Publications pursuant to sec. 65a of the Austrian banking act (BWG)

In compliance with the obligations set out in Section 65a of the Austrian Banking Act (BWG), Raiffeisen Bank International AG ("RBI AG") hereby publicly discloses the following key information on its institution-specific internal measures implemented to ensure compliance with corporate governance requirements and remuneration regulations:

1. Information on the Implementation of the Provisions Regarding the Suitability Assessment of Managing Directors, Supervisory Board Members and Key Function Holders (§§ 5 para. 1 items 6 to 9a, 28a para. 5 items 1 to 5)

Sections 5 para. 1 items 6 to 11 and item 13, 28a para. 3 and para. 5, and 30 para. 7a of the Austrian Banking Act (BWG) stipulate certain requirements for managing directors as well as for the chair and members of the supervisory board of credit institutions, financial holding companies and mixed financial holding companies. These requirements relate, among other things, to personal reliability, honesty and integrity, professional suitability, as well as the experience and sufficient time commitment required for the exercise of management and supervisory functions (Fit & Proper requirements).

Furthermore, the Joint Guidelines of the European Securities and Markets Authority (ESMA) and the European Banking Authority (EBA) on the assessment of the suitability of members of the management body and key function holders dated 2 July 2021 (EBA/GL/2021/06, ESMA35-36-2319), applicable since 31 December 2021, establish criteria and procedures that credit institutions must observe when assessing the suitability of members of the management body in both their management and supervisory functions. The Austrian Financial Market Authority (FMA) has also published a circular on the suitability assessment of managing directors, supervisory board members and key function holders (Fit & Proper Circular, version March 2023).

As the Fit & Proper requirements must be observed by institutions both on an individual basis and at the level of banking groups (§ 30 BWG), RBI AG, as the superordinate institution of the RBI banking group, has issued a corresponding RBI Group Policy on Suitability Assessment, establishing minimum standards for members of the RBI banking group subject to the Fit & Proper requirements.

To implement these provisions, RBI AG has adopted a Suitability Assessment Policy setting out a process for conducting suitability assessments of Management Board and Supervisory Board members as well as key function holders and defining the responsibilities and criteria for assessing suitability and personal reliability. Accordingly, prior to any appointment or reappointment of a Management Board member, Supervisory Board member or key function holder, RBI must assess and document their professional suitability and personal reliability in accordance with the applicable legal requirements. In addition, a process for regular internal suitability assessments of Management Board and Supervisory Board members and key function holders has been implemented.

To support suitability assessments, RBI has established a dedicated **Group Fit & Proper Office**. The Group Fit & Proper Office is responsible for preparing decisions of the body responsible for the suitability assessment and for ensuring centralized documentation of suitability assessments for RBI AG and certain Austrian subsidiaries. It is also available to support other network banks. Furthermore, the Group Fit & Proper Office assists the responsible bodies in conducting regular evaluations.

For the assessment of suitability, information and documentation provided by the prospective Management Board member, Supervisory Board member or key function holder are reviewed, including, for example, a curriculum vitae, criminal record extract, information on time commitment and potential conflicts of interest. A positive overall assessment ("positive Fit & Properness") is issued where personal reliability, honesty, integrity, professional suitability, experience and time commitment meet the established criteria and legal requirements. The appointment of Management Board and Supervisory Board members of RBI AG must be notified to the Financial Market Authority (FMA) and the European Central Bank (ECB), together with the required assessment documentation, via the **Single Supervisory Mechanism Portal (SSM Portal)** in accordance with the applicable legal provisions.

2. Information on the Implementation of the Provisions Regarding the Nomination Committee (§ 29 BWG)

The Supervisory Board of RBI AG has established a Nomination Committee in accordance with § 29 BWG. Its responsibilities primarily cover personnel-related matters concerning the Management Board and Supervisory Board. In carrying out its duties, it pays particular attention to ensuring that the respective individuals possess adequate knowledge and skills appropriate to their responsibilities.

