

Code of conduct

Corporate culture and ethics

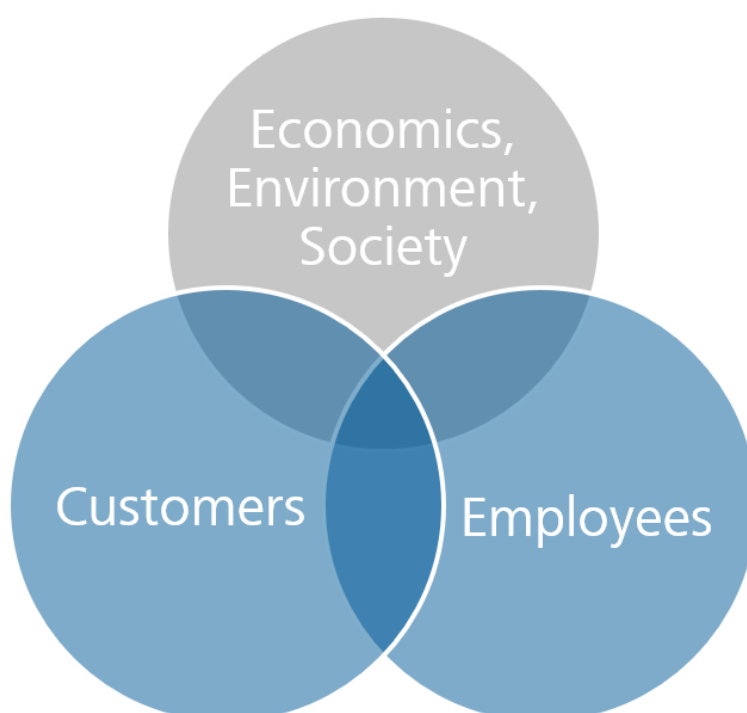
We take our responsibility seriously

As the largest independent investment company in the German-speaking world, we are aware of our social responsibility. We regard our reputation and the trust of our clients as a valuable asset.

We want to drive innovation and change without losing sight of our values and our responsibility towards our environment. We live a culture of responsibility and accountability.

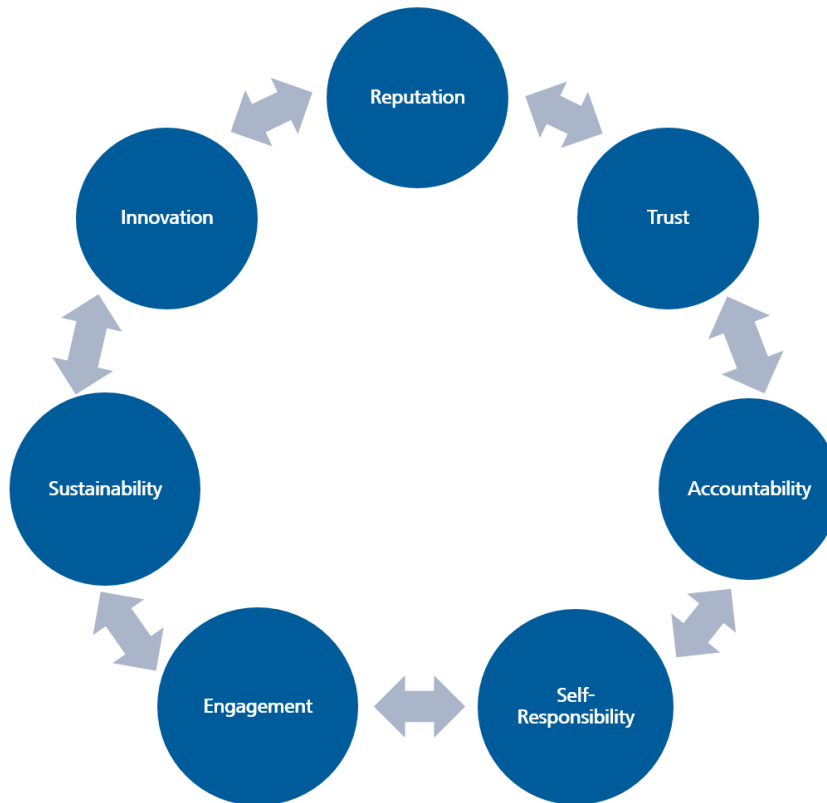
The management is working to ensure that all our business activities are sustainable and valuable for the society in which we live and for our environment.

