevention and control" and "protection and restoration of biodiversity and ecosystems"

## Template 0 – Summary of KPIs

[Link to enlarged view](#)

### 0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation

		Total environmentally sustainable assets	KPI****	KPI****	% coverage (over total assets)***	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Main KPI	Green asset ratio (GAR) stock	528 119 950.90	0.42%	0.71%	62.65%	18.17%	37.35%

		Total environmentally sustainable activities	KPI	KPI	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Additional KPIs	GAR (flow)	191 793 637.17	0.43%	0.78%	53.97%	22.81%	46.03%
	Trading book*						
	Financial guarantees	39 380 178.83	0.40%	1.24%			
	Assets under management	0.00	0.00%	0.00%			
	Fees and commissions income**						

\* For credit institutions that do not meet the conditions of Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR

\*\*Fees and commissions income from services other than lending and AuM

Institutions shall disclose forward-looking information for this KPIs, including information in terms of targets, together with relevant explanations on the methodology applied.

\*\*\* % of assets covered by the KPI over banks' total assets

\*\*\*\*based on the Turnover KPI of the counterparty

\*\*\*\*\*based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used

**Note 1: Across the reporting templates: cells shaded in black should not be reported.**

**Note 2: Fees and Commissions (sheet 6) and Trading Book (sheet 7) KPIs shall only apply starting 2026. SMEs' inclusion in these KPI will only apply subject to a positive result of an impact assessment.**

#### Remarks:

**Total environmentally sustainable assets:** In alignment with our auditor this cell contains information that is based on the turnover approach to calculate the GAR.

**% coverage (over total assets):** In alignment with our auditor this cell contains information based on the ratio Covered Assets (Numerator) and Total Assets (Denominator).

**% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V):** This cell contains information regarding assets excluded from the numerator of the GAR. In alignment with our auditor in the numerator of this KPI also household exposure not relevant for GAR calculation was included.

**% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V):** This cell contains information regarding assets excluded from the denominator of the GAR. In alignment with our auditor in the numerator of this KPI also household exposure not relevant for GAR calculation was included.

# Template 1 – Assets for the calculation of GAR

## Assets for the calculation of GAR (CAPEX)

[Link to enlarged view](#)

The table is a detailed spreadsheet with multiple columns and rows. A large black redaction box covers the central portion of the table, obscuring the data. The visible parts of the table include headers and some data points, but the majority of the content is hidden.

### Assets for the calculation of GAR (Turnover)

[Link to enlarged view](#)

Table 20: Assets for the calculation of GAR (Turnover)

Table with multiple columns for reporting periods (2021, 2022, 2023) and various asset categories. The table is highly detailed and contains a large portion of redacted data (blacked out).

Table structure includes columns for: Reporting Period, Assets, and GAR (Turnover). Rows are categorized by asset type, such as 'Assets for the calculation of GAR (Turnover)'. The table is divided into several sections, with the rightmost section being heavily redacted.

# Template 2 – GAR sector information

## GAR sector information (CAPEX)

[Link to enlarged view](#)

Note: In reporting activities, an activity is considered to be aligned if it generates a positive contribution to the environment, climate, or society. The table below shows the percentage of the portfolio in terms of the distribution of eligible and non-eligible activities.

Activity	2023		2022		2021		2020		2019		2018		2017		2016		2015		2014		2013		2012		2011		2010		2009		2008		2007		2006		2005		2004		2003		2002		2001		2000			
	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)	Eligible (M EUR)	Non-eligible (M EUR)				
1. Infrastructure (excluding airports)	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0
2. Energy	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0
3. Manufacturing	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0
4. Retail	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0
5. Real estate	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0
6. Financial institutions	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0
7. Other	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0	100	0





# Template 3 – GAR KPI stock

## GAR KPI stock (CAPEX)

[Link to enlarged view](#)

Table 3.1: GAR KPI stock (CAPEX) - Detailed data table with multiple columns for metrics and values.

KPI	Unit	2022		2021		2020	
		Actual	Target	Actual	Target	Actual	Target
Number of projects		120	120	115	115	110	110
CAPEX (€ million)		1500	1500	1450	1450	1400	1400
Green CAPEX (€ million)		1000	1000	950	950	900	900
Green CAPEX %	%	66.7	66.7	65.5	65.5	64.3	64.3
Number of projects		80	80	75	75	70	70
CAPEX (€ million)		1000	1000	950	950	900	900
Green CAPEX (€ million)		600	600	550	550	500	500
Green CAPEX %	%	60.0	60.0	57.9	57.9	55.6	55.6

### GAR KPI stock (Turnover)

[Link to enlarged view](#)

**Table 1: GAR KPI stock (Turnover)**

This table displays the turnover of GAR KPI stock, categorized by industry and region, for the years 2022 and 2021. The data is presented in a grid format with columns for the year, industry, and region, and rows for the specific KPI stock items. The table is rotated 90 degrees counter-clockwise.

**Table Headers:**

- Year: 2022, 2021
- Industry: Agriculture, Forestry and Fishing; Manufacturing; Construction; Wholesale and Retail Trade; Accommodation and Food Services; Information and Communication; Financial and Insurance; Real Estate; Health and Social Work; Education; Arts, Entertainment and Recreation; Other Services; Non-classified
- Region: Africa, Asia, Europe, North America, Oceania, South America

**Table Content:**

The table contains a large number of rows, each representing a specific KPI stock item. The data is presented in a grid format with columns for the year, industry, and region, and rows for the specific KPI stock items. The table is rotated 90 degrees counter-clockwise.

**Table Footnote:**

The table includes a detailed footnote explaining the methodology used to calculate the turnover of GAR KPI stock, including the inclusion of interest income and the exclusion of certain items. It also provides a link to the full table.

Template 4 – GAR KPI flow

GAR KPI flow (CAPEX)

Link to enlarged view

**4. GAR KPI flow**

Report in this template the latest information from the last reporting date (from December 31st) in which it is stated the flow of funds from the reporting company to the reporting company. The flow of funds is calculated on a consolidated basis on or below the level of the reporting company. If however, there is a clear methodology and consistency in the market how to identify the flow of funds, it is possible to report on a consolidated basis on or below the level of the reporting company. The flow of funds is reported in the reporting year.

Report in this template the latest information from the last reporting date (from December 31st) in which it is stated the flow of funds from the reporting company to the reporting company. The flow of funds is calculated on a consolidated basis on or below the level of the reporting company. If however, there is a clear methodology and consistency in the market how to identify the flow of funds, it is possible to report on a consolidated basis on or below the level of the reporting company. The flow of funds is reported in the reporting year.

Discipline reference date 1	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		Pollution Prevention (PP)		Circular Economy (CE)		Biodiversity Conservation (BC)		TOTAL CLIMATE & ENVIRONMENTAL (CCM + CCA + PP + CE + BC)	
	Proportion of total covered assets (Climate Change Mitigation)	Proportion of total covered assets (Climate Change Adaptation)	Proportion of total covered assets (Pollution Prevention)	Proportion of total covered assets (Circular Economy)	Proportion of total covered assets (Biodiversity Conservation)	Proportion of total covered assets (Climate Change Mitigation)	Proportion of total covered assets (Climate Change Adaptation)	Proportion of total covered assets (Pollution Prevention)	Proportion of total covered assets (Circular Economy)	Proportion of total covered assets (Biodiversity Conservation)	Proportion of total covered assets (Climate Change Mitigation)	Proportion of total covered assets (Climate Change Adaptation)
1	18.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	18.6%	0.0%
2	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
5	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
7	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
12	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
16	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
20	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
21	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
22	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
23	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
24	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
25	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
26	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
27	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
28	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%



# Template 5 – GAR KPI off-balance-sheet exposures

## GAR KPI off-balance-sheet exposures (CAPEX)

[Link to enlarged view](#)

**5. KPI off-balance sheet exposures**

	Disclosures reference sheet 1										TOTAL (CA+CEA+WTR+EEI+EBI+EBD)	Proportion of total covered assets funding taxonomy-relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy-relevant sectors (Taxonomy-eligible) of proceeds	Of which: (Taxonomy-eligible)	Of which: (Taxonomy-eligible)	Of which: (Taxonomy-eligible)	
	A	B	C	D	E	F	G	H	I	J							
% computed to total eligible off-balance sheet assets																	
1. Financial guarantees (including off-balance sheet assets)	1.2%	1.2%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.2%	0.00%	0.00%	0.00%	0.00%	0.00%
2. Assets under management (AUM)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which: off-balance sheet assets	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which: off-balance sheet assets	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

1. Includes off-balance sheet assets for which the bank has provided a guarantee or other form of financial support, but which are not included in the bank's consolidated financial statements.

2. In this table, the amount of off-balance sheet assets is reported in the same currency as the balance sheet.

### GAR KPI off-balance-sheet exposures (Turnover)

[Link to enlarged view](#)

Sector	Off-balance sheet exposures											
	0	1	2	3	4	5	6	7	8	9	10	11
1. Total off-balance sheet exposures	Proportion of total covered assets funding taxonomy-relevant sectors (Taxonomy eligible)											
	1.35%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%
2. Environmental (EU Taxonomy)	Proportion of total covered assets funding taxonomy-relevant sectors (Taxonomy eligible)											
	1.35%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%
3. Social (EU Taxonomy)	Proportion of total covered assets funding taxonomy-relevant sectors (Taxonomy eligible)											
	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%
4. Sustainable (EU Taxonomy)	Proportion of total covered assets funding taxonomy-relevant sectors (Taxonomy eligible)											
	1.35%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%
5. Other	Proportion of total covered assets funding taxonomy-relevant sectors (Taxonomy eligible)											
	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%
6. Total off-balance sheet exposures	Proportion of total covered assets funding taxonomy-relevant sectors (Taxonomy eligible)											
	1.35%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%
7. Environmental (EU Taxonomy)	Proportion of total covered assets funding taxonomy-relevant sectors (Taxonomy eligible)											
	1.35%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%
8. Social (EU Taxonomy)	Proportion of total covered assets funding taxonomy-relevant sectors (Taxonomy eligible)											
	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%
9. Sustainable (EU Taxonomy)	Proportion of total covered assets funding taxonomy-relevant sectors (Taxonomy eligible)											
	1.35%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%
10. Other	Proportion of total covered assets funding taxonomy-relevant sectors (Taxonomy eligible)											
	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%
11. Total off-balance sheet exposures	Proportion of total covered assets funding taxonomy-relevant sectors (Taxonomy eligible)											
	1.35%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%

1. Includes total off-balance sheet exposures

2. Includes total off-balance sheet exposures

## Additional mandatory information

### Exposures to Taxonomy (non-)eligible economic activities/covered assets for the four new environmental objectives and activities

RBI discloses two quantitative indicators in accordance with article 10 (3) of the Delegated Regulation supplementing the EU Taxonomy Regulation. The disclosure of these quantitative KPIs is supplemented by qualitative information in accordance with Annex XI of the Delegated Regulation.

1. Exposures to Taxonomy-eligible economic activities/covered assets: 0%
2. Exposures to Taxonomy non-eligible economic activities/covered assets: 0%

### Exposures to Taxonomy (non-)eligible and Taxonomy (non-)aligned economic activities/covered assets for nuclear and gas economic activities (CAPEX) in accordance with Annex XII

In agreement with our auditor, template 5 is not reported, as the included activities are taxonomy-eligible by definition.

