



# **esg report 2023. executive summary.**

April 2024

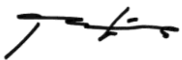
# sustainability. a matter for management.

The difficult economic environment in 2023 and the challenges faced in 2024 frequently raise questions over the importance of ESG. However, there is no break in the climate crisis, even in economically challenging times and ESG has, once and for all, set the stage for the transformation of financial flows.

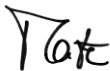
We are therefore continuing to follow our *green. smart. and more.* strategy. With a clear commitment to transparency and sustainability, we measured our company's overall carbon footprint in 2023 and arranged for the validation of our ambitious climate goals by the Science Based Targets Initiative. We also issued our first Green Bond with a volume of €50m in July based on the UBM Green Finance Framework – a step that would never have been possible without our proven ESG credibility.

Information on further milestones, also in the areas of social and governance, is provided in UBM's ESG report, which – similar to previous years – was subject to independent verification by a chartered accountant.

Thank you for your confidence in our efforts to implement our *green. smart. and more.* strategy.

**Thomas G. Winkler**  
CEO, Chairman



**Patric Thate**  
CFO



**Martina Maly-Gärtner**  
COO



**Peter Schaller**  
CTO

# ubm. at a glance.

## focus.

- Residential and Light Industrial & Office
- Major European cities
- *green. smart. and more.*

## pipeline.

- € 2.3bn (pro rata over the next four years)
- More than 300,000m<sup>2</sup> of timber (hybrid) construction
- 90% in Germany and Austria

## stock exchange.

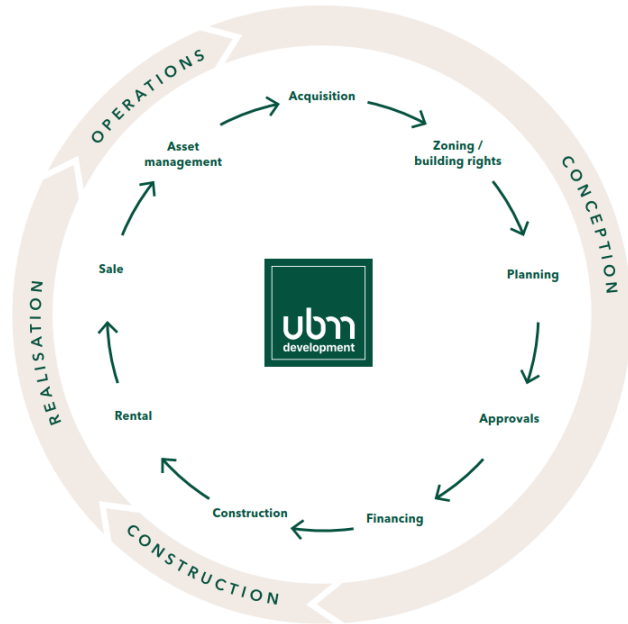
- Prime Market listing in Vienna for maximum transparency
- Ortner and Strauss syndicate as core shareholder (roughly 39%)
- Top management (Executive Committee) invested with €5m

## track record.

- 150 years of corporate history
- 150 years of capital markets history
- *competent. consequent. transparent.*

# competence. along the entire value chain.

- UBM provides **all services** from a single source: market analysis, project development, planning and project management, financing, rental and sale.
- **Pure Play Developer:** UBM works with a wide variety of service providers and suppliers, like architects, building physicists, appraisers or structural engineers. Project realisation involves either a general contractor, individual companies or a combination of both.
- Selection of **business partners** based on experience from earlier business relationships, integrity and appropriate qualifications.





# sustainability. a matter for management.

## supervisory board.

UBM was one of the first listed companies in Austria to establish an **ESG committee**, which:

- reports each year to Annual General Meeting on major ESG factors & measures.
- oversees and supports actions in line with the ESG catalogue of measures.

## management board.

The Management Board is responsible for the organisation of and compliance with sustainability issues. ESG key performance indicators will be integrated in management's variable **remuneration** over the medium term.

## executive committee.

The Executive Committee as an **extended management body** meets six to eight times each year to evaluate market trends and ensure continuous fine-tuning.

### ubm management board.



**Thomas G. Winkler, CEO:**  
strategy, investor relations  
& ESG, legal & compliance

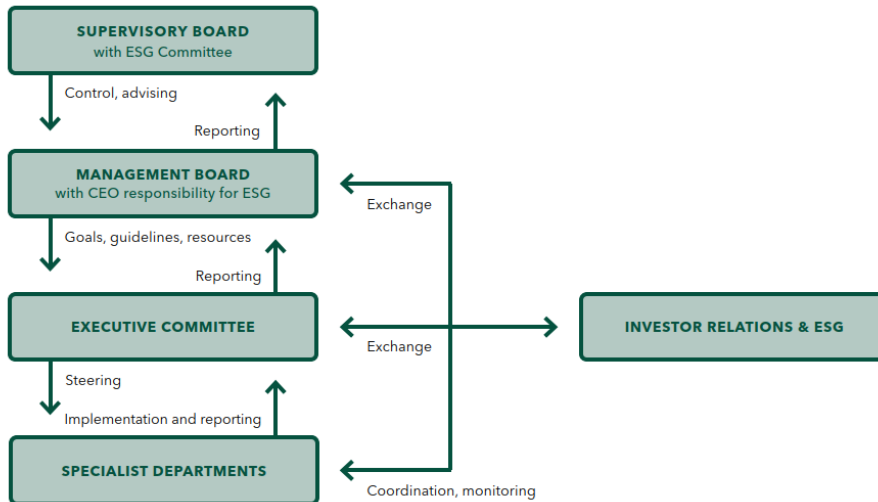
**Patric Thate, CFO:**  
green financing, ESG  
data management

**Martina Maly-Gärtner, COO:**  
human resources,  
work safety

**Peter Schaller, CTO:**  
green building &  
timber construction

# teamwork. clear responsibilities.

Together with our **green. smart. and more.** corporate strategy, we have anchored ESG goals throughout the **entire corporation**. We see the transformation of our conviction into concrete actions as the shared responsibility of all employees.





Sustainably well positioned – on all sides.

Our view of sustainability is universal: as values in action and a sought-after goal. For a real estate developer, this creates widespread obligations. It demands a far-sighted strategy, a finely tuned organisation and full commitment at all levels.

