# 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	1. Created: 6 December 2019	
applicable, of the latest update to it	2. Last updated: 1 September 2023	
2. Name of the administrator	UniCredit Bank AG	

# B. UniCredit Bank AG 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 AG, 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

Benchmark Name	1.		
2         Multi Asset Trend III Index         DE000A1R0D4           3         Multi Asset Index         DE000A2DBWP           4         VP Klassik 70 Benchmark Index         DE000A2CBWP           5         Multi Asset ETF Index         DE000A2CGKPZ           6         Real Value Stratedy II Index         DE000A2KPZ           7         Real Value Stratedy II Index         DE000A0X72C7           8         SPAIS®-LEBENSZYKLUS 2029 Index         DE000A0X72C7           9         SPAIS®-LEBENSZYKLUS 2032 Index         DE000A0X72C7           10         SPAIS®-LEBENSZYKLUS 2033 Index         DE000A0X7186           11         SPAIS®-LEBENSZYKLUS 2034 Index         DE000A0X72A1           12         SPAIS®-LEBENSZYKLUS 2034 Index         DE000A0X72A1           13         SPAIS®-LEBENSZYKLUS 2041 Index         DE000A0X72A1           14         SPAIS®-LEBENSZYKLUS 2047 Index         DE000A2BNB52           15         SPAIS®-LEBENSZYKLUS 2050 Index         DE000A2BNB52           16         SPAIS®-LEBENSZYKLUS 2050 Index         DE000A2BNB52           17         SPAIS®-LEBENSZYKLUS 2050 Index         DE000A2BNB52           18         HVB Whiti Manager Best Select Flex Index II         DE000A2BNB52           19         SPAIS®-LEBENSZYKLUS 2050 Index		Benchmark Name	ISIN
Multi Asset Index VP Klassik 70 Benchmark Index DE000A2DBRW4 VP Klassik 70 Benchmark Index DE000A2DBRW6 ERED VP Klassik 70 Benchmark Index DE000A2DBRW6 ERED VP Klassik 70 Benchmark Index DE000A2DBRW7 Real Value Stratedy Index DE000A2RPR93 Real Value Stratedy Index DE000A2RPR93 SPAIS®-LEBENSZYKIUS 2026 Index DE000A0X72C7 SPAIS®-LEBENSZYKIUS 2026 Index DE000A0X72DB SPAIS®-LEBENSZYKIUS 2035 Index DE000A0X72BB SPAIS®-LEBENSZYKIUS 2035 Index DE000A0X72BB SPAIS®-LEBENSZYKIUS 2035 Index DE000A0X72BB SPAIS®-LEBENSZYKIUS 2035 Index DE000A0X72BB SPAIS®-LEBENSZYKIUS 2041 Index DE000A0X72BB SPAIS®-LEBENSZYKIUS 2041 Index DE000A0X72BB SPAIS®-LEBENSZYKIUS 2041 Index DE000A2M1NF0 SPAIS®-LEBENSZYKIUS 2041 Index DE000A2M1NF0 SPAIS®-LEBENSZYKIUS 2041 Index DE000A2M1NF0 SPAIS®-LEBENSZYKIUS 2041 Index DE000A2M1NF0 DE000A2M1NF0 DE000A2M1NF0 SPAIS®-LEBENSZYKIUS 2041 Index DE000A2M1NF0	1	Multi Asset Trend II Index	DE000A1HUFA8
4 VP Klassik 70 Benchmark Index DE000A2DBVP0 Multi Asset ETF Index DE000A2GGK22 Real Value Strategy Index DE000A2GK22 Real Value Strategy Index DE000A2K72D5 Real Value Strategy Index DE000A2K72D5 SPAIS®-LEBENSZYKLUS 2026 Index DE000A0X72C7 SPAIS®-LEBENSZYKLUS 2029 Index DE000A0X72D5 DE000A0X72D1 SPAIS®-LEBENSZYKLUS 2038 Index DE000A0X72D1 SPAIS®-LEBENSZYKLUS 2038 Index DE000A0X72B1 SPAIS®-LEBENSZYKLUS 2041 Index DE000A0X72B1 SPAIS®-LEBENSZYKLUS 2047 Index DE000A2MNB52 DE000A2MNB53	2	Multi Asset Trend III Index	DE000A11RDD4
5 Multi Asset ETF Index 6 Real Value Strategy Illedex 7 Real Value Strategy II Index 8 DE000AZRPKP3 8 SPAISØ-LEBENSZYKLUS 2026 Index 9 SPAISØ-LEBENSZYKLUS 2029 Index 10 SPAISØ-LEBENSZYKLUS 2032 Index 11 SPAISØ-LEBENSZYKLUS 2035 Index 12 SPAISØ-LEBENSZYKLUS 2035 Index 13 SPAISØ-LEBENSZYKLUS 2036 Index 14 SPAISØ-LEBENSZYKLUS 2036 Index 15 SPAISØ-LEBENSZYKLUS 2036 Index 16 DE000ADX712A 17 SPAISØ-LEBENSZYKLUS 2048 Index 18 DE000ADX72A1 18 SPAISØ-LEBENSZYKLUS 2048 Index 19 DE000ADX72A1 19 SPAISØ-LEBENSZYKLUS 2041 Index 19 DE000ADX72A1 19 SPAISØ-LEBENSZYKLUS 2044 Index 10 DE000ADX71SB1 15 SPAISØ-LEBENSZYKLUS 2050 Index 10 DE000AZNISB1 16 SPAISØ-LEBENSZYKLUS 2050 Index 17 SPAISØ-LEBENSZYKLUS 2053 Index 18 HVB Multi Manager Best Select Flex Index 19 HVB Vermögensdepot Wachstum Flex Index II DE000A1PHAI2 20 HVB Wermögensdepot Wachstum Flex Index II DE000A1PHAI2 21 HVB Vermögensdepot Wachstum Flex Index III DE000A1B3VC2 22 HVB Robotics Fund Risk Control 9 Index 23 Emerging Focus Strategy Index 24 Silver Age Strategy Index 25 UniCredit Aktiv Risk Control 1 Index 26 Global Water Strategy Index 27 Global Disruptive Opportunities Strategy Index 28 UniCredit Clean Energy Risk Reduction Strategy Index 30 HVB Health Care Risk Control 1 Index 31 HVB Health Care Risk Control 1 Index 32 DE000A2LDBA3 33 HVB Health Care Risk Control 1 Index 34 DE000A2LDBA3 36 HVB Health Care Risk Control 1 Index 37 DE000A2LDBA3 38 HVB Health Care Risk Control 1 Index 39 DE000A2LDBA3 40 HVB Health Care Risk Control 1 Index 40 DE000A2LDBA3 41 HVB Global Water Risk Control 1 Index 41 DE000A2LDBA3 42 DE000A2LBA5 43 HVB Health Care Risk Control 6 Index 44 DE000A2LBA5 45 HVB Health Care Risk Control 6 Index 46 DE000A2LBA5 47 HVB Health Care Risk Control 6 Index 48 DE000A2LBA5 49 HVB Health Care Risk Control 6 Index 40 DE000A2LBA5 40 HVB Health Care Risk Control 6 Index 41 DE000A2LBA5 41 HVB Global Water Risk Control 6 Index 42 DE000A2RBA5 43 BAIX (Price) - Bayerischer Aktienindex 44 DE000A2RSSB 45 BAIX (Price) - Bayerischer Aktienindex 46 DE000A2RSSB 47 U	3	Multi Asset Index	DE000A2DBRW4
6         Real Value Strategy Index         DE000A2RPKP3           7         Real Value Strategy II Index         DE000A2L23E5           8         SPAIS®-LEBENSZYKLUS 2026 Index         DE000A0X72C7           9         SPAIS®-LEBENSZYKLUS 2032 Index         DE000A0X71B6           10         SPAIS®-LEBENSZYKLUS 2032 Index         DE000A0X71B4           11         SPAIS®-LEBENSZYKLUS 2031 Index         DE000A0X71B4           12         SPAIS®-LEBENSZYKLUS 2038 Index         DE000A0X72A1           13         SPAIS®-LEBENSZYKLUS 2041 Index         DE000A0X72A1           14         SPAIS®-LEBENSZYKLUS 2044 Index         DE000A2X1500           15         SPAIS®-LEBENSZYKLUS 2050 Index         DE000A2X1500           16         SPAIS®-LEBENSZYKLUS 2053 Index         DE000A2X1500           17         SPAIS®-LEBENSZYKLUS 2053 Index         DE000A3X1500           18         HVB Multi Manager Best Select Flex Index II         DE000A1YHA82           20         HVB Wermögensdepot Wachstum Flex Index II         DE000A1YHA82           21         HVB Vermögensdepot Wachstum Flex Index III         DE000A12HA83           22         HVB Robotics Fund Risk Control 9 Index         DE000A21BA94           23         Emerging Focus Strategy Index         DE000A21BA94           24	4	VP Klassik 70 Benchmark Index	DE000A2DBVP0
