

# » Policy statement of UniCredit Bank GmbH in accordance with the German Supply Chain Due Diligence Act (LkSG)

For us, UniCredit Bank GmbH (“UniCredit”), respecting and promoting human rights and environmental standards is a high priority. We therefore take measures with the aim of identifying, preventing, ending and minimising human rights-related and environment-related risks and violations of corresponding obligations at our company and in our supply chains.

For this purpose, the UniCredit Group has issued a Human Rights Commitment (<https://www.unicreditgroup.eu/en/esg-and-sustainability/esg-sustainability-policies-and-ratings.html>). We also adhere to the Principles for Responsible Banking.

We have been subject to the German Supply Chain Due Diligence Act (LkSG) since 1 January 2023. We hereby issue our policy statement in accordance with section 6 (2) LkSG.

## 1. DESCRIPTION OF THE PROCEDURE FOR THE FULFILMENT OF DUE DILIGENCE OBLIGATIONS

We have developed a risk management system and embedded it in all relevant business processes in order to identify and minimise human rights-related and environment-related risks and to prevent, end or minimise the extent of violations of human rights-related or environment-related obligations.

We carry out risk analyses at our company and in relation to our suppliers – both regularly and on an ad hoc basis. For this purpose, we have defined risk factors, their weighting and other criteria that enable us to identify human rights-related and environment-related risks and respond appropriately. Depending on the results, we may carry out an in-depth risk analysis, e.g. by analysing a supplier’s self-assessment. An external service provider supports us with the risk analysis regarding our suppliers.

If we identify and prioritise a relevant risk to a human right or the environment at our company or at a supplier as part of the risk analysis, we take preventive measures. In addition to this policy statement, the preventive measures include:

- training on the human rights-related and environment-related risks of our business activities;
- defining and documenting our expectations of the employees in our own business area and of our suppliers in our Code of Conduct (<https://www.hypovereinsbank.de/hvb/ueber-uns/das-unternehmen/compliance>) and through contractual provisions;
- the implementation of our strategy for human rights and the environment in our business processes, particularly in purchasing;
- the consideration of our expectations with regard to human rights and the environment when selecting our suppliers;
- requesting our suppliers to commit to complying with these expectations, for example in our General Conditions of Purchase;
- checks, including on-site audits, to verify that our employees and suppliers fulfil our expectations.

If we discover that a violation of a human rights-related or environment-related obligation has already occurred or is imminent at our company or at a supplier, we take appropriate remedial action to prevent, end or minimise the extent of such a violation.

In order to learn about human rights-related and environment-related risks at an early stage and to be able to offer support and remedy the situation in good time, we have set up a complaints procedure, which is described and accessible here: <https://www.hypovereinsbank.de/hvb/ueber-uns/das-unternehmen/compliance>.

We review the effectiveness of the afore-mentioned measures and repeat or adapt them if necessary.

We continuously document our measures to fulfil our human rights-related and environment-related due diligence obligations. In future, we will prepare an annual report on these measures and submit it to the Federal Office for Economic Affairs and Export Control (BAFA).

## 2. PRIORITY RISKS

As part of our risk analysis for 2024, we have not identified any risks as substantial risks. As part of the risk analysis, risks were identified at suppliers, for example in connection with occupational health and safety obligations and the prohibition of unequal treatment in employment. However, these risks are not or only indirectly related to our services. Furthermore, a part of the suppliers must apply the LkSG themselves. Both our ability to influence the direct causer and our contribution to causation are extremely low or non-existent. We therefore consider the impact of our business activities on the risks addressed by the LkSG to be extremely minor overall.

## 3. EXPECTATIONS OF EMPLOYEES AND SUPPLIERS

We expect our employees to respect our human rights-related and environment-related policies and measures (inter alia our Code of Conduct). We expect our suppliers to undertake, upon our request, to comply with human rights-related and environment-related requirements and to fulfill such obligations.

Munich, 27 January 2025

UniCredit Bank GmbH  
The Executive Board