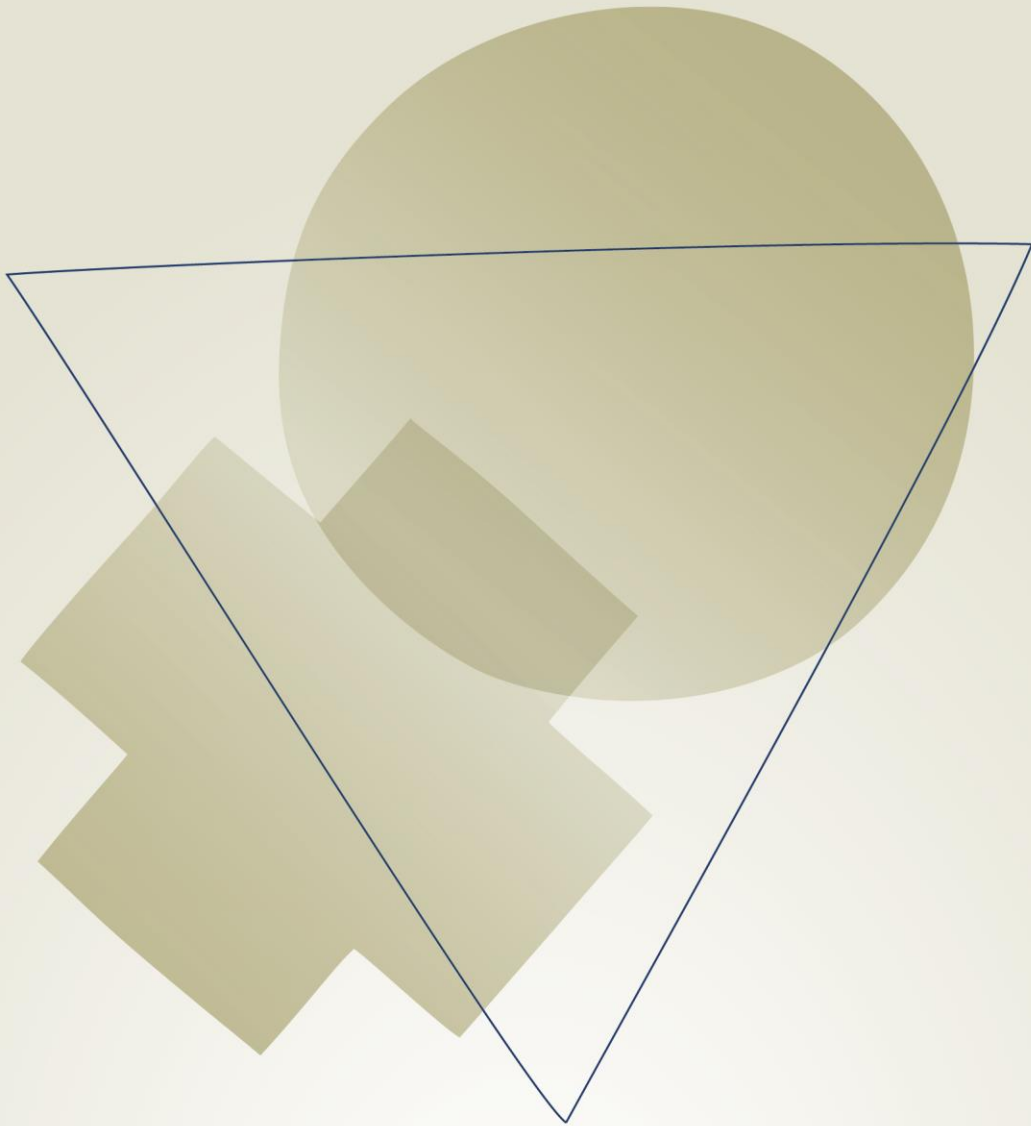


VP Bank Group

# Supplier Code of Conduct



## Purpose

This Supplier Code of Conduct outlines the expectations VP Bank sets for its suppliers regarding ethical conduct, compliance with laws, sustainable business practices and adherence to human rights principles.