7         Real Value Strategy II Index         DE000A2L23E5           8         SPAIS®-LEBENSZYKLUS 2026 Index         DE000A0X72C7           9         SPAIS®-LEBENSZYKLUS 2032 Index         DE000A0X7186           11         SPAIS®-LEBENSZYKLUS 2035 Index         DE000A0X7184           12         SPAIS®-LEBENSZYKLUS 2038 Index         DE000A0X72A1           13         SPAIS®-LEBENSZYKLUS 2034 Index         DE000A0X72A1           14         SPAIS®-LEBENSZYKLUS 2041 Index         DE000A0X72A1           15         SPAIS®-LEBENSZYKLUS 2041 Index         DE000A2MINFO           16         SPAIS®-LEBENSZYKLUS 2050 Index         DE000A2MINFO           17         SPAIS®-LEBENSZYKLUS 2051 Index         DE000A2MINFO           18         HVB Mutti Manager Best Select Flex Index         DE000A2MINFO           19         HVB Vermögensdepot Wachstum Flex Index II         DE000A1PHIN28           20         HVB Wermögensdepot Wachstum Flex Index III         DE000A1FAIST           21         HVB Vermögensdepot Wachstum Flex Index III         DE000A2PIAAS1           22         HVB Robotics Fund Risk Control 9 Index         DE000A2PIAAS1           23         Emerging Focus Strategy Index         DE000A2PIAAS1           24         Silver Age Strategy Index         DE000A2PIAAS1	5	Multi Asset ETF Index	DE000A2GGK22
8         SPAIS®-LEBENSZYKLUS 2026 Index         DE000A0X72C7           9         SPAIS®-LEBENSZYKLUS 2029 Index         DE000A0X7186           10         SPAIS®-LEBENSZYKLUS 2035 Index         DE000A0X7194           11         SPAIS®-LEBENSZYKLUS 2035 Index         DE000A0X72A1           12         SPAIS®-LEBENSZYKLUS 2038 Index         DE000A0X72A21           13         SPAIS®-LEBENSZYKLUS 2041 Index         DE000A0X72A21           14         SPAIS®-LEBENSZYKLUS 2044 Index         DE000A2X1500           15         SPAIS®-LEBENSZYKLUS 2047 Index         DE000A2X1500           16         SPAIS®-LEBENSZYKLUS 2053 Index         DE000A2X1500           17         SPAIS®-LEBENSZYKLUS 2053 Index         DE000A2X1500           18         HVB Wulti Manager Best Select Flex Index II         DE000A1Y1048           20         HVB Wermögensdepot Wachstum Flex Index II         DE000A1Y1048           21         HVB Vermögensdepot Wachstum Flex Index III         DE000A12048           22         HVB Robotics Fund Risk Control 9 Index         DE000A2204           23         Emerging Focus Strategy Index         DE000A22034           24         Silver Age Strategy Index         DE000A22034           25         Unicredit Ativ Risk Control 1 Index         DE000A22034           <	6	Real Value Strategy Index	DE000A2RPKP3
8 SPAISØ-LEBENSZYKIUS 2029 Index DE000A0X72CD 10 SPAISØ-LEBENSZYKIUS 2029 Index DE000A0X7186 11 SPAISØ-LEBENSZYKIUS 2035 Index DE000A0X7184 12 SPAISØ-LEBENSZYKIUS 2038 Index DE000A0X72A1 13 SPAISØ-LEBENSZYKIUS 2038 Index DE000A0X72A1 14 SPAISØ-LEBENSZYKIUS 2048 Index DE000A0X72A1 15 SPAISØ-LEBENSZYKIUS 2041 Index DE000A0X72A1 16 SPAISØ-LEBENSZYKIUS 2044 Index DE000A2XISO1 17 SPAISØ-LEBENSZYKIUS 2047 Index DE000A2XISO1 18 HVB Multi Manager Best Select Flex Index DE000A2XISO1 17 SPAISØ-LEBENSZYKIUS 2053 Index DE000A2XISO1 18 HVB Wermögensdepot Wachstum Flex Index II DE000A1PHN28 19 HVB Vermögensdepot Wachstum Flex Index II DE000A1PHN28 20 HVB Multi Manager Best Select Flex Index II DE000A1PHN28 21 HVB Vermögensdepot Wachstum Flex Index II DE000A1PHN28 22 HVB Robotics Fund Risk Control 9 Index DE000A2PHAS1 23 Emerging Focus Stratedy Index DE000A2PHAS1 24 Silver Age Stratedy Index DE000A2PHAS1 25 UniCredit Aktiv Risk Control 1 Index DE000A2L01A3 26 Global Water Strategy Index DE000A2L01A3 27 Global Disruptive Opportunities Strategy Index DE000A2L01A3 28 UniCredit Clean Enerdy Risk Reduction Strategy Index DE000A2L01A3 29 HVB Health Care Risk Control 1 Index DE000A18TXA9 30 HVB Health Care Risk Control 1 Index DE000A18TXA9 31 HVB Global Water Risk Control 1 Index DE000A2R04A3 32 UC European Sector Rotation Strategy Index DE000A2R04A3 33 European Sector Rotation Strategy Index DE000A2R04A3 34 BAIX - Bayerischer Aktienindex DE000A2R04A3 35 BAIX (Price) - Bayerischer Aktienindex DE000A2R04A3 36 BAIX Strategy - Bayerischer Aktienindex DE000A2R04A3 37 BAIX (Price) - Bayerischer Aktienindex DE000A2R04A3 38 BAIX - Bayerischer Aktienindex DE000A2R04A3 39 UC Equity Sector Rotation Strategy Index DE000A2R04A3 40 LC European Sector Rotation Formance Index DE000A2R04A3 41 UC European Sector Rotation Performance Index DE000A2R04A3 42 UC European Sector Rotation Formance Index DE000A2R04A3 43 BAIX (Price) - Bayerischer Aktienindex DE000A2R04A34 44 UC European Sector Rotation Performance Index DE000A2R04A34 45 UC EsG Goods for Lif	7	Real Value Strategy II Index	DE000A2LZ3E5
10 SPAIS®-LEBENSZYKLUS 2032 Index DE000A0X7186 11 SPAIS®-LEBENSZYKLUS 2035 Index DE000A0X72A1 12 SPAIS®-LEBENSZYKLUS 2038 Index DE000A0X72E3 13 SPAIS®-LEBENSZYKLUS 2041 Index DE000A0X72E3 14 SPAIS®-LEBENSZYKLUS 2041 Index DE000A2X7E3 15 SPAIS®-LEBENSZYKLUS 2047 Index DE000A2BNB52 16 SPAIS®-LEBENSZYKLUS 2047 Index DE000A2BNB52 16 SPAIS®-LEBENSZYKLUS 2050 Index DE000A2BNB52 17 SPAIS®-LEBENSZYKLUS 2053 Index DE000A2BNB52 18 HVB Multi Manager Best Select Flex Index DE000A1PHA28 19 HVB Vermögensdepot Wachstum Flex Index II DE000A1PHA28 20 HVB Multi Manager Best Select Flex Index II DE000A1PHA28 21 HVB Vermögensdepot Wachstum Flex Index III DE000A163VC2 22 HVB Robotics Fund Risk Control 9 Index DE000A2BNB52 23 Emerging Focus Strategy Index DE000A2BA53 24 Silver Age Strategy Index DE000A2L0FA39 25 UniCredit Aktiv Risk Control 1 Index DE000A2L0FA39 26 Global Water Strategy Index DE000A2L0FA39 27 Global Disruptive Opportunities Strategy Index DE000A2L0FA39 28 UniCredit Clean Energy Risk Reduction Strategy Index DE000A2L0FA3 29 HVB Health Care Risk Control 1 Index DE000A1B7XCA 30 HVB Health Care Risk Control 1 Index DE000A2BM143 31 HVB Global Water Risk Control 6 Index DE000A2BM143 32 UC European Sector Rotation Net Return Index DE000A2FA65 33 BAIX (Price) - Bayerischer Aktienindex DE000A2FA66 34 BAIX - Bayerischer Aktienindex DE000A2FA66 35 BAIX (Price) - Bayerischer Aktienindex DE000A2FA66 36 BAIX Strategy - Bayerischer Aktienindex DE000A2FA66 37 BAIX (Price) - Bayerischer Aktienindex DE000A2FA66 38 BAIX Strategy - Bayerischer Aktienindex DE000A2FA66 39 BAIX (Price) - Bayerischer Aktienindex DE000A2FA66 30 BAIX (Price) - Bayerischer Aktienindex DE000A2FA66 31 BAIX (Price) - Bayerischer Aktienindex DE000A2FA66 32 BAIX (Price) - Bayerischer Aktienindex DE000A2FA66 33 BAIX (Price) - Bayerischer Aktienindex DE000A2FA66 34 BAIX (Price) - Bayerischer Aktienindex DE000A2FA66 35 BAIX (Price) - Bayerischer Aktienindex DE000A2FA66 36 BAIX (Price) - Bayerischer Aktienindex DE000A2FA66 37 BAIX (Price) - Bayerischer Aktienindex DE0	8	SPAIS®-LEBENSZYKLUS 2026 Index	DE000A0X72C7
