

Whistleblower system

Ensuring a culture of trust and integrity - help us!

Ensuring integrity in all business processes is an essential prerequisite for our success. In addition to our values, the basis for this is compliance with laws, rules and internal guidelines. This is a top priority at UI BVK Kapitalverwaltungsgesellschaft mbH, because only if we comply with rules and standards can we avert damage to our company, our employees, customers and investors.

We are grateful for any information from employees, customers, suppliers and business partners that helps to identify and remedy grievances. This is the only way we can prevent economic disadvantages and damage to our company's reputation.

Whistleblowers who report actual or suspected violations in good faith are not whistleblowers, but help ensure the integrity of our business processes – and thus our success. Please support us in this!

In an open corporate culture, employees should be able to address mistakes openly and at an early stage. The direct supervisor should be the first point of contact for problems and process improvements. If you have the feeling that you cannot or do not want to contact your supervisor with a report of a violation of the rules – for whatever reason – the whistleblower system of UI BVK Kapitalverwaltungsgesellschaft mbH offers the possibility to submit this information.

Submit a hint – but in the right way!

In order for a report to be appropriately processed and investigated, it is important that the report is as specific as possible. It is helpful if the following W-questions are taken into account when reporting:

- Who? Who is it about? Who is affected?
- What? What happened? Description of the facts.
- When? When did the incident occur?
- How? How often did it happen and in what period of time?
- Where? Where did the incident take place?
- Which persons (surname, first name) and/or departments and/or business partners (exact company) are involved?
- Who has already been informed about this?

As a whistleblower, you should make sure that the descriptions can also be understood by people from outside the field.

What issues should I report?

We are interested in cases of violations of criminal standards and/or standards subject to fines and/or violations of European and national law that have been adopted for the implementation of European regulations and/or violations of internal rules or the correct conduct in the workplace. This includes, in particular, violations with potential consequences for personal well-being at work, the assets or reputation of UI BVK Kapitalverwaltungsgesellschaft mbH as well as violations with potential criminal consequences.

Please keep in mind that the information you provide may lead to decisions that may have consequences for colleagues or third parties. Therefore, we ask you to only provide us with information that you are convinced of to the best of your knowledge and belief.

Information that accuses employees or others with bad faith and against their better judgment is expressly undesirable.

What happens to my report?

For the submission of his report, the whistleblower is free to use two-way communication via the whistleblower system anonymously or non-anonymously. This is what the platform of the law firm CLARIUS.LEGAL stands for as a reporting channel. CLARIUS. As an internal reporting office, LEGAL operates the ombudsman service within the meaning of the Whistleblower Protection Act.

The lawyers of CLARIUS. LEGAL will confirm receipt of a report to the whistleblower via the platform, check the validity of the reported violation, request further information from the whistleblower if necessary, and keep in touch with you as the whistleblower as part of a two-way communication. If the notice is plausible and contains sufficient information about violations of the law or material violations of internal rules or inappropriate behavior in the workplace, etc., CLARIUS will take action. LEGAL appropriate follow-up measures, in particular the notification to the competent body (Compliance Department). If necessary, other internal and/or external bodies will be consulted. The circle of participants is kept as small as possible.

The information will be processed through a fair and confidential process. Our goal is to clarify suspected cases and to eliminate any existing grievances.

How is my anonymity ensured?

The overriding principle of the whistleblower system is to protect the identity of the whistleblower when clarifying the facts.

When using anonymous communication, only your registration details will be transmitted, without the possibility for the law firm or the competent authority to ask questions. The disclosure of information is then always carried out while preserving the anonymity of the whistleblower. In this case, you can find out about the progress of the processing of the procedure on the platform via a transaction number automatically generated for you.

If you disclose contact details or your identity to us as a whistleblower, you will enter into an attorney-client relationship with the law firm CLARIUS. LEGALLY. Information that you provide to us via the platform is subsequently subject to attorney-client privilege, which ensures that you are optimally protected. You will not incur any costs with this client relationship, these will be covered by UI BVK Kapitalverwaltungsgesellschaft mbH. At no time do you have to provide any personal information during the submission of your report. In this case, do not provide any information that allows conclusions to be drawn about your identity if you wish to remain anonymous.

Where do I submit my report?

We provide you with a fully encrypted platform solution from CLARIUS. LEGAL Rechtsanwältsaktiengesellschaft, a German law firm. You can submit your report anonymously using a digitally supported format.

For whistleblowers, internal (e.g. CLARIUS. LEGAL) and external state reporting channels, two equally adjacent reporting channels are provided, between which the user can freely choose. Whistleblowers should prefer to report to an internal reporting unit in cases where the breach can be dealt with effectively and they do not fear reprisals. Internal reporting is often the best way to get information to the people who can investigate and remedy the breach the fastest. If an internally reported breach has not been remedied, you are free to contact external parties afterwards.

An external reporting office has been set up at the Federal Office of Justice (BfJ). It is responsible for the federal and state governments to accept information from the private sector and the public sector. In special areas of responsibility, the Federal Financial Supervisory Authority (BaFin) and the Federal Cartel Office (FCO) act as external reporting bodies with special responsibilities with their already established whistleblower systems.

Contact
(not for whistleblower reports!)

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