

Sustainability Statement

Explanatory Information on the Content of the Report and the Framework

The Corporate Sustainability Reporting Directive (CSRD) entered into force across the EU on January 5, 2023. All European Union (EU) member states, including Germany, were given a period of 18 months, i.e. until July 5, 2024, to transpose the Directive into national law. Germany had not transposed the Directive as of December 31, 2025.

This means that the existing legal situation regarding the implementation of the Non-Financial Reporting Directive (NFRD) remains unchanged for the 2024 and 2025 reporting periods, and that a Non-financial Group Declaration must continue to be prepared in accordance with Sections 315b, 315c in conjunction with Sections 289c to 289e of the German Commercial Code (HGB).

Despite not being under any obligation to report in accordance with the European Sustainability Reporting Standards (ESRS), Vonovia SE (hereinafter referred to as "Vonovia") has decided to publish its **sustainability statement** (hereinafter referred to as "sustainability statement") - **which also meets the requirements for the Non-financial Group Declaration prepared in accordance with Sections 315b to 315c HGB, taking full account of the ESRS** as a recognized framework in accordance with Sections 315c (3) in conjunction with 289d HGB. Consequently, this Group sustainability statement meets both the requirements set out in the CSRD, as well as the requirements laid down in Sections 315b to 315c HGB for a Non-financial Group Declaration and Article 8 of Regulation (EU) 2020/852 (the EU taxonomy).

This ensures compliance with the Minimum Disclosure Requirements pursuant to Sections 315c in conjunction with 289c HGB and German Accounting Standards (GAS) 20.257 et seq.

The main relevant non-financial performance indicators are reported - together with information on the underlying

policies, objectives and measures - in the individual chapters covering the content in question. These cover the legally mandated aspects - environmental issues, social issues, employee issues, combating corruption and bribery, and observance of human rights.

This sustainability statement includes Vonovia's Sustainability Performance Index (SPI). This key figure is the Vonovia Group's primary non-financial performance indicator within the meaning of GAS 20, Paragraph 101 in conjunction with Paragraph 106. The SPI consists of six sub-indicators derived from the material sustainability priorities and serves as a vital instrument for managing, and in terms of the remuneration for our sustainable activities (for further details see → **ESRS2 GOV-3**). As the most significant non-financial performance indicator, the SPI is also presented in the chapters entitled → **Corporate Governance** and → **Forecast Report**.

The sustainability statement is subjected to a voluntary limited assurance review conducted by PwC GmbH Wirtschaftsprüfungsgesellschaft in accordance with ISAE 3000 (Revised). External references are designed only to provide further information and are not covered by the business audit.

Risk Assessment Based on Sustainability Aspects

In the sustainability statement, material risks associated with the Group's own business activities - and business relations or products and services of the Group - which are very likely to occur and which could have serious negative impacts on non-financial topics must be reported. On the basis of the risk analyses performed and in the opinion of Vonovia's management, there are no non-financial risks subject to a reporting requirement that meet the criteria pursuant to Section 289c (3) Nos. 3 and 4 HGB following application of the net method and taking risk mitigation measures into consideration.

The definition of material reportable risks provided in Section 289c (3) Nos. 3 and 4 HGB differs from that used in the ESRS. Consequently, this sustainability statement reports on all of the risks that are material in accordance with the ESRS, even if they are not considered severe from a HGB perspective.

ESRS 2 – General Disclosures

BP-1 – General Basis for Preparation of Sustainability Statements

Vonovia SE's sustainability statement is prepared on a consolidated basis.

The scope of consolidation matches that used in Vonovia's consolidated financial statements and includes the activities of Vonovia and its subsidiaries in Germany, Austria and Sweden, including Deutsche Wohnen SE (hereinafter referred to as Deutsche Wohnen). These companies are listed in the → [list of shareholdings](#) in the notes to the consolidated financial statements. Companies with minority interests and apartments owned by third parties are not included.

Deutsche Wohnen will not be issuing its own sustainability statement for the 2025 fiscal year, as it is exercising its rights under the simplifying provision for CSR reporting pursuant to Sections 289b (2) and 315b (2) HGB.

The Care segment, which had still been presented as a discontinued operation pursuant to IFRS 5 in the previous fiscal year, was sold in full in 2025. In order to ensure that the latest information can be compared with the prior-year information, the information reported for 2024 has been split in two, allowing this year's data to be compared against the prior-year data for "continuing operations."

Alongside our own business, the sustainability statement also covers the upstream and downstream value chain, in particular suppliers, business partners and customers. These were taken into account in assessing impacts, risks and opportunities (IROs) as part of the materiality assessment.

Vonovia has not used the option to omit a specific piece of information corresponding to intellectual property, know-how or the results of innovation.

BP-2 – Disclosures in Relation to Specific Circumstances

While estimates were used to determine a small number of selected metrics, none of the metrics contained in this sustainability statement are validated by an external body beyond the auditor.

Vonovia also uses the sustainability statement to report on compliance with the requirements set out in the EU Taxonomy Regulation.

GOV-1 – The Role of the Administrative, Management and Supervisory Bodies

Vonovia is a European company (SE) in accordance with the German Stock Corporation Act (AktG), the SE Act and the SE Regulation. Its registered office is in Bochum. It has three governing bodies: the General Meeting, the Supervisory Board and the Management Board, whose duties derive from the SE Regulation (SE-VO), the German Stock Corporation Act (AktG) and the Articles of Association. Shareholders, as the owners of the company, exercise their rights at the Annual General Meeting.

According to the **two-tier governance system** provided for in the German Stock Corporation Act (AktG), Vonovia has a Management Board and a Supervisory Board. While managing the company is the sole responsibility of the Management Board, the Supervisory Board is responsible for monitoring the company's business by providing advice to the Management Board and supervising those transactions that are significant for the company. Members cannot sit on both bodies at the same time.

Vonovia's Management Board still comprises five members, with the Supervisory Board made up of ten members. In accordance with the SE Regulation and the German SE Employee Participation Act (SEBG), the Supervisory Board is only made up of representatives of the shareholders. The highest representative body of the employees is the Group Works Council. An SE Works Council was also set up at the level of Vonovia SE.

In accordance with the German Corporate Governance Code (GCGC), the Supervisory Board and the Management Board must be composed in such a way that these bodies/their members as a group have the knowledge, ability and specialist experience required to properly complete their tasks. The corresponding knowledge, skills and experience – particularly with regard to sustainability – can be found in the Supervisory Board Qualifications Profile set out below, as well as in the description of Supervisory Board and Management Board skills.

Supervisory Board Qualifications Matrix

Name	Independent	Year of birth	Year appointed	Gender	Nationality	Accounting, finance, controlling	Accounting, audit, risk, compliance
Clara-Christina Streit (Chair of the Board)	yes	1968	2013	female	German/U.S.	4	3
Vitus Eckert	yes	1969	2018	male	Austrian	2	3
Birgit M. Bohle	yes	1973	2024	female	German	2	3
Jürgen Fenk	yes	1966	2022	male	German	2	2
Dr. Florian Funck	yes	1971	2014	male	German	4	4
Dr. Daniela Gerd tom Markotten	yes	1974	2023	female	German	2	2
Matthias Hünlein	yes	1961	2022	male	German	1	1
Dr. Ariane Reinhart	yes	1969	2016	female	German	2	2
Michael Rüdiger**	yes	1964	2025	male	German	4	4
Dr. Marcus Schenck**	yes	1965	2025	male	German	4	4
Dr. Ute Geipel-Faber***	yes	1950	2015	female	German	4	4
Hildegard Müller***	yes	1967	2013	female	German	3	2

* 1: "Limited experience/no key competency"; 2: "Substantial experience/competency"; 3: "Extensive experience/key competency/expertise"; 4: "Direct management experience".

** Member of the Supervisory Board since May 28, 2025.

*** Member of the Supervisory Board until May 28, 2025.

To ensure that members have suitable skills and expertise in the area of sustainability, the **Management Board** is engaged in constant dialogue with the Head of Strategy, Corporate Development & Sustainability and calls on the support of the relevant specialist departments depending on the topic. The Management Board also engages in ongoing dialogue with stakeholders and external experts on sustainability issues, particularly those relating to the environment. The Management Board is also provided with information on relevant sustainability topics and developments via the Sustainability Committee. The Management Board combines various qualification profiles and skills, for example in the areas of real estate, renewable energies, corporate management, legal and strategy, ensuring that Vonovia has access to crucial expertise in these specialist areas. CEO Rolf Buch served for several years as a moderator of the Initiativkreis Ruhr, where he was responsible for promoting the structural transformation of the Ruhr region into a sustainable, livable and economically strong metropolitan area. As a longtime Chief Financial Officer (CFO) of major residential real estate companies, Philip Grosse has gained particular expertise in green and social bonds. Thanks to his membership in the Supervisory Board of Gropvys AG, he also contributes expertise in sustainable hybrid wooden construction. The Chief Human Resources Officer (CHRO) Ruth Werhahn boasts extensive professional experience in HR. Within Vonovia, Daniel Riedl is responsible for building project

development in line with an ambitious sustainability agenda, and advises other construction and project companies on sustainable production as a Supervisory Board member. Arnd Fittkau is responsible for operations as well as portfolio management, the "neighborhood workshop" (Quartierwerk) and climate investments, which play a crucial role in modernization and renovation actions to implement the climate pathway. Moreover, as a member of the Supervisory Board of Iqony Fernwärme GmbH, he regularly engages in dialogue with experts in sustainable heat supply. All members of the Management Board keep abreast of regulatory developments related to sustainability on an ongoing basis and keep their sustainability-related knowledge up to date.

Women make up 20% of the Management Board, in line with the previous year, and 40% of the Supervisory Board (2024: 60%). The target for appointing Supervisory Board members takes account of the German Act on the Equal Participation of Women and Men in Leadership Positions in the Private Sector and the Public Sector (Gesetz für die gleichberechtigte Teilhabe von Frauen und Männern an Führungspositionen in der Privatwirtschaft und im öffentlichen Dienst), based on which the Supervisory Board should comprise at least 30% women and 30% men. If the Management Board consists of more than three members, which is the case at Vonovia, it must comprise at least one woman and at least one man. Targets also have to be set for the

Key skills and areas of experience*

Housing industry	Development, construction industry	M&A, real estate transactions	Law, regulation, governance	Financing (banks, capital market)	Investment, capital investment	Digitalization, cyber security	Sustainability, energy	HR management, remuneration, leadership development	Politics, public administration
3	1	4	3	4	3	2	2	3	1
4	4	4	3	3	4	2	1	2	1
1	1	1	3	1	2	3	2	4	3
4	3	4	2	4	4	2	1	3	2
2	1	3	4	4	2	2	1	2	1
1	1	1	2	1	1	4	3	3	3
3	3	3	4	1	4	1	2	2	1
2	1	2	3	1	2	2	4	4	4
2	1	3	4	4	4	2	2	3	3
1	1	3	2	4	3	1	4	3	3
4	1	4	4	2	2	1	4	4	1
3	2	3	4	3	2	3	4	2	4

proportion of women at the two management levels below the Management Board (Section 76 (4) sentence 1 AktG). Vonovia is aiming to have achieved the target of 30% women at these levels by December 31, 2026. More information on target achievement is set out in → S1-9.

All members (100%) of the Supervisory Board are considered by the latter to be independent within the meaning of C. 6 and C. 7 of the GCGC. No member of the Supervisory Board was a member of the company's Management Board or has a personal relationship with a significant competitor of the company as defined by C. 12 of the GCGC.

As of December 31, 2025, the Management Board of Vonovia consisted of the following five members:

- > Rolf Buch
- > Arnd Fittkau
- > Philip Grosse
- > Daniel Riedl
- > Ruth Werhahn

The composition of the current Supervisory Board is shown in the table entitled "Supervisory Board Qualifications Profile."

The disclosure of the names of all members of the Management Board and Supervisory Board serves as an expression of their collective responsibility for monitoring impacts, risks and opportunities.

By law, all Management Board members are collectively responsible for managing the company. The division of responsibilities serves only to facilitate daily operations, while matters of special or fundamental significance are subject to decision-making by the entire Management Board. Implementing the sustainability strategy and the climate path is a joint responsibility. Every member has to ensure that sustainable measures are developed and implemented, both in their own executive division and by the other members. The Sustainability Committee provides support in this process.

As a control and management instrument, all Management Board members are required to incorporate the risks inherent to their respective areas into the risk report, which is

then discussed and approved by the entire Management Board.

The responsibilities of the Supervisory Board (including committees) and the Management Board with regard to impacts, risks and opportunities, as well as strategies, are distributed as follows:

The Supervisory Board

The Supervisory Board appoints, supervises and advises the Management Board and is directly involved in decisions of fundamental importance to the company. The Supervisory Board performs its work in accordance with the legal provisions, the Articles of Association, its rules of procedure and its resolutions. The Supervisory Board examines and adopts the consolidated financial statements and the combined management report, and adopts the annual financial statements. The Supervisory Board reports in writing to the shareholders at the Annual General Meeting on the result of its examination.

The Supervisory Board has established **four committees** (the Governance and Nomination Committee, the Audit, Risk and Compliance Committee, the Strategy, Finance and Sustainability Committee and the HR and Remuneration Committee), two of which, namely the Audit, Risk and Compliance Committee and the Strategy, Finance and Sustainability Committee, have explicit responsibilities related to sustainability. In this respect, the HR and Remuneration Committee has an indirect role through its determination of variable remuneration elements aligned with sustainable performance criteria.

The **Audit, Risk and Compliance Committee** handles, in particular, the monitoring of the accounting process, the effectiveness of the internal control system, risk management system and internal audit system, the audit of the annual financial statements and compliance. Accounting and auditing also include the sustainability statement and the auditing of this report.

The **Strategy, Finance and Sustainability Committee** discusses focal issues relating to corporate strategy, financial matters and sustainability issues, and prepares resolutions for the Supervisory Board. It advises and monitors the Management Board with regard to its sustainability and financing strategy, in particular the planning of the strategic framework for all Group-wide sustainability measures, including the interaction between entrepreneurial activities and the challenges associated with climate change.

In particular, the **HR and Remuneration Committee** is responsible for the preparation of discussions and resolutions on the remuneration system – including the

remuneration-relevant sustainability targets – and HR strategy, as well as other Management Board matters.

The Management Board

The Management Board develops the company's strategy, coordinates it with the Supervisory Board and implements it. It ensures that all statutory provisions and the company's internal policies are complied with and is responsible for corporate policy. The Management Board also ensures appropriate risk management and risk controlling in the company. The Chief Executive Officer is responsible for the ESG factors to be taken into account in this process, as well as for the associated risks, opportunities and impacts. The CEO submits the corporate planning for the coming fiscal year to the Supervisory Board as well as the midterm and strategic planning, which also includes sustainability targets and the impacts, opportunities and risks that are to be addressed. The Chair of the Management Board informs the Supervisory Board Chair without delay of important events that are essential for the assessment of the situation and the development of the company or for the management of the company as well as of any shortcomings that occur in the monitoring systems.

Vonovia also defines specific sustainability-related responsibilities with regard to the implementation of the recommendations made by the **Task Force on Climate-related Financial Disclosures (TCFD)**. The recommendations made by the TCFD constitute important guidance for defining and implementing the climate pathway as part of Vonovia's systematic way of tackling climate change – with regard to both Vonovia's contribution to mitigating climate change and the effects of climate change on the company's economic development. Responsibilities for implementing the TCFD recommendations are distributed as follows at Vonovia:

- > The entire Management Board bears responsibility for sustainability and climate change mitigation, as well as climate-related risks and opportunities.
- > In its Strategy, Finance and Sustainability Committee, the Supervisory Board addresses climate change mitigation and relevant risks and opportunities, among other topics.
- > The Sustainability Committee – comprising the entire Management Board and representatives of central functional departments – determines the strategy and targets and monitors progress.
- > The central department Strategy, Corporate Development & Sustainability, within the executive division of the CEO, coordinates and spearheads the development of the sustainability strategy and the implementation of relevant measures.

- > Climate-related risks are calculated and collated on a half-yearly basis as part of the company-wide risk management process. The process is coordinated by Controlling, with the Management Board taking the final decision on risk assessment.
- > Energy efficiency modernization, the expansion of renewable energies for heating and powering the existing portfolio and the use of innovative technologies in Germany is the responsibility of the Chief Rental Officer (CRO) (regional business areas and portfolio management); for Austria, the Chief Development Officer (CDO) is responsible, for Sweden the CEO of Victoriahem.

Responsibility for the **other material sustainability topics** is also distributed **within the Management Board**. The CHRO, for example, is responsible for employee issues, the CRO – in conjunction with the decentralized regional managing directors – for all issues related to the provision of affordable housing, the climate-friendly development of the overall portfolio and other social sustainability issues, and the CDO for sustainable new construction. The CEO is responsible for sustainability-related governance issues, in particular for compliance, while the CFO's responsibility encompasses the infrastructure of sustainability data and risk management, as well as reporting, in addition to sustainable financing aspects.