11 SPAIS®-LEBENSZYKLUS 2035 Index DE000A0X7194 12 SPAIS®-LEBENSZYKLUS 2036 Index DE000A0X7261 13 SPAIS®-LEBENSZYKLUS 2041 Index DE000A0X7261 14 SPAIS®-LEBENSZYKLUS 2044 Index DE000A0X7261 15 SPAIS®-LEBENSZYKLUS 2047 Index DE000A2MINF0 15 SPAIS®-LEBENSZYKLUS 2047 Index DE000A2MINF0 16 SPAIS®-LEBENSZYKLUS 2050 Index DE000A2MINF0 17 SPAIS®-LEBENSZYKLUS 2053 Index DE000A2MINF0 18 HVB Multi Manager Best Select Flex Index DE000A2MINF0 19 HVB Vermögensdepot Wachstum Flex Index II DE000A1PHAIS8 20 HVB Multi Manager Best Select Flex Index II DE000A1FHAIS8 21 HVB Wermögensdepot Wachstum Flex Index III DE000A1FHAIS8 22 HVB Robotics Fund Risk Control 9 Index DE000A2MINF0 23 Emerging Focus Strategy Index DE000A2MINF0 24 Silver Age Strategy Index DE000A2L03F2 25 UniCredit Aktiv Risk Control 1 Index DE000A2L03F2 26 Global Water Strategy Index DE000A2L03F3 27 Global Water Strategy Index DE000A2L03F3 28 UniCredit Clean Energy Risk Reduction Strategy Index Not applicable Very HVB Health Care Risk Control 1 Index DE000A2L03F3 29 HVB Health Care Risk Control 1 Index DE000A2L03F3 30 HVB Health Care Risk Control 1 Index DE000A2L03F3 31 HVB Global Water Strategy Index DE000A2L03F3 32 Un Curopean Sector Rotation Strategy Index DE000A2L03F3 33 European Sector Rotation Strategy Index DE000A2L03F3 34 BAIX - Bayerischer Aktienindex DE000A2R9H3F3 35 BAIX (Performance Index) - Bayerischer Aktienindex DE000A2R9H3F3 36 BAIX Strategy - Bayerischer Aktienindex DE000A2R9F3 37 BAIX (Performance Index) - Bayerischer Aktienindex DE000A2P7SF6 38 BAIX (Performance Index) - Bayerischer Aktienindex DE000A2P7SF6 40 First Eagle Amundi International Strategy Index DE000A2P7SF6 41 UC European Sector Rotation Strategy Index DE000A2P7SF6 42 UC European Sector Rotation Performance Index DE000A2P7SF6 43 BAIX (Performance Index) - Bayerischer Aktienindex DE000A2P7SF6 44 Climate Action Strategy Index DE000A2P7SF6 45 UC ESG Goods for Life Strategy Index DE000A2P7SF6 46 UC ESG Goods for Life Strategy Index DE000A2P7SF6 47 UC ESG Goods for Life Strategy Index DE000	9	SPAIS®-LEBENSZYKLUS 2029 Index	DE000A0X72D5
12 SPAIS®-LEBENSZYKLUS 2041 Index DE000A0X72A1 13 SPAIS®-LEBENSZYKLUS 2041 Index DE000A0X72A1 14 SPAIS®-LEBENSZYKLUS 2041 Index DE000A1MINFO 15 SPAIS®-LEBENSZYKLUS 2047 Index DE000A2MINFO 16 SPAIS®-LEBENSZYKLUS 2050 Index DE000A2MINFO 17 SPAIS®-LEBENSZYKLUS 2050 Index DE000A2MINFO 18 HVB Multi Manager Best Select Flex Index DE000A3D19A1 18 HVB Multi Manager Best Select Flex Index DE000A3D19A1 29 HVB Vermögensdepot Wachstum Flex Index II DE000A1P0A65 20 HVB Multi Manager Best Select Flex Index II DE000A1F0A65 21 HVB Vermögensdepot Wachstum Flex Index III DE000A163VD0 22 HVB Robotics Fund Risk Control 9 Index DE000A2D82A4 23 Emerging Focus Strategy Index DE000A2D82A4 24 Silver Age Strategy Index DE000A2D82A4 25 UniCredit Aktiv Risk Control 1 Index DE000A2D82A4 26 Global Water Strategy Index DE000A2L0JA3 27 Global Disruptive Opportunities Strategy Index DE000A2L0JA3 28 UniCredit Clean Energy Risk Reduction Strategy Index DE000A2L0JA3 28 UniCredit Clean Energy Risk Reduction Strategy Index DE000A2L0JA3 29 HVB Health Care Risk Control 1 Index DE000A1BT2X6 30 HVB Health Care Risk Control 1 Index DE000A1BT2X6 31 HVB Global Water Risk Control 1 Index DE000A2L0JA3 32 UC European Sector Rotation Strategy Index DE000A2L0JA3 33 European Sector Rotation Strategy Index DE000A2R0JA3 34 BAIX - Bayerischer Aktienindex DE000A2R0JA3 35 BAIX (Price) - Bayerischer Aktienindex DE000A2YNG1 36 BAIX Strategy - Bayerischer Aktienindex DE000A2YNG1 37 BAIX (Price) - Bayerischer Aktienindex DE000A2YNG1 38 Food for Generations Strategy Index DE000A2YNG1 39 UC Equity Sector Select Index DE000A2PSUB3 40 LU C European Sector Rotation Risk Control Index DE000A2PSUB61 41 UC European Sector Rotation Risk Control Index DE000A2PSUB61 42 UC European Sector Rotation Risk Control Index DE000A2PSUB61 43 BAIX (Performance Index) - Bayerischer Aktienindex DE000A2PSUB61 44 UC European Sector Rotation Risk Control Index DE000A2PSUB61 45 LUC European Sector Rotation Risk Control Index DE000A2PSUB61 46 UC European Sector Rotation Risk Control Index DE000A2PS	10	SPAIS®-LEBENSZYKLUS 2032 Index	DE000A0X7186
13 SPAIS®-LEBENSZYKLUS 2041 Index DE000AUNTZE3 14 SPAIS®-LEBENSZYKLUS 2044 Index DE000AUNTZE3 15 SPAIS®-LEBENSZYKLUS 2047 Index DE000A2NTSE3 16 SPAIS®-LEBENSZYKLUS 2050 Index DE000A2NTSE3 16 SPAIS®-LEBENSZYKLUS 2053 Index DE000A2NTSE3 17 SPAIS®-LEBENSZYKLUS 2053 Index DE000A1PD465 19 HVB Wulti Manager Best Select Flex Index DE000A1PD465 19 HVB Wermögensdepot Wachsturn Flex Index II DE000A1PHN28 20 HVB Multi Manager Best Select Flex Index II DE000A1PHN28 20 HVB Wermögensdepot Wachsturn Flex Index II DE000A1E3YD0 21 HVB Vermögensdepot Wachsturn Flex Index III DE000A1E3YD0 22 HVB Robotics Fund Risk Control 9 Index DE000A2PD864 23 Emerging Focus Strategy Index DE000A2PD864 24 Silver Age Strategy Index DE000A2L3782 25 UniCredit Aktiv Risk Control 1 Index DE000A2L3782 25 UniCredit Aktiv Risk Control 1 Index DE000A2L0JD4 27 Global Disruptive Opportunities Strategy Index DE000A2L0JD4 28 UniCredit Clean Energy Risk Reduction Strategy Index DE000A2L0JD4 29 HVB Health Care Risk Control 10 Index DE000A18TYX9 30 HVB Health Care Risk Control 10 Index DE000A18TYX6 31 HVB Global Water Risk Control 10 Index DE000A2RMIH3 32 UC European Sector Rotation Strategy Index DE000A2RMIH3 33 European Sector Rotation Net Return Index DE000A2RMIH3 34 BAIX - Bayerischer Aktienindex DE000A2RMIH3 35 BAIX (Performance Index) - Bayerischer Aktienindex DE000A2RNIG07 36 BAIX Strategy - Bayerischer Aktienindex DE000A2RNIG07 37 BAIX (Performance Index) - Bayerischer Aktienindex DE000A2RNIG1 38 Food for Generations Strategy Index DE000A2RNIG3 39 UC European Sector Rotation Risk Control Index DE000A2RNIG3 40 First Eagle Amundi International Strategy Index DE000A2RNIG3 41 BAIX - Bayerischer Aktienindex DE000A2RNIG3 42 UC European Sector Rotation Risk Control Index DE000A2RNIG3 43 BAIX (Reformance Index) - Bayerischer Aktienindex DE000A2RNIG3 44 CUrinate Action Strategy Index DE000A2RNIG3 45 BOO First Eagle Amundi International Strategy Index DE000A2RNIG3 46 UC ESG Goods for Life (Performance) Index DE000A2RNIG3 47 UC ESG Goods for Life (Performance) In		SPAIS®-LEBENSZYKLUS 2035 Index	DE000A0X7194
