

KFW

KFW



Code of Conduct

Living responsibility



Stefan Wintels,
Chief Executive Officer of KfW

Dear colleagues,

Living responsibility is our goal and motivation. With this Code of Conduct, we aim to ensure that we all not only practise rule-based conduct, but also value-based conduct, and take this as a matter of course.

And just as we regularly review rules, our Code of Conduct is also updated annually.

Let's embark on a cultural journey

Observing rules – whether they are prescribed by law or formulated within the bank – is a daily standard for all of us. However, this in and of itself is not sufficient, because not every situation is predictable and manageable. Especially now, at a time when many things are changing quickly and dynamically, it is necessary that we are guided by common principles. Our corporate culture subconsciously shapes our decisions and our cooperation. As a result, we need a culture that sees change above all as an opportunity, a culture of learning, and a culture that makes it possible to take responsibility. But what does this mean in concrete terms?

Our corporate culture serves as a compass for our actions. That is why it is also of central importance that we continuously develop this culture. With this document, we would like to invite you to join us on this cultural journey and support you all in taking responsibility for your own actions. In the first part, we have defined the scope of application and summarised our common value system for you. The second section looks at typical situations in everyday life and illustrates how our guidelines apply. Here you will also find references to additional documents and support offers.

We take responsibility – as “one bank”

KfW Group is “one bank”, and this in spite of – or in fact precisely because of – its many and often very different activities.

It is therefore important that we have a common understanding of how we want to live out and develop our corporate culture. One thing is for certain: If we want to successfully shape our journey to becoming a digital transformation and promotional bank – as well as achieving transformation on an economic and societal level – we need to work together.

Therefore, this Code of Conduct focuses on some important questions such as:

- How can we take responsibility for the tasks within our own areas of responsibility and at the same time keep an equally responsible eye on the tasks of others?
- How can we live up to this shared responsibility in our decisions and at the same time add value for our customers as an agile KfW Group?
- And how do we manage to not only do what is legally permissible or permitted within the bank, but also “the right thing” – especially in difficult situations?

In addition to an ability to weigh things up and make decisions, this also takes strength and courage. Your courage to stay on course when the wind changes and your strength to deal with both external resistance and internal uncertainty in a calm and sympathetic manner.

My request is this:

Walk this path with us – we will help you!

A handwritten signature in blue ink that reads "Stefan Wintels". The signature is fluid and cursive, written in a professional style.

Stefan Wintels
Chief Executive Officer of KfW

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Scope

This **Code of Conduct** applies to all persons employed within KfW or its subsidiaries or who are mandate holders: to the Executive Board, Management Board, managers and all staff members in Germany and abroad. It is also regarded as a guide for external parties and our partner institutions.

We are all called upon to inform ourselves about the relevant applicable laws and provisions, so as to act in accordance with these requirements.

Of course, this **Code of Conduct** does not replace any other conduct guidelines, laws and legal requirements or internal regulations, but rather, based on these, it offers support for acceptance of responsibility and common value-based conduct.

Sustainable action and sustainable promotion: this is what drives us

By the way:
Employees can actively participate in in-house environmental protection



Climate-friendly travel to KfW and on business trips

Choose to use public transport or travel by bike – or simply walk. For short trips, make the switch to using the train – or meet via video call.



Saving energy in the office

Open the window wide for brief periods instead of leaving it ajar for long periods for ventilation. Don't print as many things out – if you do need to print something out, print out double-sided. Switch off the lights when you leave the room. Take the stairs instead of the lift.



Eating healthily and sustainably

Use KfW's plant-based menu and choose the right portion size.

Sustainable promotion and procurement for the benefit of society

As a digital transformation and promotional bank, we support the transformation of the economy and society. We actively contribute to improving economic, environmental and social living conditions worldwide and to strengthening resilient structures.

In doing so, we are guided by the German Federal Government's sustainability strategy in order to achieve the goals of the 2030 Agenda (Sustainable Development Goals) and to fulfil the Paris Agreement. Since 2020, all our financing has contributed directly to at least one of the UN Sustainable Development Goals.

Sustainability and respect for human rights also determine our actions as a company internally and as a service recipient, for example when it comes to selecting our suppliers. We ensure the implementation of international (e.g. Declaration of Human Rights of the United Nations) and national regulations (such as the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG)) through appropriate precautions such as the careful analysis of our suppliers.

In-house environmental protection at KfW – we lead by example

We use natural resources sparingly, avoid waste and protect the air, water, soil and climate. Our core goals: to continuously increase the share of renewable energies and make important contributions to achieving the Sustainable Development Goals (SDGs). This also includes measures that contribute to health and well-being, such as occupational health and safety and the protection of infrastructure.

Green bonds

We are one of the largest issuers of green bonds in the world and are active internationally in a variety of currencies. Our investors can find out the efficiency of their investments in our green bond reporting.



You can find more information about KfW Group's commitment to sustainability here
[KfW Sustainability Report](#)



“The transition to a climate-friendly economy and society requires a rethink and an enormous amount of capital. **‘Green Bonds – made by KfW’** steer capital towards climate change mitigation and adaptation projects. In so doing, we raise awareness of this central task and actively help to shape the ‘green’ capital market.”