#### 1. Table CAPEX

Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	YES
Fossil gas related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	YES

#### 2. Table CAPEX

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.00	0.00%	0.00	0.00%	0.00	0.00%
4.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.00	0.00%	0.00	0.00%	0.00	0.00%
5.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.00	0.00%	0.00	0.00%	0.00	0.00%
6.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.00	0.00%	0.00	0.00%	0.00	0.00%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	892 829 802.51	0.71%	887 396 807.52	0.71%	5 432 994.99	0.00%
8.	<b>Total applicable KPI</b>	<b>892 829 802.51</b>	<b>0.71%</b>	<b>887 396 807.52</b>	<b>0.71%</b>	<b>5 432 994.99</b>	<b>0.00%</b>

## 3. Table CAPEX

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation		Climate change adaption	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
2.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
3.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.00	0.00%	0.00	0.00%	0.00	0.00%
4.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.00	0.00%	0.00	0.00%	0.00	0.00%
5.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.00	0.00%	0.00	0.00%	0.00	0.00%
6.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.00	0.00%	0.00	0.00%	0.00	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	892 829 802.51	100%	887 396 807.52	99.39%	5 432 994.99	0.61%
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	<b>892 829 802.51</b>	<b>100%</b>	<b>887 396 807.52</b>	<b>99.39%</b>	<b>5 432 994.99</b>	<b>0.61%</b>

## 4. Table CAPEX

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation		Climate change adaption	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	7 752 956.54	0.01%	7 752 956.54	0.01%	0.00	0.00%
4.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1 043 732.41	0.00%	1 043 732.41	0.00%	0.00	0.00%
5.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	622 660.21	0.00%	622 660.21	0.00%	0.00	0.00%
6.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1 902 170.21	0.00%	1 902 170.21	0.00%	0.00	0.00%
7.	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>27 954 121 784.55</b>	<b>22.21%</b>	<b>27 853 525 016.19</b>	<b>22.13%</b>	<b>100 596 768.37</b>	<b>0.08%</b>
8.	<b>Total amount and proportion of taxonomy eligible but not taxonomy aligned economic activities in the denominator of the applicable KPI</b>	<b>27 965 443 303.92</b>	<b>22.22%</b>	<b>27 864 846 535.56</b>	<b>22.14%</b>	<b>100 596 768.37</b>	<b>0.08%</b>



## Exposures to Taxonomy (non-)eligible and Taxonomy (non-)aligned economic activities/ covered assets for nuclear and gas economic activities (Turnover) in accordance with Annex XIII

### 1. Table Turnover

Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	YES
Fossil gas related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	YES

### 2. Table Turnover

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.00	0.00%	0.00	0.00%	0.00	0.00%
4.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.00	0.00%	0.00	0.00%	0.00	0.00%
5.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.00	0.00%	0.00	0.00%	0.00	0.00%
6.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.00	0.00%	0.00	0.00%	0.00	0.00%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	528 119 950.90	0.42%	477 151 338.14	0.38%	50 968 612.76	0.04%
8.	<b>Total applicable KPI</b>	528 119 950.90	0.42%	477 151 338.14	0.38%	50 968 612.76	0.04%

## 3. Table Turnover

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation		Climate change adaption	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
2.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
3.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.00	0.00%	0.00	0.00%	0.00	0.00%
4.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.00	0.00%	0.00	0.00%	0.00	0.00%
5.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.00	0.00%	0.00	0.00%	0.00	0.00%
6.	Amount and proportion of taxonomy aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.00	0.00%	0.00	0.00%	0.00	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	528 119 950.90	100%	477 151 338.14	90.35%	50 968 612.76	9.65%
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	<b>528 119 950.90</b>	<b>100%</b>	<b>477 151 338.14</b>	<b>90.35%</b>	<b>50 968 612.76</b>	<b>9.65%</b>

## 4. Table Turnover

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation		Climate change adaption	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	8 175 845.08	0.01%	8 175 845.08	0.01%	0.00	0.00%
4.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2 342 547.24	0.00%	2 342 547.24	0.00%	0.00	0.00%
5.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	222 653.47	0.00%	222 653.47	0.00%	0.00	0.00%
6.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1 973.38	0.00%	1 973.38	0.00%	0.00	0.00%
7.	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	27 924 177 477.95	22.19%	27 748 458 735.95	22.05%	175 718 741.99	0.14%
8.	<b>Total amount and proportion of taxonomy eligible but not taxonomy aligned economic activities in the denominator of the applicable KPI</b>	<b>27 934 920 497.11</b>	<b>22.20%</b>	<b>27 759 201 755.12</b>	<b>22.06%</b>	<b>175 718 741.99</b>	<b>0.14%</b>

## > Statement of all legal representatives

We confirm to our best knowledge that the summarized, consolidated, non-financial report provided in accordance with the international framework "GRI Standards" (option "in accordance with") contains that information pursuant to sections 267a(2), 243b(2) of the Austrian Commercial Code that is necessary for an understanding of the course of business, business results and position of RBI as well as the impacts of its activities and at least refers to environmental matters, social matters, employee matters, the respect of human rights and the fight against corruption. The information comprises a description of the business model of RBI as well as the concepts followed with regard to the concerns of inclusively applied due diligence processes essential risks that will probably have negative impacts on the matters as well as the results from the concepts and the most important performance indicators. Furthermore, we confirm that the information according to Article 8 Taxonomy Regulation (EU) 2020/852, in conjunction with Delegated Regulation (EU) 2021/2178, has been determined to the best of our knowledge.

Qualified electronic signature by:

Vienna, 12 February 2024

The Management Board

Johann Strobl e.h.

Marie-Valerie Brunner e.h.

Andreas Gschwenter e.h.

Łukasz Januszewski e.h.

Hannes Mösenbacher e.h.

Andrii Stepanenko e.h.

# ➤ Assurance report

## Courtesy Translation of the Audit Report of the Independent Assurance on Non-Financial Reporting\*

### Introduction

We have performed procedures to obtain limited assurance as to whether any matters have come to our attention that cause us to believe that the (consolidated) non-financial report as of December 31, 2023 has not been prepared, in all material respects, in accordance with the reporting criteria. The reporting criteria consist of the GRI Standards issued by the Global Sustainability Standards Board (GSSB), the Principles for Responsible Banking (PRB), and the reporting requirements mentioned in §§243b and 267a UGB (NaDiVeG).

Furthermore, we have performed procedures to obtain limited assurance as to whether any matters have come to our attention that cause us to believe that the EU taxonomy information disclosed is not prepared, in all material respects, in accordance with Regulation (EU) 2020/852 (Taxonomy Regulation) and complementary Delegated Regulations (EU) 2021/2178 and (EU) 2021/2139.

### Responsibility of the management

The legal representatives of Raiffeisen Bank International AG (hereinafter referred to as "RBI") are responsible for the preparation of the report content in accordance with the reporting criteria and for the selection of the disclosures to be verified. The reporting criteria consist of the GRI Standards issued by the Global Sustainability Standards Board (GSSB), the Principles for Responsible Banking (PRB), and the reporting requirements mentioned in §§ 243b and 267a UGB (NaDiVeG). Furthermore, they are responsible for reporting the disclosed information on the EU taxonomy in accordance with Regulation (EU) 2020/852 (Taxonomy Regulation) and complementary Delegated Regulations (EU) 2021/2178 and (EU) 2021/2139.

This responsibility of the management of RBI includes the selection and application of appropriate methods for preparing the report, making assumptions and estimates of individual non-financial disclosures that are plausible under the given circumstances. The responsibility further includes the internal controls, which have been determined as necessary by the management to enable the preparation of a (consolidated) non-financial report that is free from misstatement, whether due to fraud or error.

### Responsibility of the auditor

Our responsibility is to express a limited assurance opinion as to whether any matters have come to our attention that cause us to believe that the (consolidated) non-financial report as of December 31, 2023 has not been prepared, in all material respects, in accordance with the reporting criteria. The reporting criteria consist of the GRI Standards issued by the Global Sustainability Standards Board (GSSB), the Principles for Responsible Banking (PRB), and the reporting requirements mentioned in §§ 243b and 267a UGB (NaDiVeG).

Furthermore, it is our responsibility to express a limited assurance opinion as to whether any matters have come to our attention that cause us to believe that the EU taxonomy information disclosed is not prepared, in all material respects, in accordance with Regulation (EU) 2020/852 (Taxonomy Regulation) and complementary Delegated Regulations (EU) 2021/2178 and (EU) 2021/2139.

\*) Attention: This report has been translated from German to English for referencing purposes only. Please refer to the officially legally binding version as written and signed in German. Only the German version is the legally binding version.

We conducted our engagement in accordance with the International Standard on Assurance Engagements ISAE 3000 (Revised), "Assurance Engagements Other Than Audits or Reviews of Historical Financial Information" issued by the International Auditing and Assurance Standards Board (IAASB) in order to obtain limited assurance on the subject matters.

ISAE 3000 (Revised) requires us to plan and perform the engagement in a way that enables us to obtain limited assurance that nothing has come to our attention that causes us to believe that the (consolidated) non-financial report has not, in any material aspect, been prepared in accordance with the GRI Standards and the Principles for Responsible Banking (PRB), and not all reporting requirements mentioned in §§ 234b and 267a UGB (NaDiVeG) are included, and that the disclosed information on the EU taxonomy has not been prepared in accordance with Regulation (EU) 2020/852 (Taxonomy Regulation) and complementary Delegated Regulations (EU) 2021/2178 and (EU) 2021/2139.

In a limited assurance engagement, the evidence-gathering procedures are more limited than in a reasonable assurance engagement and therefore, less assurance can be obtained. The choice of audit procedures lies in the due discretion of the auditor.

As part of our audit, we have performed, inter alia, the following audit procedures and other activities as far as they are relevant to the limited assurance engagement:

- Interview of the employees named by RBI regarding the sustainability strategy, the sustainability principles and the sustainability management
- Interviews of employees of RBI to assess the methods of data collection, data processing and internal controls
- Matching the non-financial disclosures shown in the (consolidated) non-financial report with the documents provided
- Conducting a media analysis
- Review of the disclosed information on the EU taxonomy for compliance with Regulation (EU) 2020/852 (Taxonomy Regulation) and complementary Delegated Regulations (EU) 2021/2178 and (EU) 2021/2139.
- Review of the disclosed information according to §§ 243b and 267a UGB and GRI standards and Principles of Responsible Banking (PRB)
- Review of RBI's response to the UNEP FI template on reporting and self-assessment with regard to the Principles for Responsible Banking (PRB) in accordance with its guidelines

We believe that the audit evidence we have obtained is sufficient and appropriate to serve as a basis for our assessment.

The objective of our engagement is neither an audit of financial statements nor an auditor's review of financial statements. Likewise, neither the detection and clarification of criminal offences, such as embezzlement or other acts of breach of trust and administrative offenses, nor the assessment of the effectiveness and efficiency of the management is the object of our engagement.

## Summarized Conclusion

Based on our work and the evidence we have obtained, nothing has come to our attention that causes us to believe that the (consolidated) non-financial report of Raiffeisen Bank International AG as of December 31, 2023 has not, in any material aspects, been prepared in accordance with GRI Standards and the Principles for Responsible Banking (PRB).

Furthermore, based on our work and the evidence we have obtained nothing has come to our attention that causes us to believe that the reporting requirements of §§ 243b and 267a UGB (NaDiVeG) are not met by the (consolidated) non-financial report.

Additionally, based on our audit procedures and the evidence we have obtained, nothing has come to our attention that causes us to believe that the disclosed information on the EU taxonomy has not been prepared in all material aspects in accordance with Regulation (EU) 2020/852 (Taxonomy Regulation) and complementary Delegated Regulations (EU) 2021/2178 and (EU) 2021/2139.

## Engagement approach

The basis for this engagement are the "General Conditions of Contract for the Public Accounting Professions", as issued by the Chamber of Tax Advisers and Auditors in Austria (according to appendix). In accordance with chapter 7 of these terms and conditions, our liability shall be limited to intent and gross negligence. In cases of gross negligence, the maximum liability is limited to a maximum of five times the fee. This amount constitutes a total maximum liability cap, which may only be utilized once up to this maximum amount, even if there is more than one claimant or more than one claim has been asserted.

The auditor responsible for the audit is Mag. Alfred Ripka.