14 SPAIS®-LEBENSZYKLUS 2044 Index DE000A1MLNF0 15 SPAIS®-LEBENSZYKLUS 2047 Index DE000A2BMB52 16 SPAIS®-LEBENSZYKLUS 2050 Index DE000A2BM52 17 SPAIS®-LEBENSZYKLUS 2053 Index DE000A3DH9A1 18 HVB Multi Manager Best Select Flex Index DE000A1PH0465 19 HVB Wermögensdepot Wachstum Flex Index II DE000A1PHN28 20 HVB Multi Manager Best Select Flex Index II DE000A1PH028 21 HVB Wermögensdepot Wachstum Flex Index III DE000A163YDD 22 HVB Robotics Fund Risk Control 9 Index DE000A2DB64 23 Emerging Focus Strategy Index DE000A2DB64 24 Silver Age Strategy Index DE000A2LDB64 25 UniCredit Aktiv Risk Control 1 Index DE000A2LDB32 26 Global Water Strategy Index DE000A2LDB32 27 Global Disruptive Opportunities Strategy Index DE000A2LDB4 28 UniCredit Clean Energy Risk Reduction Strategy Index DE000A2LDB4 29 HVB Health Care Risk Control 1 Index DE000A2LDB4 29 HVB Health Care Risk Control 1 Index DE000A2LDB4 30 HVB Health Care Risk Control 1 Index DE000A2LB1YY9 30 HVB Health Care Risk Control 6 Index DE000A2LB1YY9 31 HVB Global Water Risk Control 6 Index DE000A2LB1Y38 32 UC European Sector Rotation Strategy Index DE000A2LB1Y38 33 European Sector Rotation Net Return Index DE000A2RB1B764 34 BAIX - Bayerischer Aktienindex DE000A2Y5F3 35 BAIX (Price) - Bayerischer Aktienindex DE000A2Y5F3 36 BAIX Strategy - Bayerischer Aktienindex DE000A2Y5F3 37 BAIX (Performance Index) - Bayerischer Aktienindex DE000A2Y5F3 38 Food for Generations Strategy Index DE000A2Y5F3 39 UC Equity Sector Select Index DE000A2Y5F3 30 European Sector Rotation Performance Index DE000A2Y5F3 31 BAIX (Performance Index) - Bayerischer Aktienindex DE000A2Y5F3 32 BAIX (Performance Index) - Bayerischer Aktienindex DE000A2Y5F3 39 UC Egotos Sector Rotation Performance Index DE000A2Y5F3 30 E000A2Y5F3 31 BAIX (Performance Index) DE000A2Y5F3 32 BAIX (Performance Index) DE000A2Y5F3 33 BAIX (Performance Index) DE000A2Y5F3 34 BAIX - Bayerischer Rotation Risk Control Index DE000A2Y5F3 35 BAIX (Performance Index) DE000A2Y5F3 36 BAIX (Bartategy Index DE000A2Y5F3 37 BAIX (Performance Index) DE	12	SPAIS®-LEBENSZYKLUS 2038 Index	DE000A0X72A1
15 SPAIS®-LEBENSZYKLUS 2047 Index DE000A2RJS00 16 SPAIS®-LEBENSZYKLUS 2050 Index DE000A2XJ500 17 SPAIS®-LEBENSZYKLUS 2053 Index DE000A3DH9A1 18 HVB Multi Manager Best Select Flex Index DE000A1PD465 19 HVB Vermögensdepot Wachstum Flex Index II DE000A1PD465 19 HVB Wermögensdepot Wachstum Flex Index II DE000A163VD0 21 HVB Wulti Manager Best Select Flex Index III DE000A163VD0 21 HVB Wermögensdepot Wachstum Flex Index III DE000A163VD0 22 HVB Robotics Fund Risk Control 9 Index DE000A2PB264 23 Emerging Focus Strategy Index DE000A2HAS1 24 Silver Age Strategy Index DE000A2LAF32 25 UniCredit Aktiv Risk Control 1 Index DE000A2LOH39 26 Global Water Strategy Index DE000A2LOH39 27 Global Disruptive Opportunities Strategy Index DE000A2LOH3 28 UniCredit Clean Energy Risk Reduction Strategy Index DE000A2LOH3 29 HVB Health Care Risk Control 1 Index DE000A18TX9 30 HVB Health Care Risk Control 7 Index DE000A18TX9 31 HVB Global Water Risk Control 6 Index DE000A2RBM13 32 UC European Sector Rotation Strategy Index DE000A18TX6 33 European Sector Rotation Strategy Index DE000A2RBM607 34 BAIX - Bayerischer Aktienindex DE000A2YSF3 35 BAIX (Price) - Bayerischer Aktienindex DE000A2YSF3 36 BAIX Strategy - Bayerischer Aktienindex DE000A2YSF3 37 BAIX (Performance Index) - Bayerischer Aktienindex DE000A2YSF3 38 Food for Generations Strategy Index DE000A2YSF3 39 UC Equity Sector Select Index DE000A2YSF3 30 BAIX (Performance Index) - Bayerischer Aktienindex DE000A2YSF3 31 BAIX (Performance Index) - Bayerischer Aktienindex DE000A2YSF3 32 UC Equity Sector Select Index DE000A2YSF3 33 BAIX (Reformance Index) - Bayerischer Aktienindex DE000A2YSF3 34 BAIX - Bayerischer Rotation Risk Control Index DE000A2YSF3 35 BAIX (Reformance Index) - Bayerischer Aktienindex DE000A2YSF3 36 BAIX (Reformance Index) - Bayerischer Aktienindex DE000A2YSF3 37 BAIX (Reformance Index) - Bayerischer Aktienindex DE000A2YSF3 38 Food for Generations Strategy Index DE000A2PSB9B 39 UC Egodos for Life Index DE000A2PSB9B 40 UC ESG Goods for Life Performance Index DE000A2PSB9B 41 UC	13	SPAIS®-LEBENSZYKLUS 2041 Index	DE000A0X72E3
16 SPAIS®-LEBENSZYKLUS 2050 Index DE000A2X1500 17 SPAIS®-LEBENSZYKLUS 2053 Index DE000A3DH9A1 18 HVB Multi Manager Best Select Flex Index DE000A1PD465 19 HVB Vermögensdepot Wachstum Flex Index II DE000A1PHN28 20 HVB Multi Manager Best Select Flex Index II DE000A163YD0 21 HVB Vermögensdepot Wachstum Flex Index III DE000A163YD0 22 HVB Robotics Fund Risk Control 9 Index DE000A2BZ64 23 Emerging Focus Strategy Index DE000A2BZ64 24 Silver Age Strategy Index DE000A2LASS1 25 UniCredit Aktiv Risk Control 1 Index DE000A2LOH39 26 Global Water Strategy Index DE000A2LOH39 27 Global Disruptive Opportunities Strategy Index DE000A2LOH39 28 UniCredit Clean Energy Risk Reduction Strategy Index DE000A2LOH39 29 HVB Health Care Risk Control 7 Index DE000A18TYX9 30 HVB Health Care Risk Control 7 Index DE000A18TYX9 31 HVB Global Water Risk Control 6 Index DE000A2BWH3 32 UC European Sector Rotation Net Return Index DE000A2BWH3 33 European Sector Rotation Net Return Index DE000A2BWH3 34 BAIX - Bayerischer Aktienindex DE000A2RYS63 35 BAIX (Price) - Bayerischer Aktienindex DE000A2YYS63 36 BAIX Strategy - Bayerischer Aktienindex DE000A2YYS63 37 BAIX (Price) - Bayerischer Aktienindex DE000A2YYN63 38 Food for Generations Strategy Index DE000A2YYN63 39 UC Equity Sector Select Index DE000A2YYN63 30 HVB Heath Care Risk Control 6 Index DE000A2YYN63 31 BAIX (Price) - Bayerischer Aktienindex DE000A2YYN63 32 BAIX (Price) - Bayerischer Aktienindex DE000A2YYN63 33 BAIX (Price) - Bayerischer Aktienindex DE000A2YYN63 34 BAIX - Bayerischer Aktienindex DE000A2YYN63 35 BAIX (Price) - Bayerischer Aktienindex DE000A2YYN63 36 BAIX Strategy - Bayerischer Aktienindex DE000A2YYN63 37 BAIX (Price) - Bayerischer Aktienindex DE000A2YYN63 38 Food for Generations Strategy Index DE000A2PXPN64 40 LC European Sector Rotation Performance Index DE000A2PXPN64 41 UC European Sector Rotation Performance Index DE000A2PXPN64 42 UC European Sector Rotation Performance Index DE000A2PXPN64 43 BAIX (Net Return) - Bayerischer Aktienindex DE000A2PXPN64 44 Climate Action Strategy I	14	SPAIS®-LEBENSZYKLUS 2044 Index	DE000A1MLNF0
17 SPAIS®-LEBENSZYKLUS 2053 Index 18 HVB MULTI Manager Best Select Flex Index 19 HVB Vermögensdepot Wachstum Flex Index II 20 HVB Multi Manager Best Select Flex Index II 21 HVB Vermögensdepot Wachstum Flex Index II 22 HVB Robotics Fund Risk Control 9 Index 23 Emerging Focus Strategy Index 24 Silver Age Strategy Index 25 UniCredit Aktiv Risk Control 1 Index 26 Global Water Strategy Index 27 Global Disruptive Opportunities Strategy Index 28 UniCredit Clean Energy Risk Reduction Strategy Index 29 HVB Health Care Risk Control 1 Index 29 HVB Health Care Risk Control 1 Index 30 HVB Health Care Risk Control 1 Index 31 HVB Global Water Strategy Index 32 Uc European Sector Rotation Strategy Index 32 Uc European Sector Rotation Net Return Index 33 European Sector Rotation Net Return Index 34 BAIX - Bayerischer Aktienindex 35 BAIX (Price) - Bayerischer Aktienindex 36 BAIX (Performance Index) - Bayerischer Aktienindex 37 BAIX (Performance Index) - Bayerischer Aktienindex 38 Food for Generations Strategy Index 39 BAIX (Performance Index) - Bayerischer Aktienindex 40 DE000A2X16P2 41 Uc European Sector Rotation Risk Control Index 42 DE000A2X16P2 43 BAIX - Bayerischer Aktienindex 44 DE000A2X16P3 45 BAIX (Price) - Bayerischer Aktienindex 46 DE000A2X16P3 47 BAIX (Performance Index) - Bayerischer Aktienindex 48 DE000A2X16P3 49 BAIX (Performance Index) - Bayerischer Aktienindex 40 DE000A2X16P3 41 UC European Sector Rotation Risk Control Index 42 DE000A2X16P3 43 BAIX (Performance Index) - Bayerischer Aktienindex 44 DE000A2X16P3 45 BAIX (Net Return) - Bayerischer Aktienindex 46 DE000A2X16P3 47 UC ESG Goods for Life Strategy Index 48 DE000A2X16P3 49 DE000A2X16P3 40 Eirst Eagle Amundi International Strategy Index 41 DE000A2P3UB3 42 DE000A2P3UB3 43 BAIX (Net Return) - Bayerischer Aktienindex 44 DE000A2P3UB3 45 DE000A2P3UB3 46 UC ESG Goods for Life Strategy Index 47 DE000A2P3UB3 48 DE000A2P3UB3 49 DE000A2P3UB3 40 DE000A2P3UB3 41 DE000A2P3UB3 42 DE000A2P3UB3 43 DE000A2P3UB3 44 DE000A2P3UB3 45 DE000A2P3UB3 46 UC ESG Goods for Life Strateg	15	SPAIS®-LEBENSZYKLUS 2047 Index	DE000A2BNB52