Tim Armbruster,
Treasurer KfW

Our subsidiaries also share these goals

Incidentally, we also anchor our funding targets through donations and sponsoring in the public sector



Our diverse donation, sponsorship and foundation activities flow into the areas of “social and socio-political purposes”. The principles of the organisations we support are in line with our values. The organisations we support must demonstrate their non-profit status. We avoid repeat donations to the same recipients.

Further information can be found here (for internal use only): [Donation Policy](#)

KfW IPEX-Bank uses internationally recognised environmental and social standards in the project analysis (due diligence) phase of its financing, such as the Equator Principles. A separate Sustainability Guideline, which also includes a commitment to the protection of human rights and the application of IFC standards, provides additional security.

DEG is one of the largest development financiers in the private sector in emerging and developing countries. It is exclusively involved in environmentally and socially responsible projects – always in accordance with the World Bank’s Environmental and Social Standards and the IFC Performance Standards for cooperation with the private sector.

KfW Capital invests in European venture capital (VC) funds with the support of the Federal Government. KfW Capital aims to sustainably strengthen and further develop the VC ecosystem so that innovative technology companies receive growth capital.



Further information on KfW, KfW IPEX-Bank GmbH an KfW Capital GmbH & Co. KG [Environmental & Social Impact Assessments](#) | [Equator Principles](#) | [Sustainability in the Investment Process](#)



“KfW Capital is convinced that the identification of key ESG opportunities and risks as well as the management thereof are central elements for the long term success of companies.”

Alexander Thees,
Member of the Management Board of KfW Capital



“For me, acting sustainably as a group simply means doing the right thing– there’s nothing more to be said. Even though we at IPEX make a special contribution to KfW’s success, sustainability is one of the main ways in which KfW is connected closely with its subsidiaries.”

Claudia Schneider,
Member of the Management Board of KfW IPEX-Bank

Our standards also apply when we are active abroad



We respect the social and cultural values of other countries

Employees on business trips, seconded staff and national staff are obliged to comply with the laws and regulations applicable in the countries where they are deployed. Violations of applicable domestic and foreign law do not only harm individuals – they can have serious consequences for the entire Group. Regulations concerning our national staff are therefore also available in at least one internationally used language.

For secondments or business trips, we observe our rules

We also expect our employees to comply at least with the prohibitions applicable in Germany or in the country where they are employed when travelling on business or when seconded abroad – even if the local laws and regulations allow greater freedom.

Our ethical values guide us

In our international financing projects, in construction projects for example, we take care that the use of children for waste disposal, which is perhaps customary in the country, is prohibited.



A common system of values

We take responsibility

The core of our corporate culture is: **“We take responsibility”**
In practical terms, this means:



Working together

We take responsibility for effective collaboration and are guided by shared principles.



Developing risk culture

We assume responsibility in the appropriate and constructive handling of risks on a day-to-day basis.

Promoting diversity

We take joint responsibility for a non-discriminatory work environment and take advantage of diversity.

Leading effectively

As managers, we take responsibility for a good working environment in which employees can act in a committed and responsible manner.



Further information can be found here (for internal use only):

KfW IPEX-Bank GmbH: [Taking the Lead \(video, 1:30\)](#)

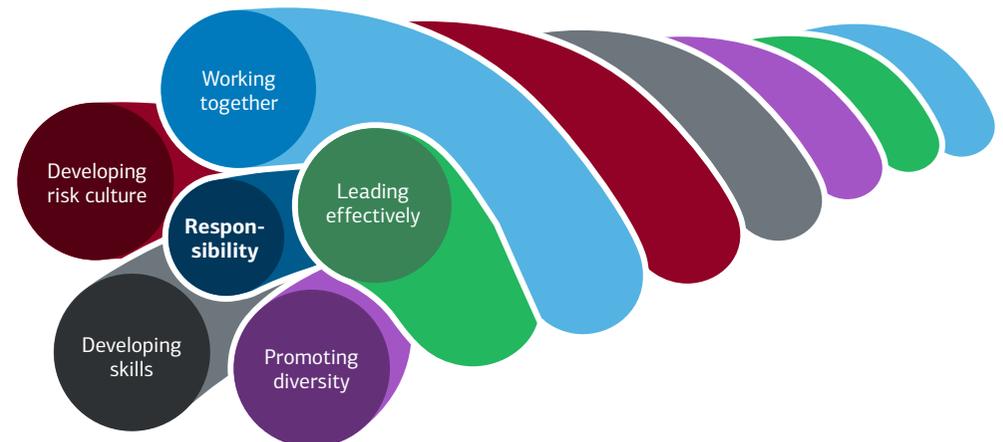
Value-based conduct is also what sets KfW apart as an employer and contributes to attractive employer positioning – find out more (for internal use only):

[KfW's employer brand | Employer positioning objective |](#)

[KfW's cultural journey](#)

Developing skills

We assume joint responsibility for the ongoing development of the skills, competencies and potential of all KfW colleagues.