This means that at Vonovia, sustainability is a top management priority, with all Management Board members sharing responsibility. The Chair of the Management Board ensures that the business model and the respective departments are aligned to achieve the company's goals. On the part of the Supervisory Board, the **Strategy, Finance and Sustainability Committee**, as well as the Audit, Risk and Compliance Committee (for reporting) perform the corresponding control function. The Management Board has overall responsibility for monitoring, managing and overseeing impacts, risks and opportunities, setting related targets and monitoring progress towards achieving these targets. In this quest, it involves the Sustainability Committee in decision-making and monitoring processes. The Management Board is provided with information on impacts, risks and opportunities in the Risk Report. The Controlling department is responsible for preparing the Risk Report. Technical management of impacts, risks and opportunities is the responsibility of the Strategy, Corporate Development & Sustainability department, and these impacts, risks and opportunities are assessed by the responsible risk owners. The Management Board monitors progress towards achieving the targets through annual sustainability reporting as part of the Annual Report, the ESG Factbook and other sustainability reporting formats approved by the Management Board.

Central **coordination of sustainability activities** is the responsibility of the Strategy, Corporate Development & Sustainability department. Its core duties include, in particular, the further development of an integrated corporate strategy aligned with sustainability matters, the definition and monitoring of sustainability targets, the providing of impetus and the implementation of sustainability projects. The Strategy, Corporate Development & Sustainability department is also responsible for preparing the ESG Factbook and transmitting data for numerous ESG ratings, as well as for the sustainability statement in the Annual Report, which is prepared in collaboration with the Accounting department.

The **Sustainability Committee** meets two to three times a year – as required – to discuss the overall strategic direction and to evaluate the company's sustainability performance. The committee comprises the entire Management Board as well as the heads of Sustainability, Corporate Communications, Controlling, Accounting and Investor Relations. The Audit, Risk and Compliance Committee meets at least four times a year with the Strategy, Corporate Development & Sustainability department providing it with information on the implementation of sustainability reporting on an ad hoc basis.

The availability of appropriate skills and expertise to oversee sustainability matters is ensured by furnishing evidence of the relevant skills (see → [skills profile/description for the Supervisory Board and Management Board](#)). The Supervisory Board and the Management Board are briefed on sustainability topics at regular intervals and on an ad hoc basis.

The skills and expertise of Vonovia's Management Board and Supervisory Board are closely related to the company's material impacts, risks and opportunities. The Management Board contributes in-depth expertise in the areas of real estate, energy and sustainability, corporate governance, legal, and strategy so as to be able to make strategic decisions and manage risks effectively. The Supervisory Board supplements this expertise by providing independent monitoring and advice, drawing on its extensive experience in a whole range of sectors and disciplines. Working in tandem, the Management Board and Supervisory Board ensure that impacts are considered, opportunities are exploited and risks minimized in order to create sustainable corporate value.

GOV-2 – Information Provided to and Sustainability Matters Addressed by the Undertaking’s Administrative, Management and Supervisory Bodies

The Strategy, Corporate Development & Sustainability division reports directly to the CEO (at least once a month) and consults the Sustainability Committee on the latest topics and developments. These include the identification of material impacts, risks and opportunities, further development of the sustainability strategy, the implementation of appropriate measures, the definition and monitoring of sustainability objectives and metrics, and the implementation of sustainability projects. This also includes the implementation of sustainability-related due diligence.

The Audit, Risk and Compliance Committee within the Supervisory Board addresses sustainability topics at least twice a year, once when adopting the annual financial statements (including the sustainability statement) and once to assess the impacts, risks and opportunities in the context of the risk report.

When overseeing the company’s strategy, making decisions on major transactions and in the risk management process, impacts, risks and opportunities – including trade-offs – are taken into account as follows:

Vonovia is adapting to the constant changes in the market environment and in the overall statutory and regulatory framework by developing its strategy and, within this context, its business activities on an ongoing basis. Vonovia also reacts to ESG requirements from a wide variety of stakeholders by **adjusting its corresponding ESG targets** (see → [ESRS 2 GOV-3](#)), which also involves using suitable KPIs to continually monitor the progress made towards achieving these targets. Conflicting targets, such as the extent of energy-efficient refurbishment to achieve climate objectives versus the associated costs and impacts on housing affordability, are also taken into account in the strategic focus. These changes mean that additional impacts, opportunities and risks arise on a regular basis, and that the extent of existing impacts and resulting opportunities and risks can change at any time.

As a result, Vonovia has implemented a **comprehensive risk management system** that ensures that all of the risks that are relevant to the company (and to the environment and society at large) can be identified, evaluated and managed. This risk management system also explicitly takes into account impacts, opportunities and risks related to sustainability. The resilience of Vonovia’s strategy and business model is analyzed and evaluated annually as part of risk management. First-level executives below the Management Board are responsible for identifying and assessing risks within their areas of responsibility during the semiannual risk inventory process. The risk management horizon and the evaluation period extend five years beyond the reporting year. Risk management assessments focus on net risks.

In organizational terms, risk management is assigned directly to the Management Board. It has overall responsibility and decides on the organizational structures and workflows of risk management and provision of resources. The Management Board approves the documented risk management findings, takes account of them in steering the company and reports them to the Supervisory Board on a regular basis. The Audit Committee of the Supervisory Board monitors the effectiveness of the risk management system and is informed of any material changes in the assessment of impacts, risks and opportunities.

In the 2025 fiscal year, the Sustainability Committee – and as a result the Management Board – and the Strategy, Finance and Sustainability Committee within the Supervisory Board addressed the material impacts, risks and opportunities listed in → [ESRS 2 SBM-3](#) and validated the results of the materiality assessment. The Vonovia SE Works Council was also informed of these results.

GOV-3 – Integration of Sustainability-related Performance in Incentive Schemes

To demonstrate the importance of sustainability for our corporate activities, we have integrated sustainability targets into Vonovia’s management and remuneration system for the Management Board and top management

(first level below the Management Board) via the **Sustainability Performance Index (SPI)**. The index comprises six sub-indicators based on the material sustainability priorities at Vonovia. They are each included in the SPI, which is measured as a percentage, with different weightings. The sub-indicators include:

Composition of the Sustainability Performance Index (SPI)

Indicator	Scope	Weighting	Unit	Value 2024	Value 2025	Change compared to previous year	Target 2030
Carbon intensity of the housing stock*	Germany	35%	kgCO ₂ e/m ²	31.2	30.7	-1.4%	< 25
Average primary energy demand of new constructions**	Group	10%	kWh/m ²	22.0	21.9	-0.4%	< 25
Proportion of accessible (partially) modernized newly rented apartments	Germany	10%	%	29.5	36.8	7.3 ppts	approx. 27
Customer satisfaction (CSI)	Germany	20%	%	75.2	76.5	1.3 ppts	> 73
Employee satisfaction	Group	15%	%	79.0	85.0	6.0 ppts	≥ 77
Proportion of women in management positions***	Group	10%	%	25.8	26.7	1.0 ppts	≥ 30
SPI Total			%	104.2	106.2	2.0 ppts	annually 100

* Scope 1, Scope 2 (market-based) and Scope 3.3, based on final energy demand as per energy performance certificates, in some cases incl. specific CO₂ factors from district heating suppliers.

** Excl. commercial projects, modernizations and floor additions.

*** First and second levels below the Management Board.

The **SPI** is one of Vonovia’s **internal performance indicators** and relates explicitly to its core business, property management and development. Its six sub-indicators are company-specific metrics.

The indicators “proportion of accessible (partially) modernized newly rented apartments,” “customer satisfaction” and “carbon intensity of the housing stock” are only measured for Germany, i.e., they do not include Austria or Sweden.

Climate-related considerations are incorporated into Management Board and top management remuneration via two SPI sub-indicators: “carbon intensity of the housing stock (in Germany)” and “average primary energy demand of new constructions (Group as a whole).” The carbon intensity of the housing stock (see → E1-4) is designed to illustrate energy-efficient alterations to existing properties, while the energy demand of new constructions addresses the average primary energy demand of newly constructed housing. Overall, climate-related considerations are incorporated into long-term variable remuneration at 11.25%. In 2025, climate-related considerations of around 2% to 3% (2024: around 2% to 4%) were included in the total compensation paid to members of the Management Board (in accordance with Section 162 AktG).

We are aiming to achieve 100% target achievement in the 2026 fiscal year. The **Management Board** has set **specific**

annual targets for each of the SPI indicators. The weighted targets add up to a target of 100%. Progress during the year is recorded, reported to the Management Board and monitored on a quarterly basis for internal annual controlling purposes. The SPI target achievement level for the 2025 fiscal year was 106.2% (see also the chapter → **Corporate Governance**). The Management Board has also set medium-term targets for 2030 for internal management purposes (see table).

The remuneration paid to members of the Management Board (and top management) is based on a number of components. Among other things, members are granted a remuneration component with a long-term incentive effect and a balanced risk-return profile in the form of notional shares (“performance shares”) in line with the provisions of the relevant applicable Long-term Incentive Plan (LTIP). Target achievement as part of the LTIP is calculated on the basis of three financial performance criteria and one non-financial performance criterion, the Sustainability Performance Index (SPI, excluding customer satisfaction).

- > Relative total shareholder return (relative TSR) (40%)
- > EPRA NTA (Net Tangible Assets) per share (20%)
- > Operating free cash flow (OFCF) per share (20%)
- > Sustainability Performance Index (SPI, excl. CSI) (20%)

The weightings assigned to the four performance criteria (which were previously assigned equal weightings) have been adjusted to place greater emphasis on Vonovia's capital market performance via the relative TSR. Maximum target achievement, on the other hand, remains unchanged at 250% of the grant amount.

As part of the changes made to the remuneration system in the reporting year, customer satisfaction (CSI) was switched to a performance criterion for the Short-term Incentive Plan (STIP) to provide an incentive for ongoing high levels of customer satisfaction (see [Remuneration Report](#)). It is included, as an ESG target, in the short-term variable remuneration as part of the STIP at a rate of 20%, alongside adjusted earnings before tax (EBT), at a rate of 80%, and, where appropriate, a strategic factor (as a multiplier). To prevent double incentives via both variable remuneration components (LTIP and STIP), customer satisfaction (CSI) has now been removed from the Sustainability Performance Index (SPI) relevant to the LTIP for the purpose of Management Board remuneration.

The SPI targets are closely tied to the company's five-year investment planning.

In the reporting year, around 22% (2024: 13% to 14%) of the (target) remuneration for members of the Management Board depended on sustainability-related targets, based on the total of LTIP and STIP. The increase resulted from the adjustment of the remuneration system.

The remuneration system and the SPI are described in detail in the [Remuneration Report](#) and in the chapter entitled [Corporate Governance](#). These sections also present the payout amounts and target achievement levels for the individual LTIP tranches.

In accordance with the requirements of Sections 87 (1) and 87a (1) AktG, the Supervisory Board adopts a remuneration system for Vonovia SE Management Board members. The Supervisory Board is supported by the HR and Remuneration Committee, which develops recommendations relating to the Management Board remuneration system. The Supervisory Board submits the remuneration system to the Annual General Meeting for approval (every time any major adjustments are made to the remuneration system, but at least every four years). The Supervisory Board also makes a decision every year on the specific SPI targets for the term of the STIP and LTIP and on the parameters for target achievement.

[GOV-4 – Statement on Due Diligence](#)

Our due diligence procedures are aimed at preventing and combating human rights violations, environmental pollution and other illegal behavior. We implement corresponding measures in our own sphere of business and also ensure that our business partners and suppliers are obliged to comply with the same standards via our Business Partner Code. The information provided in this sustainability statement on due diligence procedures can be found in the table below:

Statement on Due Diligence

Core elements of due diligence	Paragraphs in the Sustainability Statement
a) Embedding due diligence in governance, strategy, and business model	ESRS 2 GOV-2, GOV-3, SBM-3
	G1-1
	ESRS 2 GOV-2, SBM-2, IRO-1
b) Engaging with affected stakeholders in all key steps of the due diligence	ESRS S1-2
	ESRS S4-2
	MDR-P: E1-2, E5-1, S1-1, S4-1, G1-1
c) Identifying and assessing adverse impacts	ESRS 2 IRO-1, SBM-3
	ESRS E1-3
	S1-4
d) Taking actions to address those adverse impacts	S4-4
	MDR-A: E1-3, E5-2, S1-4, S4-4, G1-1, G1-3, G1-4
	ESRS E1-3, E1-4
	S1-4, S1-5
e) Tracking the effectiveness of these efforts and communicating	S4-5
	MDR-M and MDR-T: E1-4, E1-5 to E1-9, E5-3, S1-5, S1-6 to S1-17, S4-4, G1-1, G1-4

GOV-5 – Risk Management and Internal Controls Over Sustainability Reporting

Organizationally, responsibility for preparing the sustainability statement lies with the CFO, in particular with the Accounting department, in collaboration with Strategy, Corporate Development & Sustainability. Vonovia considers failure to meet legal sustainability reporting requirements to be a **material risk** associated with the sustainability statement. Appropriate measures have been taken to address this risk, which was identified as part of the Group-wide risk management process: as well as constantly monitoring the development of regulatory requirements and ensuring the associated dialogue in associations and working groups, the company places particular emphasis on implementing and establishing robust data collection processes. Controlling is responsible for identifying and preparing key sustainability figures. These include, in particular, key environmental and HR-related figures, as well as the key SPI figures relevant to management. Bundling responsibility within Controlling ensures that plausible, quality-assured data is available. This is supported by Strategy, Corporate Development & Sustainability. The risks identified are prioritized based on the risk categories they are assigned to, which depend on the loss amount and probability of occurrence. Additional details can be found in our → [Risk Report](#).

The accounting related internal control system (ICS) – and risk management system forms part of the **Group-wide risk management system** and is aimed at ensuring due and proper financial and sustainability reporting, as well as compliance with the relevant regulations. The sustainability-related impacts, risks and opportunities pursuant to the ESRS have been incorporated into the risk management system. A separate ICS process, including the associated key controls, is in place for sustainability reporting in line with the requirements that apply to the internal control system. This process is audited and validated annually by the respective department and the Internal Audit department. For information on the controls implemented for the risks identified, please refer to our → [Risk Report](#), in particular the details on the ICS. Risk mitigation strategies are also described in topic-specific standards.

Key processes and key indicator definitions are documented centrally using a data governance tool, as are the corresponding internal controls. This **documentation** illustrates the relevant process steps and data flows and is supplemented by our risk management tool, which is used to record the material risks and mitigating measures. These systems provide the binding basis for subsequent evaluations, audits and reporting to Vonovia's executive bodies on the effectiveness of the ICS within the meaning of Section

107 (3) sentence 2 of the German Stock Corporation Act (AktG).

The Sustainability Statement is reviewed in the first instance by the Audit, Risk and Compliance Committee and then by the Supervisory Board based on the committee's recommendation. The Audit, Risk and Compliance Committee is continually involved in the establishment and refinement of the accounting-related internal control and risk management system.

The **Internal Audit department** reports annually to the Management Board on the audit process that has been completed, which includes the sustainability-related ICS process.

SBM-1 – Strategy, Business Model and Value Chain

Vonovia's **business model** is based on the provision and rental of good-quality and affordable living space at the right time, as well as the management of these properties in Germany, Sweden and Austria. This means that the main customer group consists of (potential) tenants in these countries.

This business model is based on a highly digitalized management platform and a similarly highly digitalized development platform allowing all stages in the value chain to be managed.

An established in-house craftsmen's, residential neighborhood and caretaker organization, coupled with extensive back-office functions, support us in our management and development of our housing stocks. Vonovia continues to develop its real estate portfolio through **active portfolio management**. In addition to acquisition, sale and modernization, this also includes developing and building new apartments for our own portfolio and for sale to third parties. The business model is complemented by the housing-related services we offer. The focus here is on offering energy supply services for electricity and heating, as well as automated meter reading. The business model is rounded off by the management services we offer to third-party portfolio holders.

Vonovia's economic environment is dominated by four megatrends: urbanization, climate change, demographic change and the shortage of housing, as well as technological advances. Together, these factors provide positive impetus for the business model's growth and strategy.

The tried-and-tested 4+2 strategy remains the foundation for growth. This strategy has been refined in the recent years

of crisis and has evolved into a stakeholder value strategy, reflecting the importance of all of the company's major stakeholders. This strategy consists of four basic approaches: the property management strategy, the financing strategy, the portfolio management strategy and the Value-add strategy. Vonovia pursues the two complementary approaches – acquisitions and internationalization – opportunistically.

For the purposes of **managing** the company, we make a distinction between the segments Rental, Value-add, Recurring Sales and Development.

The **Rental segment** combines all of the business activities that are aimed at the value-enhancing management of our own residential real estate. It includes our property management activities in Germany, Austria and Sweden.

The **Development segment** encompasses project development activities to create new and cost-efficient homes, and expands the value chain ranging from the purchase of land to completion for Vonovia's own portfolio (to hold) and sale (to sell).

The **Value-add segment** bundles all of the housing-related services that we have expanded our core rental business to include. The established Value-add service areas include the craftsmen's organization, the residential environment organization, multimedia services, energy services and metering services, and insurance services. Having its own organization allows Vonovia to provide maintenance services, in particular, throughout the portfolio in a flexible manner, making the homes it offers more attractive and boosting customer satisfaction.

The **Recurring Sales segment** includes the regular and sustainable disposals of individual condominiums and single-family houses from our portfolio. Vonovia can reinvest some of these sales proceeds in modernizing its core portfolio, straightening its internal financing power.

Vonovia's size and innovative technologies mean that it can continue to make a key contribution to solving the housing shortage problem in Germany and to decarbonizing the building sector. With this in mind, the corporate strategy has been refined in recent years, in an environment characterized by a higher cost of capital and lower share prices, to enable the company to achieve this objective.