HVB Multi Manager Best Select Flex Index   DE000A1YD465     HVB Vermögensdepot Wachstum Flex Index II   DE000A1PHN28     HVB Wulti Manager Best Select Flex Index II   DE000A163YD0     HVB Wulti Manager Best Select Flex Index II   DE000A163YD0     HVB Vermögensdepot Wachstum Flex Index III   DE000A163YC2     HVB Robotics Fund Risk Control 9 Index   DE000A2D8Z64     DE000A2D8Z64   DE000A2LA351   DE000A2LA351     Emerging Focus Strategy Index   DE000A2LA351     DE000A2LA352   DE000A2LA352     UniCredit Atkiv Risk Control 1 Index   DE000A2L0H39     DE000A2L0H39   DE000A2L0H39     DE000A2L16P2   DE000A2L16P2   DE000A2L16P2     DE000A2L16P2   DE000A2L3EP3   DE000A2L3EP3     DE000A2L3EP3   DE000A2L3EP3   DE000A2L3EP3   DE000A2L3EP3   DE000A2L3EP3   DE000	16	SPAIS®-LEBENSZYKLUS 2050 Index	DE000A2X1500
19 HVB Vermögensdepot Wachstum Flex Index II DE000A1PHN28 20 HVB Multi Manager Best Select Flex Index II DE000A163YDD 21 HVB Vermögensdepot Wachstum Flex Index III DE000A163YDD 22 HVB Robotics Fund Risk Control 9 Index DE000A2D8Z64 23 Emerging Focus Strategy Index DE000A2LZ3F2 24 Silver Age Strategy Index DE000A2LZ3F2 25 UniCredit Aktiv Risk Control 1 Index DE000A2LD13P3 26 Global Water Strategy Index DE000A2LD13P3 27 Global Disruptive Opportunities Strategy Index DE000A2LD10P4 28 UniCredit Clean Energy Risk Reduction Strategy Index DE000A2LD10P4 29 HVB Health Care Risk Control 1 Index DE000A18TYX9 30 HVB Health Care Risk Control 7 Index DE000A18TYX9 31 HVB Global Water Risk Control 6 Index DE000A2BMJH3 32 UC European Sector Rotation Strategy Index DE000A18TZ64 33 European Sector Rotation Net Return Index DE000A2RNI607 34 BAIX - Bayerischer Aktienindex DE000A2YY5F3 35 BAIX (Price) - Bayerischer Aktienindex DE000A2YY5F3 36 BAIX Strategy - Bayerischer Aktienindex DE000A2YY5F3 37 BAIX (Price) - Bayerischer Aktienindex DE000A2YZNG1 38 Food for Generations Strategy Index DE000A2YZNG1 39 UC Equity Sector Select Index DE000A2YZNG3 40 First Eagle Amundi International Strategy Index DE000A2PXF56 41 UC European Sector Rotation Performance Index DE000A2PXPS63 42 UC European Sector Rotation Risk Control Index DE000A2PXPS64 43 BAIX (Net Return) - Bayerischer Aktienindex DE000A2PXPS64 44 Climate Action Strategy Index DE000A2PXPS64 45 UC European Sector Rotation Performance Index DE000A2PXPS64 46 Climate Action Strategy Index DE000A2PXPS64 47 UC ESG Goods for Life Index DE000A2PXPS64 48 Constantin Vermögen Global Sustainability Index DE000A2PXPS64 49 International Mixed ETF Basket Index DE000A2QCCV8 50 Global Infrastructure Strategy Index DE000A2QCV85652 51 Global Infrastructure Strategy Index DE000A2QCV85652 52 Ethik Vorsorge Strategy Index DE000A2QBV746	17	SPAIS®-LEBENSZYKLUS 2053 Index	DE000A3DH9A1
BUB Multi Manager Best Select Flex Index II   DE000A163YDD	18	HVB Multi Manager Best Select Flex Index	DE000A1YD465
21 HVB Vermögensdepot Wachstum Flex Index III DE000A163YC2 22 HVB Robotics Fund Risk Control 9 Index DE000A2DBZ64 23 Emerging Focus Strategy Index DE000A2HAS1 24 Silver Age Strategy Index DE000A2L03F2 25 UniCredit Aktiv Risk Control 1 Index DE000A2L0H39 26 Global Water Strategy Index DE000A2L0JD4 27 Global Disruptive Opportunities Strategy Index DE000A2L0JD4 28 UniCredit Clean Energy Risk Reduction Strategy Index DE000A18TYM9 30 HVB Health Care Risk Control 10 Index DE000A18TYM9 30 HVB Health Care Risk Control 7 Index DE000A18TYM9 31 HVB Global Water Risk Control 7 Index DE000A18TYM9 32 UC European Sector Rotation Strategy Index DE000A2BMJH3 33 European Sector Rotation Net Return Index DE000A2RN607 34 BAIX - Bayerischer Aktienindex DE000A2YY5F3 35 BAIX (Price) - Bayerischer Aktienindex DE000A2YY5F3 36 BAIX Strategy - Bayerischer Aktienindex DE000A2YYSE6 37 BAIX (Performance Index) - Bayerischer Aktienindex DE000A2YYSE6 39 UC Equity Sector Select Index DE000A2YXF62 40 First Eagle Amundi International Strategy Index DE000A2RN867 41 UC European Sector Rotation Performance Index DE000A2RN868 42 UC European Sector Rotation Performance Index DE000A2RN869 43 BAIX (Net Return) - Bayerischer Aktienindex DE000A2RN869 44 Climate Action Strategy Index DE000A2RN869 45 UC ESG Goods for Life Index DE000A2P3UB5 46 UC ESG Goods for Life Index DE000A2P3UB5 47 UC ESG Goods for Life Index DE000A2P3UB5 48 Constantin Vermögen Global Sustainability Index DE000A2P3UB5 50 Global Infrastructure Strategy Index DE000A2P3UB5 51 Global Infrastructure Basket Index DE000A2QBVT4 52 Ethik Vorsorge Strategy Index DE000A2QBVT4	19	HVB Vermögensdepot Wachstum Flex Index II	DE000A1PHN28
22 HVB Robotics Fund Risk Control 9 Index 23 Emerging Focus Strategy Index 24 Silver Age Strategy Index 25 UniCredit Aktiv Risk Control 1 Index 26 Global Water Strategy Index 27 Global Disruptive Opportunities Strategy Index 28 UniCredit Clean Energy Risk Reduction Strategy Index 29 HVB Health Care Risk Control 1 Index 29 HVB Health Care Risk Control 1 Index 30 HVB Health Care Risk Control 7 Index 31 HVB Global Water Risk Control 6 Index 32 UC European Sector Rotation Strategy Index 33 European Sector Rotation Strategy Index 34 BAIX - Bayerischer Aktienindex 35 BAIX (Price) - Bayerischer Aktienindex 36 BAIX (Price) - Bayerischer Aktienindex 37 BAIX (Performance Index) - Bayerischer Aktienindex 38 Food for Generations Strategy Index 39 UC Equity Sector Select Index 40 First Eagle Amundi International Strategy Index 41 UC European Sector Rotation Risk Control Index 42 UC European Sector Rotation Strategy Index 43 BAIX - Bayerischer Aktienindex 44 UC European Sector Rotation Strategy Index 45 DE000A2YZNF3 46 Food for Generations Strategy Index 47 UC European Sector Rotation Risk Control Index 48 DE000A2YZF52 49 First Eagle Amundi International Strategy Index 40 First Eagle Amundi International Strategy Index 41 UC European Sector Rotation Risk Control Index 42 UC European Sector Rotation Performance Index 44 Climate Action Strategy Index 45 DE000A2PXF5G 46 UC EsG Goods for Life Index 47 UC ESG Goods for Life Strategy Index 48 Constantin Vermögen Global Sustainability Index 49 DE000A2P3UB1 48 Constantin Vermögen Global Sustainability Index 49 DE000A2PNF4 49 International Mixed ETF Basket Index 40 DE000A2PNF4 41 International Mixed ETF Basket Index 41 DE000A2PNF4 42 DE000A2PNF4 43 Global Infrastructure Strategy Index 44 DE000A2PNF4 45 Life Sig Goods for Life Strategy Index 46 DE000A2PNF4 47 DE000A2PNF4 48 Constantin Vermögen Global Sustainability Index 49 DE000A2PNF4 49 International Mixed ETF Basket Index 40 DE000A2PNF4 41 DE000A2PNF4 42 Ethik Vorsorge Strategy Index 43 DE000A2QCCV6 51 Global Infrastructure Strateg	20	HVB Multi Manager Best Select Flex Index II	
