Compliance statement referred to in Article 26(3) of Regulation (EU) 2016/1011

Item	Text Field
A. General Information	
1. Date of creation of this document and, where applicable, of the latest update to it	1. Created: 6 December 2019 2. Last updated: 4 December 2025
2. Name of the administrator	UniCredit Bank GmbH

B. UniCredit Bank GmbH chooses to not apply the following provisions of Regulation (EU) 2016/1011 in respect of the non-significant benchmark or non-significant benchmarks identified below.

As UniCredit Bank GmbH, we support the objectives of Regulation (EU) 2016/1011 to establish a regulatory framework at the European Union level. However, for reasons of proportionality, and given the multitude of different types and sizes of benchmarks, a less detailed system should apply to us. In the following, we describe which individual corporate rules apply. In our opinion, these represent a reasonable and equivalent substitute for the articles of the Benchmark Regulation as given below, which we do not wish to apply.

1. The benchmark or benchmarks in respect of which the provision(s) do not apply

1.

	Benchmark Name	ISIN
1	Multi Asset Trend II Index	DE000A1HUFA8
2	Multi Asset Trend III Index	DE000A11RDD4
3	VP Klassik 70 Benchmark Index	DE000A2DBVP0
4	Multi Asset ETF Index	DE000A2GGK22
5	Real Value Strategy Index	DE000A2RPKP3
6	Real Value Strategy II Index	DE000A2LZ3E5
7	SPAIS®-LEBENSZYKLUS 2026 Index	DE000A0X72C7
8	SPAIS®-LEBENSZYKLUS 2029 Index	DE000A0X72D5
9	SPAIS®-LEBENSZYKLUS 2032 Index	DE000A0X7186
10	SPAIS®-LEBENSZYKLUS 2035 Index	DE000A0X7194
11	SPAIS®-LEBENSZYKLUS 2038 Index	DE000A0X72A1
12	SPAIS®-LEBENSZYKLUS 2041 Index	DE000A0X72E3
13	SPAIS®-LEBENSZYKLUS 2044 Index	DE000A1MLNF0
14	SPAIS®-LEBENSZYKLUS 2047 Index	DE000A2BNB52
15	SPAIS®-LEBENSZYKLUS 2050 Index	DE000A2X1500
16	SPAIS®-LEBENSZYKLUS 2053 Index	DE000A3DH9A1
17	Emerging Focus Strategy Index	DE000A2HAAS1
18	Silver Age Strategy Index	DE000A2LZ3F2
19	UniCredit Aktiv Risk Control 1 Index	DE000A2L0H39
20	Global Water Strategy Index	DE000A2L0JD4
21	Global Disruptive Opportunities Strategy Index	DE000A2L0M32
22	HVB Health Care Risk Control 10 Index	DE000A18TYX9
23	HVB Health Care Risk Control 7 Index	DE000A18T2X6
24	HVB Global Water Risk Control 6 Index	DE000A2BMJH3
25	UC European Sector Rotation Strategy Index	DE000A18T264
26	European Sector Rotation Net Return Index	DE000A2RN607
27	BAIX - Bayerischer Aktienindex	DE000A2YY5F3
28	BAIX (Price) - Bayerischer Aktienindex	DE000A2YY5E6
29	BAIX Strategy - Bayerischer Aktienindex	DE000A2YZNG1
30	BAIX (Performance Index) - Bayerischer Aktienindex	DE000A2YZNF3
31	Food for Generations Strategy Index	DE000A2X16P2
32	UC Equity Sector Select Index	DE000A2X2FS2
33	First Eagle Amundi International Strategy Index	DE000A26R3D8
34	UC European Sector Rotation Risk Control Index	DE000A26RYX6
35	UC European Sector Rotation Performance Index	DE000A26RYW8
36	BAIX (Net Return) - Bayerischer Aktienindex	DE000A2YY5G1
37	Climate Action Strategy Index	DE000A2GHGN6
38	UC ESG Goods for Life Index	DE000A2P3UB5
39	UC ESG Goods for Life Strategy Index	DE000A2P3UE9
40	UC ESG Goods for Life (Performance) Index	DE000A2P3UD1
41	International Mixed ETF Basket Index	DE000A2GHGP1
42	Global Infrastructure Strategy Index	DE000A2QCCV8
43	Global Infrastructure Basket Index	DE000A2QCCW6
44	Ethik Vorsorge Strategy Index	DE000A2QBVT4
45	UC SDG Transatlantic Leaders Index	DE000A2QLVH8
46	UC SDG Transatlantic Leaders (Performance) Index	DE000A2QMKZ1
47	UC SDG Transatlantic Leaders Strategy Index	DE000A2QMYE7
48	Health Science Strategy Index	DE000A2QNQU7
49	Ethik Evolution Strategy Index	DE000A3CWUW4
50	Thematic Strategy Index	DE000A3CWUX2
51	UC Next Generation Energy Index	DE000A3CYRP0
52	UC European Hydrogen Focus Strategy Index	DE000A3C3AX5
53	UC European Banks Index	DE000A3DDSA2