## Preamble

VP Bank's values 'we explore', 'we care' and 'we achieve' are the cornerstone for the behaviour of all Bank employees. The Supplier Code of Conduct also builds on this foundation. VP Bank therefore acts in accordance with ethical standards and bases its actions on a solid foundation of upright business principles. It maintains a constructive and open dialogue with shareholders, clients, employees, suppliers and other stakeholders across its value chain, taking their views into account in its business decisions. This creates added value for all parties concerned.

The Supplier Code of Conduct reflects these corporate objectives. It defines the ethical principles of VP Bank in a binding document that serves as a manual for proper conduct.

The Board of Directors and Group Executive Management of VP Bank fully endorse this Supplier Code of Conduct, which applies to the entire VP Bank Group.

VP Bank is committed to ethical standards and sustainable business practices. We recognise the critical role that suppliers play in achieving business success and sustainability goals. This commitment is reflected in our Supplier Code of Conduct, which is aligned with international standards and our own Code of Conduct to ensure responsible and transparent supplier relationships.

## Scope

This Code applies to all suppliers of VP Bank AG and its subsidiaries. Suppliers are responsible for ensuring that their employees, subcontractors and other suppliers also comply with the principles of this Code. Suppliers are expected to exercise due diligence in selecting their own suppliers to meet VP Bank's requirements, to communicate the principles set forth in this Code to their suppliers, to obtain their acknowledgement, and to ensure compliance with these principles.

## Compliance

Suppliers must immediately report any breaches of this Code to VP Bank for prompt remediation. Non-compliance may result in material non-performance, contractual review and possible termination of the relationship.

## Documentation and inspection

Suppliers are required to maintain documentation proving compliance with relevant laws, guidelines and the principles of this Code. VP Bank reserves the right to inspect such documentation to verify compliance.

## Key principles

VP Bank is committed to fostering a responsible, sustainable and ethical supply chain. With this Code, we set out our expectations for suppliers and aim to build partnerships based on mutual respect, integrity and shared values. Adherence to this Code is not only essential to maintaining a relationship with VP Bank but also reflects our collective commitment to a sustainable future.

### Minimum standards and legal compliance

Suppliers must comply with local laws, customs and the standards of this Code, prioritising the highest applicable standards to ensure ethical and legal compliance.

### Fundamental rights for workers

Suppliers are expected to respect fundamental workers' rights as defined by the International Labour Organisation (ILO), including freedom of association, the abolition of forced labour, child labour, modern slavery and human trafficking, the elimination of discrimination in employment, and the provision of a safe working environment.



Suppliers must ensure compliance with **ILO Standards**, particularly concerning labour rights, to prevent forced labour, child labour and discrimination, and to support freedom of association and the right to collective bargaining.

### Health and safety

A commitment to maintaining a safe, healthy and hygienic workplace in accordance with all applicable laws is required. This includes the necessary training and protective equipment for employees.

### Environmental responsibility

Suppliers are urged to minimise environmental impacts, promote sustainability, comply with environmental laws and maintain effective environmental management systems - including but not limited to energy efficiency, waste reduction and the use of environmentally friendly materials and practices.

### Integrity and governance

Fair competition, anti-bribery and anti-corruption laws must be strictly followed. Suppliers must not engage in or tolerate corrupt practices and are expected to have robust governance structures and risk management processes in place.



Suppliers are expected to commit to the ten principles of the **UN Global Compact**, which cover human rights, labour, environment and anti-corruption, and consequently also to the **OECD Guidelines for Multinational Enterprises**.

### Commitment to sustainability and ESG considerations

At VP Bank, sustainability is at the core of our business strategy. We recognise the significant impact that climate change and social issues have on our operations and the communities in which we operate. Adherence to internationally recognised standards such as the UN Global Compact, the UN Guiding Principles for Business and Human Rights, and the ILO standards is essential.



Suppliers are expected to respect the **United Nations Guiding Principles on Business and Human Rights** as well as prevent or address adverse human rights impacts related to their business activities.

### Entry into force

This Code of Conduct is effective as of 1 June 2024 and applies to all existing and future Suppliers of VP Bank Group as of this date.