## **UBM & Sustainability**

# esg. anchored in our strategy.

## green.

- Our claim: **leading timber construction developer** in Europe
- Timber construction: **not a choice** but an imperative

## smart.

- Setting a **UBM Standard**: buyers know what they are getting
- Sustainability is the **driver**, technology is the **enabler**

## and more.

- We deliver **a story**, not only a building
- Look and feel for **distinctive products** and higher sustainability

### green.



Design & Construction



Energy



Building Operations

### smart.



User Services



Technology & Data



Mobility

### more.



Look & Feel



# clear direction. consistent implementation.

## Environment

Reduction of CO<sub>2</sub> by 30% by 2030<sup>2</sup>

Timber construction >100.000m<sup>2</sup> by 2025

Green building certification for 100% new developments

Brownfield development over 66% by 2025

Increase renewable energy to 30% by 2025

EU Taxonomy alignment for 100% new developments in the office asset class

## Timber Family

## Social

Over 30% women in management positions by 2025

Hold employee turnover below 15% by 2025

Annual ESG training for all employees

## Governance

Voluntary external ESG audit starting in 2021

Code of conduct for 100% of our business partners

Code of conduct for 100% of employees

For detailed goals and measures, please refer to the ESG Report 2023 at [www.ubm-development.com/esg-management](http://www.ubm-development.com/esg-management)

# fundamental principles.

## sustainable development goals.

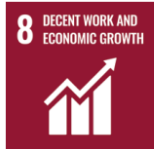
UBM is committed to the United Nations SDGs to make a direct contribution to the UN Agenda 2030. The following have been identified as focus goals where the company can make a direct contribution:



**Affordable and clean energy** - Ensure access to affordable, reliable, sustainable and modern energy for all.  
Focus: Goals 7.2 and 7.3



**Climate Action** - Take urgent action to combat climate change and its impacts.  
Focus: Goals 13.1 and 13.2



**Decent work and economic growth** - Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.  
Focus: Goals 8.4 and 8.8



**Life on land** - Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss.  
Focus: Goal 15.5



**Industry, innovation and infrastructure** - Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation.  
Focus: Goal 9.1



**Peace, justice and strong institutions** - Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels.  
Focus: Goal 16.7



**Sustainable cities and communities** - Make cities and human settlements inclusive, safe, resilient and sustainable.  
Focus: Goals 11.1 and 11.3

# stakeholder inclusion.

As a project developer, we influence many areas of life. Maintaining regular contact with our **internal and external stakeholders** and their active inclusion in our business activities therefore has high priority at UBM.

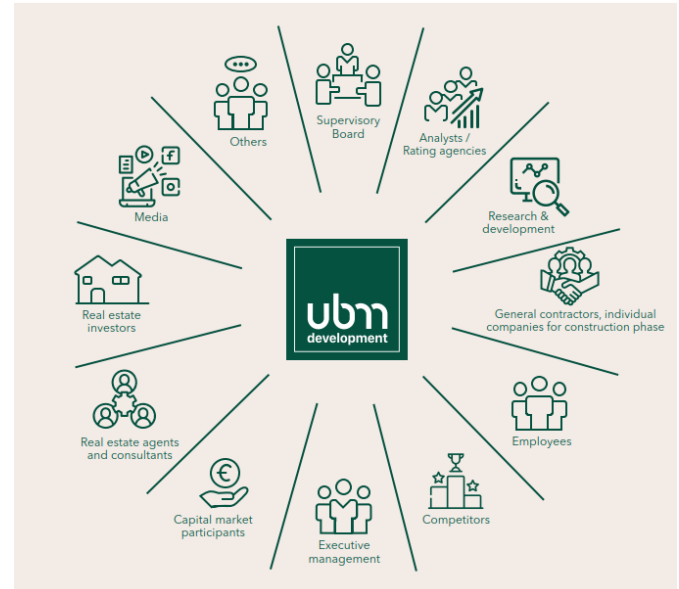
We include significant stakeholder groups through

- early information,
- participation and
- co-determination

in planning and development processes.

This gives neighbouring residents an opportunity to explain their **needs and interests and influence results**.

This practice has been embedded in the process landscape as UBM's standard since 2021.



# top priorities. for progress.

## materiality analysis 2021.

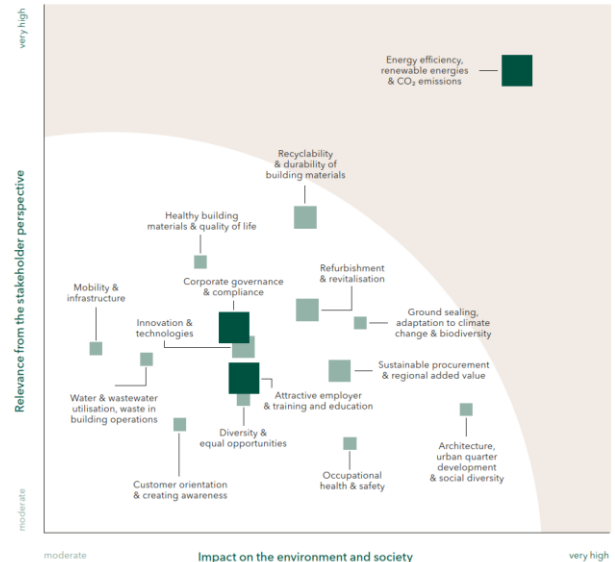
The first step involved compiling a list of **17 potential material issues** based on a comprehensive contact analysis, studies on megatrends, an extensive peer group review and discussions with internal experts.

The evaluation of the importance and impact of these issues followed **three perspectives**:

- UBM’s impact on people, society and the environment**  
 Carbon footprint measurements, expert-based evaluation
- Relevance from the stakeholder perspective**  
 Online survey sent to c. 700 stakeholders, generated one third evaluable results
- Impact on UBM**  
 Internal worst-case scenario analysis, time horizon c. 10 years

## materiality matrix.

**Materiality** is signified by dark green squares and topics with beige background.



The **relevance** for UBM is assigned as follows:





# green strategy. green financing.

WERBUNG

## 7% UBM Green Bond 2023-2027

**Umtauschfrist: 14.06. - 26.06.2023**  
(für Umtausch der UBM-Anleihe 2018-2023)

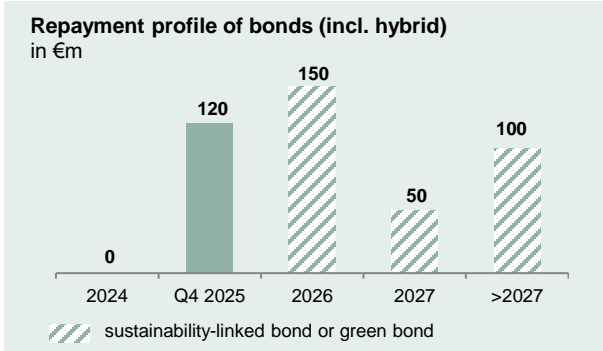
**Zeichnungsfrist: 27.06. - 03.07.2023**  
ISIN: AT0009A35H58

**UBM Development**  
UBM Development sieht sich als einer der führenden Entwickler von Holzbau-Projekten in Europa. Der strategische Fokus liegt auf Green Building und Smart Office in Großstädten wie Wien, München, Frankfurt oder Prag. Das Platin-Rating von EcoVadis sowie der Prime-Status von ISS ESG bestätigen die konsequente Ausrichtung auf Nachhaltigkeit. Mit 150 Jahren Erfahrung bietet UBM von der Planung bis zur Vermarktung alle Development-Leistungen aus einer Hand an. Die Aktien sind im Prime Market der Wiener Börse gelistet, dem Segment mit den höchsten Transparenzanforderungen.