	54	UC Travel & Leisure Index	DE000A3DDSB0
	55	Infrastructure Strategy Index	DE000A3C8SX6
	56	Ethik Aktien Strategy Index	DE000A3C8TQ8
	57	Private Banking Vermogensportfolio 70 Strategy Index	DE000A3C7VX2
	58	UC ESG Global Renewable Energies Index	DE000A3DK4H2
	59	US Equity Fund Strategy Index	DE000A3DLAE5
	60	Energy Transition Strategy Index	DE000A3DK4J8
	61	Global Demographics Strategy Index	DE000A3DM6P8
	62	UC European Health and Lifestyle Index	DE000A3DTQZ9
	63	UC European Hydrogen Focus (Net Return) Index	DE000A3D3Y22
	64	UC European Overnight Capitalisation Index	DE000A0G9G43
	65	HVB 3 Months Rolling Euribor Index	DE000A0QZBZ6
	66	HVB 1M Rolling Euribor Index	Not applicable.
	67	UC European Dividend Stars Large Cap (Price) Index	DE000A3EQB06
	68	UC ESG European Biodiversity Leaders Index	DE000A3ESL69
	69	UC US Sector Rotation Strategy Index	DE000A3EUJZ0
	70	UC European Essence (Price) Index	DE000A3X0048
	71	UC European Quintessence (Price) Index	DE000A4AGX88
	72	AcomeA AI Europe Top 10 Large-Cap Index	DE000A4AGJR2
	73	UC US Health Care (Net Return) Index	DE000A4AK7B0
	74	UC US Energy (Net Return) Index	DE000A4AK7C8
	75	UC US Materials (Net Return) Index	DE000A4AK7D6
	76	UC US Industrials (Net Return) Index	DE000A4AK7E4
	77	UC US Consumer Discretionary (Net Return) Index	DE000A4AK7F1
	78	UC US Consumer Staples (Net Return) Index	DE000A4AK7G9
	79	UC US Financials (Net Return) Index	DE000A4AK7H7
	80	UC US Information Technology (Net Return) Index	DE000A4AK7J3
	81	UC US Communication Services (Net Return) Index	DE000A4AK7K1
	82	UC US Utilities (Net Return) Index	DE000A4AK7L9
	83	UC US Market (Net Return) Index	DE000A4ALCB1
	84	UC US Sector Rotation Net Return Index	DE000A4ALCC9
	85	UC Capture-the-Change (Net Return) Index	DE000A4AM1M8
	86	UC Global Quality 5% Decrement Index	DE000A4ANNY6
	87	UC High Dividend Europe Index	DE000A4AM1L0
	88	UC Opti Essence Select (Price) Index	DE000A4APKZ4
	89	UC Global Analyst Consensus Index	DE000A4AQSL5
	90	UC AI-related Physical Infrastructure Index	DE000A4AQSD2

