

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

Kathrein Privatbank Aktiengesellschaft

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.

Kathrein Privatbank Aktiengesellschaft recognizes 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 for the year ending 31. December 2025 the steps we have taken and our plans for the year ahead.

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 Kathrein.

Kathrein is reviewing its policies, controls and procedures relating to slavery and human trafficking on a continuing basis.

1) Corporate Structure, Business Overview and Supplier Management

Corporate structure and Business Overview

Kathrein is a credit institution established in accordance with the Austrian Banking Act. Kathrein is a 100% subsidiary of Raiffeisen Banki International AG (RBI AG). The owners of RBI AG are regional Austrian Raiffeisen banks (61,17%) and 38.83% free float.

Kathrein is located in Vienna, Austria and focused on offering private banking services to its clients. Kathrein does not maintain branches or representative offices in Austria or abroad.

Supplier Management

RBI AG has in place a detailed Supplier Code of Conduct, valid also for Kathrein as part of RBI Group. The Code of Conduct is described further below under the heading 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.

2) Policies on Slavery and Human Trafficking

Kathrein 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 Kathrein'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

Code of Conduct:

The RBI Group Code of Conduct, which is also applicable for and in Kathrein is intended to guide our daily interactions with internal and external stakeholders:

Link: [RBI - Code of Conduct](#)

All employees of Kathrein are required to understand and comply at all times with the Code of Conduct, and Kathrein 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 Kathrein'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 Kathrein and other business partners are expected to apply rules and Standards which are equivalent to those set out in the Code.

Kathrein uses a whistleblowing system to report, amongst other matters, breaches of conduct of RBI AG and Kathrein.

Code of Conduct for Suppliers:

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

Link: [RBI Group Supplier Code of Conduct](#)

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. Kathrein 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.

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

Human Rights Policy

The RBI Group Human Rights Policy sets out the general framework for human rights management and describes the measures that also Kathrein as subsidiary of RBI AG takes to achieve its human rights objectives and fulfil 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.

The RBI Group Human Rights Policy, which is also applicable for Kathrein, 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 regulations ⁽¹⁾.

Economic Crime Policies

Kathrein 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 recognized that slavery, human trafficking and other human rights violations often involve money laundering and the commission of other economic crimes. Kathrein also has in place a comprehensive anti-bribery and corruption program.

Sanctions Policy

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

Kathrein 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.

⁽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).

3) Customer Due Diligence Processes regarding Slavery and Human Traffic

KTB takes its social and environmental responsibilities very seriously and adheres to very strict rules of conduct as set out in its Code of Conduct.

As part of the onboarding and updating process, checks are carried out to determine whether there are any indications of financially motivated human trafficking. This mainly involves identifying 'red flags' relating to specific countries or industries.

Customers identified during the assessment as posing an increased risk of human rights violations are subject to enhanced due diligence, the relationship is either not entered into or terminated.

4) Risk Profile

Considering Kathrein'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. Kathrein's own workforce is 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) Training

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

6) Kathrein's Continuing Commitment

Kathrein's role as responsible banker, fair partner and engaged corporate citizen in the business world is characterized by responsibility towards all its stakeholders, especially their customers, suppliers, staff members and shareholders, as well as society as a whole.

KTB takes its social and environmental responsibilities very seriously and adheres to very strict rules of conduct as set out in its Code of Conduct.

As part of the onboarding and updating process, checks are carried out to determine whether there are any indications of financially motivated human trafficking. This mainly involves identifying 'red flags' relating to specific countries or industries.

Customers identified during the assessment as posing an increased risk of human rights violations are subject to enhanced due diligence, the relationship is either not entered into or terminated.

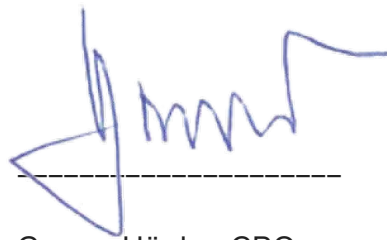
Approval of the Statement

The Statement has been approved by the board of directors of Kathrein Privatbank Aktiengesellschaft on June 30, 2026 pursuant to section 54 of the UK Modern Slavery Act 2015 (MSA).

This Statement has been published on Kathrein's website at: [Sustainability-related disclosures - Governance](#)

A handwritten signature in blue ink, consisting of a series of loops and a long horizontal stroke at the end.

Stefan Neubauer CEO

A handwritten signature in blue ink, featuring a large, stylized 'G' followed by several vertical strokes and a horizontal line at the end.

Gregor Höpler CRO

Kathrein Privatbank Aktiengesellschaft

Signed: June 30, 2026