General recommended courses of action



“If something feels not right, it probably isn’t. In such cases, the same applies for everyone: **‘Stop’**, seek advice and voice your concerns. What you tolerate today may become accepted routine tomorrow!”

Eva Witt,
Department Head KfW Domestic
Promotion

We set the framework – your action is crucial

Legally and ethically sound conduct is everyone’s responsibility. We show that trust in us is justified. The principles of this Code serve both as a guideline and a base. They help us to behave correctly and prevent damage.

We’ve all been there: We’ve all had that vague, annoying gut feeling at one time or another, where something doesn’t feel quite right. But it’s too unclear to say anything specific –how will I look? And who knows, perhaps it will be used against me? What can I do for myself (or others) in this situation? First of all: It’s best to slow down and take a step back. And then ask yourself (or the other person) the right questions – e.g.:

- Can I justify my actions to myself?
- Do I have a sufficient overview of my decision?
- What is currently being asked of me – a quick decision or differentiated consideration?
- Am I in a conflict of interest?
- Could my actions, if they became public, harm KfW?
- Am I primarily protecting myself, or am I really deciding in the best interest of KfW?



Such reflection can be conducted as part of an internal dialogue or with a trusted person to name disruptive feelings and uncertainties. Don’t simply disregard moments like these quickly – they are too valuable! They help enormously to align our behaviour with this Code; and that is part of the responsibility we have for KfW. Please keep in mind when reading the following pages: You decide what you take on board and address in your everyday work!

On the following pages you will find **specific help** on how to reach a good decision.



Recommended courses of action How we treat each other

We make decisions and act in a responsible manner, taking risks into account

With our actions, we take risks and weigh them up for KfW Group on a daily basis. Our goal is to find a good solution for the entire organisation.

Collaborating constructively with others

We take into account the risk assessments of others and make our own risk decisions transparent. Risks are identified and assessed in dialogue.

Continuous learning and dealing constructively with mistakes

We are always working on the best possible solutions for KfW and accept that this is accompanied by errors, mistakes and misjudgements. Generally, there is no zero tolerance for mistakes. We address the associated risks candidly, learning from mistakes as well as from success.



“We can’t just avoid all risks, no matter what the cost. However, we can make risks transparent using the right tools, we can measure risks, and we can sensibly handle risks. This is one of our main tasks as a bank – and also presents us with great opportunities. A risk culture where risks are handled confidently is at the heart of what I do.”

Patrick Vetter,
Head of Risk Controlling



The areas of action of the risk culture provide orientation for everyone.



If a mistake has occurred, we focus on “Why”, not “Who”

We talk about our own learning experiences and actively contribute to the solution. We learn from other people’s mistakes instead of pointing fingers. Deliberate misconduct and negligent failure to comply with existing rules will not be tolerated and will result in appropriate consequences.





**Communicate openly,
directly and authentically**

In our communication, we also disclose grievances and undesirable developments across hierarchical and divisional boundaries in an appreciative manner. We apply escalation processes without fear of criticism or accusation.

Dealing with risks appropriately

We are guided by a realistic view of individual facts differentiated by risk. When reaching decisions, we bear in mind that the risks we take are intended to achieve a specific goal and that they always entail opportunities. When taking measures to reduce risk, we pay attention to suitability and effectiveness, but also keep an eye on the balance between costs and benefits. There is no generally applicable implementation level of requirements.

We naturally accept that we are a regulated bank and comply with existing rules and regulations. We only make rules where necessary, meaningful or useful. If required, we strive to change rules.



Acting responsibly

We know and understand the risks we face every day. We make bold and swift decisions within the scope of our decision-making authority. In the event of damage, we assume responsibility, clarify the facts and help to minimise the damage.



Further information can be found here
(for internal use only):
[KfW Risk Culture](#)



Equal opportunities for everyone: Diversity and inclusion in everyday life

Anyone who works for and with us is respected – regardless of origin, gender identity, sexual orientation, age, physical and mental abilities, religion or belief.

Take preventive action: Reflect on your own biases and exchange ideas respectfully with others.

- If I am unsure whether I should help a person in a situation because of their disability, I ask the person candidly. This helps ensure that the situation is dealt with safely on both sides.
- I benefit from the experiences of older colleagues but also from the perspectives of my younger colleagues. I let others have their say, do not ignore or interrupt, take what is being said seriously and do not exclude anyone from communication.

We respect and protect privacy.

And are always on hand to discuss private matters. And it's also okay if this isn't something someone wants in a professional context.



Sexual harassment is not tolerated.

Anyone can be affected by sexual or gender-related behaviour – regardless of which gender they identify as. These include, for example, sexual incitements or inappropriate physical contact. Especially when a person has been put under pressure to tolerate or respond to a sexual act, we view this behaviour as sexual harassment. The same applies to third parties in Germany and abroad who work on our behalf.

When having discussions in our very mixed-age team, learning everyone's different perspectives is enriching.

