

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 ("MSA").

Raiffeisen Bank International AG

Modern Slavery Act 2015 Statement

Introduction and Scope

Modern slavery is an extremely serious and, sadly, widespread form of human rights abuse.

The international nature of our operations informs our approach to addressing the risk of human rights abuses occurring across our supplier and customer base. We are committed to identifying and dealing with human rights abuses (including modern slavery and human trafficking) throughout our operations and supply chains.

We recognise that our business activities may have an impact on the economy, society and the environment, which we consider representing our Sustainability Strategy.

We set out in this Statement the steps we have taken and our plans for the year ahead.

Raiffeisen Bank International AG ("**RBI AG**") is providing this Statement for the year ending 31 December 2024 in respect of itself (including its United Kingdom branch) and its subsidiaries forming part of its supply chains and references in this Statement to "**RBI**", "**we**", "**us**" and "**our**" should be read accordingly. Where policies described in this Statement refer to "**RBI Group**" the policies apply to RBI AG and all subsidiaries of RBI AG which are credit institutions and units fulfilling the criteria of more than ten employees, operative, and fully consolidated (according to Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 (CRR)). RBI AG is reviewing its policies, controls and procedures relating to slavery and human trafficking on a continuing basis to ensure that to the extent feasible, they operate consistently across the RBI Group.

To the extent permitted by applicable laws and regulations, this Statement and its contents shall not, and are not intended to, create any enforceable third party rights against RBI AG

1. Corporate Structure, Business Overview and Supplier Management

Corporate structure

RBI AG is a credit institution established in accordance with the Austrian Banking Act. The ownership structure of RBI is described on RBI AG's website and can be viewed here: <https://www.rbinternational.com/en/investors/rbi-share/shareholder-structure.html>.

Further details about the structure of the RBI Group can also be found on RBI AG's website here: <https://www.rbinternational.com/en/raiffeisen.html>

Business Overview

RBI AG is one of Austria's leading corporate and investment banks and operates as a universal bank in 12 Central and Eastern European markets. RBI AG also operates in the areas of leasing, asset management and mergers and acquisitions. RBI AG maintains representative offices and service branches in selected Asian and Western European locations to support its business activities.

Supplier Management

RBI AG has in place a detailed Supplier Code of Conduct, as described further below under the heading **RBI Group Code of Conduct for Suppliers** and is served by suppliers across its geographies in respect of the provision of IT products and services, marketing, consulting services and facilities management.

RBI AG has internal procurement and sourcing policies in place.

2. Policies on Slavery and Human Trafficking

RBI AG has policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business which are summarized below. We regularly review and update all our policies.

A wide range of human rights-related matters already form part of RBI AG's internal corporate regulatory frameworks, such as the requirement to adhere to labour standards and the principles of non-discrimination and the incorporation of ESG (environmental, social and governance) strategies into existing and in-progress policies, controls and procedures and due diligence.

RBI Group Code of Conduct (Code of Conduct)

https://www.rbinternational.com/content/dam/rbi/ho/home/sustainability-esg/responsible-banking/code-of-conduct/coc-2024/RBI_CoC_2024_English.pdf.coredownload.pdf

The Code of Conduct is intended to guide our daily interactions with internal and external stakeholders.

All employees of RBI AG are required to understand and comply at all times with the Code of Conduct, and RBI AG relies on their personal integrity to protect and enhance our reputation. It is the responsibility of all those subject to the Code of Conduct to adhere to it in carrying out RBI AG's business activities and, if appropriate, escalating any potential non-compliance to the relevant designated managers or compliance officers or otherwise through any of the available channels.

All persons acting for or providing services to RBI AG and other business partners are expected to apply rules and standards which are equivalent to those set out in the Code.

RBI AG aims to conduct business in line with the European Convention on Human Rights as well as the United Nations Universal Declaration of Human Rights principles and not to finance – directly or indirectly – any transactions or parties, nor cooperate with any business partner (including customers, service providers and suppliers) that do not adhere to these standards or are suspected of human rights violations, including any form of slavery and human trafficking.