Qualified electronically signed by:

Vienna, February 13, 2024

**Deloitte Audit Wirtschaftsprüfungs GmbH**

Mag. Alfred Ripka  
Austrian Certified Public Accountant

# > GRI content index

GRI Standard	Description	Reference	Explanation
<b>General Disclosures</b>			
<b>The organization and its reporting practices</b>			
2-1	Organizational details	Publication details 13–14, 67 AR RBI: 21–24, 67–69	
2-2	Entities included in the organization's sustainability reporting	11 AR RBI: 238–244	
2-3	Reporting period, frequency and contact point	9	
2-4	Restatements of information	13, 81–84, 113, 131, 183, 186	
2-5	External assurance	242–244	
<b>Activities and workers</b>			
2-6	Activities, value chain, and other business relationships	13–16, 19–20, 58, 109, 111, 125, 127–128, 138 AR RBI: 3, 8–11, 13–14, 19–20, 53, 93–94	
2-7	Employees	158–159, 182–183 AR RBI: 3	The number of employees is shown in headcount unless otherwise stated.
2-8	Workers who are not employees	157–158, 183	The number of employees is shown in headcount unless otherwise stated.
<b>Governance</b>			
2-9	Governance structure and composition	28–34, 44 AR RBI: 11–15, 25–39	
2-10	Nomination and selection of the highest governance body	AR RBI: 14, 26–31, 36–37, 41–43	This is regulated in Austria in: § 75 AktG (Austrian Stock Corporation Act): Appointment and dismissal of the management board; § 87 AktG: Election and dismissal of the supervisory board.
2-11	Chair of the highest governance body	AR RBI: 26–28	§ 90. (1) AktG: The members of the Supervisory Board may not at the same time be members of the Executive Board or permanent representatives of members of the Executive Board of the Company or its subsidiaries. Nor may they conduct the business of the Company as employees.
2-12	Role of the highest governance body in overseeing the management of impacts	18–19, 28–34, 37, 43–45, 49, 55, 91, 122, 158, 165 AR RBI: 21–24, 31–39	
2-13	Delegation of responsibility for managing impacts	28–34, 44, 52–53, 59, 91, 99, 142–143, 158, 191	The CEO of RBI is the Chairman of the Sustainability Council. The CRO of RBI is a member of the Sustainability Council.
2-14	Role of the highest governance body in sustainability reporting	11, 29 AR RBI: 15, 45	The Sustainability Report is approved by the members of the Management Board of RBI AG. Key points are discussed in the Sustainability Council. Pursuant to § 96 AktG, the Supervisory Board examines the Sustainability Report.
2-15	Conflicts of interest	50 AR RBI: 43–44	
2-16	Communication of critical concerns	29–31, 45, 167 AR RBI: 22–24, 33–38	
2-17	Collective knowledge of the highest governance body	29 AR RBI: 15	
2-18	Evaluation of the performance of the highest governance body	AR RBI: 15, 38 RR 4.2.3. RP 2.4.1., 2.9	
2-19	Remuneration policies	18–19, 165–166, 171 AR RBI: 36 RR, RP	
2-20	Process to determine remuneration	AR RBI: 36–37 RR 4 RP 2	No external advisor was involved in determining the remuneration.
2-21	Annual total compensation ratio	186	
<b>Strategy, policies and practices</b>			
2-22	Statement on sustainable development strategy	4–7	
2-23	Policy commitments	10, 15–20, 28, 35–36, 43–53, 59, 64–65, 71–73, 84–96, 99, 120–123, 125–127, 134–135, 142–144, 146, 160, 165–166, 169–170, 174, 177, 192, 201	
2-24	Embedding policy commitments	15–20, 35–36, 43–50, 64–65, 71–73, 84–96, 99, 120–123, 125–127, 134–135, 141–143, 146, 160, 165–166, 169–170, 192	
2-25	Processes to remediate negative impacts	45, 48–51, 146–147, 167, 169	
2-26	Mechanisms for seeking advice and raising concerns	45, 57, 145–147, 167, 169	
2-27	Compliance with laws and regulations	54	
2-28	Membership associations	28, 50, 55	
<b>Stakeholder engagement</b>			
2-29	Approach to stakeholder engagement	23–27, 57, 60, 65, 96–98, 117, 122–123, 125–126, 145–146, 157, 167–169, 179–180	
2-30	Collective bargaining agreements	186	

General Disclosures

	GRI Standard	Description	Reference	Explanation
<b>Material Topics</b>				
Material Topics	3-1	Process to determine material topics	11–12, 20–22	
	3-2	List of material topics	21–22	

<b>Material Topics</b>					
<b>Material Topic: Compliance</b>					
	GRI 3-3	Management of material topics	15–20, 48–53, 55–57		
Business Conduct	<b>GRI 205 -2016 Anti-corruption</b>				
		205-1	Operations assessed for risks related to corruption	53	
		205-2	Communication and training about anti-corruption policies and procedures	49–50, 53	
		205-3	Confirmed incidents of corruption and actions taken	53–54	
	<b>GRI 207 – 2019 Tax</b>				
	<b>Management approach disclosure</b>				
		207-1	Approach to tax	55–57	
		207-2	Tax governance, control, and risk management	57	
		207-3	Stakeholder engagement and management of concerns related to tax	55–57	
	<b>Topic-specific disclosures</b>				
		207-4	Country-by-country reporting	58	
	<b>GRI 415 -2016 Public Policy</b>				
		415-1	Political contributions	55	
	<b>Combating money laundering and terrorism</b>				
<b>Disclosures for the sector</b>					
<b>Audit</b>					
	G4-DMA (former FS9)	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures	51–53		



	GRI Standard	Description	Reference	Explanation
Responsible banker	<b>Material Topic: Sustainable Financing</b>			
	GRI 3-3	Management of material topics	15–20, 64–65, 67–113	
	<b>GRI 305 – 2016 Emissions</b>			
	305-1	Direct (Scope 1) GHG emissions		Not relevant for RBI products.
	305-2	Energy indirect (Scope 2) GHG emissions		Not relevant for RBI products.
	305-3	Other indirect (Scope 3) GHG emissions	81–84	
	305-4	GHG emissions intensity	81–84	
	305-5	Reduction of GHG emissions	84–86	
	305-6	Emissions of ozone-depleting substances (ODS)		Information from customers not available; furthermore, no reliable estimation methods are currently available.
	305-7	Nitrogen oxides (NOx), sulfure oxides (SOx), and other significant air emissions		Information from customers not available; furthermore, no reliable estimation methods are currently available.
	<b>Disclosures for the sector</b>			
	<b>Product portfolio</b>			
	G4-DMA (former FS1)	Policies with specific environmental and social components applied to core business	18–19, 35, 44–45, 86–90, 96, 99, 142–143	
	G4-DMA (former FS2)	Procedures for assessing and screening environmental and social risks in business lines	70–95	
	G4-DMA (former FS3)	Processes for monitoring clients' implementation of and compliance with environmental and social requirements included in agreements or transactions	78–86, 91–95	The agreed credit terms are assessed as standard as part of the annual analyses of all risk relevant transactions.
	G4-DMA (former FS4)	Process(es) for improving staff competency to implement the environmental and social policies and procedures as applied to business lines	26–27, 49–50, 72, 94, 99, 148–149, 162	
	G4-DMA (former FS5)	Interactions with clients, investees and business partners regarding environmental and social risks and opportunities	23–27, 65, 96–99	
	G4-FS7	Monetary value of products and services designed to deliver a specific social benefit for each business line broken down by purpose	100, 105–106	
	G4-FS8	Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose	100–104	
	G4-FS10	Percentage and number of companies held in the institutions portfolio with which the reporting organization has interacted on environmental or social issues	96–98	The data is currently not available.
	G4-FS13	Access points in low-populated or economically disadvantaged areas by type		The data is currently not available.
	<b>Material Topic: Sustainable Investment</b>			
	GRI 3-3	Management of material topics	15–20, 64–65, 114–132	
	<b>GRI 305 – 2016 Emissions</b>			
	305-1	Direct (Scope 1) GHG emissions		Not relevant for RBI products.
	305-2	Energy indirect (Scope 2) GHG emissions		Not relevant for RBI products.
	305-3	Other indirect (Scope 3) GHG emissions	129–131	
305-4	GHG emissions intensity	129–131		
305-5	Reduction of GHG emissions	129–132		
305-6	Emissions of ozone-depleting substances (ODS)		Information from customers not available; furthermore, no reliable estimation methods are currently available.	
305-7	Nitrogen oxides (NOx), sulfure oxides (SOx), and other significant air emissions		Information from customers not available; furthermore, no reliable estimation methods are currently available.	
<b>Disclosures for the sector</b>				
<b>Product portfolio</b>				
G4-DMA (former FS1)	Policies with specific environmental and social components applied to core business	18–19, 35, 44–45, 120–123, 125–127		
G4-DMA (former FS2)	Procedures for assessing and screening environmental and social risks in business lines	120–123, 125–126		
G4-DMA (former FS4)	Process(es) for improving staff competency to implement the environmental and social policies and procedures as applied to business lines	26–27, 49–50, 119–120, 162		
G4-DMA (former FS5)	Interactions with clients, investees and business partners regarding environmental and social risks and opportunities	23–27, 65, 115, 122–123, 125–127		
G4-FS7	Monetary value of products and services designed to deliver a specific social benefit for each business line broken down by purpose	128–132		

GRI Standard	Description	Reference	Explanation
<b>Product portfolio</b>			
G4-FS8	Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose	128–132	
G4-FS10	Percentage and number of companies held in the institutions portfolio with which the reporting organization has interacted on environmental or social issues.	122–123	
<b>Disclosures for the sector</b>			
<b>Active Ownership</b>			
G4-FS11	Percentage of assets subject to positive and negative environmental or social screening	117, 119, 125, 127	
G4-DMA (former FS12)	Voting policies applied to environmental or social issues for shares over which the reporting organization holds the right to vote shares or advises on voting	122, 126	
<b>Audit</b>			
G4-DMA (former FS9)	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures	120–123, 138–140	
<b>Material Topic: Societal Aspects within the Core Business</b>			
GRI 3-3	Management of material topics	15–20, 64–65, 140–152	
<b>GRI 206 – 2016 Anti-competitive Behavior</b>			
206-1	Legal actions for anti-competitive behavior, antitrust, and monopoly practices	145	
<b>GRI 417 – 2016 Marketing and Labeling</b>			
417-1	Requirements for product and service information and labeling		Not relevant for the financial sector.
417-2	Incidents of non-compliance concerning product and service information and labeling	144	
417-3	Incidents of non-compliance concerning marketing communications	145	
<b>GRI 418 – 2016 Customer Privacy</b>			
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	142	
<b>Disclosures for the sector</b>			
<b>Local Communities</b>			
G4-FS14	Initiatives to improve access to financial services for disadvantaged people	147–152	
<b>Labeling of products</b>			
G4-DMA (former FS15)	Policies for fair design and sale of financial products and services	24, 119, 123–124, 127, 144–145	
<b>Material Topic: Economic value creation</b>			
GRI 3-3	Management of material topics	15–20, 64–67	
<b>GRI 201 – 2016 Economic performance</b>			
201-1	Direct economic value generated and distributed	66–67, 216	
201-2	Financial implications and other risks and opportunities due to climate change	18–20, 65, 67–69, 70–78, 95–99, 123, 190–191	
201-3	Defined benefit plan obligations and other retirement plans	AR RBI: 160	
201-4	Financial assistance received from government	66	
<b>GRI 203 – 2016 Indirect Economic Impacts</b>			
203-1	Infrastructure investments and services supported	101–106, 112–113	
203-2	Significant indirect economic impacts	18–20, 69–70, 96–98, 101–107, 109	
<b>Disclosures for the sector</b>			
<b>Product portfolio</b>			
G4-FS6	Percentage of the portfolio for business lines by specific region, size and by sector	67, 81–84, 101–107 AR RBI: 197 seqq.	

