

RULES OF PROCEDURE

**for UniCredit Bank GmbH's ("UCB GmbH") complaints management process
according to the German Supply Chain Due Diligence Act
(Lieferkettensorgfaltspflichtengesetz "LkSG")**

CONTENT

| | |
|---|----------|
| A. COMPLAINTS PROCEDURE WITHIN UNICREDIT BANK GMBH | 3 |
| I. Foreword | 3 |
| II. Scope of application | 3 |
| B. SUBMISSION OF A COMPLAINT | 3 |
| I. Persons entitled to complain | 3 |
| II. Reporting channels | 3 |
| III. Subject of the complaint | 3 |
| IV. Structure and content of a complaint (assistance) | 3 |
| C. PROCEDURE | 4 |
| I. Receipt of the complaint | 4 |
| II. Examination of the complaint | 4 |
| III. Outcome of the Complaints Procedure and information to the complainant | 5 |
| IV. Duration of the investigation | 5 |
| V. Costs and expenses of the Complaints Procedure | 5 |
| D. PROCEDURAL PRINCIPLES | 5 |
| I. Confidentiality of the Complaints Procedure | 5 |
| II. Protection of the complainant from adverse effects | 5 |
| III. Impartiality of the Complaints Procedure | 5 |
| IV. Other principles | 6 |
| V. Other legal action to the benefit of affected persons | 6 |
| VI. Bank and business secrecy | 6 |
| VII. Data protection | 6 |

A. COMPLAINTS PROCEDURE WITHIN UNICREDIT BANK GMBH

I. Foreword

As UniCredit Bank GmbH, we have a purpose that goes beyond the basic task of supporting our society financially. We want to act as an engine of social progress and be the bank for Europe's future.

Our goal is: **Win. The right way. Together.** In this way we can achieve sustainable long-term success and create a culture in which each of us participates and of which we can be proud. A culture that places our values of **Integrity, Ownership and Caring** at the heart of our decisions and actions. This also includes respect for the law, in particular the environment and human rights within the company itself and along our supply chains.

II. Scope of application

The present rules of procedure are applicable to reports in connection with certain human rights or environmental risks or violations within the meaning of the LkSG in UCB GmbH and the associated supply chains. The complaints procedure, on the other hand, does not apply to product and service-related customer concerns and complaints. Such concerns should be addressed to the UCB GmbH channels provided on the internet for this purpose. With regards to reports within the meaning of the Whistleblower Protection Act (HinSchG), we refer as well to the information provided on the Internet and the intranet.

B. SUBMISSION OF A COMPLAINT

I. Persons entitled to complain

Anyone can submit a complaint about potential risks and breaches within the meaning of the German Supply Chain Due Diligence Act (LkSG).

II. Reporting channels

A complaint can be lodged via the following reporting channels:

- **By post:** personal/confidential
Chief Compliance Officer
UniCredit Bank GmbH
Arabellastrasse 12
D-81925 Munich, Germany
- **Via the Whistleblowing system SpeakUp!** (The login credentials for externals/third parties are provided here: <https://www.hypovereinsbank.de/hvb/ueber-uns/das-unternehmen/compliance-en>)

Reports in text form in German and English are accepted and answered via these channels. This also applies to communication with the reporting person. Upon request, UCB GmbH will endeavor to communicate in the language of the reporting person but cannot guarantee this.

III. Subject of the complaint

Any potential human rights or environmental related risk as well as violation of human rights or environmental obligations attributable to UCB GmbH or its direct or indirect suppliers under the Supply Chain Due Diligence Act (LkSG) can be reported.

IV. Structure and content of a complaint (assistance)

You make it easier for us to process the complaint if you provide the following information:

- Description of the situation/facts/circumstances *in chronological order, preferably with the following information:*
 - *What happened? Specific description of the incident and context*
 - *Where did it happen? Location, department, unit*
 - *When did the incident occur? Is the violation still ongoing?*
 - *Who is/are the affected or injured person(s)?*
 - *Can the responsible person be identified? Name of the person/department/position of employee or business partner or supplier in the supply chain. In this context, information on the possible motivation of the person(s) involved can also be helpful.*
- Which law or internal regulation has been violated? What is the connection to the activities of UCB GmbH?
- Is there any evidence? Photos, videos, documents, possible witnesses etc.
- What is the specific or intended objective of the complaint?
- Has anyone else already been informed about the grievance?
- How should further communication take place? Email, phone etc.

The above information facilitates proper and timely processing of the complaint. The list is therefore intended as an aid for formulating a complaint, but not a mandatory requirement for processing the complaint.