The new growth strategy ("Accelerate") was published in 2025 to respond to market changes and to develop new sources of revenue. The resulting growth initiatives have been gradually implemented since the strategy was un-

veiled. What all of these initiatives have in common is that they are based on standardized and scaled business processes. They enable the company to expand its business relationships with existing end customers (B2C) on the one hand, and to explore new business areas in the commercial customer segment (B2B) on the other.

The strategic growth initiatives focus on three areas: **Return to performance** is about strengthening the company's core business and growth in **Development**, within **VTS** (Vonovia technical service) and in **Recurring Sales**. The **Accelerated tech-supported investments** aim to significantly accelerate portfolio investments in line with Vonovia's climate path. Innovative technologies are transferred to industrial manufacturing processes through standardization and industrialization: serial refurbishment, heat pump cubes and Energy, Plan and Build.

New sources of growth explore new business models at all stages in the value chain. In this area, Vonovia has developed innovative ideas that significantly expand its existing business or extend it to include new areas with the Operate Energy, Manage to Green, Occupancy Rights and Operating Platform initiatives. The HR strategy supports growth initiatives and their implementation as an enabler.

Further details on the business model and strategy can be found in the chapters entitled → **The Company** and → **The Strategy** within the management report.

We disclose the number of employees in Germany, Austria and Sweden in section → **S1-6**.

Our Sustainability Strategy for the Future

The considerable social relevance of housing and the need to adapt to climate change mean that all aspects related to sustainability are an integral part of the business model. Sustainability is thus a key component of our corporate strategy and orientation. Vonovia is working towards specific targets in the three areas of environmental (E), social (S) and governance (G):

As far as its **environmental** targets are concerned, our aim is to make the business model future-fit in the long run by using sustainable new construction and refurbishment approaches and CO₂ reduction in the real estate portfolio to achieve the current climate protection objectives by 2045 and using innovations and new technologies to contribute to a climate-neutral housing stock.

When it comes to **social** concerns, we assume responsibility towards customers and society by providing affordable housing that meets people's needs and being committed to

Aspects of Sustainability at Vonovia

E Environmental	S Social	G Governance
<p>Contribution to climate protection and reducing CO₂ in both the housing stock and new construction.</p>	<p>Responsibility towards tenants and society through fair prices, housing that meets people's needs and future-fit neighborhood development.</p> <p>Attractive and fair working environment for our diverse workforce.</p>	<p>Sustainable governance and responsible business practices with reliable compliance.</p>

future-fit neighborhood development. At the same time, we want to boost satisfaction among our employees by promoting diversity, opportunities for participation and professional development, and work-life balance, positioning ourselves as an attractive employer in the process.

With regard to **governance**, our aim is to ensure sustainable corporate management and responsible business practices with a reliable compliance system. These targets have a positive impact on the working atmosphere and, as a result, directly affect our employees, as well as being consistent with the objectives of the capital market.

Vonovia's business model addresses the socio-political challenges of housing shortages, affordable housing and climate protection, which we are aiming to make a decisive contribution to with our sustainability targets. When we talk about **affordable housing**, we mean that our rental prices are based on local rent prices, and, if available, on certified rent indices. We base our approach on the ratio of the average rent excluding ancillary expenses in our portfolio to the average net income of tenant households, which was below 30% at Vonovia during the reporting period.

Our efficient organizational model, satisfied and high-performing employees, optimized processes, committed service and customer orientation, and a profitable investment strategy that focuses on climate protection lay the foundation for a sustainable business while safeguarding our legitimate interests as a private-sector company. The importance of our sustainability targets is reflected in the fact that they have a direct impact on the remuneration paid to our Management Board and top management via the SPI.

Information on our progress as we work toward achieving our objectives can be found in → **ESRS 2 GOV-3**.

Through the preparation of the materiality assessment in accordance with the ESRS and identifying the opportunities and risks, as well as the impacts that the company's activities have on stakeholders, transparency has been enhanced, laying the foundation for even more integrated business activities.

E: We are faced with the challenge of achieving a climate-neutral housing stock by 2045. To achieve this transformation and ensure that the commercial implementation is successful, we require a high level of refurbishment within the portfolio, industrialized technologies and decentralized use of renewable energies for heating and power in line with our climate pathway. The neighborhood is the main implementation level for climate protection targets and carbon reduction in the housing portfolio. Around 77% of Vonovia's strategic real estate portfolio is located in contiguous urban quarters, i.e., neighborhoods that generally include more than 150 apartments. Cost-effective and series new construction, as well as the use of renewable energies and sustainable materials, play an important role in new construction and conversion.

S: We are confronted with the challenge of providing affordable housing for as many people in society as possible. To rise to this challenge and achieve our targets, we rely on socially responsible, transparent rents. We see the expansion of housing tailored to tenants' needs against the backdrop of demographic change, social infrastructure incorporating innovations and new technologies as an integral part of our neighborhood development projects. We aim to design urban, environmentally friendly and affordable housing in a socially responsible manner. A sufficient supply of qualified expert staff is essential for our business activities and growth, especially given the skilled-labor shortage. This is why we offer our employees an attractive working environment characterized by diversity and scope for personal development.

G: Another challenge facing us lies in ensuring that our compliance and corporate cultures are always consistent with current (legal) requirements. Within this context, we stand behind our reliable, transparent and trust-based corporate management, which is based on German Corporate Governance Code best practice. We comply with all applicable laws and internal and external guidelines. This is an integral part of being a reliable and trustworthy partner.

In terms of the direction of its sustainability strategy, Vonovia is guided by national and international standards and frameworks, such as the German Federal Climate Change Act (Klimaschutzgesetz), the Paris Agreement, the Sustainable Development Goals, the UN Global Compact and the United Nations Guiding Principles on Business and Human Rights.

The results of the ESRS materiality assessment underscore and confirm the orientation of our sustainability strategy and areas for action. As a result, we report the following as material topics: E1, E5, S1, S4 and G1 (see → [ESRS 2 SBM-3](#))

The **value chain** comprises the upstream supply chain, our own operations and the downstream stages. Our core activities include construction, rental and management activities, including neighborhood development and customer service, as well as the provision of housing-related services.

Relevant inputs include construction products and materials, as well as (human) capital; outputs include affordable homes, neighborhoods with a good residential atmosphere, new construction as well as property-related services (energy supply, multimedia, metering services, insurance, condominium administration). As part of our insourcing strategy, we employ specialists in our own business areas, for example in the caretaker organization, in modernization projects or in green space maintenance. This allows us to generate synergy potential, make ourselves largely independent of external service providers and offer a consistent level of quality. Our central, multilingual customer service department acts as the first port of call for our tenants, whereas our caretakers and craftsmen look after the needs of customers on location. This allows us to ensure fast and reliable service. We run our own customer service centers in Essen, Dresden and Berlin.

Upstream of our own value chain, our supply chain starts with the production of construction products and materials. Vonovia works with over 9,000 direct suppliers (tier 1) and business partners. Almost all of our direct suppliers are based in Germany, Austria or Sweden. An important supplier group is the (construction) material suppliers and construction companies who supply Vonovia's craftsmen's organization (VTS and Residential Environment Service) and BUWOG with construction products, among other things, or build our new homes. The contractual partners who implement maintenance measures, for instance, on our behalf are another relevant group. The sale of our buildings, building demolition and the disposal of our customers' waste and wastewater form part of our downstream value chain.

In line with our target of ensuring the company has good **access to the capital market**, ensuring that it focuses on sustainability and generating attractive returns for our investors relative to risk, Vonovia uses a broad range of financing instruments, such as bonds, promissory notes, secured real estate loans, commercial papers, working capital facilities and subsidy loans from the German government-owned development bank Kreditanstalt für Wiederaufbau (KfW) and the European Investment Bank (EIB) (see also the chapter entitled → [Financing](#)). Our 12 outstanding sustainable bonds, four of which we placed successfully on the capital market for the first time in 2025, meet the demand for both green and social bonds – and play a crucial role in our financing strategy. All of our green bonds are aligned with the EU Taxonomy.

ESRS – Stakeholders in the Value Chain

(Activities, resources and relationships)

	Activities	Resources*	Relationships
Upstream	<ul style="list-style-type: none"> > Raw materials/materials from suppliers > Delivery and logistics > Political engagement/lobbying > Planning > Approval procedure > Involvement and participation 	<ul style="list-style-type: none"> > Natural resources <ul style="list-style-type: none"> - Water - Raw materials/materials (construction sector) > Non-employee workers > Logistics and infrastructure 	<ul style="list-style-type: none"> > Suppliers/other companies > Politics > Residents > Potential tenants/customers > NGOs > Financing/capital market
Business area	<ul style="list-style-type: none"> > Rental; use by tenants > Customer services/management platform > Portfolio development <ul style="list-style-type: none"> - Development/construction activities - Neighborhood development - Maintenance & modernization - Residential environment > Energy generation & supply multimedia 	<ul style="list-style-type: none"> > Human resources <ul style="list-style-type: none"> - The company's own employees > Social resources <ul style="list-style-type: none"> - Non-employee workers - Public infrastructure 	<ul style="list-style-type: none"> > The company's own employees > Tenants (users/end users) > Buyers and residents > Media > NGOs, associations, community > Financing/capital market > Suppliers/other companies
Downstream	<ul style="list-style-type: none"> > Sale > Demolition > Disposal/recycling > Redesign > Use by tenants (users/end users) 	<ul style="list-style-type: none"> > Secondary/recycling materials > Waste/effluents > Logistics/infrastructure > Energy > Land use/design > Non-employee workers 	<ul style="list-style-type: none"> > Buyers (WEG [German Condominium Act]) > Social/legal (liability) > Suppliers/other companies > Tenants (users/end users)

* ESRS 1, paragraph 50: Dependencies on natural, human and social resources can be sources of financial risks or opportunities.

With our Sustainable Finance Framework, we have contributed to the definition and selection of social assets on the Swedish market. The criterion logic we use as well as the specific criteria we selected in this context have already been adopted by other issuers on the market. We have published our Sustainable Finance Framework, the annual impact report evaluating the effectiveness of our measures and further information about our sustainable financing strategy on our Group website.

SBM-2 – Interests and Views of Stakeholders

Our company is in close contact with numerous, and in terms of their interests, very different stakeholder groups. Particularly **important stakeholder groups**, other than our tenants/customers (and those representing them), include our own employees, shareholders and analysts, policy-makers and administrative bodies, suppliers and service providers – particularly from the construction industry – as well as society and the natural environment.

Stakeholders are involved using specific formats, depending on the group concerned, such as quarterly customer surveys and annual employee surveys, dialogue sessions with tenant representatives, local administrative bodies, policymakers as well as memberships in industry associations. These external perspectives are incorporated into the materiality

assessment on a regular basis. Please refer to → **S1-2** for information on how we involve our employees and their representatives.

Our main interface **for dialogue** with our stakeholders is our **Corporate Communications department**. It is directly available for stakeholders every day and ensures a uniform internal and external presentation. The Public Affairs department within Corporate Communications maintains connections with politicians and stakeholders. This department is responsible for analyzing who our material stakeholders are, and updating the analysis annually. As part of this process, it takes into account the interests of the key stakeholders, their positioning in the strategy and the business model. In addition, our departments or the local employees working in operations in the neighborhoods react to specific and target Group-related communication occasions and engage in dialogue with our stakeholders. This allows us to meet the needs and fulfill the demands of our stakeholders. For instance, the Procurement department handles communication with suppliers and service providers, while the Investor Relations department is responsible for dialogue with shareholders and analysts.

When designing our development and neighborhood development projects, engagement is also fostered by the provision of information at an early stage, as well as by opportunities to actively participate in the development process. Within this context, we first of all adhere to the statutory requirements for civic participation in development planning and, second, use various voluntary participatory processes to take into account the interests of the parties involved and ensure the necessary transparency.

Our quarterly customer surveys allow us to ask our tenants about their concerns and tailor our measures to the needs of specific neighborhoods or regions. We also provide information on topics relevant to our customers on our website and via the customer app.

The interests and viewpoints of our major stakeholders were analyzed and evaluated at a general level as part of the materiality assessment, for example the interests of the German Tenants' Association. Interests and viewpoints at local level may differ from these. The local participation processes can be used to help us address these different interests and – in line with our strategy and business model – translate them into measures.

This process is not designed to result in any changes to our strategy and/or business model, as the participation processes are suitable for addressing and taking into account the interests of local stakeholders in the context of the existing strategy/business model.

The Strategy, Finance and Sustainability Committee of the Supervisory Board advises the Management Board on the sustainability strategy. This committee, which met 11 times in 2025, provides the entire Supervisory Board and the Management Board with information on the interests and views of the stakeholders concerned.

Topical Disclosures on SBM-2

ESRS S1 – Own Workforce

For details on how the interests, views and rights of our employees inform our strategy and business model, please refer to → **S1-1** and → **S1-2**. Our Group-wide employee satisfaction survey and our individual and team-based feedback formats give our employees the opportunity to feed individual suggestions on relevant working areas and conditions back to their employer. Core aspects of the feedback are taken into account systematically in the enhancement of Vonovia's HR strategy.

ESRS S4 – Consumers and End-Users

Our customers make up one of our major stakeholder groups. Their concerns, interests and viewpoints as well as respect for their (human) rights are a central component of our strategic focus. These rights are already covered and protected to a considerable degree by the legal framework in the markets in which we operate (Germany, Austria and Sweden). For details on how the interests, views and rights of consumers and end-users inform our strategy and business model, please refer to → **S4-1** and → **S4-2**.

Their interests and views are incorporated into our strategy and the direction of our business model through regular customer surveys and dialogue with tenant representative bodies, tenants' associations and consumer protection centers. On a local scale, we also actively involve customers in the design of our neighborhoods via participation processes if need be. We use this feedback to develop corresponding services and measures for our (potential) customers.

SBM-3 – Material Impacts, Risks and Opportunities and Their Interaction with Strategy and Business Model

Mapping of IROs to Subtopics

Material subtopic	IRO title	Risk/opportunity/ impact (actual/potential; positive/negative)	Time horizons: (S)hort-, (M)edium-, (L)ong-term	Value chain: (U)pstream, (O)wn operations (D)ownstream
ESRS E1 - Climate Change				
Climate change mitigation	Contribution to the global increase in greenhouse gas emissions	Impact (actual/negative)	S, M, L	U, O, D
	Earnings potential through investments in modernization, heat pump cubes, serial refurbishment and PV expansion	Opportunity	M, L	U, O, D
	Contributing to negative effects of climate change through new construction and densification	Impact (actual/negative)	M, L	O, D
Climate change adaption	Contribution to urban climate resilience through climate change adaptation measures in the portfolio	Impact (actual/positive)	M, L	O, D
E5 - Resource Use and Circular Economy				
Resources inflows, including resource use	Contribution to resource consumption	Impact (actual/negative)	S, M, L	U
ESRS S1 - Own Workforce				
Working conditions	Employee satisfaction due to fair remuneration	Impact (actual/positive)	S	O
	Employee satisfaction based on work-life balance	Impact (actual/positive)	S	O
	Employee satisfaction through opportunities for participation	Impact (actual/positive)	S	O
	Lower employee turnover and targeted recruitment of skilled workers through working conditions that are tailored to the needs of employees and the company	Opportunity	M	O
	Lack of a sense of belonging due to insufficient promotion of diversity	Impact (actual/negative)	M	O
Equal treatment	Employee satisfaction through professional development opportunities	Impact (actual/positive)	S	O
ESRS S4 Consumers and End-Users				

	Contribution to affordable homes	Impact (actual/positive)	S	O
	Housing tailored to tenants' needs	Impact (actual/positive)	S	O, D
	Influence of accessibility and service quality on customer satisfaction	Impact (actual/positive)	S	O
Social inclusion of consumers and/or end-users	Increased quality of living for tenants through contribution to neighborhood development and infrastructure	Impact (actual/positive)	S	O, D
ESRS G1 - Business Conduct				
Corporate culture	Positive impacts on employees through the Code of Conduct and the development of a corresponding corporate culture	Impact (actual/positive)	S	O
Corruption and bribery	Violations of applicable bribery and corruption regulations undermine the confidence of relevant stakeholders in the integrity of the company	Impact (actual/negative)	M	O

[IRO-1 – Description of the Process to Identify and Assess Material Impacts, Risks and Opportunities](#)

Vonovia identifies material impacts, risks and opportunities (IROs) as part of a double materiality assessment in accordance with the ESRS, which was updated for the first time this year. Necessary adjustments are identified, by way of example, using benchmarking, in particular with the company's peers in the real estate sector, but also with other relevant (DAX-listed) companies. In addition to the information from the existing materiality assessment, the IROs were also identified based on the risks already identified by Vonovia's risk management system, as well as an extensive analysis of other external sources (e.g., position papers published by stakeholders).

Vonovia systematically manages the main sustainability topics for the company based on the ESRS on the basis of two dimensions:

- > The relevance of social and environmental risks and opportunities to the business and value creation (outside-in perspective or **financial materiality**) as well as
- > the actual or potential, positive or negative, short, medium or long-term impacts of the business model on the environment and society (inside-out perspective or **impact materiality**).

The ESRS methodology was applied to identify and evaluate the **impacts** and corresponding **risks** and **opportunities**. Ultimately, the following reporting standards were considered material for the purposes of reporting: E1, E5, S1, S4 and G1. The results of the IRO assessment underscore Vonovia's sustainability strategy and its material areas for action.

IROs were identified and assessed on a consolidated basis for the Group as a whole and at all stages in its value chain using the criteria specified in the ESRS (in accordance with ESRS 1, Sections 3.4, 3.5). When identifying and assessing IROs in the upstream and downstream value chain, we focused, in line with ESRS 1 Section 3.3, on areas where impacts, risks and opportunities are considered likely due to the nature of the activities concerned, (direct and indirect) business relationships, geographical circumstances or other factors.

