

Whistleblower Policy

November 14, 2022

Whistleblower Policy

1. Summary

A whistleblower in SimCorp is a person who raises a concern about illegal or criminal activities or clear and serious violations of internal guidelines or policies of SimCorp. A whistleblower may be an employee, member of management, or board member of SimCorp, or an external stakeholder, such as a client, a supplier, or others with a connection to SimCorp.

If you become aware of illegal or criminal activities or clear and serious violations of internal guidelines or policies of SimCorp, you are encouraged to use SimCorp's whistleblower hotline:

→ <https://simcorp.whistleblownetwork.net/>

The hotline is an internet based reporting tool hosted by a third party, Got Ethics A/S.

All reports sent through the hotline are electronically submitted directly to the Chair of SimCorp A/S' Audit and Risk Committee and an independent member of SimCorp's Board of Directors.

The Whistleblower Policy is a supplement to the usual communication between employees and SimCorp's management and/or between SimCorp and its external stakeholders. Therefore, if possible, you are generally encouraged to talk to your manager or local point of contact at SimCorp if you encounter issues or problems during your work with SimCorp. If this is not possible or if you do not feel comfortable in doing so or if you fear there is a risk of retaliation, you may use the whistleblower hotline.

Below you will find information on the Whistleblower Policy and how it is implemented in SimCorp.

2. Your rights as a whistleblower

As a whistleblower in SimCorp you have the following rights:

- (i) You may report anonymously
- (ii) Filing a report in good faith will not have any adverse employment consequences
- (iii) Your information will be confidential

3. Purpose of the Whistleblower Policy

The purposes of the Whistleblower Policy and the associated processing of data are the following:

- (i) to prevent and investigate any suspected illegal or criminal actions and any clear and serious violations of internal guidelines or policies of SimCorp;
- (ii) given our international organization and partnerships with different cultures, to undo barriers which could prevent information from being relayed to SimCorp and thus acted upon, assuming that some employ-ees or other stakeholders without a whistleblower policy may refrain from sharing with SimCorp information on behaviour which indicates some of the above activities;
- (iii) to highlight the importance of a consistent high level of credibility towards SimCorp's shareholders, existing and potential employees, clients, vendors, and other stakeholders; and
- (iv) to provide a formal and secure procedure for protecting stakeholders that choose to come forward under the Whistleblower Policy.

The Whistleblower Policy is annually reviewed by independent auditors to ensure that SimCorp is aligned with current good practices.

4. Who may submit information by way of the Whistleblower Policy

Whether you are an employee of SimCorp A/S and its subsidiaries (SimCorp A/S and its subsidiaries hereafter "SimCorp"), a member of SimCorp's Executive Management Board or a board member of SimCorp or otherwise a stakeholder of SimCorp (such as supplier representatives, clients or SimCorp shareholders) you may submit information by way of the Whistleblower Policy.

5. Anonymity and confidentiality

In order to provide SimCorp with the best opportunity to investigate any report submitted under the Whistleblower Policy, SimCorp recommends that you disclose your identity to SimCorp. Unless compelled otherwise by law or regulation, SimCorp will keep your identity in full confidence and not disclose your identity internally or externally unless you provide your prior consent. However, it is up to you whether you decide to disclose your identity or remain anonymous when submitting information through the whistleblower hotline, and any information received by virtue of the Whistleblower Policy will be processed whether anonymous or not.

As the data controller SimCorp will ensure that all processing of personal data under the Whistleblower Policy is compliant with EU legislation on data protection and applicable local legislation. SimCorp will limit the number of people involved in the processing of the information to the largest extent possible. The personal data under this policy will only be disclosed to the extent mentioned under this Whistleblower Policy.

6. No retaliation

Submission of information in good faith through the Whistleblower Policy will not have any adverse employment consequences or be used to the detriment of the whistleblower. All information, including the identity of the whistleblower, will be treated confidentially as described in section 5.

7. Which offences may be reported under the Whistleblower Policy

Only information that indicates that one or more employees, management or board members of SimCorp, either actively or by omission and by virtue of their position in or assignments for SimCorp, carry out illegal or criminal activities or commit clear and serious violations of internal guidelines or policies of SimCorp will be processed.