RBI AG operates a whistleblowing system to report, amongst other matters, breaches of RBI AG's codes of conduct.

Raiffeisen Bank International Group Code of Conduct for Suppliers (Supplier Code of Conduct)

https://www.rbinternational.com/content/dam/rbi/ho/home/sustainability-esg/responsible-banking/code-of-conduct/GroupSupplier_CoC_2024_English.pdf.coredownload.pdf

Based on RBI AG's core values as set out in the Supplier Code of Conduct, RBI AG's suppliers are required to adhere to the core principles embedded in the such document.

The principles focus on the need for suppliers to respect all key aspects of human rights, such as zero tolerance of human right abuse and the prohibition of forced and child labour (as defined by the International Labour Organization's Programme on the Elimination of Child Labour (IPEC) and article 3 of the United Nation's Convention on the Rights of the Child (UNCRC)) in any form. Working conditions include remuneration and working hours in compliance with national laws and International Labour Organization standards, and the working environment should comply with applicable occupational health and safety standards.

Under the Supplier Code of Conduct, suppliers must also act in accordance with the principles contained in the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights of Work.

The Supplier Code of Conduct additionally requires suppliers to respect the personal dignity, privacy and rights of each individual. RBI AG expects all suppliers' employees to be treated with respect, with no use of corporal punishment, mental or physical coercion, any form of abuse or harassment or threat of such treatment and to do their utmost to implement such principles throughout each supplier's supply chain.

The Supplier Code of Conduct is included in contracts entered into with suppliers. In exceptional cases, a supplier's code of conduct which contains comparable content is incorporated in supplier contracts. Adherence to the principles set out in the Supplier Code of Conduct is a prerequisite to becoming a RBI AG supplier.

RBI AG typically reserves the right to terminate supplier contracts if the principles are not complied with.

RBI Group Human Rights Policy

The RBI Group Human Rights Policy sets out the general framework for human rights management in RBI AG and describes the measures that RBI AG takes to achieve its human rights objectives and fulfill its responsibilities, such as respecting, promoting and strengthening human rights within its sphere of influence and not supporting any form of child labour, forced labour, human trafficking or modern slavery. It was developed in cooperation with the Ludwig Boltzmann Institute of Fundamental and Human Rights, a research institute based in Vienna, working in partnership with the University of Vienna and a cross-divisional RBI working group established specifically to address human rights matters.

RBI Group Human Rights Policy has also been prepared to be aligned to the extent feasible with the United Nations and European human rights standards and principles and relevant EU regulations¹.

Economic Crime Policies

RBI AG has detailed policies, controls and procedures in place to address the risk of money laundering, terrorist financing, sanctions evasion, tax evasion, insider trading and market abuse. It is recognised that slavery, human trafficking and other human rights violations often involve money laundering and the commission of other economic crimes. In particular, RBI AG has in place a comprehensive anti-bribery and corruption programme (<https://www.rbinternational.com/en/raiffeisen/rbi-group/leadership-governance/compliance/abc-programme.html>). The approach taken by RBI AG to money laundering is encapsulated in RBI Group Anti-Money Laundering Declaration that has been signed by the RBI Management Board and can be found here: <https://www.rbinternational.com/content/dam/rbi/ho/home/rbi-group/leadership-governance/compliance/anti-money-laundering-declaration/Anti-Money Laundering Declaration RBI%20Group EN.pdf>

¹ Namely, the United Nations Universal Declaration of Human Rights; the United Nations International Covenant on Civil and Political Rights; the United Nations International Covenant on Social, Economic and Cultural Rights; Fundamental Principles of the International Labour Organization; the European Convention on Human Rights; EU human rights and sustainability regulations, in the form of the Corporate Sustainability Due Diligence Directive and the Corporate Sustainability Reporting Directive as well as to the minimum safeguards concerning human and labour rights standards set out in the EU Taxonomy Regulation; and standards promulgated by the Global Reporting Initiative (GRI).