The IROs identified were then validated in workshops organized with the relevant stakeholders (see → [ESRS 2 SBM-2](#)).

Appropriate **thresholds** were defined in order to determine which impacts are to be taken into account in Vonovia's sustainability statement. Based on the "more likely than not" concept for financial materiality, Vonovia also used this as a guide for setting the **impact materiality threshold**. Decisions on materiality are based on the result produced from the probability of occurrence and severity (impact score). This results in a threshold value of 3.0 for Vonovia, based on a predefined scale of 1-5. The resulting material impacts are prioritized for monitoring purposes.

Vonovia uses the risk management system that has already been implemented to determine the appropriate threshold for **financial materiality** in order to ensure connectivity. The risk matrix was used as a basis to determine which risks arising from the identified impacts are material and should thus be prioritized in monitoring and reporting. Numerical values were assigned to this matrix. The severity of materialization and the probability of occurrence were given the same weighting. A threshold for material financial risks and opportunities of one or more was set as a result of this process.

Vonovia has calculated a value (score) for each IRO based on the formulas described above. The score for each IRO is also calculated based, among other things, on the company's own risk management system and other projects (German Supply Chain Diligence Act (LkSG)), ensuring consistency in the strategic consideration, prioritization and reporting of all material risks for Vonovia, including sustainability risks. The IROs identified were assigned to the relevant subtopics within the associated ESRS standard. All IROs identified were then added to our risk management tool to ensure continuous monitoring and prioritization, as with all other material risks for Vonovia.

The IROs identified, and their assessment, are reviewed for the current fiscal year by internal experts from the respective departments as part of the existing risk survey process, before being supplemented and validated if necessary. This survey is integrated into Vonovia's existing risk management tool. Strategy, Corporate Development & Sustainability checks whether the new assessments have resulted in changes in materiality, and monitors the results. The Sustainability Committee reviews and adopts the results of the materiality assessment.

In the current reporting year, Vonovia adjusted its methodology and switched from the average value method to the **maximum value method**, which is more common practice on the market. The average value method involved calculating an average value based on the underlying IRO scores to determine the materiality of each subtopic. This calculation of the average value formed the basis for identifying the topics that were material from Vonovia's perspective. This procedure has been simplified and standardized with the introduction of the maximum value method, meaning that the assessment of the individual IROs determines materiality in accordance with the defined threshold value. The adjusted methodology ensures that a single IRO above the defined threshold leads to a topic being classified as material and, as a result, reported in the relevant scope. This process also involved raising the threshold for impact materiality from 2.5 to 3.0 in order to ensure consistent content during the methodological switch. Compared to the previous year, all material topics are still classified as material based on the maximum value method, with one additional material IRO in ESRS E5.

Topical Disclosures on IRO-1

The general information on our materiality assessment set out under → **ESRS 2 IRO-1** above also applies accordingly to the (sub)topics in standards E1-E5 and G1.

E1 - Climate Change

In order to assess Vonovia's impact on climate change, the company introduced a comprehensive **energy and GHG controlling system** several years ago. This system includes the energy consumption and GHG emissions of all of Vonovia's own office sites, its own operations as well as the entire housing stock. Indirect effects at other stages in the value chain are also captured if they are material. The results of this process are set out in → **E1-6**.

In order to determine the positive impact that our modernization measures have, the difference in energy consumption before and after the measures is determined for each measure, and the savings and GHG reductions achieved are also measured.

We have established a **life cycle calculation** as a firm component of the planning process for our development projects. This enables our planning departments to determine the carbon footprint of the planned development and new construction projects early on in the project planning and include this in their design.

Since 2022, Vonovia has been using an **IT tool in accordance with EU taxonomy requirements** in order to identify and analyze the physical risks associated with climate change. This climate risk tool covers Vonovia's portfolio and development projects in Germany, Austria and Sweden and allows material negative impacts on our business activities due to the effects of climate change to be analyzed at portfolio and property level. This tool enables physical climate risks to be identified and evaluated for the location of each building in the Group-wide portfolio on a continuous basis using the prescribed climate scenarios (RCP2.6, RCP4.5 and RCP8.5), with this data then being aggregated at portfolio level. This does not cover the upstream or downstream value chain. The impacts are assessed with a view to the medium term (up to 2030) and long term (2045 and 2085) in order to cover the lifespan of both existing buildings and new buildings, which is assumed as 50 years. The scenarios considered range from scenarios with low emissions (RCP2.6) and medium emissions (RCP4.5) to high emissions (RCP8.5). The climate risks examined are heat, drought, increases in precipitation, wind and storms, snow loads and flooding. The risk assessment at company level is based on scenario RCP4.5, which, according to the United Nations (UNEP Emissions Gap Report 2023), represents an increase of around 2 to 3 degrees Celsius in the global average temperature. In this scenario, no material risk has been identified for

any of the climate-related hazards at portfolio level up to 2045.

Climate transition risks and opportunities in our own business, as well as in the upstream and downstream value chain, are identified via the central risk management process. As part of the risk management process, risk owners assess the transition risks and opportunities (related to factors including regulation, legal liability, and technological and market changes, as well as the company's reputation) and use various scenarios, where available, for the risk being evaluated or the factors influencing it. The transition risks and opportunities are assessed over a period of five years as a mandatory requirement. If a risk or opportunity also has a long-term impact, i.e., extending beyond the five-year period, then the relevant period also has to be specified and a qualitative assessment performed. Both gross and net risks (i.e., with and without risk-mitigating measures) are taken into account. The knowledge currently available suggests that the risks assessed do not have any accounting-related implications from either a gross or net perspective. No assets or business activities were identified as incompatible with the transition to a climate-neutral economy.

Procedure for Standards E2 to E5

Our materiality assessment involved reviewing our business activities in our business regions of Germany, Austria and Sweden as well as within our upstream and downstream value chain in order to identify (potential) impacts, risks and opportunities. Our business activities were also analyzed as follows for the topics E2 to E5:

E2 - Pollution

In the context of our business activities, local and temporary **construction, demolition and modernization activities** are performed on a regular basis at properties in all business regions. These activities can lead to pollution (e.g., pollution of air, groundwater contamination, negative effects on flora and fauna). Substances of concern in new or existing buildings can also result in environmental contamination. We have not identified any locations in our value chain that give rise to such problems.

Impacts on the environment and human health were classified as low in all business regions, as there are **standard processes** in place for handling substances of very high concern and regulatory requirements governing or prohibiting their use (e.g., the German Hazardous Substances Ordinance (Gefahrstoffverordnung)). Any potential pollution in the construction industry is only localized and has a minor, short-term impact. In order to avoid and prevent pollution (EU environmental objective 5), compliance with certain EU directives must be ensured. Substances of very

high concern (SVHC) are generally not present in the building materials used (see also the chapter on the → [EU Taxonomy Regulation](#)). No material dependencies have been identified.

There are potential cost risks associated with possible environmental pollution resulting from construction, demolition and modernization activities, from potential regulatory changes or failure to comply with such requirements, and from the use of substances of very high concern in new construction. These risks, however, were not classified as material. This means that overall, environmental pollution has not been classified as a material topic.

E3 – Water and Marine Resources

Our business activities can result in increased water consumption as a result of **construction activities or use of water by our customers**, leading to an increasing scarcity of water and lowering the groundwater table. Increased water consumption can also occur in the upstream value chain (e.g., in the production of building materials). No locations were identified in connection with marine resources and river basins in our business operations or in the value chain, as our properties (particularly our neighborhoods) are largely located in urban areas, which is where our construction activities are also performed.

The impacts on water resources were classified as very low, as the **influence** on groundwater, if any, is only **temporary**, for example during the construction phase or potentially in the future due to droughts, and is limited to specific **local areas**. We also consider increased water consumption by customers to be temporary (e.g., in periods of extreme heat) and not material to date. Consequently, we do not exert any general influence over water scarcity.

In particular, there is an opportunity to make long-term cost savings by implementing measures to save water. This opportunity, however, was not classified as material. No (significant) physical risks, transition risks or systemic risks were identified in this context. Acute physical climate risks related to water are addressed in → [ESRS E1](#). Overall, water and marine resources has not been classified as a material topic.

E4 – Biodiversity and Ecosystems

In the course of our business activities, **soil sealing** for residential construction measures and the development of new areas could have a negative impact on the habitat of regional species. The same applies to the downstream value chain when buildings are demolished. Identifying and assessing (potential) impacts on biodiversity and ecosystems forms an integral part of process involved in planning new construction projects. The associated risk assessments

include analyses of the existing land for construction, as well as biodiversity reports for flora and fauna. Woodland surveys are also used to determine the health and conservation value of existing trees.

The impacts on biodiversity and ecosystems were classified as low, as new construction and densification measures are generally performed in **areas with relatively low levels of biodiversity** (urban cultural landscape, brownfield (re)development). This impact on biodiversity is also very localized, as Vonovia's sphere of influence does not extend beyond the neighborhood concerned. What is more, there are regulations in place to protect and restore biodiversity. There are no material dependencies.

Vonovia has not identified any physical risks, transition risks, systemic risks or opportunities related to biodiversity and ecosystems. As a result, no material opportunities or risks have been identified either. According to the tool ENCORE, used to identify material dependencies and impacts related to biodiversity and ecosystems, there are no material impacts in the real estate sector that could exert significant pressure on ecosystems. As a result, biodiversity and ecosystems has not been classified as a material topic.

Vonovia does not have any locations in, or close to, areas with biodiversity in need of protection. These primarily consist of existing residential buildings and rental parking spaces, meaning that activities related to these locations do not impact the habitat of species for which the respective protected areas were designated. Our new construction is built in compliance with the EU taxonomy, meaning that these buildings are not constructed on valuable agricultural and cultural land, recognized high-value underdeveloped areas or forests. We therefore do not consider remediation measures regarding biodiversity to be necessary.

E5 – Resource Use and Circular Economy

The process of identifying and assessing the material impacts, opportunities and risks associated with resource use and the circular economy looked at those business areas and assets associated with **significant material flows**. The assumption was applied that significant resource use occurs primarily in connection with products for new construction, modernization and maintenance activities concerning properties in all of our business areas (Germany, Austria, Sweden). This assessment is based on factors including the existing calculation of GHG emissions for purchased goods and services as well as capital goods (Scopes 3.1 and 3.2), and the average number of rented units that were newly built or modernized every year. Material flows associated with the company's own operations, e.g., administrative activities, were assessed as insignificant.

The process revealed material negative impacts in connection with the subtopic “**Resource inflows, including resource use,**” as indirect negative environmental impacts (e.g., high volumes of waste, use of hazardous substances and interference with nature and the landscape) can materialize if no, or insufficient quantities of, sustainable, recycled and reusable products or materials are used in new construction, modernization and maintenance. This applies in particular to the use of construction products and materials whose manufacture in the value chain involves the use of raw materials from primary production (e.g., concrete, steel, stone, insulation materials and plastics).

Newly built living area that is constructed to be sold contains resources that constitute an inflow, but are designed for a very long life. The life cycle of new buildings is assumed to be at least 50 years on average, but can often amount to 100 years or even more with regular modernization and maintenance. The assessment concluded that **no significant resource outflows/waste** are/is generated over these long periods. Any additional negative impacts associated with new construction, modernization and maintenance (such as the potential contribution to surface sealing, climate change or a negative impact on biodiversity) have already been incorporated into the assessments under E1, E2, E3, and E4.

Our customers are always informed of any necessary construction, demolition and modernization activities. The relevant city or municipal administrative bodies and their responsible authorities also have to be involved as a mandatory requirement. In cases involving new buildings, all affected residents are involved in the process before any measures are implemented to comply with both mandatory and voluntary consultation procedures. Aside from involvement in the context of specific construction measures, our customers can also raise concerns relating to environmental pollution, water and marine resources, and the residential environment, as well as resource use and circular economy, at any time as part of our regular customer satisfaction surveys, via our customer service centers, the respective caretakers, and other whistleblowing channels.

G1 - Business Conduct

Our IT **risk management tool Risk2Value** is used to capture and assess risks of corruption and bribery, as well as risks related to corporate culture, for the entire Vonovia Group as part of a systematic, standardized process, ensuring 100% coverage across all Group companies in Germany and abroad. Appropriate measures are identified based on the risks that are identified and assessed. No material opportunities or risks have been identified. Our business partners are obliged to sign our Business Partner Code, in which we set out our expectations and requirements that our contractual partners have to meet, before any contracts are concluded. The potential risks resulting from breaches committed by contractual partners in our value chain are included in the risks recorded in the Risk2Value tool.

IRO-2 – Disclosure Requirements in the ESRS Covered by the Company’s Sustainability Statement

The table below sets out the disclosure requirements that were taken into account when preparing the sustainability statement based on the results of the materiality assessment:

Disclosure Requirement

Disclosure requirement	Description	Reference
ESRS E1 - Climate Change		
ESRS E1-1	Transition plan for climate change mitigation	E1-1
ESRS E1-2	Policies related to climate change mitigation and adaptation	E1-2
ESRS E1-3	Actions and resources related to climate change policies	E1-3
ESRS E1-4	Targets related to climate change mitigation and adaptation	E1-4
ESRS E1-5	Energy consumption and mix	E1-5
ESRS E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	E1-6
E5 - Resource Use and Circular Economy		
ESRS E5-1	Policies related to resource use and circular economy	E5-1
ESRS E5-2	Actions and resources related to resource use and circular economy	E5-2
ESRS E5-3	Targets related to resource use and circular economy	E5-3
ESRS E5-4	Resource inflows	E5-4
ESRS S1 - Own Workforce		
ESRS S1-1	Policies related to own workforce	S1-1
ESRS S1-2	Procedures for engaging with own workforce and workers’ representatives about impacts	S1-2
ESRS S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	S1-3
ESRS S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	S1-4
ESRS S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	S1-5
ESRS S1-6	Characteristics of the undertaking’s employees	S1-6
ESRS S1-7	Characteristics of the undertaking’s non-employees	S1-7
ESRS S1-8	Collective bargaining coverage and social dialogue	S1-8
ESRS S1-9	Diversity metrics	S1-9
ESRS S1-10	Adequate wages	S1-10
ESRS S1-11	Social protection	S1-11
ESRS S1-12	Persons with disabilities	S1-12
ESRS S1-13	Training and skills development metrics	S1-13
ESRS S1-15	Work-life balance metrics	S1-15
ESRS S1-16	Remuneration metrics (pay gap and total remuneration)	S1-16
ESRS S1-17	Incidents, complaints and severe human rights impacts	S1-17
ESRS S4 - Consumers and End-Users		
ESRS S4-1	Policies related to consumers and end-users	S4-1
ESRS S4-2	Processes for engaging with consumers and end-users about impacts	S4-2
ESRS S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	S4-3
ESRS S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	S4-4
ESRS S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	S4-5
ESRS G1 - Business Conduct		
ESRS G1-1	Business conduct policies and corporate culture	G1-1
ESRS G1-3	Prevention and detection of corruption and bribery	G1-3
ESRS G1-4	Incidents of corruption or bribery	G1-4

The table below lists all of the datapoints included in this sustainability statement that result from other EU legislation – as listed in Annex B to this standard:

