

# Fundamental Principles of the Anti- Corruption Standard of the OeKB Group

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## Preamble

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Oesterreichische Kontrollbank AG (OeKB) is Austria's central financial and information service provider for the export industry and the capital market. It is owned by commercial banks headquartered in Austria. OeKB holds participations in companies engaged in credit insurance, investment, development and tourism financing and in safeguarding the infrastructure of the capital market in Austria.

The companies of the Oesterreichische Kontrollbank credit institution group (OeKB KI Group) include, in addition to Oesterreichische Kontrollbank AG, the Oesterreichische Entwicklungsbank AG ("OeEB"), the Österreichische Hotel- und Tourismusbank GmbH ("OeHT"), and OeKB CSD GmbH ("OeKB-CSD").

Within the OeKB KI Group, we comply with national laws and international regulations equally.

We approach the environment and society with respect and a strong sense of responsibility.

The OeKB KI Group is guided by the principles of the "Austrian Code of Corporate Governance" as a standard of modern corporate governance, even though the shares of OeKB and OeEB are not publicly listed and therefore compliance with above mentioned code not mandatory. At OeKB, the Compliance Officer also serves as the Anti-Corruption Officer, and in the OeKB KI subsidiaries, designated responsible persons are appointed to oversee adherence to anti-corruption regulations. Executive directors, managers and employees are committed to the Code of Conduct of the OeKB KI Group as a clear set of rules.

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## Corruption Prevention (Gifts, Benefits)

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In business life, the line between acceptable hospitality or sponsorship and conduct that crosses into a grey area and potentially into corruption is not always easy to draw. Determining when an “advantage” constitutes corruption/a criminally relevant benefit that may not be accepted is difficult based on general criteria alone.

Small invitations or the exchange of gifts/guest gifts may be part of national or international business customs or culturally rooted practices.

However, the acceptance or granting of advantages that create or appear to create a conflict of interest or partiality—and especially those that may endanger the neutrality of the OeKB KI Group or any of its institutions—is unacceptable. The mere appearance or expectation of reciprocity is already sufficient.

Every gift or invitation employees receive in the course of their duties is considered a benefit to the function performed, not a personal gift.

Employees of the OeKB KI Group are not public officials as defined in § 74 Abs 1 Z 4a StGB (Austrian Criminal Code). Nevertheless, given the Group's central role in the Austrian capital market, export industry, and development financing, it is considered appropriate for all employees to align their conduct with the anti-corruption regulations applicable to public officials.

Furthermore, the OeKB KI Group supports its customers in their efforts to prevent corruption, in particular by organizing or supporting events and workshops.

The OeKB KI Group does not grant any benefits to political parties.

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## 1. Offering, Granting or Promising Advantages

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When providing benefits, it is necessary to distinguish whether the recipient is a public official or a private business partner. Generally, advantages that—regardless of value—could influence the decision(s) of the recipient are prohibited and may not be granted, offered, or promised.

### 1.1 Dealing with Public Officials

The OeKB KI Group understands “public officials” to include all persons falling under § 74 Abs 1 Z 4a StGB (Austrian Criminal Code). The provisions below apply analogously to “candidates for public office” pursuant to § 74 Abs 1 Z4d StGB.<sup>1</sup>

#### Definition of a Public Official (§ 74 Abs 1 Z4a StGB)

- i. Persons who perform legislative, administrative or judicial functions as an organ or employee for the federal government, a state, an association of municipalities, a municipality, another public-law entity (except churches or religious communities), another state, or an international organization, are EU officials or persons entrusted with public tasks related to the financial interests of the European Union in EU Member States or third countries;
- ii. Persons who are authorised to execute official acts in the execution of laws on behalf of the above-mentioned entities;
- iii. Persons who serve as organs or employees of enterprises in which public bodies hold directly or indirectly at least 50% of the capital, which such a public body operates alone or jointly with other public bodies or effectively controls through financial or other economic or organizational measures. This includes in any case all enterprises subject to audit by the Austrian Court of Audit or similar regional, international, or foreign auditing bodies.

#### Gifts to Public Officials

— Offering, promising, or granting an advantage to a public official is prohibited if intended to induce the performance or non-performance of an official act or to influence the official in his/her function (“to prime an official”).

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<sup>1</sup> Anyone, who is involved in an election campaign, an application or selection process for a position as a public official or a comparable position to obtain a function in the highest executive body of the federation or a federal province, or as a member of a controlling body responsible for monitoring the lawful action of the executive, provided that obtaining such a position is not entirely improbable.