Sanctions Policy

RBI AG is committed to undertaking risk assessments of its activities, and monitoring and improving its risk-related policies, controls and procedures. To this end, RBI AG has in place a strict sanctions compliance policy requiring adherence to all applicable sanctions laws and regulations in force in the jurisdictions in which RBI AG entities conduct business. These policies must be observed by staff to safeguard RBI AG's business and reputation and to protect shareholder value.

RBI AG understands that the implementation of human rights policies, controls and procedures is a continuing and evolving process that requires the inclusion of and engagement with stakeholders and expert and is committed to reviewing the policies, controls and procedures that concern slavery and human trafficking on a regular basis in order to identify and test the effectiveness of potential improvements to them and will provide an update, as appropriate, in any subsequent Statements.

3. Due Diligence Processes regarding Slavery and Human Trafficking

Supplier Due Diligence Processes

RBI AG's key suppliers are surveyed annually on matters including their human rights policy, the due diligence processes applicable to their own operations and supply chains and incidence of litigation concerning social accountability.

Customer Due Diligence Processes

As part of customer due diligence, RBI AG employs a semi-automated tool to assign a human rights risk rating to all KYC-relevant customers determined by the customer's country of domicile and the sector or industry in which they operate. Customers that present a high human rights risk following the scoring exercise are subject to additional human rights due diligence measures to raise awareness of the client for human rights matters prior to potential limitation of the business relationship.

RBI AG also employs an ESG Customer Scoring model. This focuses on assessing societal risks at the non-retail lending customer level, with a strong emphasis on human rights-related matters. Modern slavery is covered via assessments of labour conditions and human rights compliance. The model evaluates customers on their adherence to social codes of conduct, working conditions and support for diversity and education. The resulting ESG scores are used for credit portfolio steering, influencing risk costs and pricing impacts, and are incorporated into the annual credit rating process.

4. Risk Profile

Considering RBI AG's operations, we consider that the risk of modern slavery and human trafficking is concentrated at the customer and supply chain level, particularly in higher-risk jurisdictions and industry sectors. RBI AG's own workforce are considered to have a low risk. There is, accordingly, a group-wide emphasis on the implementation and assessment of policies, controls and procedures concerning the onboarding and continuing monitoring of customers and suppliers.

5. Our Effectiveness in Combating Slavery and Human Trafficking

RBI AG will be introducing key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking are not taking place in any part of our business. We will report on our progress in this respect in our next Statement.

Appropriate remediation measures and a due diligence process will be incorporated into the RBI Group-wide Business Compliance Framework, expected to be finalized in the course of 2025.

6. Training

RBI AG employees are required to undertake training on financial crime matters, the Code of Conduct and risk management.

RBI AG ESG Knowledge Hub "SustainAble" offers online training modules on sustainability, including one focused on human rights and another on business ethics. Moreover, Code of Conduct-related compliance training also covers human rights issues.

RBI AG is in the process of reviewing its group-wide ESG training programme, including human rights-specific training for all relevant personnel. RBI AG will report on our progress in this respect in its next Statement.

RBI AG's Continuing Commitment


RBI AG is committed to the United Nations Environment Programme Finance Initiative (UNEP FI) Principles for Responsible Banking and to the social and environmental responsibility that goes with it. Our role as responsible banker, fair partner and engaged corporate citizen in the business world is characterised by responsibility towards all our stakeholders, especially our customers, suppliers, staff members and shareholders, as well as society as a whole.

Approval of the Statement

The Statement has been approved by the board of directors of Raiffeisen Bank International AG on June 17, 2025 pursuant to section 54 of the MSA.

This Statement has been published on RBI's website at:

<https://www.rbinternational.com/en/raiffeisen/sustainability-esg/sustainability-reports.html>.

A handwritten signature in black ink, consisting of a stylized 'J' followed by a series of loops and a horizontal line extending to the right.

Johann Strobl CEO of RBI AG

RAIFFEISEN BANK INTERNATIONAL AG

Signed: June 18, 2025