Disclosure Requirements and Related Datapoints

Disclosure requirement and related datapoint	Reference
ESRS 2 GOV-1 (ESRS 2.21 (d)) Board's gender diversity	GOV-1
ESRS 2 GOV-1 (ESRS 2.21 (e)) Percentage of board members who are independent	GOV-1
ESRS 2 GOV-4 (ESRS 2.30) Statement on due diligence	GOV-4
ESRS 2 SBM-1 (ESRS 2.40 (d) (i)) Involvement in activities related to fossil fuel activities	not material
ESRS 2 SBM-1 (ESRS 2.40 (d) (ii)) Involvement in activities related to chemical production	not material
ESRS 2 SBM-1 (ESRS 2.40 (d) (iii)) Involvement in activities related to controversial weapons	not material
ESRS 2 SBM-1 (ESRS 2.40 (d) (iv)) Involvement in activities related to cultivation and production of tobacco	not material
ESRS E1-1 (ESRS E1.14) Transition plan to reach climate neutrality by 2050	E1-1
ESRS E1-1 (ESRS E1.16 (g)) Undertakings excluded from Paris-aligned Benchmarks	not material
ESRS E1-4 (ESRS E1.34) GHG emission reduction targets	E1-4
ESRS E1-5 (ESRS E1.38) Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	E1-5
ESRS E1-5 (ESRS E1.37) Energy consumption and mix	E1-5
ESRS E1-5 (ESRS E1.40 to 43) Energy intensity associated with activities in high climate impact sectors	E1-5
ESRS E1-6 (ESRS E1.44) Gross Scopes 1, 2, 3 and Total GHG emissions	E1-6
ESRS E1-6 (ESRS E1.53 bis .55) Gross GHG emissions intensity	E1-6
ESRS E1-7 (ESRS E1.56) GHG removals and carbon credits	not material
ESRS E1-9 (ESRS E1.66) Exposure of the benchmark portfolio to climate-related physical risks	Phase-In
ESRS E1-9 (ESRS E1.66 (a)) Disaggregation of monetary amounts by acute and chronic physical risks	Phase-In
ESRS E1-9 (ESRS E1.66 (c)) Location of significant assets at material physical risk	Phase-In
ESRS E1-9 (ESRS E1.67 (c)) Breakdown of the carrying value of its real estate assets by energy-efficiency classes	Phase-In
ESRS E1-9 (ESRS E1.69) Degree of exposure of the portfolio to climate-related opportunities	Phase-In
ESRS E2-4 (ESRS E2.28) Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil	not material
ESRS E3-1 (ESRS E3.9) Water and marine resources	not material
ESRS E3-1 (ESRS E3.13) Dedicated policy	not material
ESRS E3-1 (ESRS E3.14) Sustainable oceans and seas	not material
E3-4 (ESRS E3.28 (c)) Total water recycled and reused	not material
ESRS E3-4 (ESRS E3.29) Total water consumption in m ³ per net revenue on own operations	not material
ESRS 2 - SBM-3 - E4 (ESRS 4.16 (a) (i))	not material
ESRS 2 - SBM-3 - E4 (ESRS 4.16 (b))	not material
ESRS 2 - SBM-3 - E4 (ESRS 4.16 (c))	not material
ESRS E4-2 (ESRS E4.24 (b)) Sustainable land/agriculture practices or policies	not material
ESRS E4-2 (ESRS E4.24 (c)) Sustainable oceans/seas practices or policies	not material
ESRS E4-2 (ESRS E4.24 (d)) ESRS E4-2 Policies to address deforestation	not material
ESRS E5-5 (ESRS 5.37 (d)) Non-recycled waste	not material
ESRS E5-5 (ESRS 5.39) Hazardous waste and radioactive waste	not material
ESRS 2 SBM-3 - S1 (ESRS S1.14 (f)) Risk of incidents of forced labor	SBM-3 - S1
ESRS 2 SBM-3 - S1 (ESRS S1.14 (f)) Risk of incidents of child labor	SBM-3 - S1
ESRS S1-1 (ESRS S1.20) Human rights policy commitments	S1-1
ESRS S1-1 (ESRS S1.21) Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8	S1-1
ESRS S1-1 (ESRS S1.22) Processes and measures for preventing trafficking in human beings	S1-1
ESRS S1-1 (ESRS S1.23) Workplace accident prevention policy or management system	S1-1
ESRS S1-3 (ESRS S1.32 (c)) Grievance/complaints handling mechanisms	S1-3

ESRS S1-14 (ESRS S1.88 (b) (c)) Number of fatalities and number and rate of work-related accidents	not material
ESRS S1-14 (ESRS S1.88 (e)) Number of days lost to injuries, accidents, fatalities or illness	not material
ESRS S1-16 (ESRS S1.97 (a)) Unadjusted gender pay gap	S1-16
ESRS S1-16 (ESRS S1.97 (b)) Excessive CEO pay ratio	S1-16
ESRS S1-17 (ESRS S1.103 (a)) Incidents of discrimination	S1-17
ESRS S1-17 (ESRS S1.104 (a)) Non-respect of UNGPs on Business and Human Rights and OECD guidelines	not material
ESRS 2 SBM-3 – S2 (ESRS S2.11 (b)) Significant risk of child labor or forced labor in the value chain	not material
ESRS S2-1 (ESRS 2.17) Human rights policy commitments	not material
ESRS S2.1 (ESRS S2.18) Policies related to value chain workers	not material
ESRS S2-1 (ESRS S2.19) Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	not material
ESRS S2-1 (ESRS S2.19) Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8	not material
ESRS S2-4 (ESRS S2.36) Human rights issues and incidents connected to its upstream and downstream value chain	not material
ESRS S3-1 (ESRS S3.16) Human policy commitments	not material
ESRS S3-1 (ESRS S3.17) Non-respect of UNGPs on Business and Human Rights, ILO principles and OECD guidelines	not material
ESRS S3-4 (ESRS S3.36) Human rights issues and incidents	not material
ESRS S4-1 (ESRS S4.16) Policies related to consumers and end-users	S4-1
ESRS S4-1 (ESRS S4.17) Non-respect of UNGPs on Business and Human Rights and OECD guidelines	S4-1
ESRS S4-4 (ESRS S4.35) Human rights issues and incidents	not material
ESRS G1-1 (ESRS G1.10 (b)) United Nations Convention against Corruption	G1-1
ESRS G1-1 (ESRS G1.10 (d)) Protection of whistleblowers	not material
ESRS G1-4 (ESRS G1.24 (a)) Fines for violation of anti-corruption and anti-bribery laws	G1-4
ESRS G1-4 (ESRS G1.24 (b)) Standards of anti-corruption and anti-bribery	G1-4

The specialist departments responsible identified key information in relation to the impacts, risks and opportunities that were classified as material, and this information has been included in the sustainability reporting. Further information on the process involved in identifying material impacts, risks and opportunities can be found in section → **ESRS 2 IRO-1**. Regarding certain data points, we make use of the materiality exemption under ESRS 1, Section 3.2, and omit them from reporting. The decision to omit reporting for materiality reasons is made based on the significance of the respective information and its usefulness for the user in making decisions.

EU Taxonomy Regulation

Identification and Categorization of Economic Activities Eligible for Taxonomy

In accordance with the EU Taxonomy Regulation, we report on the proportion of our taxonomy-eligible and taxonomy-aligned turnover, capital expenditure and operating expenses. Vonovia uses the simplified reporting templates for non-financial companies in accordance with Delegated Regulation 2021/2178. Vonovia reports its activities in full, as in the previous year.

Vonovia has identified taxonomy-eligible activities under EU environmental objective 1 (climate change mitigation, CCM) in its business model. Some of these activities would also be taxonomy-eligible under EU environmental objective 4

(transition to a circular economy, CE). In order to avoid double counting, Vonovia allocates these in full to EU environmental objective 1. With regard to EU environmental objective 2 (climate change adaptation, CCA), we do not report any taxonomy-eligible activities, because we do not generate any turnover from eligible activities and do not allocate any separate CapEx (or OpEx) to this EU environmental objective in order to prevent double counting.

EU environmental objectives 3 (sustainable use and protection of water and marine resources, WTR), 5 (pollution prevention and control, PPC) and 6 (protection and restoration of biodiversity and ecosystems, BIO) do not result in any further taxonomy eligibility. Accordingly, and as in the previous year, **we have identified the following activities as being taxonomy-eligible:**

EU Taxonomy Criteria		Activities undertaken by Vonovia	Revenue	Investments	Operating expenses
CCM 7.1/CE 3.1	Construction of new buildings	Revenue from Development to sell	yes		
CCM 7.2/CE 3.2	Renovation of existing buildings	Investments for energy modernizations (7.2), Investments for refurbishments without energy-related effects (e.g., empty apartment refurbishments) (3.2)		yes	
CCM 7.3	Installation, maintenance and repair of energy efficiency equipment	Investments for measures that are not covered by 7.2 (e.g., heating modernization, insulation, window replacement)		yes	
CCM 7.4	Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	Investments for charging stations and wall-boxes		yes	
CCM 7.5	Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	Investments for metering technology and smart metering		yes	
CCM 7.6	Installation, maintenance and repair of renewable energy technologies	Investments for photovoltaic facilities		yes	
CCM 7.7	Acquisition and ownership of buildings	Revenue from rental income and recurring sales, investments for acquisitions, Development to hold and capitalized internal expenses without energy-related effects (e.g., major maintenance measures and vacant apartment renovations), operating expenses for non-capitalized maintenance (e.g., minor maintenance)	yes	yes	yes
CCM 4.1	Electricity generation using solar photovoltaic technology	Revenue from the sale of self-generated electricity to tenants and/or feed-in to the grid	yes		
CCM 3.3	Manufacture of low carbon technologies for transport	Investments for fleet		yes	
CE 1.2	Manufacture of electrical and electronic equipment	Investments for IT hardware equipment and other electronic operating and business equipment		yes	

Turnover from the condominium administration business, energy sales from energy trading activities, and multimedia is not taxonomy-eligible.

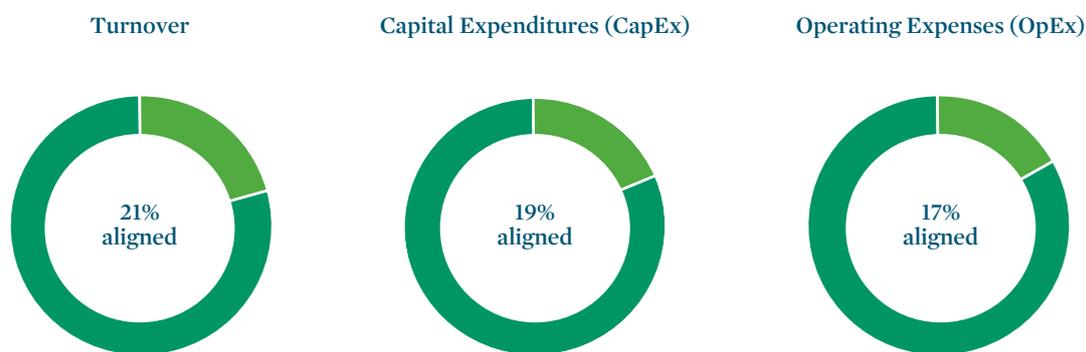
Vonovia is not affected by any economic activities related to energy generation from fossil gas or nuclear energy. As a result, Vonovia does not submit the specific reporting forms for these activities.

Procedure for Determining Taxonomy Alignment

At Group level, the following key figures are obtained from the taxonomy-aligned shares of turnover, capital expenditure and operating expenses, reported under EU environmental objective 1 (climate change mitigation).

The largest share of taxonomy-aligned turnover can be attributed to rental income from taxonomy-aligned buildings (activity 7.7). A large share of taxonomy-aligned capital expenditure is accounted for by the renovation of existing buildings (7.2) and investments in the portfolio and Development to hold (7.7 Acquisition and ownership of buildings).

Taxonomy-aligned Shares of Vonovia's Business Activities



Taxonomy-aligned Shares of Vonovia's Business Activities

Review of Substantial Contribution

Turnover associated with **new construction (activity 7.1)** is deemed taxonomy-aligned if the relevant buildings have a primary energy demand that is at least 10% below the national standard for nearly zero-energy buildings. Vonovia checks compliance by obtaining an energy performance certificate for each building. The relevant buildings undergo the thermal integrity and airtightness test. Where required to do so, Vonovia determines the global warming potential for each phase of the building life cycle (for buildings with an area of > 5,000 m²) using a model calculation of life cycle emissions based on emission factors that have been determined for different types of construction.

Turnover generated from the **acquisition and ownership of buildings (activity 7.7)** is deemed taxonomy-aligned if the buildings constructed before December 31, 2020 have been assigned to energy efficiency class A (or better) or, alternatively, are among the top 15% of regional or national housing stock in terms of primary energy demand in operation. Vonovia checks compliance by obtaining an energy performance certificate for each building. We base our assessment of the top 15% on relevant threshold values for primary energy demand for Germany, Austria and Sweden, which

were determined in a benchmark study. The threshold applied to the 2025 fiscal year is unchanged year on year. For buildings constructed after December 31, 2020, the same criteria for significant contribution to climate protection apply as for new construction (activity 7.1). Turnover from **electricity generation using solar photovoltaic technology (activity 4.1)** is treated as a direct climate change mitigation measure in the EU Taxonomy Regulation.

In accordance with Vonovia's business model, the **relevant criteria** for determining taxonomy-aligned capital expenditure stem from activities 7.2, 7.3, 7.4, 7.5, 7.6 and 7.7:

At Vonovia, capital expenditure associated with the **renovation of existing buildings (activity 7.2)** always relates to energy-efficient modernization. Vonovia verifies the required 30% reduction in primary energy demand through energy-efficiency assessments or based on energy certificates. Capital expenditure on heating modernization, charging stations and wall boxes, metering technology and smart metering, and photovoltaic systems is generally treated as a direct climate change mitigation measure and is allocated to activities 7.3, 7.4, 7.5, and 7.6.

Activity 7.7 "Acquisition and ownership of buildings" includes capital expenditure from acquisitions, Development

to hold, investments in, for example, refurbishment of vacant apartments or major maintenance measures, or other internal expenses that can be capitalized. These qualify as taxonomy-aligned if the building-related technical screening criteria are met. The relevant criteria for determining **taxonomy-aligned operating expenses** stem from activity 7.7. This is non-capitalized maintenance (usually minor maintenance). In addition to maintenance services provided by third parties, this also includes services provided internally by the company's own craftsmen's organization.

No detailed alignment review was performed for capital expenditure in connection with the purchase of electrical and electronic goods (1.2) or for the fleet (3.3), as the criteria would be difficult to meet and the effort involved would be disproportionate. Vonovia's fleet is gradually being switched to alternative drive systems; at present, only a small number of vehicles meet the required threshold for carbon emissions, as these are mainly technicians' vans. Electrical and electronic goods only account for a very small proportion of CapEx.

Assessing Significant Harm on One or Several Environmental Objectives ("Do No Significant Harm")

In order to avoid significantly compromising **adaptation to the effects of climate change** (EU environmental objective 2), the EU taxonomy requires a robust climate risk and vulnerability assessment to be carried out for all taxonomy-aligned economic activities. Vonovia uses an IT tool to identify and evaluate physical climate risks for the Group-wide portfolio on a continuous basis using the prescribed climate scenarios (RCP2.6, RCP4.5 and RCP8.5). The risk assessment is based on scenario RCP4.5, which, according to the United Nations (UNEP Emissions Gap Report 2025), represents the probable increase in the global average temperature that will result from the Nationally Determined Contributions (NDCs) to climate change mitigation that have currently been defined and implemented. In this scenario, no material risk has been identified for any of the climate-related hazards up to 2045. Therefore, no adaptation plan is required in accordance with the EU Taxonomy Regulation. As part of the neighborhood strategy, potential adaptations are defined at portfolio level and subsequently implemented individually for the properties or neighborhoods for which there are material risks at the corresponding level.

With regard to the **sustainable use and protection of water and marine resources** (EU environmental objective 3), no criteria need to be assessed for the taxonomy-eligible economic activities for residential building units.

The requirements for **transitioning to a circular economy** (EU environmental objective 4) are set out in the German Waste Management Act (KrWG)/ national legislation, and are passed on to business partners by Vonovia through the Business Partner Code and the General Terms and Conditions of Contract for Construction Services, as well as being included in framework agreements with waste disposal companies. This ensures that the requirements are implemented for each project. The selected building and construction technology strengthens resource efficiency, adaptability and dismantling capacity, taking into account the requirements set out in the ISO 20887 standard. The photovoltaic systems installed by Vonovia also meet the "Do no significant harm (DNSH)" requirements of EU environmental objective 4 on account of their design and service life.

In order to avoid and prevent environmental pollution (EU environmental objective 5), compliance with certain EU directives must be ensured (Appendix C to Annex 1 to the Supplement to EU Regulation 2020/852).

Compliance with statutory requirements is defined in Vonovia's Business Partner Code that all subcontractors and suppliers have to sign. Vonovia has established a toxic materials management system to ensure the safe handling of toxic materials. Among other measures, safety fact sheets and operating instructions are kept for affected products and the company's own employees are trained on how to handle these products correctly from an occupational safety perspective. Substances of very high concern (SVHC) cannot generally be found in the construction materials used. If these substances are identified in small amounts, Vonovia constantly examines substitutes in the individual cases.

Vonovia's economic activities do not significantly harm the achievement of EU environmental objective 6 (**protection and restoration of biodiversity and ecosystems**), as Vonovia only builds in designated areas and with a building permit.

Compliance with Minimum Standards at Group Level (“Minimum Social Safeguards”)

We are committed to our human rights due diligence obligations and align our conduct with internationally recognized frameworks such as the OECD Guidelines for Multinational Enterprises, the ILO Core Labour Standards and the UN Guiding Principles on Business and Human Rights.

Vonovia adopts a Group-wide approach to meeting minimum safeguards that address the issues of corruption and bribery, fair competition and taxation in addition to respect for human rights: comprehensive procedures forming part of the compliance management system, including Group-wide guidelines and complaints mechanisms, have been put in place to prevent and uncover violations.

A due diligence process to avoid scenarios in which business activities have negative impacts on people and the environment forms the core of compliance with the minimum safeguards. Taking the OECD Guidelines as a basis, Vonovia has implemented all of the recommended due diligence steps. In the reporting year, we conducted a human rights and environmental risk analysis for our own business area and the supply chain.

Performance Indicators

Definition and Calculation Method

In order to determine the key figures (KPIs) that are to be reported, the taxonomy-eligible and taxonomy-aligned net turnover, capital expenditure and operating expenses are calculated as a share of the total net turnover, capital expenditure and operating expenses that are to be taken into account in accordance with EU taxonomy requirements. Duplicate counting is avoided by means of direct allocation of the taxonomy-eligible or taxonomy-aligned turnover, capital expenditure and operating expenses to a taxonomy-eligible or taxonomy-aligned economic activity.

Turnover

The Group’s consolidated turnover is taken into account in the **denominator** (total net turnover). This comprises turnover from property management, income from the sale of properties, income from the disposal of properties held for sale and turnover from the disposal of real estate inventories. For more details on accounting methods, please refer to the accounting and valuation methods within the Notes to the IFRS consolidated financial statements → [B9] Income from property management, → [B10] Profit on the disposal of properties and → [B11] Profit on the disposal of real estate inventories. Taxonomy-aligned net turnover (numerator) is comprised of amounts generated through taxonomy-aligned economic activities.

The aligned rental income from the Rental segment (€ 909.6 million) increased from € 770.0 million to € 909.6 million and accounts for the largest share of aligned turnover this year. In this case, compliance is assessed on a building-by-building basis taking into account the technical criteria for activity 7.7.