23       Emerging Focus Strategy Index       DE000A2HAAS1         24       Silver Age Strategy Index       DE000A2L03F2         25       UniCredit Aktiv Risk Control 1 Index       DE000A2L0JD4         26       Global Water Strategy Index       DE000A2L0JD4         27       Global Disruptive Opportunities Strategy Index       DE000A2L0JD4         28       UniCredit Clean Energy Risk Reduction Strategy Index       Not applicable.         29       HVB Health Care Risk Control 10 Index       DE000A18TYM9         30       HVB Health Care Risk Control 7 Index       DE000A2PMIH3         31       HVB Global Water Risk Control 6 Index       DE000A2PMIH3         32       UC European Sector Rotation Strategy Index       DE000A2PMIH3         33       European Sector Rotation Net Return Index       DE000A2PN607         34       BAIX - Bayerischer Aktienindex       DE000A2YY5F3         35       BAIX (Price) - Bayerischer Aktienindex       DE000A2YY5F3         36       BAIX Strategy - Bayerischer Aktienindex       DE000A2YZNG1         37       BAIX (Performance Index) - Bayerischer Aktienindex       DE000A2YZNG1         38       Food for Generations Strategy Index       DE000A2X16P2         39       UC Equity Sector Select Index       DE000A2R0A         40	21	HVB Vermögensdepot Wachstum Flex Index III	DE000A163YC2
24Silver Age Strategy IndexDE000A2L23F225UniCredit Aktiv Risk Control 1 IndexDE000A2L0ID4926Global Water Strategy IndexDE000A2L0ID427Global Disruptive Opportunities Strategy IndexDE000A2L0ID3228UniCredit Clean Energy Risk Reduction Strategy IndexNot applicable.29HVB Health Care Risk Control 10 IndexDE000A18TYX930HVB Health Care Risk Control 7 IndexDE000A18TZK631HVB Global Water Risk Control 6 IndexDE000A2BMIH332UC European Sector Rotation Strategy IndexDE000A2RMIH333European Sector Rotation Net Return IndexDE000A2PN60734BAIX - Bayerischer AktienindexDE000A2YY5F335BAIX (Price) - Bayerischer AktienindexDE000A2YY5F336BAIX Strategy - Bayerischer AktienindexDE000A2YZNG137BAIX (Price) - Bayerischer AktienindexDE000A2YZNG138Food for Generations Strategy IndexDE000A2YZNF339UC Equity Sector Select IndexDE000A2XISF240First Eagle Amundi International Strategy IndexDE000A2A5687W841UC European Sector Rotation Risk Control IndexDE000A26RYX642UC European Sector Rotation Performance IndexDE000A26RYW843BAIX (Net Return) - Bayerischer AktienindexDE000A26RYW844Climate Action Strategy IndexDE000A27BUB546UC ESG Goods for Life IndexDE000A2P3UB947UC ESG Goods for Life IndexDE000A2P3UB949Internatio	22	HVB Robotics Fund Risk Control 9 Index	DE000A2DBZ64
25UniCredit Aktiv Risk Control 1 IndexDE000A2L0H3926Global Water Strategy IndexDE000A2L0M3227Global Disruptive Opportunities Strategy IndexDE000A2L0M3228UniCredit Clean Energy Risk Reduction Strategy IndexNot applicable.29HVB Health Care Risk Control 10 IndexDE000A18TYX930HVB Health Care Risk Control 7 IndexDE000A18T2K631HVB Global Water Risk Control 6 IndexDE000A2BMJH332UC European Sector Rotation Strategy IndexDE000A2BMJH333European Sector Rotation Net Return IndexDE000A2RN60734BAIX - Bayerischer AktienindexDE000A2YY5F335BAIX (Price) - Bayerischer AktienindexDE000A2YY5F336BAIX Strategy - Bayerischer AktienindexDE000A2YYN5E337BAIX (Performance Index) - Bayerischer AktienindexDE000A2YZNG138Food for Generations Strategy IndexDE000A2YZNG339UC Equity Sector Select IndexDE000A2XEF5240First Eagle Amundi International Strategy IndexDE000A2A6R30841UC European Sector Rotation Risk Control IndexDE000A26R30842UC European Sector Rotation Performance IndexDE000A26RYW643BAIX (Net Return) - Bayerischer AktienindexDE000A26RYW644Climate Action Strategy IndexDE000A2P3UB546UC ESG Goods for Life (Performance) IndexDE000A2P3UB547UC ESG Goods for Life (Performance) IndexDE000A2P3UB548Constantin Vermögen Global Sustainability Index	23	Emerging Focus Strategy Index	DE000A2HAAS1
25UniCredit Aktiv Risk Control 1 IndexDE000A2L0H3926Global Water Strategy IndexDE000A2L0M3227Global Disruptive Opportunities Strategy IndexDE000A2L0M3228UniCredit Clean Energy Risk Reduction Strategy IndexNot applicable.29HVB Health Care Risk Control 10 IndexDE000A18TYX930HVB Health Care Risk Control 7 IndexDE000A18T2K631HVB Global Water Risk Control 6 IndexDE000A2BMJH332UC European Sector Rotation Strategy IndexDE000A2BMJH333European Sector Rotation Net Return IndexDE000A2RN60734BAIX - Bayerischer AktienindexDE000A2YY5F335BAIX (Price) - Bayerischer AktienindexDE000A2YY5F336BAIX Strategy - Bayerischer AktienindexDE000A2YYN5E337BAIX (Performance Index) - Bayerischer AktienindexDE000A2YZNG138Food for Generations Strategy IndexDE000A2YZNG339UC Equity Sector Select IndexDE000A2XEF5240First Eagle Amundi International Strategy IndexDE000A2A6R30841UC European Sector Rotation Risk Control IndexDE000A26R30842UC European Sector Rotation Performance IndexDE000A26RYW643BAIX (Net Return) - Bayerischer AktienindexDE000A26RYW644Climate Action Strategy IndexDE000A2P3UB546UC ESG Goods for Life (Performance) IndexDE000A2P3UB547UC ESG Goods for Life (Performance) IndexDE000A2P3UB548Constantin Vermögen Global Sustainability Index			
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28UniCredit Clean Energy Risk Reduction Strategy IndexNot applicable.29HVB Health Care Risk Control 10 IndexDE000A18TYX930HVB Health Care Risk Control 7 IndexDE000A18TZX631HVB Global Water Risk Control 6 IndexDE000A2BMJH332UC European Sector Rotation Strategy IndexDE000A2RN60734BAIX - Bayerischer AktienindexDE000A2RN60735BAIX (Price) - Bayerischer AktienindexDE000A2YY5F336BAIX Strategy - Bayerischer AktienindexDE000A2YY5F337BAIX (Performance Index) - Bayerischer AktienindexDE000A2YZNG137BAIX (Performance Index) - Bayerischer AktienindexDE000A2YZNF338Food for Generations Strategy IndexDE000A2XZNF5240First Eagle Amundi International Strategy IndexDE000A2XZF5241UC European Sector Rotation Risk Control IndexDE000A26RYM842UC European Sector Rotation Performance IndexDE000A26RYW843BAIX (Net Return) - Bayerischer AktienindexDE000A26RYW844Climate Action Strategy IndexDE000A2PY5G144Climate Action Strategy IndexDE000A2PY3UB146UC ESG Goods for Life IndexDE000A2P3UB147UC ESG Goods for Life (Performance) IndexDE000A2P3UB148Constantin Vermögen Global Sustainability IndexDE000A2P3UB149International Mixed ETF Basket IndexDE000A2QCCW850Global Infrastructure Strategy IndexDE000A2QCCW851Global Infrastructure Basket Index <td< td=""><td>26</td><td></td><td></td></td<>	26		
