

# Procedure for the Complaint Process Under the Supply Chain Due Diligence Act

The Supply Chain Due Diligence Act (LkSG) applies to companies in Germany (domestically) that employ more than 3,000 staff and, from 1 January 2024 to those with more than 1,000 staff. **Universal-Beteiligungs- und Servicegesellschaft mbH**, as Holding company, along with its subsidiaries **Universal-Investment-Gesellschaft mbH** and **Universal-Investment-Labs GmbH**, will fall under the scope of the LkSG from 1 January 2024.<sup>1</sup>

The LkSG specifies the obligations these companies must fulfill, including, for example, the establishment of a complaint procedure. This complaint procedure enables both **employees and external parties** to report potential human rights violations or environmental problems within their own operations or in the supply chain.

This procedure aims to simplify the exact steps for this process.

## I. Objective of the Complaint Procedure

The complaint procedure serves not only to highlight human rights or environmental violations but also as an **early warning system**. It aims to bring attention to problems before harm is done to people or the environment.

Additionally, it should provide affected individuals access to appropriate solutions. If reports or complaints about imminent or actual violations are received and confirmed, we are obliged to take **remedial measures** to stop, or at least reduce these grievances.

Target groups of this procedure are individuals who may be affected by human rights or environmental violations in the company's own business area and in the supply chain.

## II. Submission of a Complaint

You can submit complaints and reports in **two ways**: via the online complaint platform or by phone. All incoming reports are processed immediately and confidentially.

The **online complaint platform**, operated by CLARIUS.LEGAL, a German law firm, and Universal Investments Ombuds and Reporting Office, handles all reports confidentially. Complaints can be submitted either anonymously or non-anonymously. They are processed by the reporting office and, if necessary, forwarded to the Human Rights Officer for appropriate action.

Access the online complaint procedure here:

<https://universal-investment.meldung.clarius.legal/>

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<sup>1</sup> As part of the assessment of the scope of application, the employees of the subsidiaries were counted towards the parent company. In addition, the decisive and controlling influence of the holding company on the Group companies was examined.

For **telephone complaints**, call 00496971043433. The Human Rights Officer is available to assist you.

For efficient processing and resolution, it's recommended to provide information on the 5 Ws (Who, What, When, Where, How) to enable quick understanding and action.

The Human Rights Officer is impartial, independent, not bound by instructions in complaint processing, obliged to maintain confidentiality, adequately trained, and has sufficient time resources to reliably address your concerns.

### III. Procedure of the Complaint Process

#### Confirmation of Receipt and Continuous Communication:

Whistle-blowers are **informed** about their rights and protective measures. After you have submitted your report, you will receive a **confirmation of receipt**.

Communication will take place either by e-mail, telephone or anonymously via the portal to which you will receive login credentials.

Within three months of receiving your complaint, you will be provided with feedback regarding the planned and implemented measures, should you wish to be contacted. These measures will in no case lead to disadvantages or penalties or infringements of the rights of the persons concerned.

#### Review of the Complaint:

The internal Reporting Centre checks whether the submitted complaint or the subject of the tip-off falls within the remit of the complaint procedure. If a complaint is not admissible, the person who submitted the tip-off will receive a **clear and comprehensible explanation** for the rejection. This review takes place within five working days of receipt of the complaint.

#### Clarification of Facts:

The Reporting Centre respectively the Human Rights Officer discusses the case in detail with the reporting person to gain a deep understanding of the facts and to build trust in the process.

During this conversation, the **expectations** of the person regarding possible prevention or remedial measures are discussed, forming the basis for developing an appropriate solution.

This includes suggestions for remediation, agreements for restitution, and an evaluation of outcomes.

### IV. Protection and Confidentiality

#### Maintaining Confidentiality of Identity:

As part of the complaint procedure, we ensure that the identity of the persons providing information and their personal data are treated in **strict confidence**. We always adhere to the data protection regulations for handling data.

**Protection from Discrimination or Punishment:**

We are committed to **not allowing any discrimination or penalisation** that may arise from the use of our complaint procedure.

We will not tolerate retaliation against anyone who submits a complaint or report, and we will take consequences if retaliation occurs. To ensure the safety of whistle-blowers even after the procedure has been completed, we will remain in contact with you to ensure that you are not jeopardised by retaliation.

In order to guarantee protection and confidentiality in the long term, the effectiveness of the complaint procedure is reviewed at least once a year and on an ad hoc basis. The measures are updated as necessary. Implementation is documented on an ongoing basis.

Of course, **we do not charge you any costs** for using the complaints procedure.

Contact

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