Turnover from completed residential properties for our own use (Development to hold) has been reported under turnover for 7.7 based on the completion date. The year-on-year increase is due to a larger proportion of aligned buildings. Further, approx. € 277.0 million of aligned turnover under activity 7.7 is based on the sale of aligned residential property.

The turnover from the Development to sell segment (€ 249 million), which is shown under activity 7.1, is based on the proceeds from the disposal of new construction. This turnover decreased considerably year over year from € 804 million to € 249 million. The taxonomy-aligned share within activity 7.1 fell from 94.4% to 60.3%.

The turnover for activity 4.1 (€ 6.9 million) is generated by the feed-in tariff paid for supplying electricity to the grid as well as the direct sale of electricity to tenants.

Total turnover → [C22] Segment Reporting dropped by € 334.2 million year-on-year. Thereof, approximately € -439.2 million comes from activity 7.1 (sales of new construction), approximately € 141.3 million from activity 7.7 (rentals and sales), € -61.2 million from the television business and € 20.2 million from other turnover. Aligned turnover fell by € 218.3 million in total, primarily due to the drop in sales of new construction. As a result, the share of aligned turnover has fallen overall from 23.5% to 21.4%.

Completed residential property for our own portfolio (Development to hold) is shown in the consolidated financial statements as capital expenditure under 7.7. No turnover is gained from this. The internal turnover of the Value-add companies, e.g., services provided by craftsmen, is eliminated in the course of Group consolidation and is therefore not taken into account in taxonomy-eligible turnover. If the services provided internally are larger projects, e.g., energy-efficient modernization measures, they are capitalized and shown as capital expenditure (CapEx).

Capital Expenditure

In accordance with the EU taxonomy, the **denominator** for capital expenditure (CapEx) is composed of additions to property, plant and equipment and intangible assets. For accounting details, please refer to chapters → [D25] Intangible assets, → [D26] Property, plant and equipment and → [D27] Investment properties in the Notes to the IFRS consolidated financial

statements. The individual additions and capitalized modernization costs were taken into account when calculating the denominator.

For projects lasting several years in the areas 7.2, 7.3 or 7.7, the capitalized amount in the relevant reporting year is reported as taxonomy-eligible and, provided the relevant criteria are met, taxonomy-aligned capital expenditure. For activities 7.4, 7.5 and 7.6, the capital expenditure is shown in the year of asset capitalization. When it comes to capital expenditure, the EU Taxonomy Regulation makes a distinction between different categories of capital expenditure.

Due to Vonovia's business model, it largely invests (activity 7.2 and 7.7) in assets or processes associated with economic activities that are taxonomy-aligned (category A). It also makes investments (activity 7.3-7.6) relating to individual measures through which the target activities are carried out in a low-carbon manner or the emission of greenhouse gases is lowered (category C). Capital expenditure for the fleet (3.3) and for the purchase of electrical and electronic goods (1.2) also constitutes taxonomy-eligible capital expenditure under category C.

With regard to developed land, the CapEx for buildings and land has been included as additions, as economic activity 7.7 cannot be performed without the relevant land.

Capital expenditure in the context of Vonovia's capitalized internal expenses is reviewed for taxonomy alignment and allocated to 7.2, 7.3 or 7.7 depending on the type of investment. Taxonomy alignment is assessed for each building or project. In addition to capitalized internal expenses, the addition of other property, such as Development to hold additions or other acquisitions of investment properties, is reported under 7.7.

With regard to economic activity 7.1, the corresponding properties do not constitute fixed assets but rather are reported within current assets in the real estate inventories (see → [\[D35\] Real Estate Inventories](#)) or receivables, and are therefore not included in the denominator of the key figure for taxonomy-relevant capital expenditure.

The taxonomy-aligned capital expenditure (numerator) comprises additions to investment properties (€ 431.7 million). This comprises aligned Development to hold additions (€ 293.3 million/7.7), capitalized modernization measures

(€ 113.5 million, with € 102.4 million in 7.2 and € 11.2 million in 7.7), additions of purchased real estate (€ 0.0 million/7.7) and aligned individual measures pursuant to activity 7.3 (€ 24.9 million). Additions relating to property, plant and equipment came to € 86.4 million in total. These relate to photovoltaic systems (€ 73.5 million/7.6), metering technology (€ 10.3 million/7.5) and charging stations (€ 2.7 million/7.4). There was an addition to right-of-use assets (€ 3.3 million) for metering technology (€ 1.7 million/7.5) and heating systems (€ 1.6 million/7.3). There were no aligned additions resulting from business combinations during this reporting year.

Compared to the previous year, CapEx increased significantly (€ 2,742.6 million in the current year compared to € 1,206.8 million in the previous year). The aligned share of this amount fell from € 557.5 million to € 521.5 million. There was a slight drop from € 91.0 million to € 73.5 million in activity 7.6 relating to the expansion of photovoltaic systems. Aligned additions to investment properties (7.7) are on a similar level (€ 292.0 million in the previous year to € 293.3 million). Capitalization of aligned modernization measures (7.2) fell slightly from € 118.0 million to € 102.4 million. There was also an increase in the area of heating modernization (7.3) from € 13.0 million to € 24.9 million. Activities 7.4 (installation of charging stations) and 7.5 (metering technology) remain at a similar level as in the previous year.

We have issued green bonds and obtained green loans on the capital market based on the Sustainable Finance Framework. The proceeds from these issues are used exclusively to (re)finance real estate that has been confirmed to be green. We use a portfolio-based approach, which means that funds cannot be allocated to specific properties. As a result, it was not possible to make adjustments for the taxonomy-aligned capital expenditure financed using these bonds or debentures, or corresponding revenue from environmentally sustainable buildings for the purposes of reporting the taxonomy-aligned performance indicators.

Operating Expenses

The operating expenses (OpEx) **denominator** is an addition to the performance indicator of the recognized capital expenditure values rather than a full presentation of the operating expenses of Vonovia, as shown under Section → [\[B14\] Cost of Materials](#) in the Notes to the consolidated financial statements.

Pursuant to the requirements, we include expenses for upkeep and repair (maintenance) when defining the denominator. At Vonovia, maintenance measures are mainly carried out by the internal craftsmen's organization, which is why we also include these items (technicians' and administrative costs) in the denominator. Double counting is avoided due to the fact that capitalized shares, as capital expenditure, reduce maintenance costs accordingly. As a result, the denominator reflects the non-capitalized maintenance expenses. These maintenance costs and, in particular, the personnel costs associated with the company's own staff cannot be allocated separately to the individual buildings when posting expenses. In addition, the operating expenses incurred for the individual activities 7.2 to 7.7 cannot be attributed individually. Vonovia thus allocates all maintenance costs to activity 7.7. To determine the taxonomy-aligned data, we use an allocation factor for maintenance expenses based on the area of the building (in m²). This share is multiplied by the taxonomy-eligible operating expenses to calculate the numerator. The non-taxonomy-eligible shares, e.g., condominium administration maintenance expenses, are not taken into account. The share of m² of green buildings in relation to the total area is 18.0%. The increase as against the previous year (15.6%) is due to a higher proportion of taxonomy-aligned buildings.

In this case, operating expenses are comprised of € 685.9 million in maintenance (see → **[B14] Cost of Materials**), less € 574.6 million capitalized share and € 294.2 million from our own craftsmen's organization. € 15.6 million of the maintenance expenses is attributable to condominium administration. This activity is not taxonomy-eligible. As a result, the numerator is calculated as 18.0% of € 389.9 million. Overall, there was only a minimal change in OpEx of approximately € 20.5 million. The aligned share rose by € 6.3 million.

EU Taxonomy Regulation Reporting Forms

Overview

KPI	Total	Proportion of Taxonomy eligible activities	Taxonomy aligned activities	Proportion of Taxonomy aligned activities
	mio. €	%	mio. €	%
Turnover	6,746	97.7	1,442	21.4
CapEx	2,743	95.2	521	19.0
OpEx	406	96.1	70	17.3

Economic Activities	Code(s)	Proportion of Taxonomy eligible Turnover	Taxonomy aligned Turnover	Proportion of Taxonomy aligned Turnover
		%	mio. €	%
Construction of new buildings	CCM 7.1/CE 3.1	6.1	249	3.7
Acquisition and ownership of buildings	CCM 7.7	91.5	1,187	17.6
Electricity generation using solar photovoltaic technology	CCM 4.1	0.1	7	0.1
Sum of alignment per objective				
Total Turnover		97.7	1,442	21.4

Breakdown by environmental objectives of Taxonomy aligned activities

Climate Change mitigation	Climate Change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Proportion of enabling activities	Proportion of transitional activities	Not assessed activities considered non-material	Taxonomy aligned activities in previous year	Proportion of Taxonomy aligned activities in previous year
%	%	%	%	%	%	%	%	%	€ million	%
21.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1,661	23.5
19.0	0.0	0.0	0.0	0.0	0.0	4.2	3.7	0.0	557	46.2
17.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	64	15.0

Environmental objective of Taxonomy aligned activities

Climate Change mitigation	Climate Change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Enabling activity	Transitional activity	Proportion of Taxonomy aligned in Taxonomy eligible
%	%	%	%	%	%	E	T	%
3.7	0.0	0.0	0.0	0.0	0.0			60.3
17.6	0.0	0.0	0.0	0.0	0.0			19.2
0.1	0.0	0.0	0.0	0.0	0.0			100.0
21.4	0.0	0.0	0.0	0.0	0.0			

Economic Activities	Code(s)	Proportion of Taxonomy eligible CapEx	Taxonomy aligned CapEx	Proportion of Taxonomy aligned CapEx
		%	mio. €	%
Renovation of existing buildings	CCM 7.2/CE 3.2	6.4	102	3.7
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	1.0	27	1.0
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	0.1	2.7	0.1
Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	CCM 7.5	0.4	12	0.4
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	2.7	74	2.7
Acquisition and ownership of buildings	CCM 7.7	82.4	304	11.1
Manufacture of low carbon technologies for transport	CCM 3.3	1.8	0	0.0
Manufacture of electrical and electronic equipment	CE 1.2	0.3	0	0.0
Sum of alignment per objective				
Total CapEx		95.2	521	19.0

Economic Activities	Code(s)	Proportion of Taxonomy eligible OpEx	Taxonomy aligned OpEx	Proportion of Taxonomy aligned OpEx
		%	mio. €	%
Acquisition and ownership of buildings	CCM 7.7	96.1	70	17.3
Sum of alignment per objective				
Total OpEx		96.1	70	17.3

Environmental objective of Taxonomy aligned activities

Climate Change mitigation	Climate Change adaption	Water and marine resources	Circular economy	Pollution	Biodiversity and eco-systems	Enabling activity	Transitional activity	Proportion of Taxonomy aligned in Taxonomy eligible
%	%	%	%	%	%	E	T	%
3.7	0.0	0.0	0.0	0.0	0.0		T	58.1
1.0	0.0	0.0	0.0	0.0	0.0	E		100.0
0.1	0.0	0.0	0.0	0.0	0.0	E		100.0
0.4	0.0	0.0	0.0	0.0	0.0	E		100.0
2.7	0.0	0.0	0.0	0.0	0.0	E		100.0
11.1	0.0	0.0	0.0	0.0	0.0			13.5
0.0	0.0	0.0	0.0	0.0	0.0			0.0
0.0	0.0	0.0	0.0	0.0	0.0			0.0
19.0	0.0	0.0	0.0	0.0	0.0			

Environmental objective of Taxonomy aligned activities

Climate Change mitigation	Climate Change adaption	Water and marine resources	Circular economy	Pollution	Biodiversity and eco-systems	Enabling activity	Transitional activity	Proportion of Taxonomy aligned in Taxonomy eligible
%	%	%	%	%	%	E	T	%
17.3	0.0	0.0	0.0	0.0	0.0			18.0
17.3	0.0	0.0	0.0	0.0	0.0			

ESRS E1 Climate Change

E1-1 – Transition Plan for Climate Change Mitigation

Vonovia has a transition plan that aims to attain a climate-neutral housing stock by 2045, and has set several medium and long-term reduction targets to help it achieve this objective. In the long term, we want to reduce the greenhouse gas (GHG) intensity of our housing stock in Germany to below 25 kg CO₂e/m² of rental area by 2030, and to less than 5 kg CO₂ equivalents per square meter of rental area by 2045 (includes Scopes 1, 2 and 3.3). The emissions remaining in 2045 are to be offset by suitable measures that the company is still to define, achieving a CO₂ intensity of net zero. Binding interim targets have been defined for the next five years.

In the medium term, we also plan to reduce the absolute Scope 1 and 2 greenhouse gas emissions from all of our housing stock (Germany, Sweden and Austria) by 42% by 2030 compared to the base year 2021. Vonovia is also committed, by 2030, to reducing absolute Scope 3 greenhouse gas emissions from the categories “Fuel and energy-related activities,” “Use of sold products” and “Downstream leased assets” by 25% as against 2021.

In March 2024, the Science Based Targets initiative (SBTi) confirmed that Vonovia’s absolute target for Scopes 1 and 2

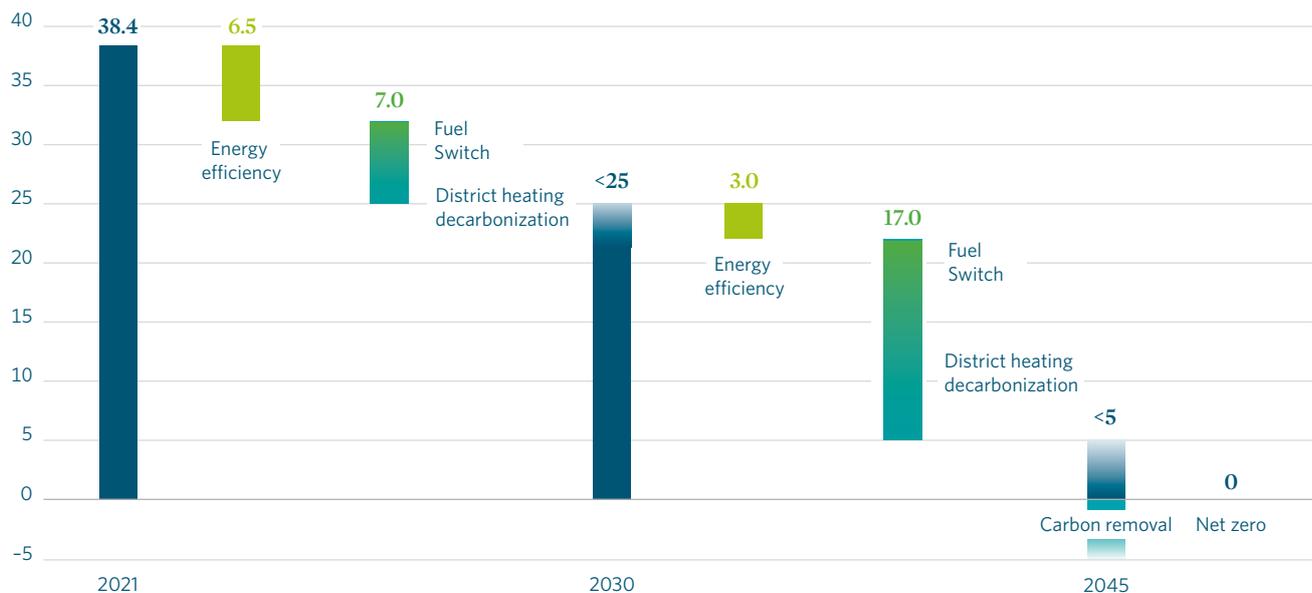
(near-term target) was in line with the 1.5 degree target set out in the Paris Agreement and that the absolute target for Scope 3 met the necessary SBTi criterion of “well below 2 degrees.” While the long-term target of reducing CO₂ intensity has not been validated externally, the emissions it encompasses are included in the absolute medium-term targets validated by the SBTi. Detailed information on the company’s climate targets can be found in Disclosure Requirement → E1-4.

The transition plan for our housing stock, our climate pathway, consists of **three decarbonization levers**:

1. Increasing efficiency and thus reducing energy demand for heat and warm water supply by way of energy-efficient refurbishment of the building envelope
2. Increasing the generation of renewable energies in the neighborhood by installing heat pumps and expanding power generation using photovoltaic systems on our buildings, and
3. Comprehensive transformation of the energy sector and supply of sufficient quantities of GHG-free district heating and electricity by the energy sector.

The CO₂ intensity of the housing stock represents the central indicator of our climate performance management.

Carbon intensity* in kg CO₂e/m²a



* Includes Scope 1 and 2 and Scope 3.3 “Fuel and energy-related emissions upstream”; referring to German housing stock; “Energy efficiency”: all measures on the building envelope, “Fuel Switch”: change in heat generation from decentralized fossil energy to heat pumps or district heating, shows the reduction in emissions in the first year of conversion; “Decarbonization of district heating”: according to the KNDE 2045 scenario of the Agora Energiewende, “Carbon removal”: natural and technological binding and long-term storage.

It is the most heavily weighted component of the Sustainability Performance Index (SPI) and therefore of the Management System and the remuneration paid to the Management Board and senior management.

Further information on the policies and actions for implementing the transition plan can be found in Disclosure Requirements → E1-2 and → E1-3.