We do not turn a blind eye!

We get involved when we observe discriminatory incidents in our environment. We seek support if we cannot resolve this alone, for example from our managers, the Equal Opportunities Officers, the Complaints Office within the meaning of the General Act on Equal Treatment, employee representatives or from social counselling.

Here you will find help
(for internal use only):

[Questions about sexual harassment | Complaints Office within the meaning of the General Act on Equal Treatment](#)



Why diversity is so important to us

We humans have individual personality traits, strengths and weaknesses, and different histories. We have different opinions and perspectives. We are open to these because we firmly believe that diversity enriches our work. We employ people from over 60 nations.

When filling positions, we make sure that our teams consist of people with different experiences, skills, views and perspectives, with different backgrounds and genders.



“My vision is that colleagues with disabilities do not feel restricted, excluded and/or disadvantaged at KfW. Of course, this is a requirement for all employees, which necessitates their willingness to put themselves in the other person’s shoes time and again; to ask themselves how they would want to be treated if they were in the same situation.”

Steffani Zschintzsch,
Overall Representative for Severely Disabled Persons, KfW





“For me, equality and diversity are above all a question of attitude and how we live and breathe them. My goal is for equality to become a matter of course at KfW and, as a result, for this to mean real equal opportunities for all.”

Sandra Groß,
KfW Equal Opportunities Officer



We do not tolerate discrimination

As an employer, we act preventively and encourage people to confront their own prejudices. We promote dialogue on the topic within the group through various measures (such as awareness-raising workshops on different types of disabilities and unconscious bias training).

Living out equal opportunities

We actively implement the objectives of the Federal Equality Act and avoid any form of structural discrimination against women or make up for existing discrimination. The issue of fair pay in particular is one of our core concerns. If women are under-represented, we actively promote their appointment to senior specialist and management positions.

Example:

An employee wants to take on a management position. Due to her private situation, she cannot do this full time.

We support the establishment of a “management tandem” where two people can share the management of a team.



Further information can be found here (for internal use only):
[Diversity Management |](#)
[Overcoming barriers – inclusion is more than just a quota |](#)
[KfW's Equal Opportunities Officer](#)





“Good and trusting cooperation makes us more creative, more efficient and also more resilient. Only as a team will we master the agile and digital transformation.”

Dr Andrea Hauser,
Head of Department in Financial Cooperation at KfW

We work on our cooperation just as well as on professional issues.

We orientate ourselves towards common goals, are guided by a positive image of people and the corresponding attitude towards others. We take responsibility, develop solutions step by step and choose simple and transparent decision-making processes. We work together continuously on our collaboration. Our principles help us to reflect on specific situations of cooperation - within the existing legal and regulatory framework.

Effective cooperation means coming together

Our cooperation model creates a binding framework for action and a common point of reference for agile cooperation across all areas and functions in the company.

We are thus paving the way for a digital and agile transformation and promotional

bank. This also includes scrutinising our current structures and processes and using existing scope to make them simpler and more efficient.

Our diverse meeting culture helps us to create trust, develop new ideas and shape change effectively.

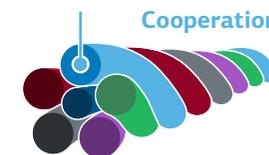
Example:

A department for the development of promotional products feels restrained by colleagues in the policy departments. “They ruin every promising idea we have! In future, we will ask them for their opinion last.”

The late checks lead to conflicts and prolong the process. In a retrospective analysis, the problems are openly addressed by both sides. They agree to engage in dialogue with the Policy department at an early stage and to allow information to flow promptly in the interest of the entire company.



Further information can be found here (for internal use only):
[#comingtogetherconnects](#)





“Managers are the key to a successful transformation. They take responsibility, drive change, provide feedback and in so doing shape the culture at KfW.”

Robert Szwedo,
Head of Human Resources at KfW

Leadership gives structure and space

People who take on leadership tasks act from the perspective of KfW Group. They work together in an interdisciplinary manner, shape changes and communicate in a credible and open manner.

Managers react adequately to different challenges: They create good working conditions, give free scope, coach and encourage. If necessary, they make responsible decisions, manage risks and drive change processes. Managers are also responsible for recognising, discussing and resolving rule violations quickly. In order to further enhance the leadership culture, Senior Management has defined four focal points for effective leadership in dialogue with all Group managers: We act responsibly and sustainably; We make decisions and implement them; We live by a “one bank” principle; We create a positive environment.



Further information can be found here
(for internal use only):
[Leadership competence model](#)
[Guidance on leadership at KfW](#)



Example:

A group of employees has developed a proposal that is innovative and expedient. To discuss this intermediate step, they approach the manager. This discussion shows that a whole range of strategic and legal framework conditions have not been taken into account. Therefore, the management advises employees on the framework conditions and provides information on who is available as a contact person in the company. In the next meeting, the employees will provide the management with feedback on the adjustments they have made in order to meet the framework conditions. Together with the management, they round off the proposal in the last meeting and submit it to the client.