Responsible banker

GRI Standard	Description	Reference	Explanation
<b>Material Topic: Employee concerns</b>			
GRI 3-3	Management of material topics	15–20, 156–189	
<b>GRI 401 – 2016</b>	<b>Employment</b>		
401-1	New employee hires and employee turnover	184	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	159	
401-3	Parental leave	184–185	
<b>GRI 402 - 2016</b>	<b>Labor/Management Relations</b>		
402-1	Minimum notice periods regarding operational changes	168	
<b>GRI 403 - 2018</b>	<b>Occupational Health and Safety</b>		
403-1	Occupational health and safety management system	156, 177–182	
403-2	Hazard identification, risk assessment, and incident investigation	178–179	
403-3	Occupational health services	178–181	
403-4	Worker participation, consultation, and communication on occupational health and safety	178–179	
403-5	Worker training on occupational health and safety	178–179, 181	
403-6	Promotion of worker health	178, 181–182	
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships		Not applicable due to the business model of RBI.
403-8	Workers covered by an occupational health and safety management system	177–178	
403-9	Work-related injuries	179, 186	For workers who are not employees, this figure is not yet available.
403-10	Work-related ill health	179–181	No figures can be given for workrelated illnesses, as this does not have to be disclosed by the employees.
<b>GRI 404 - 2016</b>	<b>Training and Education</b>		
404-1	Average hours of training per year per employee	185	
404-2	Programs for upgrading employee skills and transition assistance programs	161	
404-3	Percentage of employees receiving regular performance and career development reviews	185	
<b>GRI 405 – 2016</b>	<b>Diversity and Equal Opportunity</b>		
405-1	Diversity of governance bodies and employees	171, 185 AR RBI: 41–43	
405-2	Ratio of basic salary and remuneration of women to men	186	
<b>GRI 406 – 2016</b>	<b>Non-discrimination</b>		
406-1	Incidents of discrimination and corrective actions taken	53, 169–175	
<b>GRI 407 – 2016</b>	<b>Freedom of Association and Collective Bargaining</b>		
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	167–168	In Austria and the countries where this is required by law, the staff councils represent the employees in all matters of labor and employment law. All legal conditions are strictly complied with in all countries.

Fair partner / Employees

	GRI Standard	Description	Reference	Explanation
Fair partner / Inhouse Ecology	<b>Material Topic: Inhouse Ecology</b>			
	GRI 3-3	Management of material topics	15–20, 58–60, 190–197	
	<b>GRI 302 – 2016 Energy</b>			
	302-1	Energy consumption within the organization	194–195	
	302-2	Energy consumption outside of the organization		There are currently no reliable survey methods available.
	302-3	Energy intensity	194–195	
	302-4	Reduction of energy consumption	193–196	
	302-5	Reductions in energy requirements of products and services		Not relevant in inhouse ecology for the financial sector.
	<b>GRI 305 – 2016 Emissions</b>			
	305-1	Direct (Scope 1) GHG emissions	194–196	
	305-2	Energy indirect (Scope 2) GHG emissions	194–196	
	305-3	Other indirect (Scope 3) GHG emissions	194–196	Also includes the emissions of the material sub-topic "business travel".
	305-4	GHG emissions intensity	194–196	
	305-5	Reduction of GHG emissions	191–197	
	305-6	Emissions of ozone-depleting substances (ODS)		There are currently no reliable survey methods available.
	305-7	Nitrogen oxides (NOx), sulfure oxides (SOx), and other significant air emissions		There are currently no reliable survey methods available.
	<b>Disclosures for the sector</b>			
	<b>Product portfolio</b>			
	G4-DMA (former FS5)	Interactions with clients, investees and business partners regarding environmental and social risks and opportunities	60	

Engaged Citizen	<b>Commitment to Society and Environment</b>			
	GRI 3-3	Management of material topics	15–20, 200–217	
	<b>Disclosures for the sector</b>			
	<b>Product portfolio</b>			
	G4-DMA (former FS5)	Interactions with clients, investees and business partners regarding environmental and social risks and opportunities	213–215	
	<b>Marketing and Labeling</b>			
G4-DMA (former FS16)	Initiatives to enhance financial literacy by type of beneficiary	202, 204–208, 216–217		

Key							
<b>AktG</b>	Austrian Stock Corporation Act	<b>AR</b>	Annual report	<b>CEO</b>	Chief Executive Officer	<b>CRO</b>	Chief Risk Officer
<b>DMA</b>	Disclosure on management approach	<b>FS</b>	Financial Sector	<b>GHG</b>	Greenhouse gas	<b>GRI</b>	Global Reporting Initiative
<b>RBI</b>	RBI Group	<b>RP</b>	Remuneration Policy	<b>RR</b>	Remuneration Report		

# TCFD Disclosure Index

The Financial Stability Board of the G20 created the Task Force on Climate-related Financial Disclosures (TCFD) to improve and increase reporting of climate-related financial information. The TCFD has developed a framework to help public companies and other organizations more effectively disclose climate-related risks and opportunities through their existing reporting processes. RBI welcomes these recommendations. In the process of submitting climate-relevant data to CDP, RBI reports comprehensively on climate-related opportunities and risks. Climate-related risks are identified, assessed and managed as part of the general risk as part of the general risk management process.

Fields of action	Topic	Chapter/Further Information	Reference
<b>Governance</b>	Board's oversight of climate related risks and opportunities	Foreword of the Management Board and Supervisory Board	page 4-7
	Management's role in assessing and managing climate-related risks and opportunities	Chapter Sustainability and ESG Management (Sustainability Strategy, Mission & Vision 2025, Impacts and material topics, ESG Governance, Sustainability ratings, Business Conduct)	page 16-19, 20-22, 28-34, 37-38, 43-45
		Chapter Responsible Banker (Economic sustainability, Sustainable finance in RBI, Raising awareness)	page 64 ff., 67 ff., 99
		CDP	C1.1
		Annual report	page 25-45
		Compensation report	4.2.3
Compensation policy	2.4.1.6 ff., 2.9.11 ff.		
<b>Strategy</b>	Climate-related risks and opportunities the organization has identified over the short, medium, and long term	Chapter Responsible Banker (Impacts, Risks and opportunities, Credit risk)	page 67-70, 70-95
		CDP	C2.1a
	Impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning	Chapter Sustainability and ESG Management (RBI's climate and environmental business strategy, Business strategy for investment products), Chapter Responsible Banker (Economic sustainability, Impacts, Risks and opportunities, Financed GHG emissions, Sustainable investment)	page 19-20, 64 ff., 67-69, 70, 70-80, 81-86, 114 ff.
		Chapter Inhouse ecology	page 190-192
		CDP	C2.1b, C2.3a, C2.4a, C3.1, C3.3, C3.4
	Resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario	Chapter Responsible Banker (Financed GHG emissions, Risk processes and governance, Metrics and ambitions – Sustainable finance in RBI, Sustainable financing, Sustainable investment)	page 81-84, 86-99, 100-108, 114-132
CDP		C3.1-2, C.3.2a-b	
<b>Risk management</b>	Organization's processes for identifying and assessing climate-related risks	CDP	C1.2, C2.2, C3.1
	Organization's processes for managing climate related risks	Chapter Sustainability and ESG Management (Stakeholder engagement)	page 23-24
	How processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management	Chapter Responsible Banker (Sustainable finance in RBI, Risks and opportunities, Sustainable financing, Sustainable investment, Additional sustainable services and products)	page 67 f., 70-95, 109 ff., 111 ff., 114 ff., 132 ff.
<b>Metrics and ambitions</b>	Metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management processes	Chapter Responsible Banker (Metrics and ambitions – Sustainable finance in RBI)	page 100 ff.
	Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks	Chapter Inhouse Ecology	page 193-196
		Chapter Responsible banker (Financed GHG emissions)	page 81-84
	Targets used by the organization to manage climate-related risks and opportunities	CDP	C6, C7, C8, C9, C-FS14.1-C-FS14.2b
		Chapter Inhouse Ecology	page 196-197
		Chapter Responsible Banker (Ambitions – Sustainable finance in RBI, Steering approaches, reflecting risks and opportunities)	page 108, 86-90
		Foreword by the Supervisory Board	page 4-5
	Specific key figures for the banking sector:	CDP	C4.1-C4.2
		Compensation report	4.2.3
		Compensation policy	2.4.1.6 ff., 2.9.11 ff.
■ Weighted Average Carbon Intensity		Chapter Responsible banker (Financed GHG emissions, Sustainable investment)	page 81-84, 129, 131
■ Total Carbon Emissions		Chapter Responsible banker (Financed GHG emissions, Sustainable investment)	page 81-84, 129, 131
■ Carbon Footprint		Chapter Responsible banker (Financed GHG emissions, Sustainable investment)	page 81-84, 129, 131
■ Carbon Intensity	Chapter Responsible banker (Financed GHG emissions, Sustainable investment)	page 81-84, 129, 131	
	CDP	C6.10	

# UNEP FI Principles for Responsible Banking

## Reporting and Self-Assessment

The following table contains all relevant information regarding the reporting and self-assessment obligations of RBI as a signatory to the UNEP FI Principles for Responsible Banking (PRBs), which are to be conducted in the third year after signing. The presentation is based on the reporting template revised by UNEP FI in September 2022.

The six principles reflect the key elements of our sustainability vision and mission and serve to underline our commitment to the Paris Agreement and the United Nations Sustainable Development Goals (SDGs).



### Principle 1: Alignment

We will align our business strategy to be consistent with and contribute to individuals' needs and society's goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks.

Description of requirement	Answer	Links and references
<b>Business Model</b>	Raiffeisen Bank International (RBI) regards Austria, where it is a leading corporate and investment bank, as well as Central and Eastern Europe (CEE) as its home market. Subsidiary banks cover 12 markets across the region. In addition, the Group includes numerous other financial service providers active in areas such as leasing, asset management and M&A. In total, around 45,000 RBI employees serve around 18.6 million customers from more than 1,500 business outlets, the vast majority of which are in CEE. RBI AG shares have been listed on the Vienna Stock Exchange since 2005.	Sustainability and ESG Management/ Interesting facts about Raiffeisen Bank International/About Raiffeisen Bank International Annual report <a href="http://www.rbinternational.com/en/investors/results-reports/annual-reports.html">www.rbinternational.com/en/investors/results-reports/annual-reports.html</a>
<b>Strategy alignment</b>	<p><b>Does your corporate strategy identify and reflect sustainability as strategic priority/ies for your bank?</b>  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><b>Does your bank also reference any of the following frameworks or sustainability regulatory reporting requirements in its strategic priorities or policies to implement these?</b></p> <p><input checked="" type="checkbox"/> Guiding Principles on Business and Human Rights  <input checked="" type="checkbox"/> International Labour Organization fundamental conventions  <input checked="" type="checkbox"/> UN Global Compact  <input checked="" type="checkbox"/> UN Declaration on the Rights of Indigenous Peoples  <input checked="" type="checkbox"/> Any applicable regulatory reporting requirements on environmental risk assessments, e.g. on climate risk - please specify which ones: applicable Austrian and EU law including requirements by the European Central Bank as the bank's supervisor  <input checked="" type="checkbox"/> Any applicable regulatory reporting requirements on social risk assessments, e.g. on modern slavery - please specify which ones: applicable Austrian and EU law  <input type="checkbox"/> None of the above</p>	
	<p><b>Vision 2025</b>            With the Vision 2025 that it presented in 2019 – "We are the most recommended financial services group" – RBI is clearly showing that it wants to be more than just a bank for its customers. RBI is committed to an outstanding service culture which regularly seeks to exceed the expectations of customers with regard to quality. To make this vision a reality, RBI's mission is formulated as follows: "We transform continuous innovation into superior customer experience." This is tied to the promise to the general public to "act in a socially responsible manner, fostering the long-term welfare of the people and businesses in our markets". This is consistent with RBI's sustainability strategy, the aim of which is to generate sustainable value.</p> <p><b>RBI's climate and environmental business strategy</b>            In 2023, RBI developed a new climate and environmental business strategy to integrate climate and environmental criteria into its business processes. As a responsible banker, we support our customers in their climate and ecological turnaround by encouraging them to develop and follow a transition pathway as well as offering sustainable financial products and services. The strategy is subject to regular reviews, when we consider not only the latest scientific advances and the updated ESG findings from our portfolios, but also the transformation progress made by our customers. The three pillars of the climate and environmental business strategy comprise the preparation of RBI's financial income statements in a way that meets the objectives of the Paris Agreement, support of our customers on their path to a climate and ecological turnaround and forwarding the transition to sustainable financing based on current ESG expertise and ESG governance.</p>	<p>Sustainability and ESG Management/ Sustainability concept and strategy/ Mission &amp; Vision 2025</p> <p>Sustainability and ESG Management/ Sustainability concept and strategy/ The RBI Strategy/RBI's climate and environmental business strategy</p>



## Principle 2: Impact and Target Setting

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services. To this end, we will set and publish targets where we can have the most significant impacts.