To support and **implement our transition plan**, we **invested** a total of € 700.9 million in the reporting year, or 25.6% of our total capital expenditure in the reporting year. This amount represents the taxonomy-eligible CapEx in accordance with Delegated Regulation (EU) 2021/2178 in the business activities of energy-efficient renovation of existing buildings (7.2/CE3.2), the installation, maintenance and repair of energy-efficient equipment, the installation, maintenance and repair of charging stations for electric vehicles in buildings, the installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings, and the installation, maintenance and repair of renewable energy technologies (CCM 7.3 to 7.6) and well as the construction of new buildings for self rental purposes (CCM 7.7).

The GHG emissions that can be predicted to be emitted by the time the targets are reached in 2045 are to be understood as “locked-in GHG emissions.” By 2045, GHG emissions of around 7.8 million metric tons of CO₂e (Scope 1+2+3.3) are expected to be generated following the implementation of the transition plan. Around 15,500 metric tons of CO₂e also come from Scope 3.11 “Use of sold products.” This category contains the GHG emissions from the new residential units built for sale that were completed in the reporting year. A lifespan of 50 years has been applied.

Vonovia is continuously reducing greenhouse gas emissions in its housing stock and in its operations thanks to the GHG emission reduction targets it has set itself and the corresponding measures to boost energy efficiency and make the switch to renewable energies. The plans to reduce “locked-in GHG emissions” are described in detail in the transition plan. There is no threat to the reduction targets or any promotion of transition risks.

Vonovia has not set any target values for the key figures referred to in the EU taxonomy for 2025 or 2030. We are aiming to increase the proportion of taxonomy-aligned business activities (sales, CapEx, OpEx) on an ongoing basis.

Taxonomy-aligned capital expenditure is as follows, based on Vonovia’s business model: capital expenditure associated with the renovation of existing buildings (activity 7.2) that contributes to the transition plan always relates to energy-efficient modernization at Vonovia. We take the required 30% reduction in primary energy demand into account when designing projects. Capital expenditure on heating modernization, charging stations and wall boxes, metering technology and smart metering, and photovoltaic systems is generally treated as a direct climate change mitigation measure and is allocated to activities 7.3, 7.4, 7.5, and 7.6. Activity 7.7 “Acquisition and ownership of buildings” includes capital expenditure from acquisitions, Development to hold, investments not including energy efficiency measures (e.g., refurbishment of vacant apartments or major maintenance measures) or other internal expenses that can be capitalized. These qualify as taxonomy-aligned if the building-related technical screening criteria are met. Only investments in new buildings for self rental purposes are included as being relevant for contributing to the transition plan. The proportion of taxonomy-aligned activities will be steadily increased as the transition plan is implemented as a result of ongoing modernization measures. Vonovia did not make any significant investments in connection with economic activities related to coal, oil or gas in the reporting year. Vonovia is not excluded from the EU Paris-aligned benchmarks.

The transition plan has been fully integrated into the company’s business strategy and financial planning. The GHG emission reduction targets have been integrated into the management system as a sub-indicator of the Sustainability Performance Index (SPI). The SPI and all of its sub-indicators, such as CO₂ intensity, form part of the planning process, and the progress made as well as the forecast value for the fiscal year concerned are calculated and reported to the Management Board on a quarterly basis.

The neighborhoods and buildings to be modernized are selected in a targeted manner in cooperation with the regional business areas, and the optimal degree of modernization and modernization roadmap for each building is defined. The investments for the refurbishment programs and photovoltaics expansion are approved by the Management Board. The use of the investment funds required to implement the measures is mapped out as part of the five-year plan and the budget prepared for the following year, and is adopted by the Management Board before being confirmed by the Supervisory Board. The Supervisory Board discusses and approves the SPI targets proposed by the Management Board for the following year and the period covered by the Long-term Incentive Plan (LTIP; for four years in each case).

In the reporting year, the **CO₂ intensity for our housing stock in Germany** was 30.7 kg CO₂e/m² of rental area, down by around 1.6% year-on-year (2024: 31.2 kg CO₂e/m²), and 0.6% below the target for the reporting year (30.9 kg CO₂e/m²). In addition to the modernization measures implemented (building envelope and replacement of heating systems), this reduction can also be traced back to the inclusion of specific certificates for two district heating grids as well as the sale of buildings.

ESRS 2 SBM-3 – Material Impacts, Risks and Opportunities and Their Interaction with Strategy and Business Model

Resilience of Our Business Model

The **resilience of Vonovia's climate change strategy** is reviewed on the basis of the climate risks identified as part of the risk management process. All risks identified for the Group as a whole that relate to climate change are marked as such. Both climate-related **transition risks** (e.g., increased costs due to regulatory requirements, substantial increase in the CO₂ price) as well as climate-related **physical risks** are taken into account. When assessing transition risks, the scenarios and assumptions used for the development of the relevant influencing factors, such as regulatory requirements, electricity or material prices, are selected by risk owners themselves. As far as the risk "substantial increase in the CO₂ price" is concerned, a scenario has been defined for the development of the CO₂ price in Germany that corresponds to a 1.5-degree pathway at national level.

Current medium-term planning confirms the long-term planning assessment over a period of ten years conducted in the previous year. In each case, scenarios using different assumptions were defined, e.g., with regard to the cost of capital and the level of investment in energy-efficient modernization. These scenarios can be triggered by a number of factors, such as the transition to a low-emissions economy. When assessing transition risks as part of the risk management process, changes in the relevant influencing factors that could emerge from the transformation into a low-emissions economy are also taken into account where possible. By way of example, growing concerns regarding climate change can result in changes in the regulatory environment, subsidy conditions and customer preferences, and can have an indirect effect by triggering changes in the relative prices of various commodities and materials.

The assessment of climate-related physical risks looks at the effects on the Group's entire housing stock (Germany, Austria, Sweden) up to the year 2045, taking various climate scenarios into account (RCP 2.6, RCP 4.5 and RCP 8.5). The climate risks examined are heat, drought, increases in precipitation, wind and storms, snow loads and flooding. The downstream value chain, and tenants in particular, is also included in the analysis of physical climate risks. The upstream value chain is not explicitly included.

The resilience of Vonovia's strategy and business model is analyzed and evaluated annually as part of risk management. This involves assessing all climate-related impacts, risks and opportunities and identifying appropriate measures to manage impacts and risks and to exploit opportunities. First-level executives below the Management Board are responsible for identifying and assessing risks within their areas of responsibility during the semiannual risk inventory process. The risk management horizon and the evaluation period extend five years beyond the reporting year, with assessments focusing on net risks, i.e., the risks after taking into account those measures that have already been taken, such as the implementation of the transition plan. The process involved in identifying material impacts, risks and opportunities is characterized by various uncertainties, such as the medium and long-term development of the regulatory framework, the prices for key technologies, materials and services, or the legally regulated CO₂ price.

Vonovia has not identified any material risk related to climate change when identifying impacts, risks and opportunities. Consequently, the company is unhindered in the ability to adapt its strategy and business model to climate change in the short, medium and long term.

Vonovia identifies and assesses climate-related impacts, risks and opportunities as part of a double materiality assessment pursuant to the ESRS. This procedure is described in detail in → **ESRS 2 IRO-1**. In order to be able to identify all relevant sources for greenhouse gas emissions, Vonovia carries out a comprehensive assessment of the relevant business activities and scopes of GHG accounting at regular intervals in accordance with the GHG Protocol and the criteria set out by the Science Based Targets initiative (SBTi). In case a new business is launched or acquired an assessment of greenhouse gases to be included is exercised. The Scope 3 categories were screened for any changes in their materiality in the reporting year.

Material Impacts, Risks and Opportunities

Within the scope of our materiality assessment, we identified **four material impacts, risks and opportunities (IROs)** related to the topic of climate change:

- > Contribution to the global increase in greenhouse gas emissions
- > Earnings potential through investments in modernization, heat pump cubes, serial refurbishment and PV expansion
- > Contributing to negative effects of climate change through new construction and densification
- > Contribution to urban climate resilience through climate change adaptation measures in the portfolio

We currently expect our actual material impact **“contribution to the global increase in greenhouse gas emissions”** to have an influence on our business model, strategy and value chain in the short term. Vonovia’s business activities, in particular property rental and management, including new construction and densification, cause GHG emissions due to the supply of heat and warm water, as well as through building materials and construction activities. Some of the GHG emissions are generated in Vonovia’s own buildings, while others result from the generation of power or district heating in the energy sector. GHG emissions in (new) construction activities are associated with the manufacture of building materials and the use of construction machinery and vehicles. These emissions contribute to the global greenhouse gas effect and to global warming, which, in turn, has far-reaching consequences for human beings and the environment in the long run. Vonovia has developed, and is implementing, a climate strategy to reduce this negative contribution.

By implementing the strategic initiatives that have a direct impact on GHG emissions (in particular serial modernization, heat pump cubes, photovoltaic expansion and electricity sales), the company can further increase its income by passing on modernization costs via rental income and by selling electricity from the PV expansion. This opportunity relates to our own operations in Germany. The opportunity could have a potentially significant positive effect on Vonovia’s financial performance in the medium term.

We currently expect our actual material impact **“promoting negative consequences of climate change through new construction and densification”** to have an influence on our business model, strategy and value chain in the short term. Part of Vonovia’s current and future business activities involves building new residential properties and performing densification measures in existing neighborhoods. This promotes the expected local consequences of climate change, such as local heat islands or reduced precipitation drainage. This can affect both the environment and human

beings in the immediate vicinity. Vonovia could incur higher operating costs for its buildings or the residential environment.

We currently expect our actual material impact **“Contribution to urban climate resilience through climate change adaptation measures in the portfolio”** to have an influence on our business model, strategy and value chain in the short term. Part of Vonovia’s current and future business activities involves further developing its neighborhoods, both buildings and the residential environment. Neighborhood development typically also involves unsealing areas, creating seepage areas, installing landscaped roofs and balconies, and taking other measures to create shade. This lessens the expected local consequences of climate change, such as local heat islands or reduced precipitation drainage. This affects both the environment and human beings in the immediate vicinity, also beyond the boundaries of our neighborhoods. The positive impact has a positive effect on our business model, as it leads to an increase in the value of our properties and higher levels of customer satisfaction.

The revision of our materiality assessment (for details, see → **ESRS 2 IRO-1**) resulted in the following changes for ESRS E1:

- > The material impacts in the previous year “Positive effect on greenhouse gas reduction through modernization as part of the core business” and “Positive contribution to the energy transition” are no longer defined as separate impacts. This is because a negative impact on the contribution to the increase in greenhouse gases has already been defined, and this takes account of aspects previously described as positive impacts as mitigating activities.
- > The material impacts in the previous year “Earnings potential as a result of the energy-efficient modernization of the housing stock/increase in modernization volume” and “Positive effects through mitigation of consequences of climate change” have been made more specific in terms of their content and are now referred to as “Earnings potential through investments in modernization, heat pump cubes, serial modernization and PV expansion” and “Contribution to urban climate resilience through climate change adaptation measures in the portfolio.”

EI-2 – Policies Related to Climate Change Mitigation and Adaptation

Climate Change Mitigation

With regard to the management of its material impacts related to the subtopic of climate change mitigation and the associated material opportunity, Vonovia has a Group-wide **climate, environmental and energy policy** in place covering the company's general principles and commitments on these three topics. The climate change mitigation **policy** also consists of the three levers of the transition plan (climate pathway):

- > Energy savings through energy-efficient modernization of the building envelope
- > Increasing the generation of renewable energies in our portfolio and
- > Comprehensive transformation of the energy sector.

The climate pathway is based on the principle of closely interlinking economic viability and the reduction of emissions. This **principle** is illustrated in the decarbonization tool (DCT) prioritization mechanism. The DCT reflects all relevant ecological and commercial aspects of the housing stock and determines how the refurbishments of individual buildings should be prioritized over time, which is then aggregated into an overall plan. The result of this prioritization is then set out in more specific detail in the plans for energy-efficient refurbishment and the energy concepts. In doing so, we adopt a holistic view at neighborhood level, examining both the modernization of the building envelope and the conversion of the energy supply to climate-friendly systems in their wider context. Our approach is shaped by the concept of sequential development. This means that, depending on the buildings' initial condition with respect to energy efficiency, the measures to enhance the individual buildings and advance towards the 2045 targets set in the climate pathway are staggered in some cases.

With regard to its Development business, Vonovia's strategy is to use its new construction activities to create urgently needed new and affordable homes with optimized energy efficiency profiles and a large proportion of renewable energy use. BUWOG has a sustainability standard for development. Guides, specifications and tools have been developed in 14 focus areas to address the full range of sustainability aspects in new construction. These include optimized heat supply in the neighborhood, the use of ecological building materials and designs for open spaces. The standard is based on the use of the German efficiency house standard or the basic criteria of Austria's "klimaaktiv" initiative as well as the criteria set out in the EU Taxonomy.

The average primary energy demand (non-renewable) of newly constructed buildings, in relation to rental area, is the most important non-financial performance indicator in development.

The integration of these policies into our **corporate management** is achieved via the Sustainability Performance Index (SPI), which includes the sub-indicators CO₂ intensity of the housing stock in Germany and average primary energy demand of newly constructed housing. Specific targets for all SPI indicators are defined during the budgeting and mid-term planning processes. These are closely linked to investment planning and are approved by the Management Board. The forecasting process is used to monitor target achievement. Measures to achieve the targets are implemented through dedicated investment programs and action plans in the relevant business and specialist units. For a detailed explanation of the SPI, see → [ESRS 2 GOV-3](#). The Controlling and Strategy, Corporate Development & Sustainability departments have lead responsibility for implementation with the involvement of the Portfolio Management department and the Business Area Development. The sub-indicators and the SPI, as well as the progress made, are described in detail in the Annual Report (see chapter → [ESRS 2](#) and → [Management System](#)), the ESG Factbook and on [Vonovia's website](#).

The general **aim of the transition plan** is to achieve a greenhouse gas-neutral housing stock in Germany. The concept of the climate pathway and its incorporation into the Sustainability Performance Index cover the impacts and opportunities relating to the subtopics of climate change mitigation and energy.

The climate pathway refers to the housing stock in Germany. It looks at greenhouse gas emissions for the supply of heat and warm water (Scope 1 and 2) as well as the upstream chain involving the energy sources used in this regard (Scope 3.3). The climate pathway and its three levers were approved by the Management Board in 2021.

Climate Change Adaptation

In its climate, environmental and energy policy, Vonovia is committed to strengthening climate resilience and reducing climate and environmental risks. Regarding the management of its material impacts in connection with the subtopic of climate change adaptation, Vonovia pursues a policy founded on a neighborhood-based, holistic development approach, known as urban quarters (for a definition of the term and further details on the related policy, see → [ESRS S4](#)). The principle is that the neighborhood (or urban quarter) serves as the central management level at which the company's

business model and strategy are manifested (see the chapter on → [Corporate strategy](#)). The neighborhood approach allows us to develop socially and ecologically sustainable places for people to live together, improving our customers' quality of living in the process. This also includes adapting neighborhoods to deal with the expected effects of climate change, such as an increase in average temperature or extreme weather events.

Segmentation by urban quarters based on the definition above is only used for the German market segment at present. This means that 77% of the strategic portfolio is covered by the neighborhood concept, which equates to 755 neighborhoods. Neighborhood-based approaches are also pursued in Sweden and Austria, but based on different segmentation principles. The Management Board is responsible both for the decision to structure the portfolio and for the resulting segmentation into urban quarters and urban clusters. All measures resulting from this decision for a specific neighborhood area are planned and reviewed in the respective regional business areas before they are implemented, working in collaboration with the departments for investment, climate-neutral housing stock and corporate development.

E1-3 – Actions and Resources Related to Climate Change Policies

Vonovia implemented the following measures in the reporting year to address the policies described in → [E1-2](#) and the material impacts and opportunities described in that section:

Climate Change Mitigation

Energy-efficiency modernization to improve energy efficiency is an essential pillar of Vonovia's climate pathway. Using our decarbonization tool (DCT), an overall plan is prepared featuring an individual energy refurbishment and energy concept solution plan for each specific building. The energy efficiency measures, in particular insulating facades, cellar ceilings and lofts, and replacing windows, are implemented as part of the Upgrade Buildings investment program. As part of the strategic growth initiatives that we refined in 2025 (see chapter on → [Corporate strategy](#)), conventional modernization is to be supplemented by scaling up serial modernization. Following pilot projects in 2024, this approach was expanded further in the reporting year and is expected to lead to greater cost efficiency and shorter construction times in the medium and long term. 145 residential units underwent serial modernization work in the reporting year.

Another measure involves the digitalization of heat supply. In the reporting year, a further 1,800 gas-fired heating systems had already been connected to a digital solution developed in collaboration with the company Othermo, which detects heating system failures in real time and supports optimized adjustments to the system technology. This system offers the potential to save around 15% in energy and CO₂, with direct benefits for our customers. A total of 4,000 systems had been connected to the digital system by the end of the reporting year.

Another aspect of implementing the climate pathway is increasing energy generation from renewable sources. In particular, this includes the electrification of heat generation by using highly efficient air-to-water heat pumps. As well as installing heat pumps in boiler rooms, another strategic initiative was driven forward with the heat pump cube approach. The heat pump cube is a compact heat pump center that combines all of the necessary components in an external module, supplies several buildings and can be installed outside the buildings in a short space of time. During the reporting year, 29 heat pump cubes were installed in our neighborhoods. Vonovia's growth strategy envisages the large-scale use of heat pump cubes over the next few years. With this goal in mind, Vonovia entered into a strategic partnership with the companies EnerCube and DFA Demonstrationsfabrik Aachen in the reporting year that aims to mass-produce 1,000 cubes in the period leading up to 2029. These cubes are to be installed in Vonovia neighborhoods throughout Germany and will be able to supply around 20,000 residential units with heat and hot water. Vonovia is also continuing the program to expand electricity generation using photovoltaics. The focus here is on ensuring that the electricity generated is used directly in the neighborhood – by our customers and to operate heat pumps. The installation of these systems is therefore also closely interlinked with the heat pump initiative and the modernization program.