**Umtausch: 14.06.-26.06.**  
**Zeichnung: 27.06.-03.07.**

Timber Peak  
Mainz

## debt market. green alignment.



- a total of **€300m** green capital market products
- **€50m green bond** successfully placed in **Q3 2023**
- **ESG link:** failure to reach a specific ESG rating threshold will increase the repayment amount by 10 (senior bond) or 15 (hybrid bond) basis points.
- Represented in the **ESG Segment** by the Vienna Stock Exchange.



# best in class. industry leadership defended.

**Prime Status since 2021**

Corporate ESG Performance

RATED BY **ISS ESG**

Prime

**UBM Green Finance Framework**

**Net proceeds** exclusively for projects with clear **environmental benefits**

- ✓ Second Party Opinion (SPO) provided by ISS ESG
- ✓ Aligned with ICMA Green Bond Principles 2021 and the LMA Green Loan Principles 2023
- ✓ Based on EU Taxonomy Regulation

**GOLD**

**PLATINUM Top 1%**

**PLATINUM Top 1%**

**CDP SCORING BREAKDOWN**

**2022**     **2023**

B

B

**UBM Green Lease Framework**

**Design options** in the utilisation and management of buildings to **integrate sustainability** in lease contracts

**Benefits to all parties** involved: lower operating costs, increased building attractiveness, integration of corporate ESG strategy

# memberships.

UBM is an **active member** and **supporter** of various organisations and branch associations to pursue the vision of a sustainable and inclusive economy and reinforce an intensive stakeholder dialogue.



Our actions are based on the ten principles of the UN Global Compact, a “network of the future” which UBM joined in 2021



Member of the corporate platform respACT (Austrian Council for Sustainable Development)



Active role in the Association of Austrian Project Developers (VÖPE)



Member of the Austrian Sustainable Building Council (ÖGNI)



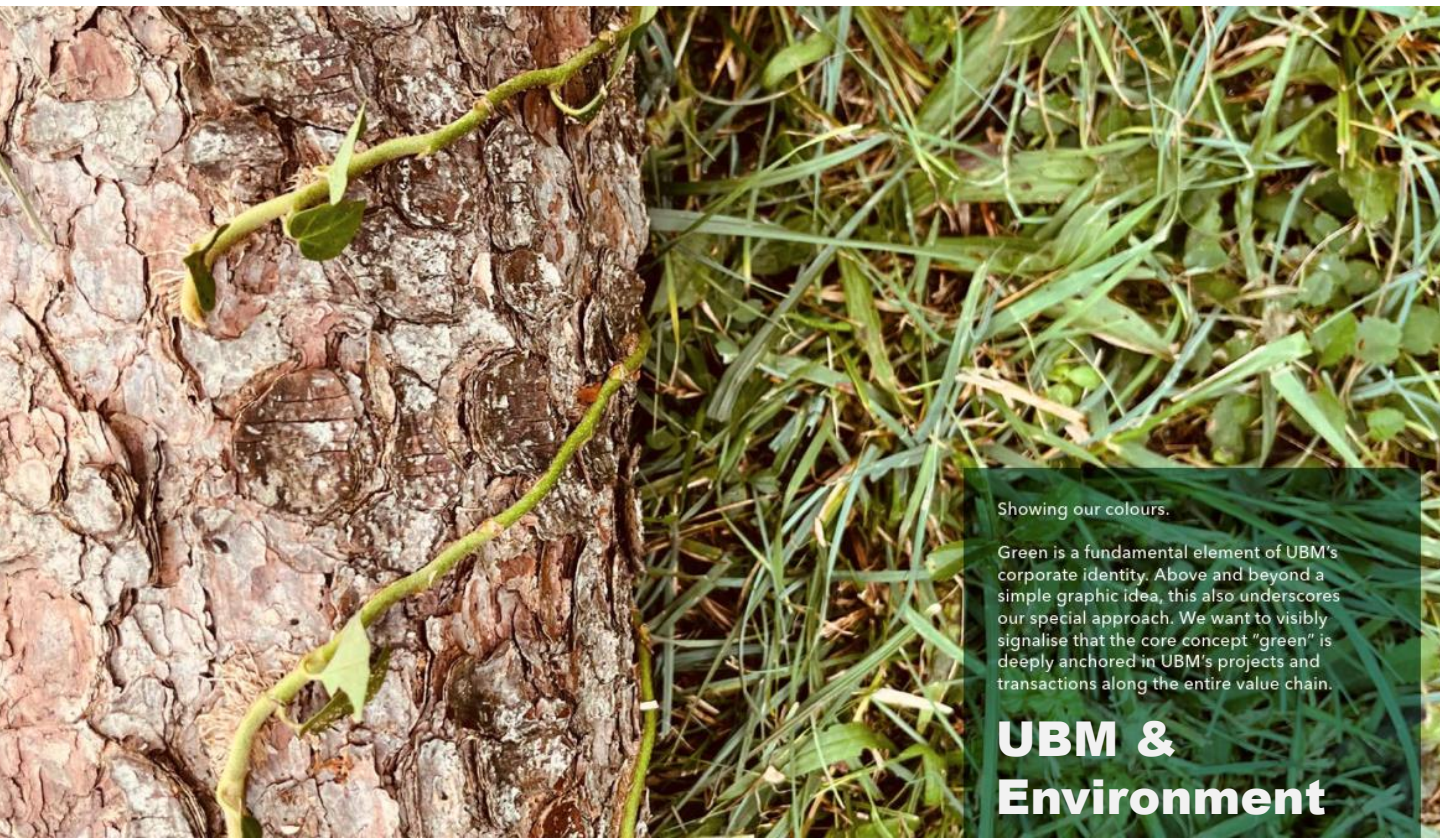
Official supporter of the Task Force on Climate-related Financial Disclosures (TCFD) since 2021



Member of the Institute for Corporate Governance (ICG) since 2019, contribution to the ICG’s social impact investment initiative



Active participation and membership in the interest group “IG-Lebenszyklus Bau”



Showing our colours.

Green is a fundamental element of UBM's corporate identity. Above and beyond a simple graphic idea, this also underscores our special approach. We want to visibly signalise that the core concept "green" is deeply anchored in UBM's projects and transactions along the entire value chain.