C. PROCEDURE

I. Receipt of the complaint

Depending on the type of complaint channel selected, receipt of the complaint will be confirmed in writing or electronically, providing that contact details have been provided.

II. Examination of the complaint

Following receipt of a complaint via the above-mentioned reporting channels, the complaint is first documented and assigned an individual reference number and will be immediately forwarded to the relevant office within UCB GmbH. The complainant will be notified of the department responsible for further examination of the matter.

In a first step, the relevant body will check the plausibility and validity of the complaint in relation to possible violations in accordance with the terms of the German Supply Chain Due Diligence Act (LkSG). Where it is possible to contact the complainant, the facts of the complaint will be discussed with the complainant and, during the investigation of the facts, the complainant will be given sufficient time to present relevant aspects and respond to relevant questions on the part of UCB GmbH.

Afterwards, an investigation will be undertaken to determine which investigative, or clarification measures (so-called follow-up measures) are required in each individual case. If necessary and after legal review, immediate measures may also be put in place.

The Complaints Process will be terminated if the facts – even after discussion with the complainant – do not constitute sufficient suspicion regarding human rights or environmental risks or violations in

accordance with the terms of the German Supply Chain Due Diligence Act (LkSG) or continued handling of the matter would be legally inadmissible. In the event of its termination, the complainant will be informed of the reasons for its termination.

III. Outcome of the Complaints Procedure and information to the complainant

Depending on the outcome of the investigation, company decisions (follow-up measures) will be taken to adequately counter any identified violation or risk, e.g., personnel measures, separation from business partner or adjustments to processes.

After closing of the investigation, the complainant will be informed about the outcome of the procedure. In many cases, however, the company must also consider conflicting legally protected interests of other persons and companies in obtaining information, e.g., data protection requirements or other confidentiality obligations, when investigating a person.

IV. Duration of the investigation

The duration of the procedure depends on the scope and complexity of the complaint as well as on necessary discussion with the complainant. Complaints are processed with high priority.

V. Costs and expenses of the Complaints Procedure

The complainant can take advantage of the Complaints Procedure described in this Rules of Procedure free of charge.

However, the company will not, in principle, assume any costs and expenses incurred by the complainant in connection with the use of the Complaints Procedure; in particular, no travel expenses or legal advice will be paid.

D. PROCEDURAL PRINCIPLES

I. Confidentiality of the Complaints Procedure

Employees entrusted with the handling of complaints must treat the information they obtain as confidential with regard to other persons. This applies in particular to personal data.

The identity of the complainant will not be disclosed if requested by him and this is legally permissible.

Any legal and regulatory disclosure and reporting requirements are exempt from the principle of confidentiality.

II. Protection of the complainant from adverse effects

Discrimination, intimidation or hostility toward the complainant, as well as other reprisals against the whistleblower or complainant or persons who cooperate in investigations to the best of their knowledge and belief, are inadmissible and will not be tolerated.

It is not permitted to adversely affect or obstruct investigations, and in particular to influence witnesses, and suppress or tamper with documents or other evidence.

The complainant and persons who cooperate in investigations to the best of their knowledge and belief will be best protected by UCB GmbH from discrimination and reprisals within the limits of the possibilities available to it.

III. Impartiality of the Complaints Procedure

Professional independence of instructions and impartiality of the employees in charge of the procedure are ensured.

IV. Other principles

1. Fair process

During investigations, the currently valid version of applicable laws, including data protection legislation and internal Group regulations, will be adhered to.

Only legal investigation methods will be used for investigation purposes and only legally usable information will be taken into account.

2. Presumption of innocence

Investigations are conducted neutrally and objectively subject to the presumption of innocence. Alongside evidence incriminating a suspected person, potentially exonerating evidence must also be examined.

3. Respect for the principle of proportionality

Actions taken under investigations must observe the principle of reasonableness, i.e. they must be suitable, necessary and appropriate to satisfy the purpose of the investigation.

4. Other rights of involvement

If, employee representatives have the right to be involved in the investigation of complaints, the necessary bodies will be involved in this respect.

V. Other legal action to the benefit of affected persons

In the event of a person being affected due to an act of violation on the part of UCB GmbH, the complainant has the right to take legal action.

VI. Bank and business secrecy

The obligation of the company to safeguard operational and business secrets remains unaffected by this. Information governed by confidentiality will not be released to third parties.

VII. Data protection

The investigation of the complaint will be carried out in accordance with the European General Data Protection Regulation ("GDPR"), including the storage and deletion of data and the rules on international data transfer. Via the internet page of UCB GmbH you can access the Data Protection Declaration governing the submission of reports.