

Whistleblowing System

Frequently asked questions

Why are we introducing a whistleblower protection system?

In accordance with the Whistleblowing Directive (EU) 2019/1937 and the German Whistleblower Protection Act (HinSchG), we are obliged to set up an internal reporting office to report violations.

What kind of breaches should be communicated via the whistleblower protection system?

According to the Directive, only breaches of certain Union law may be reported. We therefore welcome any information on e.g. corruption, bribery, breach of trust, fraud, serious discrimination and harassment, antitrust violations, insider trading, money laundering, tax evasion, accounting fraud, etc.

Why should you report a violation?

You may be aware of damaging behavior that puts the Universal Investment Group at risk. By reporting possible breaches of the rules, you will help us to uncover irregularities at an early stage so that we can take action, if possible before any damage occurs. In this way, you make a decisive contribution to our sustainable success and to safeguarding workplaces.

Who operates the whistleblower protection system?

We provide you with a fully encrypted platform solution from CLARIUS.LEGAL Rechtsanwaltsaktiengesellschaft, a German law firm.

How does the whistleblower system work?

Using the "[Whistleblower Reporting System](#)" allows you to submit a report, including the option to report anonymously.

You will receive login details that are independent of your personal information so that you can track the progress of the process.

What happens to your report?

After receiving your report, the CLARIUS.LEGAL lawyers will process your concern as ombudspersons. If necessary, you will receive questions and can provide further information anonymously. We will then have access to the case file and take internal measures to clarify the matter in order to uncover, rectify and, if necessary, punish any breaches of the rules.

When will you receive feedback on the measures taken?

After submitting a report, you will receive login details so that you can log in at any time and check the status of your case. If you provide an e-mail address, you will be notified by e-mail. You will be informed of any follow-up action after three months at the latest. Follow-up measures may include, in particular, the initiation of internal investigations, referral to the competent authority or discontinuation of the matter due to lack of evidence.

Do you have to fear any disadvantages if you submit a report?

The Directive and the HinSchG, which has been in force since 10.07.2023, provide for comprehensive protection of the whistleblower against "reprisals" as long as the whistleblower could reasonably assume that the information he or she reported or disclosed was true. Reprisals are acts or omissions in connection with professional activities that are a reaction to a report or disclosure and which cause or may cause the whistleblower an unjustified disadvantage. This includes everything from a transfer, omission of a salary increase or training trip to a warning and dismissal, but also, for example, failure to continue employment for a limited period of time.

Due to the anonymous communication on the platform, whistleblowers acting in good faith are comprehensively protected from any reprisals. However, we reserve the right to take legal action in the event that reports are made falsely against our better judgment.

Will the persons affected by my report be informed about my report?

Without your consent, the persons concerned will not be informed about who has submitted a report.

With regard to the content of your tip-off, special data protection information or disclosure obligations towards the person incriminated may have to be observed. In addition, if investigations are initiated, the person concerned will be heard in due course. Please note that the persons concerned must be regularly confronted with the allegations made against them, if only so that they can protect their own rights of defense, e.g. the right to a hearing or to be questioned by law enforcement authorities or the police.

Will my data be passed on to third parties?

Your identity will not be disclosed without your notification and consent.

In the case of consent, which is revocable until disclosure, your personal data will be transmitted to authorities, for example the police or public prosecutor's office, if necessary. Under the same conditions, it may be possible to make information available to other employees or employees of other Group companies as part of the processing of a report or as part of an investigation, for example if the information relates to events in subsidiaries. The latter may also be based in countries outside the European Union, where there may be different regulations on the protection of personal data. We always ensure that the relevant data protection regulations are complied with when passing on information.

What personal data is processed about you?

Further information on the handling of your personal data is available on the platform under "[Data protection information](#)".

When can I contact an external reporting office?

As a whistleblower, you have the right to decide whether to contact an internal reporting office (employer) or an external reporting office ("public authority"). These persons should prefer to report to an **internal reporting office** in cases where effective internal action can be taken against the violation and they do not fear reprisals.

Here you will find the appropriate external reporting office depending on the topic.

Federal Financial Supervisory Authority (BaFin)

- Banks,
- financial service providers,
- Payment and e-money institutions,
- Private insurance companies and pension funds,
- capital management companies and securities trading,
- Prevention of money laundering and terrorist financing,
- Collective consumer protection in the area of financial services.

Please report potential violations via the channels of BaFin's whistleblower office.

Federal Cartel Office

- Violations of the German and European ban on cartels (incl. vertical) (Art. 101 TFEU, § 1 GWB),
- Violations of the German and European ban on the abuse of market power, in particular in the energy sector (Art. 102 TFEU, §§ 19, 20, 29 ARC)
- Violation of the prohibition of enforcement in the case of mergers (§ 41 ARC)
- Infringement of enforceable orders and conditions imposed by the competition authorities
- Boycott - request to block supplies or purchases (§ 21 para. 1 ARC)
- Influencing others to violate antitrust law (§ 21 para. 2 and para. 3 ARC)
- Threat of disadvantages for the involvement of the competition authorities (§ 21 para. 4 ARC)
- Incorrect information in the context of an application for recognition of competition rules (§ 24 para. 4 sentence 3 ARC)
- Incorrect or incomplete information in the notification of a merger (§ 39 para. 3 sentence 5 ARC)
- Misconduct by large online platforms on digital markets (DMA - Digital Markets Act).

Please report potential infringements via the channels of the Federal Cartel Office's whistleblowing office.

Federal Office of Justice

- Criminal law,
- Regulatory offense law, insofar as the violated provision serves to protect life, limb or health or to protect the rights of employees or their representative bodies,
- Statements made by civil servants that constitute a breach of the duty to comply with the constitution,
- Product safety and conformity,
- traffic safety,
- environmental protection,
- radiation protection and nuclear safety,
- food and feed safety, animal health and animal welfare,
- public health,

- consumer protection,
- protection of privacy and personal data and security of network and information systems,
- public procurement,
- tax law for corporations and commercial partnerships,
- protection of the financial interests of the European Union,
- state aid,
- other internal market regulations (European Union regulations on the free movement of goods, persons, services and capital).

Please contact the Federal Central Reporting Office of the Federal Office of Justice.

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