

UniCredit - Public

SpeakUp® reporting line

Introduction

FAQ for making a report

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1 How to leave a message using the SpeakUp® reporting line

Leaving a message

In the SpeakUp® reporting line you can choose to leave a (new) message via the SpeakUp® phone or web system – the SpeakUp® system is provided by People Intouch, an independent third party.

When making a report, please include a detailed description of your concern (including what has happened, when did it happen, where did it take place, who are involved) and supporting information (e.g. copies of documents or screenshots), if available.

When accessing the SpeakUp® system you will be given the option to report by phone or by web. After you have made your choice, you will be asked to enter the country specific access code. This code will be clearly provided to you in the system. Finally, select the language in which you would like to leave your message.

Have a pen ready when leaving the message. You will receive a personal six-digit case number, which is randomly generated. It is very important that you **write this down**, as you need it to check the response from UniCredit when you come back to the SpeakUp® reporting line later.

If you choose to report using SpeakUp® phone system, make sure to pronounce clearly, and ideally spell out names and locations. When you are finished, simply hang up.

If you use the SpeakUp® web system, you can type in or simply copy/paste your message. It also allows you to upload documents to your message. When you are finished, you can press the 'send message' button; a screen with your case number and message will appear, which can be easily printed out.

2 Frequently Asked Questions about the SpeakUp® system

2.1 What is the SpeakUp® reporting line intended for?

It is intended for reports of suspected or observed incidences of misconduct

Examples of misconduct that can be reported include, but are not limited to:

- Bribery or corruption (for example collusion with third parties, giving or receiving kickbacks, bid rigging, improper sponsorships, donations, gifts & entertainment, illegal or improper gratuities, or facilitation payments)
- Money laundering
- Terrorism-financing violations

- Insider trading
- Privacy violations
- Conflicts of interest
- Competition law violations
- Fraud

Note that the SpeakUp® reporting line These channels are not intended for reporting customer's or supplier's complaint regarding the business relationship.

2.2 How does the SpeakUp® system work?

Web: Proceed to the SpeakUp® Web Service page (through a hyperlink or by entering the URL), choose your location, enter the relevant access code and leave your message. Within one week you can return to the Web Service and read a response. You can reply to this response. This communication cycle can be repeated endlessly.

Phone: You dial the phone number, enter your access code and leave your message. During your call you will not talk to an operator. All instructions have been pre-recorded and will guide you through the process easily. Within one week you can call back to listen to the company's response. You can post a new follow-up message to this response. This conversation cycle can be repeated endlessly.

2.3 Who operates the SpeakUp® system?

The service is operated by a third party, People Intouch, an independent Dutch company. People Intouch is responsible for processing all messages. Founded in 2004, the company is based in Amsterdam.

2.4 Can I file a report anonymously?

Yes. You can file a report anonymously and your confidentiality will be respected. However, we encourage you to identify yourself as it is more difficult, and in some instances even impossible, to investigate reports that are made anonymously.

2.5 What if I want to be identified with my report?

You may identify yourself in your message by stating your name, if you wish. We encourage you to identify yourself for creating best possible conditions for an effective investigation.

2.6 Can my identity be discovered?

UniCredit will receive a typed word-for-word transcript of your report. You are in total control of the content of the message you leave: if you leave your contact details in your message, the SpeakUp® system will forward it to UniCredit; if you do not leave your contact details, the SpeakUp® system and UniCredit will not know who you are.

2.7 Can the company trace my connection data?

No, the SpeakUp® system is operated by People Intouch. UniCredit has no access to the connection data. Phone details or IP-addresses will never be handed over to UniCredit.

2.8 Can I leave documents?

Yes, the SpeakUp® Web Service enables you to attach (electronic) documents.

When you left a message on the phone system, you can log on to the web system using the same case number. Press on the button 'if you already have a case number'. Here you can leave your (electronic) documents. If you would like to stay anonymous, please make sure your contact details are not mentioned in the attachments or in its properties.

2.9 What if I don't remember my case number?

If you have lost your case number, we ask you to leave your message again with a new case number. If you had written down your message for your first call, this will not take up much of your time. Use the new case number for all further communication.

2.10 What happens once I file a report?

The Compliance Investigations Unit will carefully review and assess the information provided in your message. If your initial report does not include enough information/evidence, we will get in touch to ask you to provide more information/evidence. A case file will be opened if your report includes minimum actionable information

and evidence. Any investigation as a result of your report will be professionally and confidentially handled— we will only involve people who need to be involved depending on the nature of the matter at hand. After the end of our investigation, you will be informed accordingly.