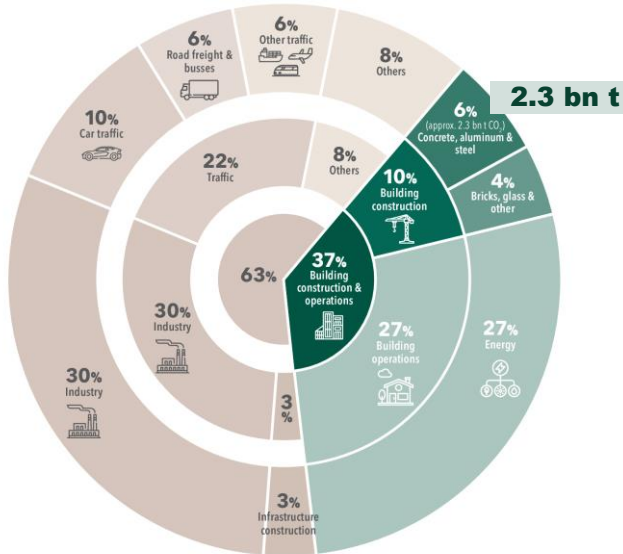
## **UBM & Environment**



# timber construction. our greatest lever.

## Global CO<sub>2</sub>-Emissions

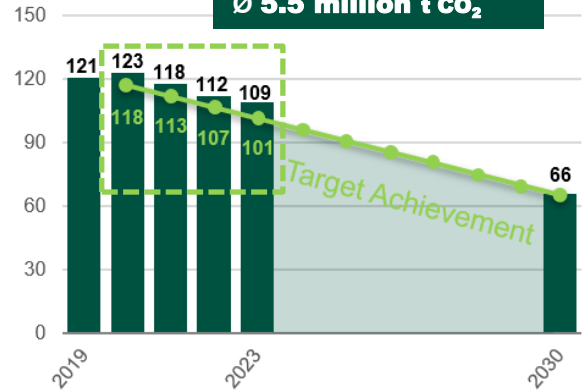
6% of total CO<sub>2</sub> emissions from concrete, aluminium and steel



## Climate Change

Development of CO<sub>2</sub> emissions in the building sector (Germany)\*

### Pathway in m t CO<sub>2</sub>

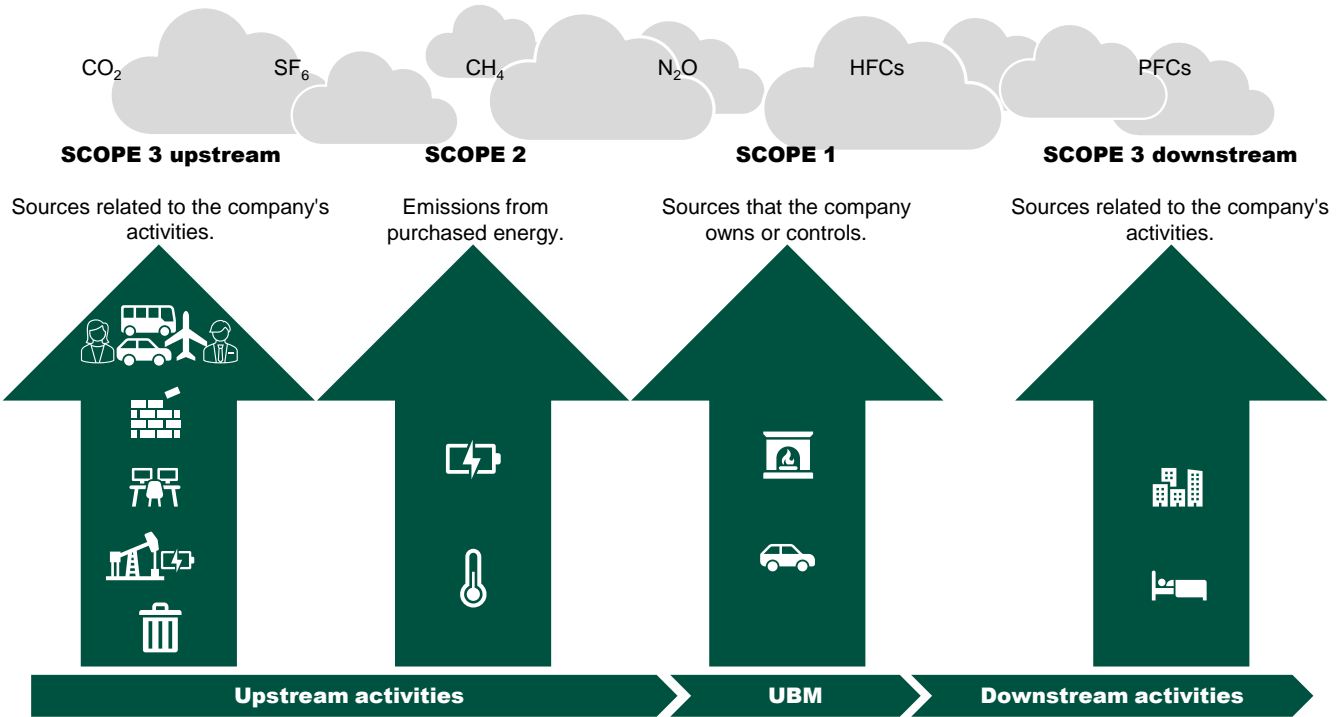


- the building sector has been failing to meet climate targets for years

**timber is the most significant lever. in construction.**

\*Agora Energiewende (2023): "Die Energiewende in Deutschland: Stand der Dinge 2023".

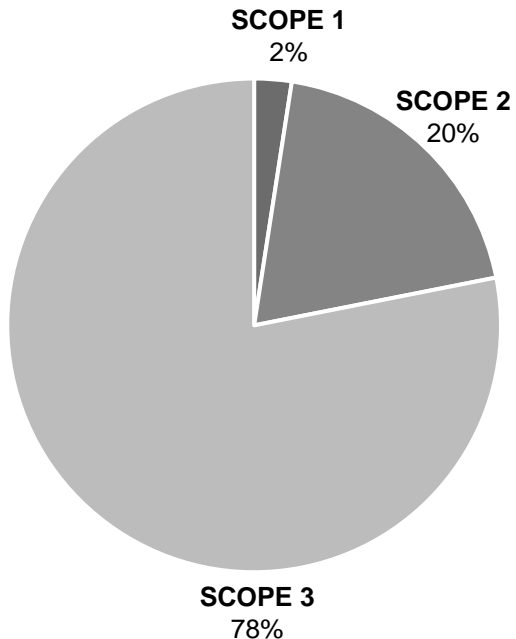
# corporate carbon footprint. ubm.