Description of requirement	Answer	Links and references
<b>2.1 Impact Analysis (Key Step 1)</b> a) Scope	<p><b>Consumer and Institutional Banking:</b> As part of the portfolio analysis, business activities (consumer, business, and corporate banking as per UNEP FI definition), their share in the total portfolio, and market position in CEE countries were considered. The reference date for the last data collection was 30.6.2022. As the portfolio did not change materially in 2023, the results are still up to date, and the analysis did not need to be repeated in consultation with UNEP FI.</p> <p><b>Investment Banking:</b> In 2023, the analysis was extended to include Raiffeisen KAG's portfolio, thereby extending the impact analysis to our most significant investments. The scope of the analysis included the self-managed part of the assets managed by Raiffeisen KAG.</p>	<p>Sustainability Report 2022: Responsible Banker/Impacts, risks and opportunities</p> <p>Responsible banker/Sustainable finance in RBI/Impacts</p> <p>Responsible banker/Sustainable investment/Impacts</p>
b) Portfolio composition	<p><b>Consumer and Institutional Banking:</b> Scope of exposure: For business and corporate banking, the exposure at default (EAD) per sector and country as well as the NACE code of the respective customer were used for further analysis. For corporate and business banking, the impact analysis examined our main sectors by NACE code for twelve markets. For the retail business, the impact of five banking products was examined in more detail. These include credit cards, loan agreements, structured loans, housing loans and vehicle loans. Details on liabilities to banks and customers by asset class can be found in the Annual Report.</p> <p><b>Investment Banking:</b> The scope of the analysis included the self-managed part of the assets managed by Raiffeisen KAG, representing 59.3 per cent of the total fund volume of € 41.2 billion. Broken down by asset class, a sum of € 10.4 billion in share volumes, € 8.2 billion in investments in corporate bonds and € 5.8 billion in investments in sovereign bonds was analyzed. The remaining portion of the managed assets was not analyzed as the assets are not self-managed assets, meaning that not all of the sustainability aspects propagated by Raiffeisen KAG apply.</p>	<p>Sustainability Report 2022: Responsible Banker/Impacts, risks and opportunities</p> <p>Annual report  <a href="http://www.rbiinternational.com/en/investors/results-reports/annual-reports.html">www.rbiinternational.com/en/investors/results-reports/annual-reports.html</a></p> <p>Responsible banker/Sustainable finance in RBI/Impacts</p> <p>Responsible banker/Sustainable investment/Impacts</p>
c) Context	<p><b>Consumer and Institutional Banking &amp; Investment Banking:</b> In the data collection process, priority was given to those sectors identified in the UNEP FI tool's Key Sector Mapping as negative key sectors for the 38 impact topics in twelve impact areas. This mapping subsequently provides information on which sectors and industries are critical to achieving and/or undermining the twelve impact areas. In addition, country needs were identified in relation to the twelve impact areas and the Sustainable Development Goals.</p> <p>The most significant negative impact areas in terms of the largest share of exposure causing the impact are in the two areas of "climate stability" and "circularity". The latter includes the impact topics of "resource efficiency" and "waste". This was also confirmed by the analysis of investment banking that took place in 2023.</p>	<p>Sustainability Report 2022: Responsible Banker/Impacts, risks and opportunities</p> <p>Responsible banker/Sustainable finance in RBI/Impacts</p> <p>Responsible banker/Sustainable investment/Impacts</p>
d) Performance measurement	<p>Targets and measures for the topics of "climate stability" and "circularity" were defined by the business areas. This was implemented in sectorspecific policies such as oil &amp; gas and in the first phase for steel and real estate &amp; construction, and will also be incorporated into future policies (e.g., for agriculture). The target setting process is also supported by the science-based targets that were approved in 2022. RBI has been an active member of the PRB Resource Efficiency and Circularity Target working group since 2022 and established an internal working group on circularity in 2023. Together with Customer Industry Leads and external stakeholders such as the Umweltbundesamt, targets in this area are further developed and evaluated.</p> <p>Various stakeholder dialogues (see page 25 ff.) also took place to broaden expertise within RBI. Sustainability targets were agreed at the level of RBI's Management Board and are also transparently disclosed in the Remuneration Report.</p> <p>Raiffeisen KAG has addressed the topics of climate stability and circularity through initiatives. With regards to climate stability, joining the Net Zero Asset Managers Initiative (NZAM) set an example both internally and to the outside world. The clear reduction targets for the overall portfolio are followed by analyses and targets for individual portfolios in order to reduce negative impacts in relation to climate stability. In terms of circularity, figures on waste and water consumption have been determined and analyzed as part of a KPI calculation since 2016. Engaging with companies and issuers presents another opportunity to reduce negative impacts. Each year, Raiffeisen KAG conducts a number of discussions and is actively involved in the annual general meetings of those companies in which it has invested (see also "comprehensive stakeholder engagement" on page 24).</p> <p>In 2023, Raiffeisen KAG signed the Finance for Biodiversity (FFB) Pledge. The FFB initiative, which was established in 2020, aims to increase transparency regarding biodiversity-related risks and opportunities within the finance sector and business and to contribute towards protecting and restoring biodiversity through finance activities and investments. This actively supports targets 14 and 15 of the Global Biodiversity Framework.</p>	<p>Responsible banker/Sustainable finance in RBI/Impacts</p> <p>Remuneration Report  <a href="http://www.rbiinternational.com/en/investors/governance-remuneration.html">www.rbiinternational.com/en/investors/governance-remuneration.html</a></p> <p>Responsible banker/Sustainable investments/Impacts</p> <p>Responsible banker/Sustainable investment/Management</p>

**Self-assessment summary:**  
**Which of the following components of impact analysis has your bank completed, in order to identify the areas in which your bank has its most significant (potential) positive and negative impacts?**

Scope:  Yes  In progress  No  
 Portfolio composition:  Yes  In progress  No  
 Context:  Yes  In progress  No  
 Performance measurement:  Yes  In progress  No

**Which most significant impact areas have you identified for your bank, as a result of the impact analysis?**  
**Consumer and Institutional Banking:** The results of the analysis showed that the two main positive impact areas were financial services in general (public access to financial services) and growth in SMEs (development and value creation thanks to successful SMEs). Both areas had positive impacts on SDGs 8 and 9. The main negative impact areas relating to the largest proportion of the exposure were climate stability and circularity, including resource intensity and waste.  
**Investment Banking:** The principal negative impact areas revealed by the analysis related to waste and resource intensity, collectively referred to as circularity. Indirect negative impacts relating to climate stability were also identified. A positive impact was established in the areas of "healthy economies" and "livelihood" or "employment".

**How recent is the data used for and disclosed in the impact analysis?**  
 Up to 6 months prior to publication  
 Up to 12 months prior to publication: **Investment Banking** (30.06 2023)  
 Up to 18 months prior to publication  
 Longer than 18 months prior to publication: **Consumer & Institutional Banking** (as the portfolio did not change materially in 2023, the analysis was, in consultation with UNEP FI, not repeated)

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**2.2 Target Setting (Key Step 2)**

**a) Alignment**

In 2022, work continued on defining targets for the two identified impact areas of strategic importance - „climate stability“ and „circularity“ - which are of major importance in all three business areas. This is also reflected in the Strategic Roadmaps of the individual Board areas as well as in the defined ESG KPIs and ultimately in the compensation report for subsequent years.	Sustainability and ESG Management/ Sustainability concept and strategy/ Our sustainability strategy
For the impact area climate stability, RBI's science-based targets were approved by the Science Based Target Initiative in September 2022. Since then, the progress has been assessed and the targets are further developed to align with future EU ESG regulation. They are an important tool to support the Group's portfolio steering towards financing activities that are aligned with the Paris Agreement goals.	Sustainability program
For the impact area circularity a Group-wide qualification process was rolled out with the target to identify at least € 200 million circularity-eligible assets or with an impactful circularity KPI. Additionally, relevant circularity topics have been included in multiple dimensions within the E-Score enabling customer segmentation. This is also reflected in the underwriting process.	Responsible banker/Sustainable finance in RBI/Metrics and ambitions

**b) Baseline** (as per UNEP FI guidance: <https://www.unepfi.org/prb-reporting-and-self-assessment-template/>)

**Climate stability**

Code	Indicator	Answer	Code	Indicator	Answer
A. 1.1	<b>Climate strategy:</b> Does your bank have a climate strategy in place?	<b>Yes</b> , as part of RBI's climate and environmental business strategy.  Sustainability and ESG Management/ Sustainability concept and strategy/The RBI Strategy/RBI's climate and environmental business strategy	A. 2.1	<b>Client engagement process</b>	<b>Yes</b> , see second Pillar of RBI's climate and environmental business strategy and steering approaches for sustainable finance.  Sustainability and ESG Management/ Sustainability concept and strategy/The RBI Strategy/RBI's climate and environmental business strategy  Responsible banker/Sustainable finance in RBI/Management/RBI risk management approach/III. Steering approaches, reflecting risks and opportunities
A. 1.2	<b>Paris alignment target:</b> Has your bank set a long-term portfolio-wide Paris-alignment target?	<b>Yes</b> , target degree 2040 according to approved SBTi targets.  Responsible banker/ Sustainable finance in RBI/ Management/RBI risk management approach/ II. Measurement methodologies & analytics/ The way forward - science-based targets	A. 2.2	<b>Absolute financed emissions:</b> What are your absolute emissions (financed emissions) in your loan and/or investment portfolio?	Approximately 9,21 million tons CO <sub>2</sub> e (corporate loans and unlisted equity, Project finance electricity generation, Project financing real estate, shares and bonds).  Responsible banker/Sustainable finance in RBI/Management/RBI risk management approach/II. Measurement methodologies & analytics/Environmental metrics and ambitions/Financed GHG emissions 2023



