

# Whistleblowing system

## Help us to ensure a culture of trust and integrity!

Ensuring integrity in all business processes is an essential prerequisite for our success.

This is based not only on our values but also on compliance with laws, regulations and internal guidelines. This has the highest priority at Universal-Investment, because only if we comply with rules and standards we can avert damage to our company, our employees and investors.

We are grateful for any information from employees, customers, suppliers and business partners that helps to identify and remedy misconduct. Only in this way can we prevent economic disadvantages and damage to our company's reputation.

Whistleblowers who report actual or suspected violations in good faith are not informers but help to 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 superior should be the first point of contact for problems and process improvements. If you have the feeling that you cannot contact your supervisor with a reference to a rule violation - for whatever reason - the whistleblower system offers various ways of making this reference. The central internal contact here is Compliance.

### Making a report correctly

In order for a tip to be processed and investigated appropriately, it is important that the tip is as concrete as possible. It is helpful if the five questions below are taken into account in the report:

- Who? - Who is it about? Who is affected?
- What? - What happened? Description of the facts.
- When? - When was the incident?
- How? - How often did it happen?
- Where? - Where did the incident occur?

As a whistleblower, you should ensure that the descriptions can also be understood by persons outside your field of expertise.

### What facts should I report?

We are interested in information about violations of the law or material violations of internal rules or proper conduct in the workplace. This includes, in particular, violations with potential consequences for personal well-being in the workplace, the assets or reputation of the Universal Investment and violations with potential criminal consequences.

In order for us to process your report successfully, we need as many concrete clues as possible:

- What has happened? What is the exact situation?
- In what period did the misconduct occur?
- Which persons (surname, first name) and/or departments and/or business partners (exact company) are involved?
- Who has already been informed?

Please remember that your information can lead to decisions that have consequences for colleagues or third parties. We therefore ask you only to provide us with information of which you are convinced to the best of your knowledge and belief.

Any information that accuses employees by malicious intent and against your better judgement are expressly unwelcome.

### **What happens after my report?**

Your message goes directly to the external law firm Clarius Legal. If the report is plausible and contains sufficient information about violations of the law or violations of internal rules or inappropriate conduct in the workplace, the matter will be forwarded to Universal-Investment for further investigation. Our goal is to clarify suspicious cases and eliminate any existing misconduct.

As a matter of principle, the facts are passed on to the Compliance Department. If necessary, other internal and/or external bodies (e.g. HR, Data & Quality Management or the Works Council) are consulted. The circle of participants is kept as small as possible. The passing on of information always takes place under preservation of the anonymity of the whistleblower.

If you have openly submitted the information and wish to receive feedback, you will be informed of the status or results of our investigations.

### **How is my anonymity ensured?**

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

Due to the existing client relationship between you as a whistleblower and the external law firm, your identity remains anonymous at all times. This client relationship does not incur any costs for you; these are borne by Universal-Investment. At no time do you have to provide personal data when submitting your notice. Also, do not provide any information that allows conclusions to be drawn about your identity if you wish to remain anonymous.

The processor responsible for your report will contact you if you openly submit your tip and agree to it. Your anonymity will be maintained at all times during this process. We are interested in your note to prevent harm or misconduct within the company, not to obtain information about you.

### **How can I make a report?**

As part of the culture of trust promoted by Universal-Investment, we recommend that you first report any information to your line manager. However, if you would like to discuss your tip in person and still remain anonymous to Universal-Investment, you can also contact our external lawyers by telephone. Clarius Legal is available to all employees, but also to our investors and other business partners of Universal-Investment as a trustworthy external contact partner. Their central task is the receipt and legal examination of indications of corrupt and other damaging or illegal conduct. The firm can be contacted by telephone (+49 172 7375234), fax (+49 40 257 660 919) or email. In addition, the Works Council and the Compliance Department are at your disposal at all times.



You can anonymously transmit your information to our partner Clarius Legal through a digitally supported [whistleblower platform](#).

## Contact

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