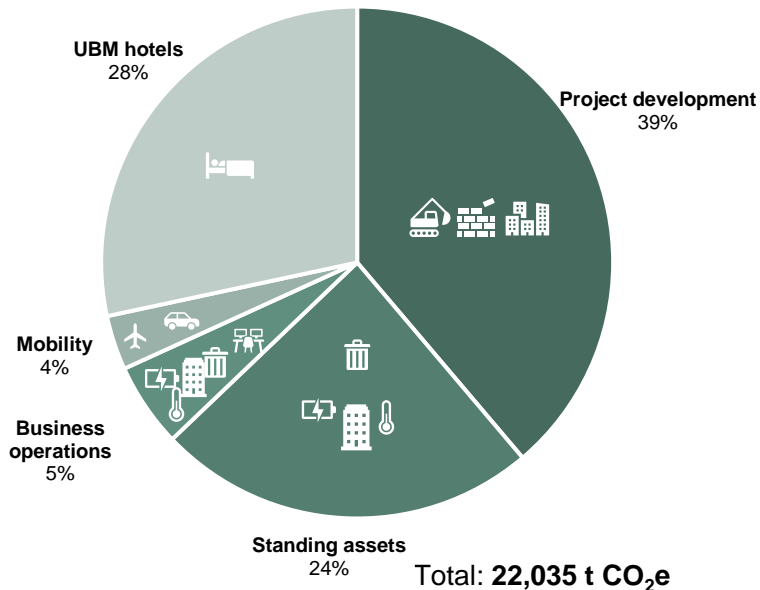
The Greenhouse Gas Protocol is the most widely used global standard for calculating and reporting emissions.

# emissions at a glance.

emissions by scope.



emissions by activity of ubm<sup>1</sup>.

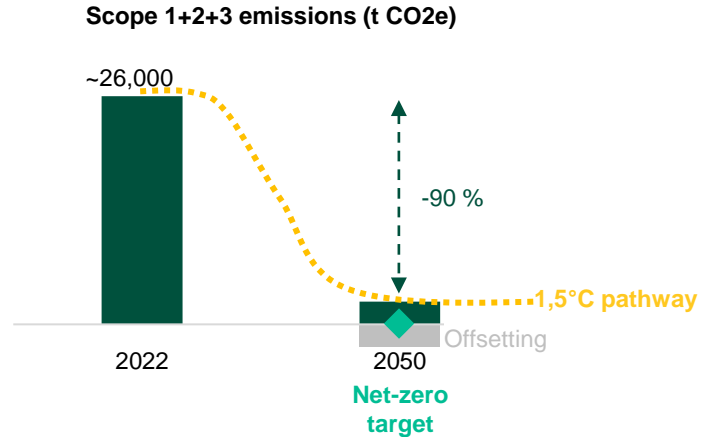


<sup>1</sup> Project development: 3.2 Embodied Carbon, 3.11, 3.12; Standing assets: 1, 2, 3.5, 3.13; Business operations: 1, 2, 3.1, 3.2 rest, 3.5, 3.8; Mobility: 1, 3.3, 3.6, 3.7, 3.8; UBM hotels: 3.15

## Science-based targets

<b>Near-term 2030</b>	<p><b>42% reduction of scope 1+2 emissions</b> (Basis: 2022)</p>
---------------------------	--

<b>Long-term 2050</b>	<p><b>Net-zero:</b> <b>90% reduction of scope 1+2+3 emissions</b> (Basis: 2022) Offsetting of unavoidable emissions from 2050</p>
---------------------------	---



## Implementation

 <p>Increase share of timber construction</p>	 <p>Increase renewable energies</p>	 <p>Increase energy efficiency (BMS)</p>
--	--	---

The detailed catalogue of objectives and measures is described in detail in the current ESG report and is available for download: [www.ubm-development.com/esg-management](http://www.ubm-development.com/esg-management)



# timber remains in the cycle.

## From tree to house ...

**1. Tree:** A tree stores an average of 10 kg CO<sub>2</sub> per year.

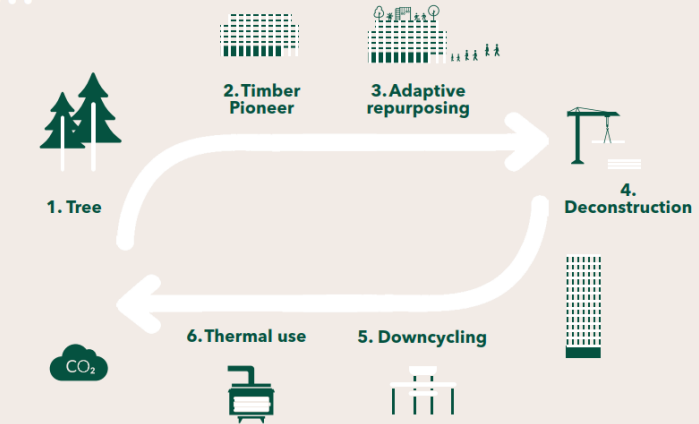
**2. Timber Pioneer:** 1,800 cubic metres of timber are being used for the office building. This means that around 1,800t CO<sub>2</sub> are stored in the prefabricated parts.

**3. Adaptive repurposing:** The building is designed to span several generations of use, and it can also be repurposed.

**4. Deconstruction:** The skeleton design allows Timber Pioneer to be deconstructed. The supports and beams made of glued laminated timber can be reused as building material for a new real estate project.

**5. Downcycling:** If the timber cannot be used as a building material after it has been deconstructed a second time, the next step is downcycling. The timber construction parts can be used for making furniture or in the production of chipboard.

**6. Thermal use:** The cycle is complete when the wood is composted or used thermally. Carbon



stored in the wood is released back into the atmosphere as CO<sub>2</sub>. If the tree had remained in a forest, this would have happened much sooner.

... and back again.