29       HVB Health Care Risk Control 10 Index       DE000A18TYX9         30       HVB Health Care Risk Control 7 Index       DE000A18TZK6         31       HVB Global Water Risk Control 6 Index       DE000A2BMJH3         32       UC European Sector Rotation Strategy Index       DE000A2RN607         33       European Sector Rotation Net Return Index       DE000A2RN607         34       BAIX - Bayerischer Aktienindex       DE000A2YY5E3         35       BAIX (Price) - Bayerischer Aktienindex       DE000A2YY5E6         36       BAIX Strategy - Bayerischer Aktienindex       DE000A2YZNG1         37       BAIX (Performance Index) - Bayerischer Aktienindex       DE000A2YZNG1         38       Food for Generations Strategy Index       DE000A2XZFS2         40       First Eagle Amundi International Strategy Index       DE000A2XZFS2         40       First Eagle Amundi International Strategy Index       DE000A26RYM8         41       UC European Sector Rotation Risk Control Index       DE000A26RYW8         42       UC European Sector Rotation Performance Index       DE000A26RYW8         43       BAIX (Net Return) - Bayerischer Aktienindex       DE000A26WW8         44       Climate Action Strategy Index       DE000A2PJSG1         45       UC ESG Goods for Life Index       DE000A2PJSG1	27	Global Disruptive Opportunities Strategy Index	DE000A2L0M32
Book   Bealth Care Risk Control 7 Index   DE000A18T2X6	28	UniCredit Clean Energy Risk Reduction Strategy Index	Not applicable.
31       HVB Global Water Risk Control 6 Index       DE000A2BMJH3         32       UC European Sector Rotation Strategy Index       DE000A18T264         33       European Sector Rotation Net Return Index       DE000A2RN607         34       BAIX - Bayerischer Aktienindex       DE000A2YYSE3         35       BAIX (Price) - Bayerischer Aktienindex       DE000A2YYSE3         36       BAIX Strategy - Bayerischer Aktienindex       DE000A2YZNG1         37       BAIX (Performance Index) - Bayerischer Aktienindex       DE000A2YZNF3         38       Food for Generations Strategy Index       DE000A2X16P2         39       UC Equity Sector Select Index       DE000A2X2F52         40       First Eagle Amundi International Strategy Index       DE000A26R3D8         41       UC European Sector Rotation Risk Control Index       DE000A26R3D8         42       UC European Sector Rotation Performance Index       DE000A26RYM8         43       BAIX (Net Return) - Bayerischer Aktienindex       DE000A26RYM8         44       Climate Action Strategy Index       DE000A27Y5G1         44       Climate Action Strategy Index       DE000A2P3UB1         45       UC ESG Goods for Life Index       DE000A2P3UB5         46       UC ESG Goods for Life Strategy Index       DE000A2P3UB1	29	HVB Health Care Risk Control 10 Index	DE000A18TYX9
32     UC European Sector Rotation Strategy Index     DE000A18T264       33     European Sector Rotation Net Return Index     DE000A2RN607       34     BAIX - Bayerischer Aktienindex     DE000A2YY5F3       35     BAIX (Price) - Bayerischer Aktienindex     DE000A2YYSG1       36     BAIX Strategy - Bayerischer Aktienindex     DE000A2YZNG1       37     BAIX (Performance Index) - Bayerischer Aktienindex     DE000A2YZNF3       38     Food for Generations Strategy Index     DE000A2X16F2       39     UC Equity Sector Select Index     DE000A2X16F2       40     First Eagle Amundi International Strategy Index     DE000A26R3D8       41     UC European Sector Rotation Risk Control Index     DE000A26RYM6       42     UC European Sector Rotation Performance Index     DE000A26RYM6       43     BAIX (Net Return) - Bayerischer Aktienindex     DE000A26RYM6       44     Climate Action Strategy Index     DE000A27Y5G1       45     UC ESG Goods for Life Index     DE000A2P3UB5       46     UC ESG Goods for Life Strategy Index     DE000A2P3UB1       47     UC ESG Goods for Life (Performance) Index     DE000A2P3UB1       48     Constantin Vermögen Global Sustainability Index     DE000A2PVFNF4       49     International Mixed ETF Basket Index     DE000A2QCCV8       51     Global Infrastructure Basket Inde	30	HVB Health Care Risk Control 7 Index	DE000A18T2X6
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34     BAIX - Bayerischer Aktienindex     DE000A2YY5F3       35     BAIX (Price) - Bayerischer Aktienindex     DE000A2YY5E6       36     BAIX Strategy - Bayerischer Aktienindex     DE000A2YZNG1       37     BAIX (Performance Index) - Bayerischer Aktienindex     DE000A2YZNF3       38     Food for Generations Strategy Index     DE000A2X16P2       39     UC Equity Sector Select Index     DE000A2X2F52       40     First Eagle Amundi International Strategy Index     DE000A2A2F3D8       41     UC European Sector Rotation Risk Control Index     DE000A26RYM6       42     UC European Sector Rotation Performance Index     DE000A26RYW8       43     BAIX (Net Return) - Bayerischer Aktienindex     DE000A27Y5G1       44     Climate Action Strategy Index     DE000A2GHGN6       45     UC ESG Goods for Life Index     DE000A2P3UB5       46     UC ESG Goods for Life Strategy Index     DE000A2P3UB9       47     UC ESG Goods for Life (Performance) Index     DE000A2P3UB9       48     Constantin Vermögen Global Sustainability Index     DE000A2P3UB1       49     International Mixed ETF Basket Index     DE000A2GHGP1       50     Global Infrastructure Strategy Index     DE000A2QCCV8       51     Global Infrastructure Basket Index     DE000A2QCCV8       52     Ethik Vorsorge Strategy Index     DE0	32	UC European Sector Rotation Strategy Index	DE000A18T264
35       BAIX (Price) - Bayerischer Aktienindex       DE000A2YY5E6         36       BAIX Strategy - Bayerischer Aktienindex       DE000A2YZNG1         37       BAIX (Performance Index) - Bayerischer Aktienindex       DE000A2YZNF3         38       Food for Generations Strategy Index       DE000A2X16P2         39       UC Equity Sector Select Index       DE000A2X2F52         40       First Eagle Amundi International Strategy Index       DE000A26R3D8         41       UC European Sector Rotation Risk Control Index       DE000A26RYW8         42       UC European Sector Rotation Performance Index       DE000A26RYW8         43       BAIX (Net Return) - Bayerischer Aktienindex       DE000A2FYSG1         44       Climate Action Strategy Index       DE000A2GHGN6         45       UC ESG Goods for Life Index       DE000A2P3UB5         46       UC ESG Goods for Life Strategy Index       DE000A2P3UB1         47       UC ESG Goods for Life (Performance) Index       DE000A2P3UB1         48       Constantin Vermögen Global Sustainability Index       DE000A2P3UB1         49       International Mixed ETF Basket Index       DE000A2GHGP1         50       Global Infrastructure Strategy Index       DE000A2QCCV8         51       Global Infrastructure Basket Index       DE000A2QCCV8	33	European Sector Rotation Net Return Index	DE000A2RN607
