

# **RESPONSIBLE MARKETING & SALES POLICY**

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December 2025

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## 01 | ABOUT BAWAG GROUP

BAWAG Group AG is a publicly listed holding company headquartered in Vienna, Austria, serving over 4 million retail, small business, corporate, real estate and public sector customers across Austria, Germany, Switzerland, Netherlands, Ireland, the United Kingdom, and the United States. The Group operates under various brands and across multiple channels offering comprehensive savings, payment, lending, leasing, investment, building society, factoring and insurance products and services. Our goal is to deliver simple, transparent, and affordable financial products and services that our customers need.

## 02 | INTRODUCTION

The way we interact with our stakeholders is a key factor in the success of our company. When marketing and selling our financial products and services, we address different groups of people in our core markets: In doing so, we want to deal responsibly with the individual financial needs and goals of our clients and support them in realizing their wishes, in sustainable investments as well as in day-to-day financial transactions.

The goals of the "Responsible Marketing & Sales Policy" are as follows:

- To provide applicable principles for the responsible marketing and responsible sales of financial products and services in BAWAG Group
- To ensure a responsible and individually tailored approach to our customers across all channels.
- The policy serves to define the scope of action for the marketing and sale of financial products and services and defines limits.
- The guideline is intended to contribute to the long-term establishment of trust between the BAWAG Group and its customers.

## 03 | SCOPE

The principles of this policy apply to all marketing and sales activities of the BAWAG Group that address (potential) customers before, during or after a business relationship.

The principles must be observed by all employees whose area of responsibility includes marketing and sales activities of the BAWAG Group. This applies in particular to those employees whose areas of responsibility are related to the following topics:

- 1) ...design and preparation of communication and advertising material for external and internal communication...
- 2) ...the design of briefings to external agencies...
- 3) ...the preparation of training materials for employees (especially in sales) ...
- 4) ...direct communication with customers (or other relevant stakeholders) ...

## 04 | OUR PRINCIPLES

We comply with legal regulations, established standards and codes of conduct in connection with the marketing and sale of financial products and services in the countries in which we operate.



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## **Integrity & Compliance**

We expect all our employees to behave with integrity. We do not accept illegal or inappropriate actions that are against legal requirements or our internal code of conduct. We do not tolerate any white-collar crime or abusive behavior and take strict measures against money laundering and other illegal activities.

## **Information protection**

We are committed to comprehensive protection and responsible handling of the data entrusted to us and to respecting the privacy of our customers, employees, suppliers or other stakeholders

## **Respectful behavior**

Mutual respect, exceptional commitment and a strong focus on the needs of our customers are the basis of our actions and are defined in the BAWAG Group Code of Conduct. We are committed to treating customers, business partners, competitors and other stakeholders as well as each other within the company in an open, respectful, appreciative and fair manner.

## **No discrimination**

We are proud that employees from over 45 nations with different personalities and ethnic, religious and social backgrounds work together in BAWAG Group. Openness and appreciation for all individuals and social groups are therefore important to us. We do not tolerate any form of discrimination in connection with age, gender, skin color, sexual orientation, religion, mental or physical limitations or with any other reasons. In the marketing and distribution of our products and services, we also make sure to respectfully address and interact with all social groups.

## **Development of analytical skills**

We are committed to carefully listen to our customers and to take their concerns and complaints seriously. It is part of our corporate strategy to continuously expand our analytical capabilities and monitoring in accordance with the data protection regulations and thus identify opportunities for improvement of our products and services at an early stage. Our goal is to find solutions that meet the needs of our customers and to continuously increase their satisfaction.

## **Participation and inclusion**

We pay attention to make our services equally accessible to all people. We want to remove barriers both in our branches and in our online channels so that people with special needs can use our products and services and thus have an autonomous financial life.

## **Responsible and profitable growth**

We want to help minimize non-financial risks and exploit specific growth opportunities associated with environmental and social developments. Examples include the transition to a resource-efficient economy and the need for greater environmental protection and social integration. Therefore, we are working on a broad view of the value chain from an ESG perspective and on broadening our understanding of risk.



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## Marketing

### TRANSPARENT AND CLEAR

We are committed to providing our marketing and product information in a comprehensive, balanced, clearly understandable and easily comparable manner. We present the advantages and disadvantages of financial products in a balanced manner in order to highlight the associated potential risks as well as realistic opportunities.

### SIMPLE AND FAIR PRICING

We provide transparent and comparable information on the fees and interest rates for our products and services. We make sure that price information is always up-to-date and easily accessible to customers. We attach great value to easily understandable pricing structures based on our customers' usage behavior.

### DIVERSITY AND RESPECT IN ADVERTISING SUBJECTS

When designing and selecting subjects for advertising materials, we commit ourselves to diversity. We don't want to transport any stereotypes through visual language. We take care to present the respective social groups and/or individuals in an appropriate and respectful manner and to consider their cultural sign and meaning systems.

### IDENTIFICATION OF ADVERTISING

In accordance with media law, we undertake to clearly identify advertising in online and print media as such.

## Sales

### APPROPRIATE RECOMMENDATIONS

For us it is important to provide competent and understandable person-to-person advice in sales, to deal responsibly with information asymmetries between advisors and customers and, for example, not to take advantage of a lack of maturity (children or young people). Our regularly trained sales staff are obliged to question and examine the personal goals, investment horizon, risk appetite and financial situation of the customer in order to respect and take this into account when recommending products. In this way, we ensure that clients are not led to take rash actions that could put them in a financially precarious position.

### FURTHER DEVELOPMENT OF TECHNICAL AND SOCIAL SKILLS

In addition to expert knowledge, a high degree of social skills is also necessary for us in sales - both in interaction with colleagues and in advising our customers. We are committed to communicating our values to our employees through training, continuing education programs and regular feedback.



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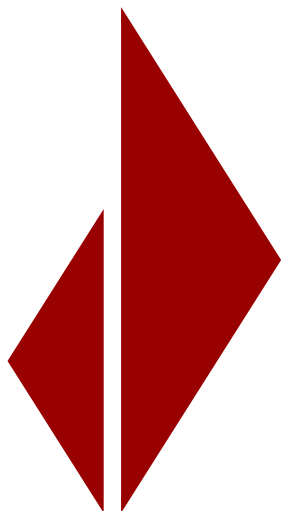
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## ONGOING QUALITY CONTROL

Internal control systems and regular customer satisfaction analyses ensure, among other things in sales, that our services are in line with the principles and guidelines we pursue.

## FAIR TREATMENT AND FOCUS ON CORE COMPETENCIES

Strict guidelines ensure that our sales staff act fairly and with integrity towards our customers. We pay attention to high quality standards in advising, which are constantly monitored. It is our highest priority to ensure that the interests of our customers are always protected. We do not advise our clients on tax matters.



# BAWAG Group

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