# the ubm timber family is expanding.



## Timber Factory

ASSET CLASS: **Light Industrial & Office**  
LOCATION: **Munich**  
GROSS FLOOR AREA: **59,000 m<sup>2</sup>**



## Timber Marina Tower

ASSET CLASS: **Office**  
LOCATION: **Vienna**  
GROSS FLOOR AREA: **44,000 m<sup>2</sup>**



## Timber Living

ASSET CLASS: **Residential**  
LOCATION: **Munich**  
GROSS FLOOR AREA: **23,200 m<sup>2</sup>**



## Timber Works

ASSET CLASS: **Light Industrial & Office**  
LOCATION: **Munich**  
GROSS FLOOR AREA: **9,700 m<sup>2</sup>**



## Timber Peak

ASSET CLASS: **Office**  
LOCATION: **Mainz**  
GROSS FLOOR AREA: **9,500 m<sup>2</sup>**



## Timber View

ASSET CLASS: **Residential**  
LOCATION: **Mainz**  
GROSS FLOOR AREA: **18,200 m<sup>2</sup>**



## Timber Pioneer

ASSET CLASS: **Office**  
LOCATION: **Frankfurt**  
GROSS FLOOR AREA: **17,600 m<sup>2</sup>**



## Timber Port

ASSET CLASS: **Office**  
LOCATION: **Düsseldorf**  
GROSS FLOOR AREA: **11,800 m<sup>2</sup>**



## Timber Praha

ASSET CLASS: **Residential**  
LOCATION: **Prague**  
GROSS FLOOR AREA: **7,400 m<sup>2</sup>**

**> 300,000m<sup>2</sup>  
in timber\*.**







\*In addition to the timber family, further major timber construction projects are in the pipeline: Situated on Vienna's Danube Canal, the **LeopoldQuartier** with over 75,000m<sup>2</sup> of floor space is Europe's first urban quarter in a timber hybrid design. Moreover, the projects **Molenkopf**, **Amras** and **Unterbiberger Strasse** contribute to UBM's timber pipeline.



# status. environmental goals.



## Project development:

	2023	PIPELINE*
 <b>&gt;100.000 m<sup>2</sup></b> in timber hybrid by 2025	Quality gate: timber hybrid construction	>300 Tm <sup>2</sup>
 <b>-30% CO<sub>2</sub> intensity</b> by 2030 (basis 2019)	+26%	> -25%
 <b>50% share renewable energy</b> by 2030	15%	tba
 <b>100% green building certification</b> for new developments	0%; mandatory for new projects	~ 100%
 <b>100% EU Taxonomy alignment</b> for new office developments by 2025	0%	100%
 <b>&gt;66% brownfield developments</b> by 2025 (cumulative)	45%	73% (2021-2025)




## consequent implementation.

\* Pipeline 2024-2027

# status. environmental goals.



## Corporate locations:




		2023
	<b>30% share of renewable energy</b> in energy carriers by 2025	30%, energy audits, ISO certification
	<b>+100% number of vehicles with alternative drives</b> by 2025 (basis 2021)	+111%
	<b>-25% reduction of CO<sub>2</sub> in air travel</b> by 2025 (basis 2019)	-77%, travel guideline

## consequent implementation.

# status. environmental goals.



## Standing assets:

	2023
 <b>30% share of renewable energy</b> in energy carriers by 2025	42%
 <b>Building management systems</b> for >90% of GFA in all standing assets	99%
 <b>-30% CO<sub>2</sub> intensity</b> by 2030 (basis 2020)	-23%

## consequent implementation.

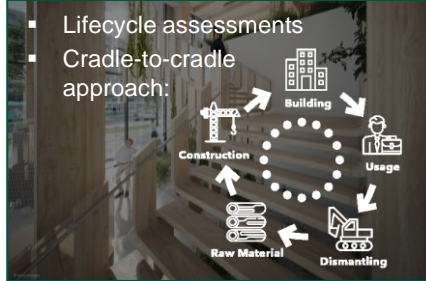
# read more on ubm's environmental initiatives in the esg report 2023.

## Energy efficiency, renewable energies & CO<sub>2</sub> emissions



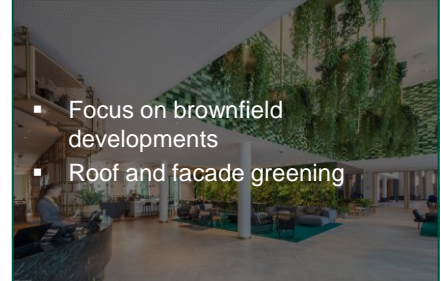
- Timber construction
- Smart building
- Green building certificates
- Renewable energy
- Building management systems
- Alternative drive vehicles
- User and travel guidelines

## Recyclability & durability of building materials



- Lifecycle assessments
- Cradle-to-cradle approach:

## Ground sealing, climate change adjustments and biodiversity



- Focus on brownfield developments
- Roof and facade greening

## Refurbishment and revitalisation



- Focus on refurbishments and revitalization due to resource-conserving benefits

## Healthy building materials & the quality of life



- Most appropriate quality level for building certification
- Timber

## Water and wastewater utilisation and waste in building operations



- Green & Clean Hotel Katowice
- Waste management solutions





Together. Social. Committed.

UBM is committed to social responsibility, both inside and outside the company. As an employer, we support the professional and social competence of our employees - in the interests of constructive and fair cooperation. As a developer, we design modern, sustainable living and working worlds - for a people-friendly future.

**UBM &  
Social**

# top 5 attractiveness factors.

**1. Meaningful work (58%)**

**2. Flexible working hours (flexitime) (58%)**

**3. Work life balance (57%)**

**4. Flexible work (57%)**

**5. Matching corporate culture (52%)**

# retain employees in the long term.



## Measures

- **Convey purpose**
- **New work** as competitive advantage
- **Develop managers**
- Foster **continuing education and development** within the company
- **Health** promotion
- **Strengthen** community

## Measurement

- Staff turnover rate
- Average duration of employment with the company
- Internal succession planning
- Annual employee appraisals
- Exit interviews

# promote women in management positions.



## Measures

- Giving **preference to women with the same qualifications** and experience when hiring
- Identification, targeted promotion and **empowerment of high-potential women**
- Active **parental leave management**
- Calculation and consequent closing of the **gender pay gap**

## Measurement

- Female new hires
- Internal promotion of women
- Parental leave return rate
- Gender pay gap

# employer branding.

## Employees provide insights



## LinkedIn Job Postings Monthly HR news



## Instagram



## Career website



**bewerben.**

Wir sind stolz auf die Suche nach den besten Mitarbeiterinnen und Mitarbeitern zu stellen. Ihre individuelle Karriere zu entwickeln, Ihre eigenen Ideen und Fähigkeiten, die besten Chancen und Entwicklungsmöglichkeiten und den Erfolg der UBM mitzubringen wollen.

## Structured application and onboarding process



## Awards



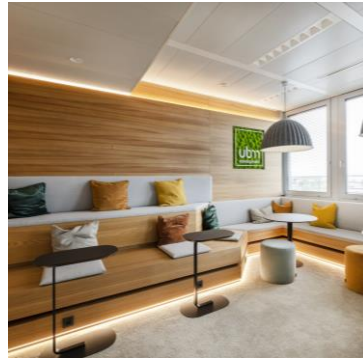


# new work at ubm.

## long week / short week.

- Clear competitive advantage in the "war for talents" through **differentiation**
- Highly attractive: **26 additional days off** per year, improved work-life balance
- Perfect **strategic fit** for office developer
- Strengthens our **community**
- **Clear, simple rules** and easy to plan
- Additional two **home office** days per month

## modern work environment.





# community and involvement.

Green thinking is an attitude. We see it as a sustainable, corporate-wide learning process. It covers UBM's training and educational programmes like the **Climate Impact Day**. Our **Welcome Day** for new employees stimulates the exchange of know-how and helps to create an open corporate culture beyond departments and countries. In addition to **UBM Family Days**, **company outings** and **Christmas parties**, we organise sports events which contribute to team building.

family days.



welcome day.



company excursions.



start-up lounge.