36     BAIX Strategy - Bayerischer Aktienindex     DE000A2YZNG1       37     BAIX (Performance Index) - Bayerischer Aktienindex     DE000A2YZNF3       38     Food for Generations Strategy Index     DE000A2X16P2       39     UC Equity Sector Select Index     DE000A2X2F52       40     First Eagle Amundi International Strategy Index     DE000A26R3D8       41     UC European Sector Rotation Risk Control Index     DE000A26RYW8       42     UC European Sector Rotation Performance Index     DE000A26RYW8       43     BAIX (Net Return) - Bayerischer Aktienindex     DE000A26WSG1       44     Climate Action Strategy Index     DE000A2GHGN6       45     UC ESG Goods for Life Index     DE000A2P3UB5       46     UC ESG Goods for Life Strategy Index     DE000A2P3UB1       47     UC ESG Goods for Life (Performance) Index     DE000A2P3UB1       48     Constantin Vermögen Global Sustainability Index     DE000A2PNF4       49     International Mixed ETF Basket Index     DE000A2GHGP1       50     Global Infrastructure Strategy Index     DE000A2QCCV8       51     Global Infrastructure Basket Index     DE000A2QCCV8       52     Ethik Vorsorge Strategy Index     DE000A2QBVT4	34	BAIX - Bayerischer Aktienindex	DE000A2YY5F3
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41     UC European Sector Rotation Risk Control Index     DE000A26RYX6       42     UC European Sector Rotation Performance Index     DE000A26RYW8       43     BAIX (Net Return) - Bayerischer Aktienindex     DE000A2YY5G1       44     Climate Action Strategy Index     DE000A2GHGN6       45     UC ESG Goods for Life Index     DE000A2P3UB5       46     UC ESG Goods for Life Strategy Index     DE000A2P3UE9       47     UC ESG Goods for Life (Performance) Index     DE000A2P3UE0       48     Constantin Vermögen Global Sustainability Index     DE000A2YPNF4       49     International Mixed ETF Basket Index     DE000A2GHGP1       50     Global Infrastructure Strategy Index     DE000A2QCCV8       51     Global Infrastructure Basket Index     DE000A2QCCW6       52     Ethik Vorsorge Strategy Index     DE000A2QBVT4	39	UC Equity Sector Select Index	
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46         UC ESG Goods for Life Strategy Index         DE000A2P3UE9           47         UC ESG Goods for Life (Performance) Index         DE000A2P3UD1           48         Constantin Vermögen Global Sustainability Index         DE000A2PNF4           49         International Mixed ETF Basket Index         DE000A2GHCPI           50         Global Infrastructure Strategy Index         DE000A2QCCV8           51         Global Infrastructure Basket Index         DE000A2QCCW6           52         Ethik Vorsorge Strategy Index         DE000A2QBVT4	44	Climate Action Strategy Index	DE000A2GHGN6
46         UC ESG Goods for Life Strategy Index         DE000A2P3UE9           47         UC ESG Goods for Life (Performance) Index         DE000A2P3UD1           48         Constantin Vermögen Global Sustainability Index         DE000A2YPNF4           49         International Mixed ETF Basket Index         DE000A2GHCP1           50         Global Infrastructure Strategy Index         DE000A2QCCV8           51         Global Infrastructure Basket Index         DE000A2QCCW6           52         Ethik Vorsorge Strategy Index         DE000A2QBVT4	45	UC ESG Goods for Life Index	DE000A2P3UB5
48     Constantin Vermögen Global Sustainability Index     DE000A2YPNF4       49     International Mixed ETF Basket Index     DE000A2GHGP1       50     Global Infrastructure Strategy Index     DE000A2QCCV8       51     Global Infrastructure Basket Index     DE000A2QCCW6       52     Ethik Vorsorge Strategy Index     DE000A2QBVT4	46	UC ESG Goods for Life Strategy Index	
49         International Mixed ETF Basket Index         DE000A2GHGP1           50         Global Infrastructure Strategy Index         DE000A2QCCV8           51         Global Infrastructure Basket Index         DE000A2QCCW6           52         Ethik Vorsorge Strategy Index         DE000A2QBVT4	47	UC ESG Goods for Life (Performance) Index	DE000A2P3UD1
50     Global Infrastructure Strategy Index     DE000A2QCCV8       51     Global Infrastructure Basket Index     DE000A2QCCW6       52     Ethik Vorsorge Strategy Index     DE000A2QBVT4	48	Constantin Vermögen Global Sustainability Index	DE000A2YPNF4
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<u> </u>	51	Global Infrastructure Basket Index	DE000A2QCCW6
53 UC SDG Transatlantic Leaders Index DE000A2QLVH8	52	Ethik Vorsorge Strategy Index	DE000A2QBVT4
	53	UC SDG Transatlantic Leaders Index	DE000A2QLVH8

54	UC SDG Transatlantic Leaders (Performance) Index	DE000A2QMKZ1
55	UC SDG Transatlantic Leaders Strategy Index	DE000A2QMYE7
56	Health Science Strategy Index	DE000A2QNQU7
57	Ethik Evolution Strategy Index	DE000A3CWUW4
58	Thematic Strategy Index	DE000A3CWUX2
59	UC Next Generation Energy Index	DE000A3CYRP0
60	UC European Hydrogen Focus Strategy Index	DE000A3C3AX5
61	UC European Banks Index	DE000A3DDSA2
62	UC Travel & Leisure Index	DE000A3DDSB0
63	Infrastructure Strategy Index	DE000A3C8SX6
64	Ethik Aktien Strategy Index	DE000A2C8TQ8
65	Private Banking Vermogensportfolio Nachhaltig 70 Strategy Index	DE000A3C7VX2
66	UC ESG Global Renewable Energies Index	DE000A3DK4H2
67	UC European Software Index	DE000A3DLV16
68	US Equity Fund Strategy Index	DE000A3DLAE5
69	Energy Transition Strategy Index	DE000A3DK4J8
70	Global Demographics Strategy Index	DE000A3DM6P8
71	UC European Health and Lifestyle Index	DE000A3DTQZ9
72	UC ESG European Women Leadership Index	DE000A3DQCJ9
73	UC ESG European Women Leadership Decrement 3% Index	DE000A3DXEA0
74	UC European Hydrogen Focus (Net Return) Index	DE000A3D3Y22
75	UC European Dividend Stars Index	DE000A3D8FW4
76	HVB EONIA Strategie	DE000A0G9G43
77	HVB 3 Months Rolling Euribor Index	DE000A0QZBZ6
78	HVB 1M Rolling Euribor Index	Not applicable.
79	UC European Dividend Stars Large Cap (Price) Index	DE000A3EQB06
80	UC ESG European Biodiversity Leaders Index	DE000A3ESL69
2 (1)		

- 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  $14 \cdot$
- 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 AG "Conflict of Interest Policy" and UniCredit Bank AG "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 AGs 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 AG.

#### 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 AG.

## 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 AG, and UniCredit Bank AG'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 AG.

Point (e) of Article 5(3) is considered as not applicable as no third party is involved in the provision of UniCredit Bank AG 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 AGs 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 AG. 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 AGs 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 AGs 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 AG 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.

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