“In order to tap into and expand the potential of all employees, a future-oriented learning culture is required, in which learning and qualification opportunities are used by everyone on their own responsibility, and in which joint learning – from and with each other – is firmly anchored in everyday work.”

Verena Lubbers,
Head of Personnel Development and
Change Management



Learning from and with each other

For us, competence development is essential for innovation and transformation

As we journey towards becoming a digital transformation and promotional bank, the framework conditions for learning and further development have also changed for us in recent years. We see the promotion of employees and their further training as a key success factor, because they are the ones who successfully implement and drive forward projects and measures.

Our learning strategy: Learning NEW LEARNING together

The way we learn is changing. We are learning more continuously and in a more self-directed manner than before. Digital technologies enable us to take advantage of a wider range of services, test more diverse formats that can be used by everyone on demand. Our goal is to use this to learn in a more situation- and needs-based manner – whenever we require new knowledge. An essential part of this is also to promote the exchange of knowledge among ourselves in order to learn from and with one another in everyday work tasks from practice.

We live responsibility through our own skills development

The best learning opportunities and formats can only work if our employees take their learning success into their own hands, because they know their individual needs best and must be able to put what they have learned into practice.

We see ourselves as a learning organisation in which we encourage each other to learn in a self-directed manner and adapt to individual needs, network, and share and expand our knowledge with each other.

Development and development paths are as diverse and individual as people are – their reasons for undertaking professional development are in many cases very unique, and their goals are often very individual to them. An overview of the offers and options is available in the one-pager linked below.



Further information on competence development can be found here: [“Learning NEW LEARNING together” on KfW One-pager development](#)





Recommended courses of action
Our decisions in daily practice

External communication is credible



We communicate competently, credibly and reliably

- Our communication conveys appreciation for our target groups.
- We communicate comprehensibly and adapt our language to the level of knowledge of those we are addressing
- We use a consistent style and brand-compliant language.
- We see complaints as an opportunity.



The Social Media Desk is responsible for LinkedIn, Instagram, YouTube, X, etc.

On social media, we communicate with relevant target groups and partners, and increase awareness among potential applicants. The Social Media Desk ensures the right selection of topics and editorial implementation.

Act responsibly on social media as a private person too

- Resolve misunderstandings and correct your own mistakes on the web.
- Be sensitive to contact requests from people you don't know.
- Treat others' opinions with respect.
- Never share business secrets and internal information online.

Only authorised employees speak on behalf of KfW.

Style Book – Guidelines for customer communication:

The KfW Style Book forms the basis for our written customer communication. The goal: KfW's external communication should be uniform, credible and comprehensible. Details can be found in the [KfW Style Book \(for internal use only\)](#)



Communication with our stakeholders follows a clear process

How we communicate with stakeholders, for example the supervisory authority BaFin, the Bundesbank, the legal supervisory authority and the Federal Audit Office, is clearly defined. You can find out more about this in the respective Organisation Manuals of the individual company institutions.

We also communicate openly and regularly with investors, business partners, analysts and rating agencies. To do this, we use roadshows, conferences, newsletters and the Investor Relations website. The Investor Relations team is the first point of contact for all questions relating to capital market issues.



Further information can be found here (for internal use only):
[Brand Guide of KfW Group and its subsidiaries](#)
[Social Media Guidelines of KfW Group and its subsidiaries](#)





Pictograms

How to handle press enquiries

- If a journalist contacts you, direct this person to the relevant Press Office immediately.
- Do not contact journalists either in writing or verbally without consulting the relevant Press Office.
- Speak to the Press Office if you give publications such as articles, letters to the editor or similar to the press.

Speak to the Press Office if you are asked by a business partner to attend a press conference. Even a “harmless” event can touch on business policy issues.



“KfW stands for open and honest communication. We also believe in the power of transparency when it comes to critical matters, wherever banking secrecy does not prevent this.”

Verena Köttker,
Director of Corporate Communications
and Brand Management

Our Press Office organises communication with the media.

A journalist you’ve had contact with before calls you and wants information about the new Efficiency House promotion. Even if you feel confident from a professional perspective, in such a case, make use of the media skills of staff from the Press Office.



Contact: [Press Office](#)



Prevent fraud and corruption early



Examples:

- The management of a company participating in a Europe-wide tender invites decision-makers to a weekend at an exclusive vineyard.
- An entrepreneur submits an application to KfW for an investment grant. He deliberately makes false statements in his documents because he would not have received the grant otherwise.

The Gifts Policy helps!

When handling the acceptance and/or giving of gifts and/or invitations, we ensure that this is done in accordance with our policy

Such and similar actions jeopardise the reputation of the entire organisation:

- Acceptance of gifts and invitations that exceed the permitted value
- Counterfeit signatures
- Theft and embezzlement of KfW property
- Sexual abuse or sexual harassment
- Misstatement of balance sheets



What you can do to prevent such activity

Be aware and make it clear through your conduct and communication with others that fraud, corruption and other criminal offences do not stand a chance at KfW Group.

If in doubt, seek advice from the Compliance unit team within the Group.