For example, this may include fraudulent behaviour, bribery, data manipulation, money laundering, sexual assaults, harassment, severe bullying, irregularities in respect of financial accounting and control in SimCorp and unethical business conduct.

8. Who will review the information

Information submitted through the whistleblower hotline will initially be received and read by two non-executive members of the Board of Directors of SimCorp, one of them being the Chair of SimCorp's Audit and Risk Committee.

Through an initial screening the gatekeepers will ensure that the information submitted is not clearly unfounded and that the information is not clearly outside the scope of the Whistleblower Policy. Upon having made such review and assessment any information which is eligible for processing under the whistleblower policy will be made available to the CEO of SimCorp A/S and the Chair of the Board of Directors of SimCorp A/S (together with the gatekeeper sending through the information collectively the "Whistleblower Committee").

In the event that the information submitted involves acts or omissions of the CEO of SimCorp, the information will be made available to the Chair and the Vice Chair of the Board of Directors and SimCorp' external counsel who will then act as the Whistleblower Committee.

In the event that the information involves acts or omissions of the Chair of SimCorp's Board of Directors, the information will be made available to the CEO of SimCorp and SimCorp's external counsel.

9. How will the information be used

The Whistleblower Committee will review the information and decide whether a formal investigation of the matter at hand should be carried out.

Upon having carried out a formal investigation, if required, the measures that can be applied by the Whistleblower Committee are the following: (i) dismissal of the information as being unfounded or outside the scope of the Whistleblower Policy; (ii) initiation of employment sanctions against the employee(s) who are the subject(s) of the report; (iii) filing of a report to the relevant authorities (including the police) of the matter at hand; (iv) report to NASDAQ Copenhagen A/S; (v) initiation of a more thorough investigation and (vi) suggestions as to changes to internal policies or procedures of SimCorp.

The whistleblower will receive an acknowledgement of the report within 7 days. Further, the whistleblower will within reasonable time, however no later than 3 months from the report, receive feedback.

In case your actions or omissions have been reported under the Whistleblower Policy and such actions and omissions are found illegal and/or in clear and serious violation of SimCorp's internal guidelines or policies by the Whistleblower Committee, you will be subsequently informed.

10. Retention of data

The information received under the Whistleblower Policy will be retained by SimCorp only for such period of time which is required by regulation and for SimCorp's processing of the data in question. In the event that the information is dismissed as being unfounded or outside the scope of the Whistleblower Policy the information will be deleted or, in case found relevant for further actions in the subsidiary which the report concerns, sent to the subsidiary in question.

11. External reporting

From 17 December 2021, all EU member states shall establish external reporting channels that you may use to report certain violations mentioned in the EU directive on whistleblowing. You can read more on www.datatilsynet.dk or contact Group Legal if you need further information.

12. Various

Please be aware that in case your personal data is processed under the Whistleblower Policy, you will have certain rights pursuant to the Danish Data Protection Act. Please refer to the privacy policy at <https://simcorp.whistleblownetwork.net/> for more details.

For the avoidance of doubt, it is emphasized that you may only use the Whistleblower Policy for the purposes mentioned under section 3 and to the extent specified in the Whistleblower Policy. Gross or repeated abuse of the whistleblower facility, such as use for harassment purposes, will not be tolerated and may lead to disciplinary sanctions, including an oral reprimand, a written warning and/or termination of employment.

If you have any questions regarding the Whistleblower Policy, please contact Group HR.

This policy is adopted in Copenhagen on
14 November 2022.

Board of Directors

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About SimCorp

SimCorp offers industry-leading, integrated investment management solutions.

Our platform and ecosystem, comprising partners, services, and third-party connectivity empowers us to provide 40% of the world's top 100 financial companies with the efficiency and flexibility needed to succeed.

With over 25 offices around the world, and more than 2,200 employees, we are a truly global, collaborative team that connects every continent and industry seamlessly.

For more information, see www.simcorp.com