

Code of Conduct on Lobbying for the ÖBB Group

Addressees

This Code is addressed to organs or employees* of the ÖBB Group of companies that conduct lobbying activities on behalf of these companies.

Legal framework

The exercise of lobbying activities should be conducted in accordance with the law, in particular the Lobbying and Advocacy Transparency Act (LobbyG) and in adherence to all intercompany rules, in particular the Code of Conduct. This Code shall form the basis of the lobbying activities of the ÖBB Group.

Principles governing the exercise of lobbying activities

1. Definition of lobbying activity

A lobbying activity consists in informing and arguing for a mandated position and in mediating and representing professional interests. This occurs exclusively through the use of fair means, which are consistent with the applicable law and the Company's own guidelines. Transparent and professional lobbying therefore supports well informed decisions by supplying expert knowledge to the decision makers. This develops integrity, transparency and compliance with, as well as respect for, the fundamental principles of democracy that are the basis of lobbying activities.

2. Professionalism

All lobbying activities must be conducted in an equitable and professional manner. This requires day to day exercise of a high ethical and moral behaviour.

3. Fairness

In the exercise of our lobbying activities, it is forbidden to gain, or to attempt to gain information in an unfair manner. Any kind of unfair or inappropriate behaviour, in particular any pressure applied to a holder of office is strictly prohibited. Socially acceptable and legitimate actions may be applied to give appropriate emphasis to an intervention.

4. Respect

Dealings with officials and colleagues should be conducted respectfully, giving due regard to common courtesy and politeness and respect for their professional and personal reputation. In particular it is forbidden to discriminate on the basis of race, gender, religion, age, disability or sexual orientation, or participate in behaviour that constitutes a practice of discrimination.

5. Honesty

In the exercise of lobbying activities, truthful, timely and accurate information should always be made available to holders of office and other interested parties.

6. Integrity and confidentiality

The exercise of lobbying activities must be carried out with appropriate integrity. All trusted information, obtained by lobbying activity, must be kept strictly confidential. It may not be made public, except, where a legal duty of disclosure exists or Executive consent has been given.

7. Conflicts of interest

Any activity that exposes holders of office to a conflict of interest should be avoided. This is particularly the case if the assumption can be made that the holder of office will be affected in their impartial administration by an action. Persons who carry out lobbying activities must inform themselves about and respect the relevant limits and incompatibility rules for holders of office, insofar as they are made public.