Further information can be found here (for internal use only):

KfW Capital GmbH & Co. KG:

[Training concept |](#)

[Fraud prevention/Other criminal offences |](#)

[Dealing with gifts/invitations](#)

DEG: [Prevention of other criminal offences](#)

KfW IPEX-Bank GmbH:

[Integrity/Compliance |](#)

[Compliance](#)

KfW:

[Gifts Policy |](#)

[Training concept](#)



If necessary, report cases anonymously:

The ombudsperson (kfw@brillinger-rechtsanwaelte.eu) is on hand to receive information.



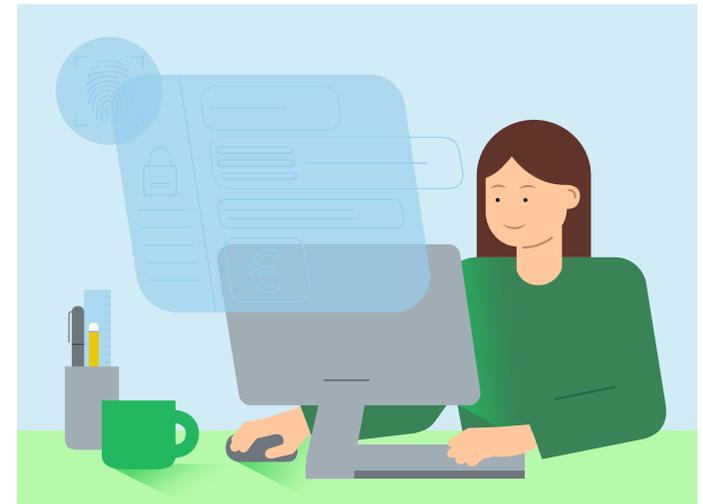
Pursue further training:

You will find a wide range of information and training courses on the Intranet.



Protection against money laundering, dealing with financial sanctions and embargoes, and tax compliance

Our in-house procedures prevent the financing of criminal offences and ensure the implementation of sanctions regulations. Ensure that they are observed.



We do not allow ourselves to be abused for criminal acts

We inform ourselves in advance about all relevant parties involved in a transaction and examine our business relationship based on the suspicion criteria for money laundering and terrorism financing.

Automatic checking of (financial) sanctions and embargoes

All KfW business partners are checked electronically against the UN/EU and other relevant embargo lists and checked for financial sanctions. If a potential business partner needs to be checked, an individual query is possible. Regarding countries classified as critical on the country risk list, the involvement of COa is essential.

Tax compliance creates a secure framework

We are committed to full compliance with all relevant tax regulations. All tax items are presented in a transparent and comprehensible manner. Our business is based on tax compliance and fairness within the public interest. We refrain from any form of aggressive tax optimisation. Our promotional and development mandate is incompatible with business models designed to avoid taxes. This is another reason why we observe the principles of the EU, OECD (Organization for Economic Co-operation and Development) and FATF (Financial Task Force) for dealing with countries and territories that are non-cooperative, non-transparent or in a deficit.



Report any anomalies that arise during a business relationship to Compliance. Take advantage of training offered on the subject of compliance. For more information, see (for internal use only):
IPEX compliance: [Training concept](#)
KfW Capital GmbH & Co. KG: [Money laundering prevention](#)
DEG: [Money laundering prevention | Embargos and financial sanctions](#)
KfW: [Money laundering prevention | Terrorism financing](#)

Be alert: “Know your customer” (know your customer principle)

Ensure transparency in your business relationships

- identification of each customer
- disclosure of the business purpose, and
- identification of the beneficial owners.

Pay particular attention to high risks and collect data on “My customer’s customer” (know your customer principle) if necessary.

Examples:

- A person has recently received a loan. Before the repayment period expires, a third party repays the full amount of the loan. KfW reports this process to the competent authority, which determines that the funds originate from drug transactions.
- You are asked to make a ‘facilitation payment’ in international business. Such requests for payment may be punishable by law and must not be made. Always report such incidents to Compliance.



Treat your own knowledge confidentially: Insider trading and market abuse

Anyone who works for a bank has access to a lot of internal information. If this is used or disclosed to gain an advantage in securities trading, this is a criminal offence, which has serious consequences for individuals, but also for the group.



Knowledge remains within the bank

Insider information is information that is not publicly available and which, if it were to become known on the market, could have a significant impact on the price of the stock exchange securities in question. We never use this knowledge for our own benefit, for the benefit of the bank or for the benefit of third parties. Anyone who publishes internal or incorrect information specifically to influence the market value of a company is committing market abuse.

protected against the unlawful use of information by other market participants.

KfW is not a trading book institution, it does not have any proprietary trading operations, and it does not remunerate traders using bonuses linked to success in proprietary trading.

Acting in compliance with the rules means:

- Treating insider knowledge confidentially – neither using it yourself for unauthorised purposes nor disclosing it to unauthorised third parties.
- Do not make recommendations based on insider knowledge.