2. (i) The provision or provisions of Regulation (EU) 2016/1011 that do not apply (ii) For each provision, the reasons why it is appropriate for the administrator not to comply with that provision	2. (i) **Article 4(2):** The provision of a benchmark shall be operationally separated from any part of an administrator's business that may create an actual or potential conflict of interest. **Article 4(7) (c), (d), (e)**: Administrators shall ensure that their employees and any other natural persons whose services are placed at their disposal or under their control and who are directly involved in the provision of a benchmark: (c) do not have any interests or business connections that compromise the activities of the administrator concerned; (d) are prohibited from contributing to a benchmark determination by way of engaging in bids, offers and trades on a personal basis or on behalf of market participants, except where such way of contribution is explicitly required as part of the benchmark methodology and is subject to specific rules therein; and (e) are subject to effective procedures to control the exchange of information with other employees involved in activities that may create a risk of conflicts of interest or with third parties, where that information may affect the benchmark. **Article 4(8):** An administrator shall establish specific internal control procedures to ensure the integrity and reliability of the employee or person determining the benchmark, including at least internal sign-off by management before the dissemination of the benchmark. **Article 5(2):** Administrators shall develop and maintain robust procedures regarding their oversight function, which shall be made available to the relevant competent authorities. **Article 5(3):**

	The oversight function shall operate with integrity and shall have the following responsibilities, which shall be adjusted by the administrator based on the complexity, use and vulnerability of the benchmark: a) reviewing the benchmark's definition and methodology at least annually; b) overseeing any changes to the benchmark methodology and being able to request the administrator to consult on such changes; c) overseeing the administrator's control framework, the management and operation of the benchmark, and, where the benchmark is based on input data from contributors, the code of conduct referred to in Article 15; d) reviewing and approving procedures for cessation of the benchmark, including any consultation about a cessation; e) overseeing any third party involved in the provision of the benchmark, including calculation or dissemination agents; f) assessing internal and external audits or reviews, and monitoring the implementation of identified remedial actions; g) where the benchmark is based on input data from contributors, monitoring the input data and contributors and the actions of the administrator in challenging or validating contributions of input data; h) where the benchmark is based on input data from contributors, taking effective measures in respect of any breaches of the code of conduct referred to in Article 15; and i) reporting to the relevant competent authorities any misconduct by contributors, where the benchmark is based on input data from contributors, or administrators, of which the oversight function becomes aware, and any anomalous or suspicious input data. **Article 5(4):** The oversight function shall be carried out by a separate committee or by means of another appropriate governance arrangement. **Article 6(3):** The control framework shall include: a) management of operational risk; b) adequate and effective business continuity and disaster recovery plans; c) contingency procedures that are in place in the event of a disruption to the process of the provision of the benchmark. **Article 6(5):** The control framework shall be documented, reviewed and updated as appropriate and made available to the relevant competent authority and, upon request, to users. **Article 7(2):** An administrator shall designate an internal function with the necessary capability to review and report on the administrator's compliance with the benchmark methodology and this Regulation. **Article 11(2):** Administrators shall ensure that their controls in respect of input data include: b) a process for evaluating a contributor's input data and for stopping the contributor from providing further input data, or applying other penalties for non-compliance against the contributor, where appropriate; and c) a process for validating input data, including against other indicators or data, to ensure its integrity and accuracy. **Article 11(3):** Where the input data of a benchmark is contributed from a front office function, meaning any department, division, group, or personnel of contributors or any of its affiliates that performs any pricing, trading, sales, marketing, advertising, solicitation, structuring, or brokerage activities, the administrator shall: a) obtain data from other sources that corroborate that input data; and b) ensure that contributors have in place adequate internal oversight and verification procedures.