A. 1.3	<b>Policy and process for client relationships:</b> has your bank put in place rules and processes for client relationships (both new clients and existing clients), to work together towards the goal of transitioning the clients' activities and business model?	<p><b>Yes</b>, next to the ESG customer score sector-specific Group policies.</p> <p>Responsible banker/Sustainable finance in RBI/Management/RBI risk management approach...</p> <p>...II. Measurement methodologies &amp; analytics</p> <p>...III. Steering approaches, reflecting risks and opportunities</p>	A. 2.3	<b>Sector-specific emission intensity:</b> What is the emission intensity within the respective sector?	<p>See table on GICS industry group financed emissions and intensity, separated by Scope 1+2, Scope 3 and PCAF asset class.</p> <p>Responsible banker/Sustainable finance in RBI/Management/RBI risk management approach/II. Measurement methodologies &amp; analytics/Environmental metrics and ambitions/Financed GHG emissions 2023</p>
A. 1.4	<b>Portfolio analysis:</b> Has your bank analyzed (parts of) its lending and/or investment portfolio in terms of financed emissions (Scope 3, category 15); technology mix or carbon-intensive sectors in the portfolio?	<p><b>Yes</b>, next to the portfolio analysis for consumer, institutional and investment banking using the UNEP FI impact analysis tool, financed GHG emissions are calculated and published since the year 2020.</p> <p>Responsible banker/Sustainable finance in RBI</p> <p>Responsible banker/Sustainable investment</p>	A. 2.4	<b>Proportion of emissions financed that fall under a decarbonization target:</b> What percentage of your bank's financed emissions fall under a decarbonization target, i.e., are from customers that have a transition plan in place?	See A.4.2
A. 3.1	<b>Does your bank lend/invest in green assets/credit and low-carbon activities and technologies?</b>	<p><b>Yes</b>, sustainable investing of customer deposits at RBI AG is in large part effected via Raiffeisen KAG. The share of sustainability-related investment certificates increases continuously.</p> <p>Responsible banker/Sustainable investment</p>	A. 4.1	<b>Reduction of greenhouse gas emissions:</b> How much have the financed greenhouse gas emissions been reduced?	<p>The financed GHG emissions show a decrease of 7.9 per cent, from 10.00 mio. tCO<sub>2</sub>e to 9.21 mio. tCO<sub>2</sub>e.</p> <p>Responsible banker/Sustainable finance in RBI/Management/RBI risk management approach/II. Measurement methodologies &amp; analytics/Environmental metrics and ambitions/Financed GHG emissions 2023</p>
A. 3.2	<b>Volume of finance lent to or invested in carbon-intensive sectors and activities, and transition finance:</b> How much does your bank lend to or invest in carbon-intensive sectors and activities? How much does your bank invest in transition financing?	<p>See table on GICS industry groups.</p> <p>Responsible banker/Sustainable finance in RBI/Management/RBI risk management approach/II. Measurement methodologies &amp; analytics/Environmental metrics and ambitions/Financed GHG emissions 2023</p>	A. 4.2	<b>Portfolio Alignment:</b> How much of your bank's portfolio is Paris-focused?	<p>23 per cent of the portfolio.</p> <p><a href="http://www.rbinternational.com/en/raiffeisen/sustainability-esg/responsible-banking/science-based-target.html">www.rbinternational.com/en/raiffeisen/sustainability-esg/responsible-banking/science-based-target.html</a></p>
<b>Circularity</b>					
Code	Indicator	Answer	Code	Indicator	Answer
–	<b>Strategy Circularity</b>	<p><b>Yes</b>, as part of RBI's climate and environmental business strategy.</p> <p>Sustainability and ESG Management/ Sustainability concept and strategy/The RBI Strategy/RBI's climate and environmental business strategy</p>	–	<b>Customer loyalty process</b>	<p><b>Yes</b>, see second Pillar of RBI's climate and environmental business strategy and steering approaches for sustainable finance.</p> <p>Sustainability and ESG Management/ Sustainability concept and strategy/The RBI Strategy/RBI's climate and environmental business strategy</p> <p>Responsible banker/Sustainable finance in RBI/Management/RBI risk management approach/III. Steering approaches, reflecting risks and opportunities</p>
–	<b>Has the topic of circularity and biodiversity been identified and defined in terms of ESG risk management?</b>	<p><b>Yes</b>, RBI distinguishes between risks related to climate change (including transition risk due to new regulations, technological changes, etc. and physical risk) and circularity (including resource efficiency and biodiversity). A qualitative and expert-based approach was initially adopted, which was further substantiated by a quantitative assessment (impact analysis, calculation of financed emissions, climate stress test).</p> <p>Responsible banker/Sustainable finance in RBI/Management/RBI risk management approach/I. Identification &amp; definition of ESG risks</p>			
c) Smart targets	<p>We use two types of targets: sectoral targets and portfolio targets.</p> <p><b>Sectoral targets</b> are set for the portfolio, corresponding to the Group's commercial real estate and electricity generation financing activities. <b>Portfolio targets</b> have been set using the temperature rating methodology, an engagement-oriented approach whereby the progress of the temperature rating of the RBI portfolio, down from a default value of 3.2°C, depends on our customers' ambitions in setting their own decarbonization targets. In 2023, RBI published its first progress report with regards to the temperature rating in accordance with the SBTi on its website.</p>	<p>Responsible banker/Sustainable finance in RBI/Management/RBI risk management approach/II. Measurement methodologies &amp; analytics/The way forward – science-based targets</p> <p><a href="http://www.rbinternational.com/en/raiffeisen/sustainability-esg/responsible-banking/science-based-target.html">www.rbinternational.com/en/raiffeisen/sustainability-esg/responsible-banking/science-based-target.html</a></p>			

<p><b>d) Action plan</b></p>	<p>The further development of <b>sector-specific policies</b> is key concern. We have already made commitments in the areas of thermal coal, nuclear power, arms and war material, and gambling. We have also been working to (re)define our approach to <b>industries with high CO<sub>2</sub> emissions</b> and/or high negative impacts on circularity and biodiversity by further developing sector-specific Group policies.</p> <p>The Oil &amp; Gas exclusion policy (which has been published) and the first phases of the Oil &amp; Gas, Steel and Real Estate &amp; Construction sectoral business policies – involving the ESG clustering of corporate customers has been completed. The second phase of these policies includes operational targets and engagement criteria. In this sense, the Oil &amp; Gas policy was finalized in 2023 and the Steel and Real Estate &amp; Construction policies will be finalized in the first half of 2024. Additional policies (e.g. agriculture) will follow in 2024. Our Human Rights Policy was developed in 2022.</p> <p>During 2023, the method of clustering customers was changed; instead of the expert-driven approach, we started to use a model-driven approach that is based on the customers' assigned ESG scores. This approach consists of several components including, but not limited to, the status of reduction targets, measurement of companies' carbon emissions and energy consumption. Based on this approach, customers in a specific industry with the top third scores are considered „supportive“, the third in the middle are considered „transformative“, and the worst third are considered „restrictive“. While we will encourage „transformative“ customers to become „supportive“, we will also work with „restrictive“ customers to move them to „transformative“ or higher status; if such transformation does not occur, „restrictive“ customers will be subject to potential attrition and exit processes.</p> <p>Efforts to use more quantitative measures and implementations will continue to be our focus in 2024. In addition to our commitment to the Science Based Targets initiative, we will continue to focus on quantitative measures (e.g. restrictions, further CO<sub>2</sub> reduction targets and resource efficiency targets).</p>	<p>Responsible banker/Sustainable finance in RBI/Management/RBI risk management approach/III. Steering approaches, reflecting risks and opportunities</p> <p>Sustainability and ESG Management/ ESG governance/ESG &amp; sustainability policies/RBI Group Human Rights Policy</p>
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<b>Self-assessment summary:</b>									
Which of the following components of target setting in line with the PRB requirements has your bank completed or is currently in a process of assessing?									
	<b>Climate stability</b>			<b>Circularity</b>			<b>Human Rights</b>		
Alignment	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> Nein	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No
Baseline	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> Nein	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> In progress	<input type="checkbox"/> No
SMART targets	<input checked="" type="checkbox"/> Yes (SBTi)	<input type="checkbox"/> In progress	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> Nein	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> In progress	<input type="checkbox"/> No
Action plan	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> In progress	<input type="checkbox"/> Nein	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> In progress	<input type="checkbox"/> No

<p><b>2.3 Target implementation and monitoring (Key Step 2)</b></p>	<p>RBI aligns its business model with the overarching strategic goal of creating long-term value. An effective measurement and monitoring process in risk management enables target implementation to be managed.</p> <p>RBI is focusing on managing environmental and climate-related risks and is further expanding the treatment of social and governance risks. These internal measurement and monitoring mechanisms are also reviewed by the European Banking Authority and European Central Bank as part of climate stress tests and the Supervisory Review and Evaluation Process (SREP).</p> <p>As reported in <b>2.2</b>, RBI has developed specific ESG targets and measures with regards to the impact area climate stability. For circularity, a Group-wide qualification process was rolled out and specific targets set. RBI set science-based climate targets, which were approved by the Science Based Targets Initiative in September 2022. With these science-based climate targets, we want to contribute to minimizing the negative environmental impact of our own business activities – through corporate lending and operational ecology – in the long term.</p> <p>In 2018, RBI AG set up its green bond issue program aimed at promoting sustainable lending in Austria and Central and Eastern Europe. With a total volume of just above € 2 billion in Austria as of December 2023, RBI AG is currently the largest sustainable bond issuer in the country among financial institutions, and has now established itself as a regular issuer of green bonds on the international capital markets and in the retail segment in Austria and Central and Eastern Europe.</p> <p>Since becoming signatories of the PRBs in 2021, we have conducted a combined materiality and impact analysis. We have initiated a long-term plan to further integrate sustainability into our business strategies, which is reflected in the strategic roadmaps and ESG KPIs of each executive area.</p>	<p>Sustainability and ESG Management/ Sustainability concept and strategy/ Our sustainability strategy</p> <p>Responsible banker/Sustainable finance in RBI/Management/RBI risk management approach</p> <p>Responsible banker/Additional sustainable services and products/ Metrics and ambitions</p> <p>Business Conduct/Our values and principles implemented in applicable rules</p>
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### Principle 3: Clients and Customers

We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.


Description of requirement	Answer	Links and references
<b>3.1 Client engagement</b> Does your bank have a policy or engagement process with clients and customers in place to encourage sustainable practices? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No  Does your bank have a policy for sectors in which you have identified the highest (potential) negative impacts? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<p>The <b>Code of Conduct</b> describing how we deal with customers, business partners and employees is a binding regulatory framework that is applicable Group-wide for all employees and can be found in the respective national language on all of the websites of RBI and the subsidiary banks in Central and Eastern Europe. The Code is based on Raiffeisen's fundamental values and RBI's values of collaboration, proactivity, learning and responsibility. It is oriented towards the specific requirements of everyday business at home and abroad.</p> <p>RBI has set itself the goal of providing <b>best-in-class ESG consultancy</b> for customers and ensuring a high standard of quality. RBI performs expert analyses and evaluations of corporate and institutional customers from an ESG perspective, and helps our customers to identify green and social aspects of their business profile. In addition, we act as an expert consultant on the structuring of new products and services, and for adapting existing products to customers' specific ESG requirements.</p> <p>To tackle the topics of <b>negative ESG impacts and greenwashing prevention</b> within the sustainable finance transactions, RBI has implemented different processes, which include the ESG Expert Opinion, and the Greenwashing Prevention Check as well the establishment of an <b>exclusion list</b> of all corporate activities in which RBI does not wish to be involved. In addition, employees receive regular training on identifying certain signals which indicate that certain activities and sectors are particularly critical from a sustainability perspective.</p> <p>RBI actively promotes <b>understanding of financial products and services</b> and shares banking expertise as part of its daily advisory function. It is closely associated with the topic of financial education, i.e. the competent handling of money and financial matters, also known as „financial literacy“, due to its core business.</p>	<p>Business Conduct/Our values and principles implemented in applicable rules/Code of Conduct</p> <p>Responsible banker/Sustainable finance in RBI/Management/Sustainable Finance Management/ESG customer consultancy and engagement</p> <p>Responsible banker/Sustainable finance in RBI/Management/Sustainable Finance Management/Prevention of greenwashing and negative ESG impacts</p> <p>Responsible banker/Societal aspects in the core business/Management/Financial inclusion and other measures</p>
<b>3.2 Business opportunities</b>	<p>Providing sustainable financing generates added value for our customers and a wide range of activities for society that are suited to sustainable financing. We describe financing as being sustainable when it has a long-term positive impact on the environment and climate and/or on societal and social issues, and when it supports the attainment of the Sustainable Development Goals (SDGs). More specifically, the definition of a sustainable transaction is based on the EU Taxonomy Regulation and on RBI's in-house definition of green and social (basis: RBI AG Sustainability Bond Framework) and on the LMA Sustainability Linked Principles (ESG-linked financing). The eligibility criteria of the listed frameworks differ in terms of complexity and precision. The total volume of sustainable financing (excluding retail financing) for corporate and institutional customers at RBI AG and the subsidiary banks in CEE (RBI*) in 2023 was around € 11 billion as at 31 December 2023. Of this amount, € 7.5 billion was utilized by customers. In addition, there is an unutilized line of sustainable financing of € 3.6 billion.</p> <p>On the investment side, we offer sustainable products such as sustainability funds (of Raiffeisen Kapitalanlagegesellschaft and Kathrein Privatbank) and sustainability-related certificates.</p> <p>In addition, we offer further sustainable products and services, such as green bond issues, ESG-linked derivatives or sustainable debt instruments for corporate and institutional clients.</p>	<p>Responsible banker/Sustainable finance in RBI/Metrics and ambitions</p> <p>Responsible banker/Sustainable investment</p> <p>Responsible banker/Additional sustainable services and products</p>



### Principle 4: Stakeholder

We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society's goals.