In case of doubt, staff from the respective Securities Compliance unit will be happy to help. There are many more examples and tips in the securities compliance training.

Securities compliance protects the functioning of financial markets

This is primarily based on the assurance that all investors are treated equally and that they are

Examples:

- In financial market transactions, employees from the Financial Markets department receive insider information in certain cases. If this information were to reach the public before the business was concluded, the damage to KfW would be immense – both for its reputation and economically.
- A trader in the Financial Markets department could favour certain customers and grant them a better price than the market price.

These and other situations are recorded as risk scenarios. Such risks are mitigated to the best extent possible through internal controls.



Further information can be found here (for internal use only):
KfW Capital GmbH & Co. KG:
[Securities compliance](#)

DEG:
[Securities compliance](#)

KfW IPEX-Bank GmbH:
[Compliance](#)

KfW: [Securities compliance](#)



Be sensitive to conflicts of interest

Conflicts of interest arise when personal or financial interests are not in line with the interests of KfW Group, its business partners or with legal obligations. Be sensitive to close relationships between colleagues, managers or employees.

This also applies to retired persons. Another example of a conflict of interest is if close relatives (partners, children, etc.) are in a contractual relationship that creates an obvious conflict of interest with your activity at KfW.

A person close to me is subordinate to me hierarchically. How do I behave correctly when making staffing decisions (such as promotion, performance evaluation, salary review)?

To avoid the appearance of a conflict of interest, make your superior aware of the situation. Solutions will be found together with the involvement of HR.



A neighbour would like to take out a KfW promotional loan. Can I give her tips on how to get the best out of her application?

You can provide general tips that would also be possible to get from publicly available sources. Do not share insider knowledge.



At KfW, I am responsible for commissioning external IT service providers. Can I perform a secondary professional activity at a service provider with whom I have a business relationship?

There is an obvious conflict of interest here that contradicts the taking up of a secondary professional activity. Your employment contract governs whether you are obliged to report any secondary professional activity.



I am a recruiter and a friend has applied for a job posting that I am responsible for. How do I ensure a fair selection process?

Hand over the recruitment process to someone else in your team.





Here are some examples of possible conflicts of interest:

- Contract awards.
- Staff decisions such as promotion and recruitment.
- Close personal relationship with a service provider.
- Superior/subordinate relationships
- Travel.

Conflicts of interest – how to deal with them in every-day life:

- Declare existing or unavoidable conflicts of interest, for example in political mandates.
- Contact your manager if you are unsure whether there is a conflict of interest.

Secondary professional activities and mandates – this is what you should consider:

- The mandates are in line with your tasks at KfW.
- Report secondary professional activities to HR in advance.



“Compliance is not something we at the CO unit can handle alone. Dialogue at and between all company levels is essential. In this way, it will always be clear to all of us how we are to act and what stance we need to take in each individual situation. Compliance is therefore always our joint responsibility.”

Dr Stephan Lauer,
Chief Compliance Officer



Further information can be found here
(for internal use only):

KfW Capital GmbH & Co. KG:

[Dealing with conflicts of interest](#)

KfW IPEX-Bank GmbH: [Compliance](#)

KfW: [Dealing with conflicts of interest](#)





Recommended courses of action

Protect data and information

Treat personal data confidentially

We protect the personal data of our business partners and colleagues. We treat this data confidentially and collect, process and use it only to the extent that we are permitted to do so (need-to-know principle).

What you can do to protect data

- Handle data with care.
- Do not share personal data with unauthorised third parties.
- Be careful with personal information with regard to external third parties.
- In case of doubt, staff of the respective Compliance units will be happy to help. Are you familiar with the compliance training available? It also contains tips on data privacy.

The following data is personal data, for example:

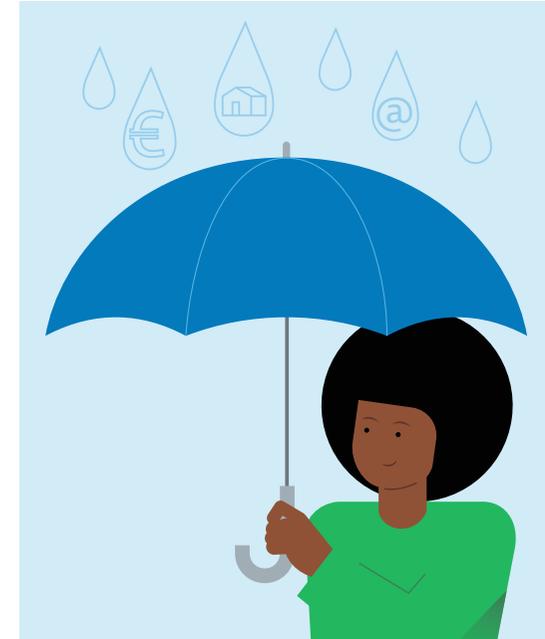
It does not matter how the data is stored or in what form it is available.