	Article 13(2): The procedures required under point (c) of paragraph 1 shall provide for: a) advance notice, with a clear time frame, that gives the opportunity to analyse and comment upon the impact of such proposed material changes; and b) the comments referred to in point (a) of this paragraph, and the administrator's response to those comments, to be made accessible after any consultation, except where confidentiality has been requested by the originator of the comments. **Article 14(2):** An administrator shall monitor input data and contributors in order to be able to notify the competent authority and provide all relevant information where the administrator suspects that, in relation to a benchmark, any conduct has taken place that may involve manipulation or attempted manipulation of the benchmark, under Regulation (EU) No 596/2014, including collusion to do so. **Article 15(2):** The code of conduct shall include at least the following elements: a) a clear description of the input data to be provided and the requirements necessary to ensure that input data is provided in accordance with Articles 11 and 14; b) identification of the persons that may contribute input data to the administrator and procedures to verify the identity of a contributor and any submitters, as well as authorisation of any submitters that contribute input data on behalf of a contributor; c) policies to ensure that a contributor provides all relevant input data; d) the systems and controls that a contributor is required to establish, including: (i) procedures for contributing input data, including requirements for the contributor to specify whether input data is transaction data and whether input data conforms to the administrator's requirements; (ii) policies on the use of discretion in contributing input data; (iii) any requirement for the validation of input data before it is provided to the administrator; (iv) record-keeping policies; (v) reporting requirements concerning suspicious input data; (vi) requirements concerning the management of conflicts of interest. **Article 16(2):** A supervised contributor shall have in place effective systems and controls to ensure the integrity and reliability of all contributions of input data to the administrator, including: a) controls regarding who may submit input data to an administrator including, where proportionate, a process for sign-off by a natural person holding a position senior to that of the submitter; b) appropriate training for submitters, covering at least this Regulation and Regulation (EU) No 596/2014; c) measures for the management of conflicts of interest, including organisational separation of employees where appropriate and consideration of how to remove incentives, created by remuneration polices, to manipulate a benchmark; d) record-keeping, for an appropriate period of time, of communications in relation to provision of input data, of all information used to enable the contributor to make each submission, and of all existing or potential conflicts of interest including, but not limited to, the contributor's exposure to financial instruments which use a benchmark as a reference; e) record-keeping of internal and external audits. **Article 16(3):** Where input data relies on expert judgement, supervised contributors shall establish, in addition to the systems and controls referred to in paragraph 2, policies guiding any use of judgement or exercise of discretion and shall retain records of the rationale for any such judgement or discretion. Where proportionate, supervised contributors shall take into account the nature of the benchmark and its input data.
	2(ii) **Article 4(2):**

	An operational separation between administration and usage of the administered benchmarks is in place on a team level. In order to protect the integrity and independence of benchmark determinations the relevant UniCredit Bank GmbH "Conflict of Interest Policy" and UniCredit Bank GmbH "Code of Conduct" address the identification, disclosure, prevention, management and mitigation of conflicts of interest. However, the resources necessary in order to establish an operational separation of any part of the administrator's business that may create an actual or potential conflict of interest are out of proportion relative to the total value of all financial instruments, financial contracts or investment funds linked to the administered benchmarks, which are far below the upper threshold for non-significant benchmarks. **Article 4(7) (c), (d), (e)**: Due to the nature of UniCredit Bank GmbHs business it is ensured that employees and any other natural persons whose services are placed at their disposal or under their control and who are directly involved in the provision of a benchmark: (1) do not have any interests or business connections that compromise the activities of the administrator concerned; (2) are prohibited from engaging in bids, offers and trades on a personal basis or on behalf of market participants, and (3) are subject to effective procedures to control the exchange of information with other employees involved in activities that may create a risk of conflicts of interest or with third parties. This is ensured by the implementation of the UniCredit Global Policies "Conflict of Interest", "Outside Business Interest" and "Inside Information Management and Information Barriers" (these policies can be provided to the relevant competent authorities) in a more general manner than required in Article 4(7) (c), (d), and (e). The requirements necessary to implement Article 4(7) (c), (d), (e) specifically with respect to the determination of a benchmark or affection to a benchmark are out of proportion relative to the total value of all financial instruments, financial contracts or investment funds linked to the administered benchmarks. **Article 4(8):** The resources necessary in order to establish and implement internal control procedures as described in Article 4(8) are out of proportion relative to the total value of all financial instruments, financial contracts or investment funds linked to the benchmarks administered by UniCredit Bank GmbH. **Article 5(2):** The resources necessary for the development and maintenance of robust procedures regarding the oversight function (Article 5(1)) is out of proportion relative to the total value of all financial instruments, financial contracts or investment funds linked to the benchmarks administered by UniCredit Bank GmbH. **Article 5(3):** A review of the benchmark's definition and methodology by the oversight function is implemented at the launch of a respective benchmark. However, an annual review of the benchmark's definition and methodology as described in point (a) of Article 5(3) is impossible due to contractual and legal reasons, i.e. the Final Terms and Conditions, which contain the sole terms and conditions applicable to the securities linked to the benchmarks administered by UniCredit Bank GmbH, and UniCredit Bank GmbH's base prospectuses and supplements prepared in accordance with Directive 2003/71/EC (Prospecus Directive). Furthermore, the resources necessary to implement points (b), (c), (d), and (f) of Article 5(3) is out of proportion relative to the total value of all financial instruments, financial contracts or investment funds linked to the benchmarks administered by UniCredit Bank GmbH. Point (e) of Article 5(3) is considered as not applicable as no third party is involved in the provision of UniCredit Bank GmbH administered benchmarks. Points (g), (h), and (i) of Article 5(3) are considered as not applicable as administered benchmarks are not based on input data from contributors.