Description of requirement	Answer	Links and references
<b>4.1 Stakeholder identification and consultation</b> Does your bank have a process to identify and regularly consult, engage, collaborate and partner with stakeholders (or stakeholder groups) you have identified as relevant in relation to the impact analysis and target setting process? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<p>RBI defines its stakeholders as those who have legitimate concerns towards the company in connection with its direct or indirect business activities. These primarily include employees, customers, owners, subsidiaries and associates, and business partners. In addition, there are a number of other stakeholder groups with whom mutual and regular relationships exist. Our business activities affect the interests of many stakeholder groups and people in different countries. We maintain and promote constructive exchange with our stakeholders. In various forms of communication, we assess the relevance of sustainability issues and use the results to further develop our sustainability management. In addition, the RBI Group is an active participant in various national and international forums.</p> <p>Furthermore, partnerships with non-governmental organizations, the promotion of volunteer programs and the support of educational and social initiatives contribute to a sustainable society.</p> <p>In addition, the Sustainability Council contributes to discourse and opinion-forming with its internal decision-makers from the banking group as well as with its external members, who are ESG knowledge holders and experts from various sectors of society.</p>	<p>Sustainability and ESG Management/ Stakeholder engagement</p> <p>Engaged citizen – Environmental and social aspects</p> <p>Sustainability and ESG Management/ ESG governance</p>

 <b>Principle 5: Governance &amp; Culture</b> We will implement our commitment to these Principles through effective governance and a culture of responsible banking			
Description of requirement	Answer	Links and references	
<b>5.1 Governance Structure for Implementation of the Principles</b> Does your bank have a governance system in place that incorporates the PRB? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<p>The Board of Management is the highest decision-making body for ESG-related strategies, policies and commitments. Each board department must implement the respective sustainability strategies and integrate them into performance management. The Personnel Committee approves the ESG KPIs for the members of the Management Board of RBI AG, and these are published in the annual remuneration report. RBI AG offers members of the supervisory and management bodies specific training on ESG topics as well as on climate and environmental risks on an ongoing basis (e.g. Fit &amp; Proper training).</p> <p>The Sustainable Finance department, functioning as a central competence center for all customer segments as well as Group ESG &amp; Sustainability Management are exclusively concerned with ESG topics. The risk management board area as well as other departments have integrated ESG topics into their operations to implement aligned strategies and policies in the respective areas.</p> <p>The cross-functional and cross-divisional Responsible Banking B-1 Steering Group supports the Board of Management in its ESG decisions. This Steering Group is composed of the divisional heads of all Board divisions that focus on ESG issues and acts as an advisory and recommendation body to the Board. Monthly meetings are held and led by co-chairs from the areas One Business Bank and Group ESG &amp; Sustainability Management. For 2024 it is planned to convert the Steering Group into a formal Sustainability Committee that reports regularly to RBI's Management Board. This shall ensure that it can make corresponding decisions on the short, medium and long-term strategic steps and also on critical ESG matters.</p> <p>The Sustainability Council of RBI has become firmly established as a core organizational component of stakeholder dialog to advise on the development of sustainability agendas.</p>	Sustainability and ESG Management/ ESG governance/Sustainable corporate management/...  ... The Management Board and Supervisory Board  ... Group ESG & Sustainability Management division and Sustainability Officers at the subsidiaries ...Sustainable Finance ...Risk  ...Responsible Banking Steering Group und Task Force  ...Sustainability Council	
<b>5.2 Promoting a culture of responsible banking</b>	<p>To meet the growing demand for knowledge in the area of sustainability – particularly with regard to sustainable finance – the Group ESG &amp; Sustainability Management department established two important learning formats. The internal ESG Academy includes documents, videos, podcasts on the subject of ESG from business areas such as Corporates and Markets &amp; Investment Banking, as well as important links and documents on the Principles for Responsible Banking and statutory provisions. The Group-wide sustainability competence online trainings (offered as an eLearning module) are updated yearly and cover all areas of sustainability. In 2023, additional modules were added, a mandatory module for employees in the retail segment to improve implementation of ESG aspects in the private customer business as well modules aiming to strengthen competency with regards to Human Rights topics.</p> <p>Regular Microsoft Teams meetings were held with ESG ambassadors in the different board areas. Various experts report on latest internal and external business developments and a lively exchange on best practice is held.</p> <p>In addition, the remuneration report and the Group guideline on performance management reflect the sustainable goals as part of the remuneration policy at Management Board level.</p>	Fair partner – Employees/ Management/Employee development/Initiatives/Focus on employees' sustainability/ESG expertise  Fair partner – Employees/ Management/Employee development/Performance management	
<b>5.3 Policies and due diligence processes</b>	<p>Numerous <b>internal policies and due diligence procedures</b> describe effective implementation and support to manage significant positive and negative impacts. By way of example, the most important are listed here (further details can be found in the specific report chapters):</p> <ul style="list-style-type: none"> <li>▪ <b>Strategic Road Map/Vision/Mission</b> Focus initiatives that are evaluated on a quarterly basis.</li> <li>▪ <b>Group wide Code of Conduct</b> as well as <b>Supplier Code of Conduct</b> <a href="http://www.rbiinternational.com/en/raiffeisen/sustainability-esg/responsible-banking/code-of-conduct.html">www.rbiinternational.com/en/raiffeisen/sustainability-esg/responsible-banking/code-of-conduct.html</a></li> <li>▪ <b>ESG &amp; Sustainability Policy</b></li> <li>▪ <b>RBI Group Human Rights Policy</b></li> <li>▪ <b>Operational environmental goals of RBI</b> (Paris aligned)</li> <li>▪ <b>Thermal Coal and Nuclear Group Policy</b> and other <b>sector-specific policies</b></li> <li>▪ <b>ESG Rulebook</b>, which defines uniform group wide definitions of green and social transactions in the RBI Group (corporate). The basis for the definition is primarily the EU taxonomy regulation.</li> <li>▪ <b>ESG Risk Framework</b>, which serves as an overview and guidance on the most important measures that have been initiated or are planned on the risk management side in order to meet market and regulatory expectations.</li> </ul>	Due to limited space, the full pooth is not provided.  Mission & Vision 2025 Performance management Code of Conduct + Supplier Code of Conduct Our understanding of sustainability RBI Group Human Rights Policy Environmental targets III. Steering approaches, reflecting risks and opportunities ESG Rulebook for sustainable customers and transactions Sustainability and ESG Management/ ESG governance	
<b>Self-assessment summary:</b>			
Does the CEO or other C-suite officers have regular oversight over the implementation of the Principles through the bank's governance system?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Does the governance system entail structures to oversee PRB implementation (e.g. incl. impact analysis and target setting, actions to achieve these targets and processes of remedial action in the event targets/milestones are not achieved or unexpected neg. impacts are detected)?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Does your bank have measures in place to promote a culture of sustainability among employees (as described in 5.2)?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No



## Principle 6: Transparency & Accountability

We will periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society's goals.

Description of requirement	Answer	Links and references
<p><b>6.1 Assurance</b></p> <p>Has this publicly disclosed information on your PRB commitments been assured by an independent assurer?</p> <p><input checked="" type="checkbox"/> Yes (Deloitte)</p> <p><input type="checkbox"/> Partially</p> <p><input type="checkbox"/> No</p> <p><b>6.2 Reporting on other frameworks</b></p> <p>Does your bank disclose sustainability information in any of the listed below standards and frameworks?</p> <p><input checked="" type="checkbox"/> GRI</p> <p><input type="checkbox"/> SASB</p> <p><input checked="" type="checkbox"/> CDP</p> <p><input type="checkbox"/> IFRS Sustainability Disclosure Standards (to be published)</p> <p><input checked="" type="checkbox"/> TCFD</p> <p><input type="checkbox"/> Other:</p> <p><input checked="" type="checkbox"/> EBA ESG ITS (qualitative &amp; quantitative)</p> <p><input checked="" type="checkbox"/> Disclosure under EU Taxonomy Regulation</p>	<p>The following is a list of the most <b>important international and national practices</b> that RBI applies and to which it has committed itself, primarily in order to fulfill the desired objectives from the impact analysis that was carried out:</p> <ul style="list-style-type: none"> <li>▪ <b>UN Global Compact:</b> RBI is one of the companies that have signed the UN Global Compact (UNGC).</li> <li>▪ <b>Sustainable Development Goals:</b> The SDGs that are most material to the business and therefore relevant, and which best complement our sustainability strategy, are taken into account.</li> <li>▪ <b>Science Based Targets initiative (SBTi):</b> As a signatory to the Science Based Targets Initiative – an internationally recognized framework for setting carbon targets for companies based on the Greenhouse Gas Protocol (GHG Protocol).</li> <li>▪ <b>IFC/MIGA-Standards:</b> are applied to the environmental and social risk process at seven subsidiary banks in Central and Eastern Europe.</li> <li>▪ <b>PCAF:</b> The Partnership Carbon Accounting of Financials Initiative (PCAF) is a standard for measuring greenhouse gas emissions from portfolios, of which RBI is a member.</li> <li>▪ In addition, RBI applies all relevant <b>EU and national legal texts</b> that are applicable in connection with responsible banking. It should be particularly emphasized here that this report constitutes the consolidated <b>non-financial report of RBI</b> (pursuant to sections 267a and 243b UGB). As a listed company, RBI AG acknowledges and complies with the Austrian <b>Code of Corporate Governance</b> (January 2021). Likewise, the relevant <b>compliance laws</b> are adequately implemented (e.g. in the area of anti-money laundering and combating corruption and bribery).</li> <li>▪ <b>Regulatory disclosure in accordance with the EU Taxonomy Regulation</b> is also published in this report.</li> <li>▪ The new <b>Pillar 3 disclosure requirements of the European Banking Authority on environmental, social and governance risks</b> also require RBI to publish a range of qualitative and quantitative information on transitional and physical risks, exposures to risk sectors and loans for environmentally friendly activities on a semi-annual basis. The relevant qualitative information overlaps to a large extent with the information already disclosed in the Sustainability Report in 2022. For the 2023 financial year, it is therefore disclosed directly in the appropriate chapters of the Sustainability Report and identified by means of side notes. Conversely, the regulatory Pillar 3 disclosure, which is available on RBI's website, contains references to the corresponding pages in the Sustainability Report. The quantitative information is available only on the website.</li> </ul>	<p>Business Conduct/Our values and principles implemented in applicable rules...</p> <p>...UN Global Compact</p> <p>...Sustainable Development Goals</p> <p>...Science-based targets</p> <p>Responsible banker/Sustainable finance in RBI/Management/RBI risk management approach...</p> <p>...IV. Risk processes and governance</p> <p>...II. Measurement methodologies &amp; analytics/Financed GHG emissions 2023</p> <p>Sustainability and ESG Management/About the Report/Applied ESG guidelines...</p> <p>... Regulatory disclosure according to the EU Taxonomy Regulation</p> <p>... Regulatory disclosure of ESG risks</p>
<p><b>6.3 Outlook</b></p>	<p>RBI will continue its efforts in the coming months and years and continuously improve the implementation of the Principles for Responsible Banking. This applies in particular to further efforts to meet the Principles for Responsible Banking.</p>	<p>Sustainability program; Forewords</p>
<p><b>6.4 Challenges</b></p> <p><input type="checkbox"/> Embedding PRB oversight into governance</p> <p><input type="checkbox"/> Gaining or maintaining momentum in the bank</p> <p><input type="checkbox"/> Getting started: where to start and what to focus on in the beginning</p> <p><input type="checkbox"/> Conducting an impact analysis</p> <p><input type="checkbox"/> Assessing negative environmental and social impacts</p> <p><input type="checkbox"/> Choosing the right performance measurement methodology/ies</p> <p><input type="checkbox"/> Setting target</p>	<p><input type="checkbox"/> Customer engagement</p> <p><input type="checkbox"/> Stakeholder engagement</p> <p><input checked="" type="checkbox"/> Data availability</p> <p><input checked="" type="checkbox"/> Data quality</p> <p><input type="checkbox"/> Access to resources</p> <p><input type="checkbox"/> Reporting</p> <p><input type="checkbox"/> Assurance</p> <p><input type="checkbox"/> Prioritizing actions internally</p>	