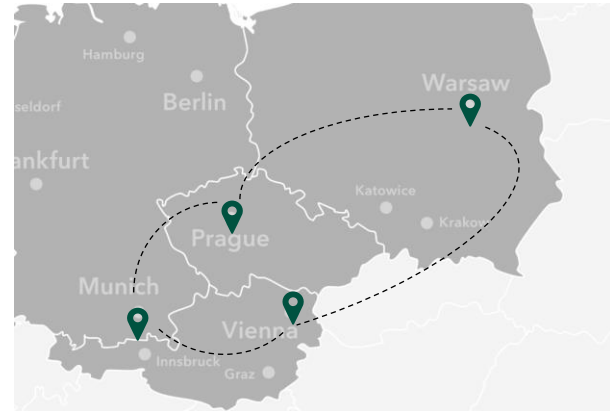
# climate impact days 2023 at ubm.

## what?

For the **second time**, UBM organized action days with 100% of employees to strengthen ESG awareness.

## who?

All UBM employees in all countries/branches.



Expert presentations on climate protection, emissions & waste



Strategic importance for UBM  
Implementation of ESG at UBM



Team activities  
Interactive workshops

# social commitment.



## social days for good purposes.

With the UBM Social Day, we also gave our employees an extra **day off** in **support of a good cause** during 2023.

They supported, among others, Vinzirast, Samariter Suppentopf, Lichtblickhof, KiJuNa, the Chelonia turtle refuge, and the action committee Kind im Krankenhaus (AKIK).









## €10,000 for the st. anna children's hospital.

UBM continued its long-standing tradition and waived gifts for business partners and employees at Christmas 2023.

Instead, UBM supported the valuable work of the St. Anna Children's Hospital in Vienna with a **donation** of €10,000.

# status. social goals.



		2023
	<b>&lt;15% employee turnover</b> by 2025	14.7%
	<b>&gt;30% women in management</b> positions by 2025	26%
	<b>50% women in the total</b> workforce	49%
	<b>+25% training hours</b> per employee (basis 2020) by 2025	+51%
	Annual ESG awareness training for <b>all employees</b>	100%
	<b>0 work accidents</b>	0

**consequent implementation.**

## read more on ubm's social initiatives in the esg report 2023.

### Attractive employer & training and education

- Flexible working time model
- Attractive remuneration
- Individual, requirements-oriented training measures
- Internal communication
- Structured onboarding process
- Structured succession planning

### Diversity and equal opportunity

- Preference given to women when qualifications & experience are equal
- Encourage employment of staff with different ages and experience (buddy principle)

### Health and safety

- Integrated management system (ISO45001)
- Occupational physicians, occupational safety specialists
- Ergonomic workplaces, sports activities

### Architecture, quarter development & diversity

- Sustainability certificates
- Aesthetic
- Absence of pollutants
- Indoor climate
- Acoustics
- Accessibility

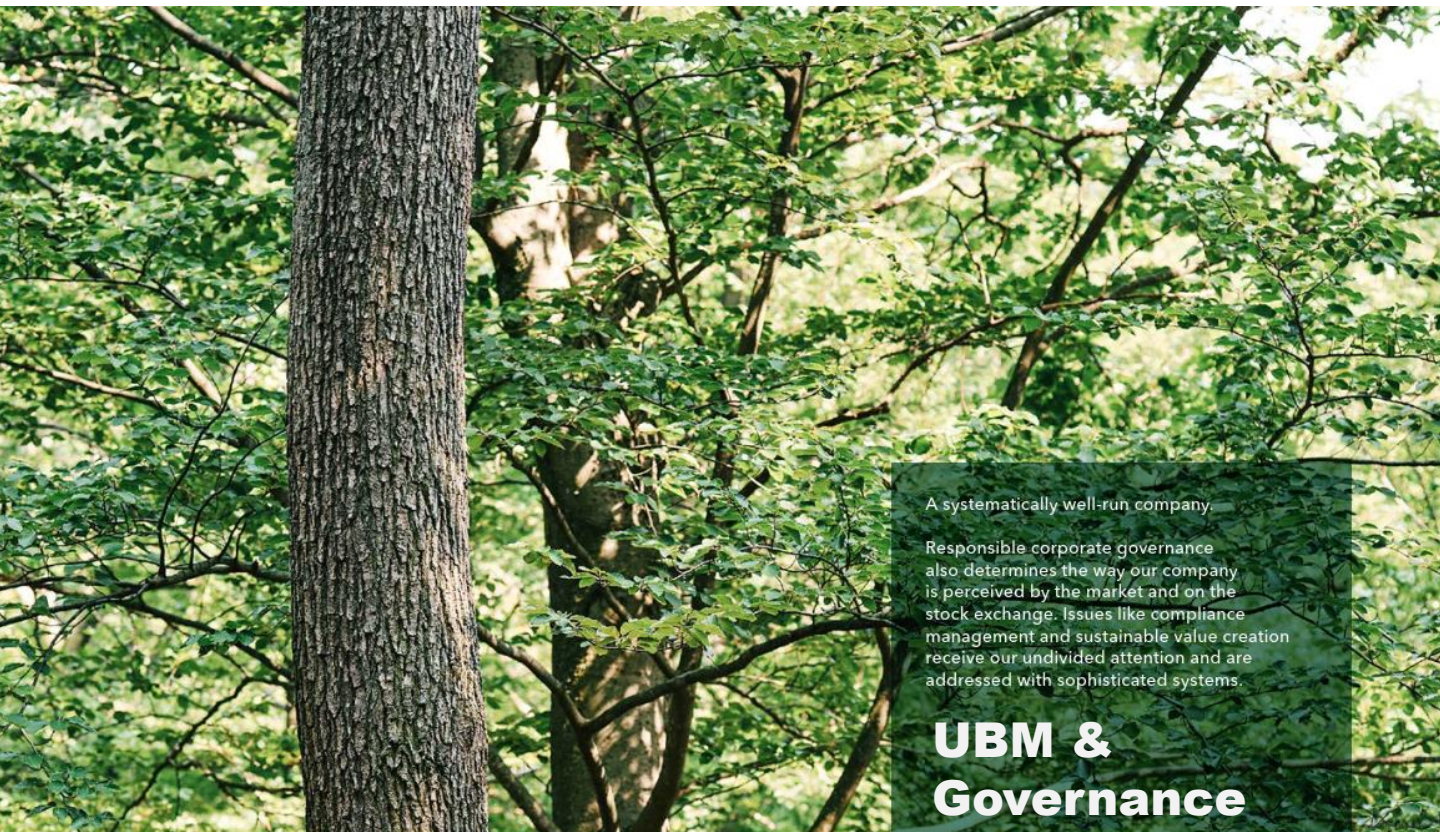
### Infrastructure and mobility

- Charging facilities for electric cars and e-bike batteries
- Car sharing
- E-bike hire stations
- Bicycle infrastructure