	Article 5(4): The resources necessary in order to establish a separate committee or by means of another appropriate governance arrangement to carry out the oversight function are out of proportion relative to the total value of all financial instruments, financial contracts or investment funds linked to the administered benchmarks. **Article 6(3):** Due to the nature of UniCredit Bank GmbHs business a framework including (1) the management of operational risk, (2) adequate and effective business continuity and disaster recovery plans; (3) contingency procedures that are in place in the event of a disruption of the business by the implementation of the Capital Requirement Regulation (Regulation (EU) No 575/2013) and the implementation of the UniCredit "Business Continuity Management" (this policy can be provided to the relevant competent authorities) in a more general manner than required in Article 6(3) (1), (2), and (3). However, the resources necessary to implement points (a), (b) and (c) specifically for the control framework as described in Article 6(1) are out of proportion relative to the total value of all financial instruments, financial contracts or investment funds linked to the administered benchmarks. **Article 6(5):** The control framework is implemented via an internal directive at UniCredit Bank GmbH. The control framework is documented, reviewed and updated as appropriate. However, it cannot be made available to externals but can be provided to the relevant competent authorities. **Article 7(2):** The resources necessary in order to designate an internal function with the necessary capability to review and report on the administrator's compliance with the benchmark methodology and Regulation (EU) 2016/1011 are out of proportion relative to the total value of all financial instruments, financial contracts or investment funds linked to the administered benchmarks. **Article 11(2) (b):** Point (b) of Article 11(2) is considered as not applicable as administered benchmarks are not based on input data from contributors. **Article 11(2) (c):** Due to the nature of UniCredit Bank GmbHs business a process for the validation of input data, including against other indicators or data, to ensure its integrity and accuracy, is established by the implementation of the Regulation Basel III/ CAP 50.7 ("Independent price verification") in a more general manner than required in Article 11(2) (c). However, the resources necessary to implement point (c) of Article 11(2) are out of proportion relative to the total value of all financial instruments, financial contracts or investment funds linked to the administered benchmarks. **Article 11(3):** Article 11(3) is considered as not applicable as administered benchmarks are not based on input data contributed from a front office function. **Article 13(2):** The resources necessary in order to comply with Article 13(2) are out of proportion relative to the total value of all financial instruments, financial contracts or investment funds linked to the administered benchmarks. **Article 14(2):** Due to the nature of UniCredit Bank GmbHs business a process for the monitoring of input data is established by the implementation of the Regulation Basel III/ CAP 50.7

	("Independent price verification") in a more general manner than required in Article 11(2) (c). However, the resources necessary to implement Article 14(2) are out of proportion relative to the total value of all financial instruments, financial contracts or investment funds linked to the administered benchmarks. **Article 15(2):** Article 15(2) is considered as not applicable as administered benchmarks are not based on input data from contributors. **Article 16(2):** Article 16(2) is considered as not applicable as administered benchmarks are not based on input data from contributors. **Article 16(3):** Article 16(3) is considered as not applicable as administered benchmarks are not based on input data from contributors.

This document is the compliance statement (the "**Compliance Statement**") for the benchmarks administered by UniCredit Bank GmbH which are benchmarks for the purpose of the Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (the "**Benchmarks Regulation**" or "**BMR**").

Nothing contained in this Compliance Statement should be construed as an offer or solicitation of any transaction.

The latest version of this Compliance Statement can be found at www.onemarkets.de. UniCredit Bank GmbH reserves the right to amend, supplement or update this Compliance Statement from time to time and accepts no liability for any such modifications.