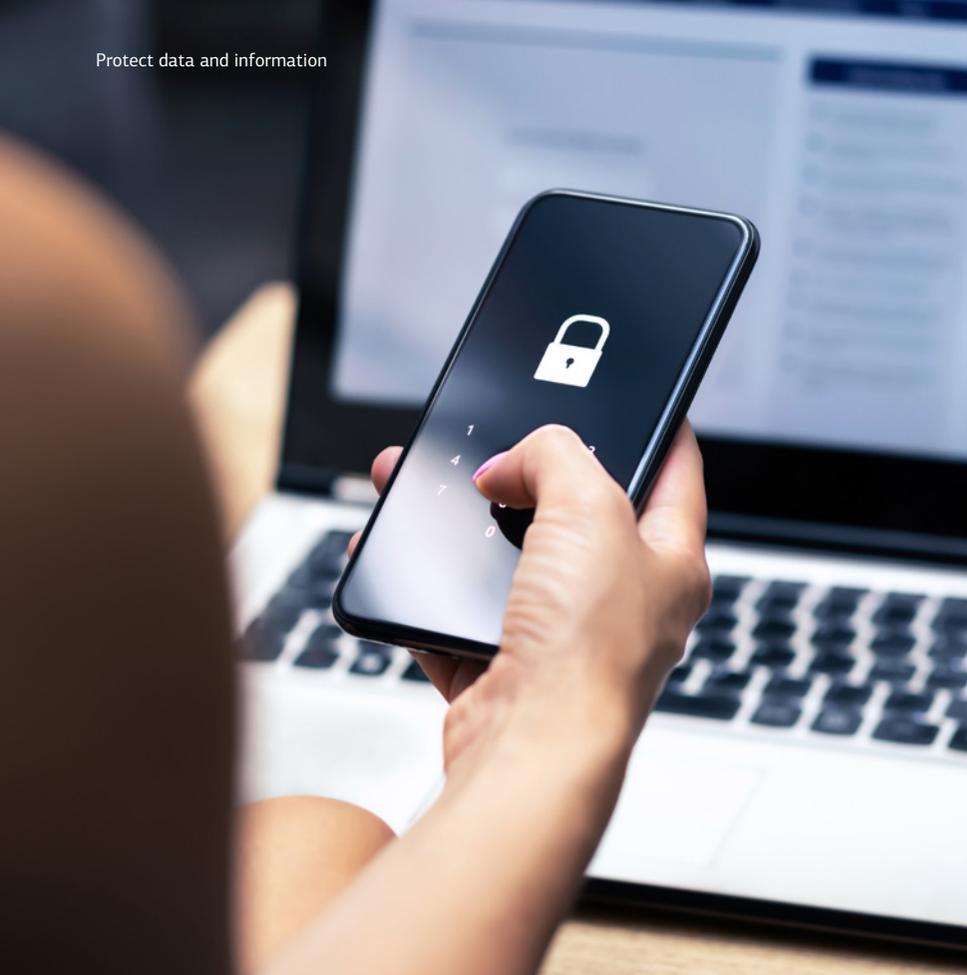


- Name
- Title
- Date of birth
- Income
- Assets
- Profession
- Address
- Contact phone number
- Email address
- Working hours and absences
- ID number



Further information can be found here (for internal use only):
KfW Capital GmbH & Co. KG: [Data privacy](#)
DEG: [Data privacy](#)
KfW IPEX-Bank GmbH: [Data privacy](#)
KfW: [Data privacy](#)





Protect confidential information from unauthorised access

We consider all information intended for a limited group of recipients to be confidential.

Examples of confidential information include corporate figures that have not yet been published, information on KfW's strategic direction, planned products or internal salary structures.

We take security measures seriously.

Information is an asset of KfW Group. That's why we treat this asset with confidence. Observe the information and rules in the Information Security Portal.

In your daily work, pay attention to the following:

- password protection
- Clean Desk and Clear Screen Policy
- protected printing of documents using pull print
- safe disposal of paper documents
- encryption of emails in Outlook
- encryption of data carriers
- fraudulent emails and calls (phishing)
- screen lock when leaving the workplace



We document important processes and projects in such a way that they are transparent for third parties. We keep records of all business activities for as long as stipulated by legal requirements.



Further information can be found here (for internal use only):
KfW Capital GmbH & Co. KG:
[Information security](#)
informationssicherheit-kfw-capital@kfw.de
DEG
[Information security](#)
#KfW IPEX-Bank GmbH:
[Compliance – Information Security](#)
KfW:
[Information Security](#)
[AA028017 – Rules for Handling Confidential Information](#)



Contact information, training

Reporting violations and suspicions:

Everybody has the right to report unlawful conduct or suspicions of a violation of laws, legal provisions and internal guidelines and rules. This also applies if internal specifications contain flaws.

The anonymous whistleblower system can be used in all cases – without the whistleblowers fearing disadvantages of any kind. The Compliance department, the Compliance units withinsubsidiaries KfW's ombudsperson can accept reports.

Ombudsperson

Arndt Brillinger, RA

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Fax: +49 (0)721,915 465-80

kfw@brillinger-rechtsanwaelte.eu

https://intranet/whistleblower_system

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