In accordance with § 29 BWG, the Nomination Committee is not only responsible for preparing proposals for the selection of members of the Management Board and Supervisory Board (as well as conducting their suitability assessments as described under section 1), but also in particular for:

a) establishing a target for the underrepresented gender on the Management Board and Supervisory Board and developing a strategy to achieve this target;

b) ensuring that the decision-making process of the Management Board or Supervisory Board is not dominated by a single individual or a small group of individuals in a manner contrary to the interests of the credit institution;

c) regularly assessing, and in any event whenever circumstances indicate a need for reassessment, the structure, size, composition and performance of the Management Board and Supervisory Board and, where necessary, submitting recommendations for change to the Supervisory Board;

d) regularly, and at least annually, assessing the knowledge, skills and experience of both the managing directors and the individual members of the Supervisory Board, as well as of each body as a whole, and reporting the results to the Supervisory Board;

e) reviewing the Management Board's approach to the selection of senior management and supporting the Supervisory Board in the preparation of recommendations to the Management Board.

3. Information on the Implementation of the Provisions Regarding the Principles of Remuneration Policies and Practices (§ 39b BWG and Annex to § 39b BWG)

The binding framework for implementing the remuneration policy and practice requirements set out in § 39b BWG (including the Annex to § 39b BWG) is provided by the Group Remuneration Policies determined by the Remuneration Committee of the RBI AG Supervisory Board and issued by RBI AG as the superordinate institution of the RBI banking group ("Group Remuneration Policies").

In accordance with the statutory remuneration principles, these policies contain, in particular, detailed provisions regarding the general remuneration policy (including the determination of fixed and variable remuneration components, specific rules for employees performing control functions, as well as the design and performance measurement of the bonus pool), special rules governing the remuneration of risk takers ("Identified Staff") within the meaning of § 39b BWG (particularly concerning the vesting, deferral and payment of variable remuneration), as well as requirements regarding the identification of Identified Staff and the process for determining and deciding on malus and clawback cases.

The Group Policy on Standard Performance Management ensures compliance with the legal requirements applicable to performance assessments in connection with performance-related remuneration. These policies ensure that RBI's remuneration policy is consistent with and promotes sound and effective risk management and does not encourage risk-taking beyond the level tolerated by RBI.

The general remuneration principles of RBI AG are determined by the Remuneration Committee of the RBI AG Supervisory Board in compliance with the RBI Group Policies and legal requirements ("Remuneration Policy"). Based on the Remuneration Policy, fixed and variable remuneration components are established. The Remuneration Policy sets out the conditions that must be met for the allocation and payment of variable remuneration.

For each financial year, members of the Identified Staff are determined in accordance with the provisions of the Remuneration Policy. Variable remuneration awarded to Identified Staff for a given financial year is not paid out in full; rather, part of it is deferred or granted in instruments (which are themselves subject to an appropriate deferral policy) in accordance with the requirements of the BWG.

The vesting and payment of variable remuneration to Identified Staff, including the deferred portion, may only take place if it is sustainable in light of the institution's overall financial situation and justified by the performance of the relevant business unit and individual. Otherwise, a reduction or complete forfeiture of variable remuneration is ensured on the basis of the Remuneration Policies and the applicable malus and clawback arrangements.

4. Information on the Implementation of the Provisions Regarding the Remuneration Committee (§ 39c BWG)

RBI AG has established a Supervisory Board Remuneration Committee in accordance with § 39c BWG.

Among its responsibilities is the determination of the general principles of the company's remuneration policy and practices in accordance with the Group Remuneration Policies and the requirements of the BWG, while also taking into account the applicable provisions of the Austrian Corporate Governance Code. The Remuneration Committee is responsible for monitoring the implementation of these principles.

The Remuneration Committee is also responsible for preparing other remuneration-related resolutions, including those with an impact on risk and risk management, insofar as such matters are subject to decision by the Supervisory Board.

The Remuneration Committee regularly reviews the remuneration policy, remuneration practices and remuneration-related incentive structures in connection with the management, monitoring and limitation of risks in accordance with the requirements of the BWG and with due regard to capital adequacy and liquidity. In doing so, it also considers the long-term interests of shareholders, investors and employees, as well as the broader public interest in a sound banking system and financial market stability.

The Remuneration Committee directly reviews the remuneration of senior management in risk management and compliance functions.