By cooperating with recognized institutions such as the [German fund association BVI](#), we are also actively involved in shaping industry standards in terms of sustainability. As part of our business activities, we also want to give something back to the community and are therefore committed to various social and ecological initiatives.



Our values

In order to fulfill our commitments to the three key areas of customers employees and society and the environment , we focus on values that are necessary for successful implementation:



Zero-tolerance strategy

As part of our zero-tolerance strategy, we expect management and all employees to comply with all laws, regulations, internal written policies and common ethical standards that apply to our activities in the conduct of business and in all other areas of corporate conduct:

Universal Investment

- acts according to ethically impeccable standards
- controls risks and minimizes them
- acts fair and honest in behavior and communication with each other
- preserves the security of information
- protects the assets of its customers
- conducts financial transactions in a responsible manner
- acts as a reliable trustee for the assets of its clients
- cultivates a respectful interaction
- complies with relevant laws and regulations
- promotes compatibility of work & family for its employees
- is committed to society, economy and environment

Support us in fostering a culture of trust and integrity!

Ensuring the integrity of all business processes is a crucial prerequisite for our success.

This includes not only our own values but also compliance with laws, regulations and internal guidelines. This has the highest priority in our group of companies; because only by complying with rules and standards can we avert damage to our company, our employees and our investors.

We are always pleased to receive information from employees, customers, suppliers and business partners that helps us to identify and remedy problematic behavior and critical situations in advance. Only in this way can we prevent economic disadvantages and damage to our company's reputation.

To this end, we have set up a secure web-based whistleblower system through which you can report possible anomalies and problems to us - even anonymously. All information will be treated confidentially and with the greatest possible discretion.

Complaints policy

The satisfaction of our customers is always our top priority. Therefore, we give you the opportunity to express your criticism in an easy way. For this purpose, we have set up a complaints office with the aim of ensuring that customer complaints are dealt with appropriately and promptly through our complaints management system. This is how you can reach our complaint management.

Data protection and confidentiality obligations

We take the protection of your personal data very seriously. We process data exclusively in accordance with the applicable data protection regulations.

If you wish to assert your rights in relation to your personal data or if you have any further questions about the use of the data you have given us, please contact us. You can find further information in our privacy policy.

Respect at work & acceptable social behavior

Each employee, executive and management team is expected to act in accordance with the Code of Conduct and to demonstrate professionalism, integrity, mutual respect and fairness in our daily business operations.

In the spirit of sustainability and social responsibility, we do everything in our power to offer employees the best opportunities to realize their potential and to create an environment in which diversity, inclusion, equal opportunities and non-discrimination are a matter of course.

Our commitment to tax compliance

For us, paying taxes is an important means to make a contribution to the society. Moreover, compliance with the applicable tax regulations builds trust with our customers, employees, the tax authorities and the public.

We observe the tax regulations in all countries in which we are operating and fulfill our tax obligations with great diligence. Equally, we fulfill the tax information requirements with regards to ourselves, our customers as well as our employees. Our internal organization and processes are designed to ensure that taxes payable by the respective group companies are completely, correctly and timely assessed and paid to the competent tax authorities. Nonetheless, under consideration of the applicable tax laws, we have a legitimate interest to keep taxes reasonable low.

We are not actively engaged in any tax arrangements aiming to avoid the declaration or payment of any taxes by us or any other party involved.

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As of Month YYYY

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