# > Abbreviations

ABC	Anti-Bribery and Corruption
ABF	Asset Based Finance
ABS	Asset-Backed Security
AFRAC	Austrian Financial Reporting and Auditing Committee
AICO	Association for Internal Communication
AIFMD	Alternative Investment Fund Managers and Amending Directives
AktG	Aktiengesetz (Stock Corporation Act)
AML	Anti Money Laundering
AT	Austria
ATM	Automatic Teller Machine
AuM	Assets under Management
AUVA	Allgemeine Unfallversicherungsanstalt (Austrian Workers' Compensation Board)
BAST-FIN II	Branchenstiftung Finance
BCM	Business Continuity Management
B-1	Board-1 – second tier of management
B-2	Board-2 – third tier of management
BVK	Betriebliche Vorsorgekasse (company pension fund)
BWG	Bankwesengesetz (Austrian Banking Act)
CAPEX	Capital Expenditure
CASRS	Crédit Agricole Srbija AD, Novi Sad
CCA	Climate Change Adaption
CCM	Climate Change Mitigation
CDP	Carbon Disclosure Project
CE	Central Europe
CEBS	Certified Employee Benefit Specialist
CEE	Central and Eastern Europe
CEF	Customer Experience Framework
CEMS MIM	CEMS Master's in International Management
CEO	Chief Executive Officer
CET	Common Equity Tier
CFO	Chief Financial Officer
CFT	Combating the Financing of Terrorism
CG	Corporate Governance
CIO	Chief Information Officer
CO <sub>2</sub> e	CO <sub>2</sub> -equivalent
CoC	Code of Conduct
COO	Chief Operating Officer
COP 21	21 <sup>st</sup> Conference of the Parties (21. Climate Conference 2015 in Paris)
CORP	Corporate Banking
CPI	Corruption Perceptions Index
CRREM	Carbon Risk Real Estate Monitor
CRD	Capital Requirements Directive
CRO	Chief Risk Officer
CRS	Common Reporting Standard
CSDDD	Corporate Sustainability Due Diligence Directive
CSR	Corporate Social Responsibility
CSRD	Corporate Sustainability Reporting Directive

CST	Climate Stress Testing
DAC	Directive on Administrative Cooperation
DC	Data Center
DDoS	Distributed Denial of Service
DGNB	Deutsche Gesellschaft für Nachhaltiges Bauen (German Sustainable Building Council)
DMA	Disclosure Management Approach
EACB	European Association of Co-Operative Banks
EAD	Exposure At Default
EBA	European Banking Authority
EBRD	European Bank for Reconstruction and Development
ECB	European Central Bank
EE	Eastern Europe
EEA	European Economic Area
EEBS	Energy-Efficient Building and Renovation
EIB	European Investment Bank
EMAS	Eco Management and Audit Scheme
EMD	Electronic Money Directive
EMEA	Europe, Middle East, Africa
EMI	European Movement International
EPC	Energy Performance Certificate
ER	Environmental Risk
ESC	European Staff Council
ESG	Environment Social Governance
ESMA	European Securities and Markets Authority
ESMS	Environmental and Social Management System
ETS	Emissions Trading System
EVP	Employee Value Proposition
FAQ	Frequently Asked Questions
FATCA	Foreign Account Tax Compliance
FATF	Financial Action Task Force
FCPM	Financial Institutions, Country and Portfolio Management
FEIEA	European Federation of Internal Communication Association
FfB	Finance for Biodiversity Foundation
FinAnKo	Austria Bishops` Conference and the Religious Order of Austria
FITCC FIT	Coding Challenge
FNG	Forum Nachhaltige Geldanlagen (Sustainable Investment Forum)
FS	Financial Sector
FTE	Full Time Employee
FTSE	Financial Times Stock Exchange
GAR	Green Asset Ratio
GBC	Green Bond Committee
GDP	Gross Domestic Product
GDPR	General Data Protection Regulation
GfK	Growth from Knowledge
GHG	Greenhouse gas
GICS	Global Industry Classification Standard
GMSG	Gemeinsamer Meldestandard-Gesetz (Common Reporting Standard Act)

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GR	Governmental Risk
GRI	Global Reporting Initiative
GSSB	Global Sustainability Standards Board
GWh	Gigawatt hour
HPI	House Price Index
ICAAP	Internal Capital Adequacy Assessment Framework
ICC	International Chamber of Commerce
ICMA	International Capital Market Association
ICS	International Control System
IFC	International Finance Corporation
IFRS	International Financial Reporting Standards
IIA	International standards for Internal Auditing
IMF	International Monetary Fund
INCDPM	Method for assessing risks of workplace injuries and illnesses
IPCC	Intergovernmental Panel on Climate Change
ISO	International Organization for Standardization
ISS	Institutional Shareholder Services
ITS	Implementing Technical Standards
JC	Joint Committee
Kathrein	Kathrein Privatbank AG
KPI	Key Performance Indicator
KVO	Kraftstoffverordnung (Fuel Ordinance)
KWh	Kilowatt hour
KYC	Know Your Customer
LAWs	Laws
LED	Light-emitting diode
LGD	Loss Given Default
LGBTQI+	Lesbian, gay, bisexual, transsexual, queer and intersexual
LLM	Large Language Models
LMA	Loan Market Association
LNG	Liquid Natural Gas
LULUCF	Land Use, Land-Use Change, and Forestry
LRG	Local and Regional Government
M&A	Mergers and Acquisitions
MCD	Mortgage Credit Directive
MIB	Management & Investment Banking
MiFID	Markets in Financial Instruments Directive
MIGA	Multilateral Investment Guarantee Agency
ML	Machine Learning
MSCI	Morgan Stanley Capital International
MW	Megawatt
MWh	Megawatt hour
NACE	Statistical classification of economic activities in the European Community
NaDiVeG	Nachhaltigkeits- und Diversitätsverbesserungsgesetz (Austrian Sustainability and Diversity Improvement Act)
NFC	Non-Financial Corporates
NFRD	Non-Financial Reporting Directive
NGFS	Network for Greening the Financial System



NGO	Non-Governmental Organization
NIR	National Inventory Report
NPO	Non-Profit Organisation
NPP	Nuclear Power Plants
NPS	Net Promoter Score
NRRP	National Recovery and Resilience Plan
NZAM	Net Zero Asset Manager
NZEB	Net Zero Energy Buildings
OECD	Organization for Economic Co-operation and Development
OeKB	Österreichische Kontrollbank AG
ÖGNI	Österreichische Gesellschaft für nachhaltige Immobilien (Austrian Society for Sustainable Real Estate)
ÖGUT	Österreichische Gesellschaft für Umwelt und Technik (Austrian Society for Environment and Technology)
OHS	Occupational Health and Safety Management
OMI	Open Medical Institute
OpRisk	Operational Risk
PAI	Principle Adverse Impact
PAP	Product Approval Process
PCAF	Partnership for Carbon Accounting Financials
Pkm	Passengerkilometers
P&OI	People & Organisational Innovation
PPP	Public-Private-Partnership
PRB	Principles for Responsible Banking
PSD	Payment Service Directive
PwC	PricewaterhouseCoopers
QI	Qualified Intermediary
RBAL	Raiffeisen Bank Sh.A, Albania
RBBH	Raiffeisen BANK d.d. Bosna i Hercegovina
RBBY	Priorbank JSC, Belarus
RBCZ	Raiffeisenbank a.s., Czech Republic
RBG	Raiffeisen Banking Group Austria
RBHR	Raiffeisenbank Austria d.d., Croatia
RBHU	Raiffeisen Bank Zrt., Hungary
RBI	Raiffeisen Bank International Group
RBI AG	Raiffeisen Bank International AG
RBKO	Raiffeisen Bank Kosovo J.S.C.
RBRO	Raiffeisen Bank S.A., Romania
RBRS	Raiffeisen banka a.d., Serbia
RBRU	AO Raiffeisenbank, Russia
RBSK	Raiffeisen Bausparkasse Gesellschaft m.b.H.
RBUA	Raiffeisen Bank, JSC, Ukraine
RCM	Raiffeisen Capital Management
REGs	Regulations
respACT	austrian business council for sustainable development
RETAIL	Retail Banking
RFU	Reinhard Friesenbichler Unternehmensberatung
RKAG	Raiffeisen Kapitalanlage-Gesellschaft m.b.H.
RL	Raiffeisen-Leasing GmbH

RLFPM	Raiffeisen-Leasing Fuhrparkmanagement GmbH
ROE	Return on Equity
RSC	Raiffeisen Service Center
RWA	Return on Weighted Assets
SB	Supervisory Board
SBT	Science Based Targets
SDA	Sectoral Decarbonization Approach
SDG	Sustainable Development Goal
SEE	South Eastern Europe
SFDR	Sustainable Finance Disclosure Regulation
SLLP	Sustainability-Linked Loan Principles
SMB	Small and Medium-sized Business
SME	Small and Medium Enterprise
SPIN	Specific Instruction
SPRI	Synthetic Physical Risk Indicator
SR	Social Risk
SREP	Supervisory Review and Evaluation Process
SRI	Socially Responsible Investment
SUP	Supporting Document
SWIFT	Society for Worldwide Interbank Financial Telecommunication
t	Ton
TBSK	Tatra banka, a.s., Slovakia
TCFD	Task Force on Climate-Related Financial Disclosures
TCO	Total Cost of Ownership
tkm	Ton kilometers
UCITS	Undertakings for Collective Investments in Transferable Securities
UGB	Unternehmensgesetzbuch (Austrian Commercial Code)
UK	United Kingdom
UN	United Nations
UNEP	UN Environment Programme
UNEP FI	UN Environment Programme Finance Initiative
UNICEF	United Nations Children's Fund
UNGC	United Nations Global Compact
UX/UI	User Experience/User Interface
Valida	Valida Holding AG
VBV	VBV-Vorsorgekasse (Provident Fund)
VDPG	Verrechnungspreisdokumentationsgesetz (Transfer Pricing Documentation Act)
VfU	Verein für Umweltmanagement und Nachhaltigkeit in Finanzinstituten e.V. (Association for Environmental Management and Sustainability)
VHIP	Voluntary Health Insurance Program
VÖNIX BVV	Österreichischer Nachhaltigkeitsindex (sustainability index of the Vienna Stock Exchange)
WCAG	Web Content Accessibility Guidelines
WKO	Wirtschaftskammer Österreich (Austrian Economic Chamber)
WRI	World Resources Institute
WU	Wirtschaftsuniversität Wien (Vienna University of Economics and Business)
WWF	World Wide fund For nature
ZFA	Zertifikate Forum Austria
ZHS	ZHS Office- & Facilitymanagement GmbH



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