- Cash gifts and vouchers may never be granted, regardless of the value. Exceptions apply only to customary minor tips (e.g., at embassy receptions).
- Small customary tokens (e.g., calendars, pens, flowers) may be given to public officials if the value does not exceed €100 per year per official.

#### **Invitations of Public Officials to Business Meals**

- Invitations to business meals must not give the impression of attempted influence and must be appropriate and customary (e.g., invitation to OeKB's internal guest kitchen, or alternatively respecting the €100 de minimis threshold per year per official in Austria or equivalent local price levels abroad).

#### **Invitations of Public Officials to Events**

- Invitations of public officials to events, provided there is an objectively justified interest on the part of both the OeKB KI Group and the public official in the public officials participation (e.g., trainings, seminars, expert lectures), including appropriate hospitality, are permissible.
- Invitations of public officials without a legitimate interest on the part of both the OeKB KI Group and the respective public official are not permitted (e.g., sports events, theatre, concerts).

## **1.2 Dealing with Business Partners**

The following applies to dealings with business partners who are not public officials:

#### **Gifts to Business Partners**

- Cash gifts and vouchers may never be granted, regardless of value. Exceptions apply only to customary minor tips (e.g., at business partner receptions).
- Small tokens (e.g., calendars, pens, flowers) and gifts may be given to business partners if the value does not exceed €100 per year per business partner.

#### **Invitations of Business Partners to Business Meals**

Invitations must not create the appearance of attempted influence and must be appropriate and customary (e.g., OeKB guest kitchen; or, alternatively, respecting the € 100 de minimis threshold per year per representative in Austria or equivalent price levels abroad).

## Invitations of Business Partners to Events

- Invitations of business partners to events, provided there is an objectively justified interest on the part of both the OeKB KI Group and the business partner in the business partners participation (e.g., trainings, seminars, expert lectures), including appropriate hospitality, are permissible.
- Invitations to other events (e.g. cultural events) are permissible if there is an objectively justified reason (e.g. networking opportunity, professionally relevant agenda items or product presentations).
- Invitations of business partners without an objectively justified reason are not allowed.

## 1.3 Requesting, Accepting or Having Advantages Promised

All advantages that—regardless of value—could influence decisions, may not be accepted or requested by employees of the OeKB KI Group. Examples:

- Requesting any kind of advantage is always prohibited.
- Accepting cash gifts or vouchers is always prohibited.
- Gifts may not exceed €100 per year per business partner/public official.
- Employees of the OeKB KI Group, like public officials, may not accept or have advantages promised (for themselves or third parties) with the intent to influence their work for the OeKB KI Group.
- Employees of the OeKB KI Group, like public officials, may not accept improper advantages from business partners even if intended for the proper performance or omission of an act.

The following may be accepted, for example:

- Ballpoint pens, a cup of coffee, small gifts (e.g. at Christmas) and other small promotional gifts, tokens of appreciation and courtesies, provided that the value does not exceed €100 (per year & business partner/public official).
- Invitations to events in which the OeKB KI Group has a predominantly business interest.
- Reasonable benefits granted in the context of representation obligations, such as admission and participation fees, reimbursement of accommodation and meal costs, etc., whereby strict standards must be applied and the approval of the superior or the OeKB Anti-Corruption Officer or the person responsible for anti-corruption at the respective OeKB KI subsidiary must be obtained.
- Benefits for charitable purposes, over the use of which no influence is exercised.

## **1.4 Facilitation Payments**

Facilitation payments are small sums paid to public officials to obtain or expedite services to which one is legally entitled (e.g., passport control, customs).

The OeKB KI Group rejects facilitation payments entirely. Neither employees nor persons acting on behalf of the OeKB KI Group may make such payments.

## **1.5 Anti-Corruption Officer (OeKB) and Anti-Corruption Responsible Persons in the OeKB KI Subsidiaries**

Employees may contact the Anti-Corruption Officer in the OeKB Compliance Office or the respective responsible persons in OeEB, OeHT and OeKB-CSD for any questions regarding granting/accepting invitations, gifts or other benefits to/from public officials and business partners.

Detailed information and further regulations are available on the [Anti-Corruption webpage \(oekb.at\)](#) and in [internal policies](#).

## **1.6 Updates**

The Group Policy is updated regularly.



Machen wir  
es möglich.