### Customer orientation and awareness raising

- Involvement of relevant stakeholder groups: early information, participation and co-determination rights





A systematically well-run company

Responsible corporate governance also determines the way our company is perceived by the market and on the stock exchange. Issues like compliance management and sustainable value creation receive our undivided attention and are addressed with sophisticated systems.

## **UBM & Governance**



# ethical and legal compliance.

## ethics code.

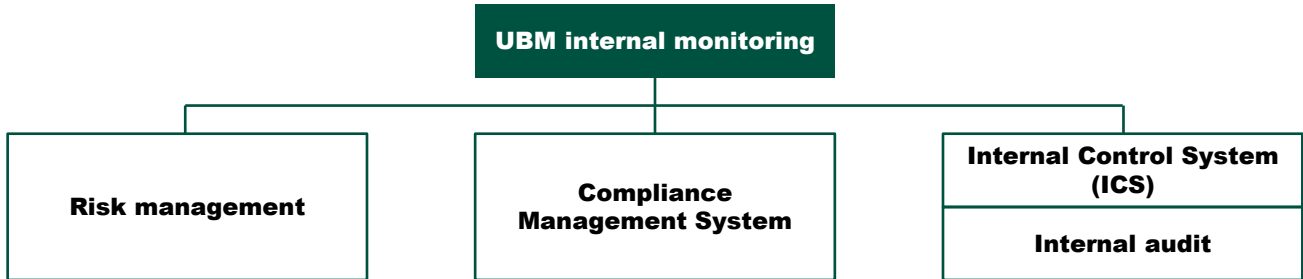
- Agreed in writing with **all employees** in their national language since 2021

## code of conduct for business partners.

- Applies to all **business partners** from an order volume of € 20,000
- Central **filing system** for the signed codes of conduct implemented
- Most important suppliers (responsible for 43% of UBM's expenditures in 2022) **reviewed**

- **Regularly adapted** to reflect developments in the regulatory environment and ethical values
- Based on **national & international laws and agreements**
- **Topics covered:**
  - bribery and corruption,
  - fair competition,
  - fundamental and human rights,
  - compliance with economic sanctions,
  - working conditions,
  - occupational safety and health,
  - environmental protection,
  - prevention of money laundering,
  - capital market compliance,
  - data protection.

# compliance principles. consequent implementation.



## Goals:

- 🎯 Monitor compliance with business policies & goals
- 🎯 Safeguard UBM's assets
- 🎯 Guarantee reliability of accounting & reporting
- 🎯 Monitor compliance with legal requirements
- 🎯 Maintain effectiveness & efficiency of business processes
- 🎯 Ensure the efficient use of resources and cost savings

# risk management.



# risk management. details.

UBM adapted its risk management in 2023 to fully **integrate ESG**. The risk catalogue was modified and expanded to include ESG-relevant **risks** and **opportunities**. ESG risks are evaluated in line with and integrated in the **existing risk measurement system** (Value at Risk and Cashflow at Risk).

## Risk catalogue

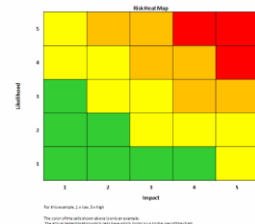
Property acquisition risks
Project costing and planning risks
Construction and quality risks
Operating risks
Distribution, utilization, sales risks
General business risks
Macroeconomic & other risks
<b>Environmental risks</b>
<b>Social risks</b>
<b>Governance risks</b>
<b>ESG opportunities</b>

## Evaluation

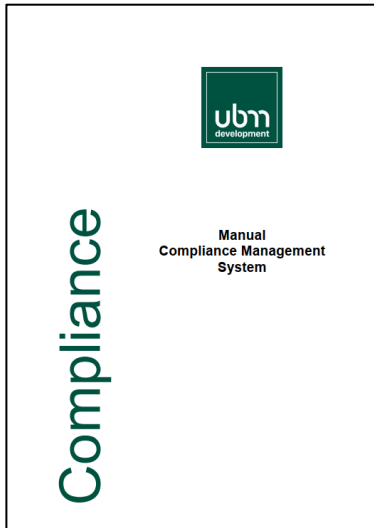
- By Mgmt. Board + Risk Coordinator.
- Amount of loss (in relation to EBT) - best, worst and most likely case
  - Probability of occurrence

## Risk measurement systems

- Visualization of Risk Map
- Value at Risk calculation
- Cash Flow at Risk calculation



# compliance management system.



- **Whistleblower system**

Reports of (potential) irregularities and violations can be submitted anonymously by external and internal persons via email or a whistleblower system

- **Internal guidelines & work instructions:**



Cartel & competition law



Anti-corruption



Issuer compliance



Signatures



Prevention of money laundering and terrorism financing



Data Maintenance 360°



Conflicts of interest







Prevention and handling of discrimination

Data protection

etc.

# status. governance goals.



		2023
	Voluntary external <b>audit</b> of ESG Report	audit (limited assurance)
	<b>KYC</b> reviews of business partners	>360 checks
	<b>Code of conduct</b> for all employees	100%
	<b>Employee training</b> on issuer compliance & anti-money laundering	164 training sessions
	<b>ISO 9001</b> certification	100% of employees covered
	No <b>legal actions</b> for anti-competitive behaviour	0

**consequent implementation.**



## read more on ubm's governance initiatives in the esg report 2023.

### Corporate governance & compliance

- Compliance management system, internal controls, internal audit
- Internal guidelines & instructions
- Whistleblowing system
- Binding ethics code
- Compliance trainings
- KYC review of business partners
- Supervisory Board self-evaluation

### Sustainable procurement & regional added value

- Binding code of conduct for suppliers
- Preferred selection of regional business partners
- Procurement guideline

### Innovation & technologies

- *green. smart. and more.* initiative
- newBM: latest software & IT equipment
- Training for IT/cybersecurity



Read the full ESG Report 2023 at [www.ubm-development.com/esg-management](http://www.ubm-development.com/esg-management)