Our own energy supply company Vonovia Energie Service GmbH (VESG) provides our customers with electricity from renewable energies. Sales efforts will be stepped up as part of the growth strategy and additional sales capacity will be created in customer service. Our objective is to maximize the share of energy we produce ourselves for the benefit of our customers and the environment, and also to use it for our housing-related services, e.g., e-mobility. By providing solar power or certified green energy that has been generated in the neighborhood, we are supplying over 52,000 households with reasonably priced electricity and helping them to reduce greenhouse gas emissions. In this context,

we concluded two power purchase agreements in 2024, from which we obtained 27.4 million kWh of electricity generated from wind turbines in the reporting year. This equates to a avoidance of around 20,700 tons of CO₂ equivalents.

In the course of the reporting year, Vonovia installed around 1,750 new photovoltaic systems with an installed output of more than 53.4 MWp. Vonovia owns a total of more than 5,300 photovoltaic systems with an installed output of around 188 MWp. This fell short of the target of 213 MWp. We will continue to forge ahead with the expansion of photovoltaics going forward and are aiming for additional capacity of more than 94 MWp in the 2026 fiscal year. We aim to have installed around 400 MWp of capacity by 2028 and up to 700 MWp in the long term.

A further key lever for our climate pathway is the supply of sufficient quantities of **CO₂-free district heating** and electricity by the energy sector. This requires the energy sector to meet the targets set by policymakers for phasing out coal and increasing the share of renewable energies. Municipal heat planning will create both long-term security for planning and obligations to decarbonize heating networks.

Where it makes commercial sense, and provided that utility companies systematically decarbonize their heat generation systems, we are looking into connecting additional properties to district heating networks. This is an area in which Vonovia is working closely with major district heating providers and integrating their strategies into its own neighborhood planning.

The ability to implement the measures described depends on the availability and allocation of the corresponding investment funds and access to funding at affordable capital costs.

Like the climate pathway, the measures described refer to the housing stock in Germany and, as a result, largely to Vonovia's own operations. As the climate pathway also includes GHG emissions from the upstream chain involving the energy sources used (Scope 3.3), the measures also relate to part of the upstream value chain. Part of the downstream value chain is also included, as the expansion of photovoltaic capacity in conjunction with tenant electricity models also reduces our tenants' GHG emissions (Scope 3.13).

The implementation of the measures is designed to be permanent until the overarching climate target for 2045 is achieved.

The CapEx spent on the measures described in the reporting year consists of the investments within the Upgrade Buildings energy-efficiency modernization and heating replacement program, including investments in photovoltaic power generation capacity, and amounts to € 700.9 million. This equates to a 25.6% share of total CapEx in the reporting year.

Annual CapEx of around € 400 million to € 500 million a year has been earmarked for the implementation of all measures in the transition plan. In the reporting year, Vonovia expected the CO₂ intensity of its housing stock in Germany to fall slightly by -0.3 kg CO₂e/m² to 30.9 kg CO₂e/m² of rental area. This reduction target was achieved.

CapEx of € 700.9 million and OpEx of € 390 million were spent on implementing the climate protection measures in the reporting year.

Climate Change Adaptation

Vonovia systematically analyzes the relevant climate risks, which are mapped in an IT tool using the relevant climate scenarios developed by the IPCC (Intergovernmental Panel on Climate Change), assessing them with regard to the impact on our portfolio. During this process we also take into account the particular characteristics of the respective buildings and neighborhoods, such as existing sun protection or the degree of surface sealing.

Climate change adaptation is also taken into account in the planning guidelines for sustainable residential environment, which describe various components that can contribute, for example, to reducing heating in the neighborhood or improving drainage options. These guidelines must be taken into account as a mandatory requirement when planning open spaces in new neighborhoods.

We are taking various measures to make our existing neighborhoods more climate-resilient. These include, for example, the targeted planting of climate change-resistant tree species, the unsealing of parking areas and the establishment of seepage areas, as well as the creation of landscaped roofs.

E1-4 – Targets Related to Climate Change Mitigation and Adaptation

The climate change mitigation policies described in → E1-2 and → E1-3 and the measures implemented to realize them aim to reduce the impact on climate change. Vonovia has set itself several reduction targets that cover both direct and indirect emissions.

1. Vonovia is committed to reducing absolute Scope 1 and 2 greenhouse gas emissions by 42% by 2030 compared to the base year 2021. This applies to the GHG emissions from operation of the housing stock in Germany, Sweden and Austria, which together account for around 97% of the Vonovia Group's total Scope 1 and Scope 2 GHG emissions (based on the base year 2021). The target was developed in accordance with the SBTi criteria in line with the 1.5°C target set out in the Paris Agreement, using the absolute contraction approach for near-term targets (cross-sector approach). At the time of validation, there was no valid SBTi sector-specific approach. In the absolute contraction approach, the SBTi defines a reduction target value of at least -4.2% per year as a prerequisite for alignment with the 1.5°C target. In its independent validation, the SBTi confirmed that Vonovia's target meets the required ambition, meaning that it is considered science-based and compatible with a 1.5°C pathway in accordance with the Paris Agreement.
2. Vonovia is committed to reducing absolute Scope 3 greenhouse gas emissions from the categories "Fuel and energy-related activities," "Use of sold products" and "Downstream leased assets" by 25% by 2030. The GHG emissions in the Scope 3 categories included in this target (Scope 3.3, 3.11 and 3.13) cover around 80% of the total Scope 3 emissions in the base year. This target was also developed in accordance with the SBTi criteria using the absolute contraction approach for near-term targets (cross-sector approach). In the absolute contraction approach, the SBTi defines a reduction ambition of at least -2.5% per year as a prerequisite for compatibility with "well below 2 degrees." In its independent validation, the SBTi confirmed that Vonovia's target meets the required ambition, meaning that it is considered science-based and compatible with a "well below 2 degrees" pathway in accordance with the Paris Agreement.
3. Vonovia is committed to attaining a climate-neutral housing stock in Germany by 2045. The **CO₂ intensity** is to be reduced to less than 5 kg of CO₂ equivalents per square meter of rental area, with appropriate action being taken to offset any remaining, unavoidable emissions. By 2030, our interim target is to achieve a CO₂ intensity of less than 25 kg CO₂e/m². The target includes Scope 1, Scope 2 (market-based) and Scope 3.3 of the housing

stock in Germany. This is a specific absolute target value for the relevant target year, measured in kg CO₂e per m² of rental area. The target is based on the German Federal Climate Change Act (Klimaschutzgesetz) and is based on the science-based KNDE 2045 scenario of Agora Energiewende with regard to the development of the energy sector, which describes a pathway towards a climate-neutral energy and building sector. Minor changes in the housing stock due to sales or new construction measures have also already been reflected in the assumptions. The reduction ambition of the target is between -87% and -93% (assumption: target achievement of between 2.5 kg and 5 kg CO₂e/m² of rental area). The SBTi defines a reduction of -90% as consistent with a 1.5°C pathway. As a result, we consider the target to be compatible with the 1.5°C pathway. While the target has not been validated externally, all of the emissions it encompasses are included in the absolute medium-term targets validated by the SBTi.

All targets are based on the overall plan that was prepared using the decarbonization tool. This plan rests on the assumption that the current legislation will remain unchanged and that both demand and the technological options available will remain constant. The assumption has also been made that the investment funds for modernization measures will be put to optimum use in line with the applicable internal return requirements. For emissions that arise indirectly from the purchase of district heating and electricity, a continuous decrease in nationwide CO₂ intensity (location-based) is assumed over the target period, based on Agora Energiewende's climate-neutral Germany scenario. A similar trend is also assumed for the specific emissions (market-based) of the individual district heating suppliers. Regarding emissions from general electricity and electricity for heating (heat pumps and direct electricity-based heating), it has been assumed that the electricity will be supplied by self-generated power, as well as that the purchase of electricity from renewable sources will continue based on a Power Purchase Agreement (PPA) or in combination with guarantees of origin, resulting in an overall emission factor of 0 kg CO₂e/kWh. As far as the absolute reduction targets are concerned, assumptions were also made for the housing stock in Sweden and Austria regarding a reduction in the emissions intensity of electricity and district heating over the target period. In Sweden, the assumptions regarding the development of the GHG intensity of district heating are based specifically on the targets of district heating suppliers. In the case of Austria, the assumptions regarding the development of emissions from district heating and electricity are based on the scenarios of the Environment Agency Austria. The assumptions made regarding changes in the housing stock, demand and available technologies match those applied to the CO₂ intensity target.

Another target involves reducing the **average primary energy demand** (non-renewable share) of newly constructed buildings to less than 25 kWh/m² of usable building area by 2030. This target refers to all newly constructed buildings in Germany, Sweden and Austria, both to-sell and to-hold, with the exception of vertical expansion and purely commercial buildings. This is a specific absolute target for the relevant target year, measured in kWh per m² of usable building area, meaning that the reference year is always the current year. In the reporting year, the average primary energy demand came to 21.9 kWh/m² (previous year: 22.0 kWh/m²). This target does not relate directly to GHG emissions as a target unit, but rather influences the development in future GHG emissions in Scopes 1 and 2 as well as Scope 3 indirectly.

External stakeholders were not directly involved in setting the targets. Various departments were involved in-house.

Target achievement is monitored on an ongoing basis. CO₂ intensity and the average primary energy demand are part of the quarterly forecasting process, which illustrates the expected target achievement level throughout the year. The absolute GHG reduction target is monitored through the annual calculation of GHG emissions as part of the reporting process.

As GHG emissions are calculated based on the energy demand and consumption values shown in energy certificates at Vonovia, the values in the base year are robust in relation to external factors such as fluctuating weather conditions. They are representative because energy certificates are available for more than 92% of the housing stock. For buildings that do not have energy certificates, energy consumption was extrapolated based on the year of construction using empirical values for comparable buildings from Vonovia's own housing stock. Actual tenant behavior may lead to deviations from the calculated energy requirements of the energy certificates at building level.

GHG Emission Reduction Targets

	Base year 2021		2025	Target 2030	Target 2045
	Total	Thereof continuing operations	Total (continuing operations)		
GHG emissions Scope 1 and 2 market-based (metric tons CO ₂ e; housing stock DE, SE, AT)	973,911	973,911	800,980	-42%	-
GHG emissions Scope 3 (metric tons CO ₂ e; categories 3.3 + 3.11 + 3.13)	767,187	767,187	683,302	-25%	-
GHG emissions housing stock Germany (in kg CO ₂ e/m ² rental area)	38.4	38.4	30.7	< 25	< 5

Regarding the target for absolute GHG emissions, 62% are attributable in the base year to Scope 1 and 38% to Scope 2 (market-based method). Regarding GHG intensity in the German housing stock, 47% are attributable in the base year to Scope 1, 42% to Scope 2 (market-based method) and 11% to Scope 3.

Vonovia is aiming to offset the unavoidable emissions remaining in 2045 by taking suitable measures that the company is still to define, achieving a CO₂ intensity of net zero.

E1-5 – Energy Consumption and Mix

Energy Consumption and Mix

	2024		2025
	Total	Thereof continuing operations	Total (continuing operations)
(1) Fuel consumption from coal and coal products (MWh)	11,064	11,064	5,860
(2) Fuel consumption from crude oil and petroleum products (MWh)*	193,732	192,663	186,354
(3) Fuel consumption from natural gas (MWh)	2,538,800	2,498,007	2,501,330
(4) Fuel consumption from other fossil sources (MWh)	-	-	-
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	1,617,861	1,607,646	1,309,052
(6) Total fossil energy consumption (MWh) (Sum of lines 1 to 5)	4,361,456	4,309,381	4,002,597
Share of fossil sources in total energy consumption (in %)	81.01%	80.96%	76.05%
(7) Consumption from nuclear sources (MWh)	59,379	59,196	57,110
Share of consumption from nuclear sources in total energy consumption (in %)	1.10%	1.11%	1.09%
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biological origin, biogas, renewable hydrogen, renewable sources, etc.) (MWh)	2,991	2,492	8,480
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	1,019,242	1,010,682	1,250,047
(10) Consumption of self-generated non-fuel renewable energy (MWh)	296	296	2,332
(11) Total renewable energy consumption (MWh) (Sum of lines 8 to 10)	1,022,528	1,013,469	1,260,860
Share of renewable sources in total energy consumption (in %)	18.99%	19.04%	23.95%
Total energy consumption (MWh) (Sum of lines 6 and 11)	5,383,985	5,322,850	5,263,457

* Correction of the figure for 2024 (due to energy consumption by the vehicle fleet not being taken into account), resulting in a minor impact on the total and subtotals based on this figure and the share of fossil and renewable sources for 2024.

Vonovia's energy production relates to the generation of electricity using photovoltaic modules. Vonovia generated 76,579 MWh (previous year: 21,468 MWh) of electrical energy from photovoltaics in the reporting year.

Energy Intensity per Net Revenue

	2024		2025	% 2025/2024
	Total	Thereof continuing operations	Total (continuing operations)	Total
Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors (MWh/€ million)*	721	752	780	103.78%

* Correction of the figure for 2024 (due to energy consumption by the vehicle fleet not being taken into account).

The real estate sector was applied as a climate-intensive sector for the purposes of determining energy intensity.

Net Revenue for the Calculation of Energy Intensity (€ million)

	2024		2025
	Total	Thereof continuing operations	Total (continuing operations)
Net revenue from activities in high climate impact sectors used to calculate energy intensity	7,464	7,080	6,746
Net revenue (other)	-	-	-
Total net revenue (financial statements)	7,464	7,080	6,746

EI-6 – Gross Scopes 1, 2, 3 and Total GHG emissions

Gross GHG Emissions, Scopes 1,2 and 3

	Base year 2021		2024
	Total	Total	Thereof continuing operations
Scope 1 GHG Emissions			
Gross Scope 1 GHG total emissions (t CO ₂ e)	-	548,394	539,867
Percentage of Scope 1 GHG emissions from regulated emission trading systems (in %)	-	-	-
Scope 2 GHG Emissions			
Gross location-based Scope 2 GHG emissions (t CO ₂ e)	-	341,016	335,518
Gross market-based Scope 2 GHG emissions (t CO ₂ e)	-	302,463	296,965
Significant Scope 3 GHG Emissions			
Total gross indirect (Scope 3) GHG emissions (t CO ₂ e)	-	1,057,399	1,054,582
1 Purchased goods and services	-	170,748	170,748
2 Capital goods	-	132,075	132,075
3 Fuel and energy-related activities (not included in Scope 1 or Scope 2)	-	208,451	205,634
4 Upstream transportation and distribution*	-	-	-
5 Waste generated in operations*	-	-	-
6 Business traveling*	-	-	-
7 Employee commuting*	-	-	-
8 Upstream leased assets*	-	-	-
9 Downstream transportation*	-	-	-
10 Processing of sold products*	-	-	-
11 Use of sold products	-	48,557	48,557
12 End-of-life treatment of sold products*	-	-	-
13 Downstream leased assets	-	497,568	497,568
14 Franchises*	-	-	-
15 Investments*	-	-	-
Total GHG Emissions			
Total GHG emissions (location-based) (t CO ₂ e)	-	1,946,809	1,929,967
Total GHG emissions (market-based) (t CO ₂ e)	-	1,908,255	1,891,414

* Not significant.

** The combined GHG reduction targets for 2030 and 2045 can be found in section E1-4.

	Retrospective		Milestones and target year**		
	2025	% 2025/2024	2026	2030	Annual % target/ Base year
Total (continuing operations)	Total				
530,690	98.30%	-	-	-	
-	-	-	-	-	
356,108	106.14%	-	-	-	
270,290	91.02%	-	-	-	
904,891	85.81%	-	-	-	
143,033	83.77%	-	-	-	
78,556	59.48%	-	-	-	
197,948	96.26%	-	-	-	
-	-	-	-	-	
-	-	-	-	-	
-	-	-	-	-	
-	-	-	-	-	
-	-	-	-	-	
-	-	-	-	-	
-	-	-	-	-	
-	-	-	-	-	
15,511	31.94%	-	-	-	
-	-	-	-	-	
469,843	94.43%	-	-	-	
-	-	-	-	-	
-	-	-	-	-	
1,791,689	92.84%	-	-	-	
1,705,871	90.19%	-	-	-	

Greenhouse gases included in the calculation: CO₂ equivalents (greenhouse gases regulated in the Kyoto Protocol CO₂, CH₄, N₂O, SF₆, PFC and HFC).

Sources of emission factors for calculating emissions from the combustion of fossil fuels and location-based emissions for Scope 1, Scope 2 and Scope 3: GEMIS 5.1, Federal Ministry of Environment Germany, Federal Ministry of Environment Austria and Swedenergy (Swedish non-profit organization).

As actual measured values for the relevant reporting year are not available at the required time, we calculate the emissions on the basis of the valid energy performance certificates of the individual buildings. The energy consumption of those buildings that do not have energy performance certificates is extrapolated based on the age of the building and corresponding average values based on the rest of the portfolio.

The model calculates life cycles for all processes and scenarios, i.e., it takes into consideration all material steps from primary energy/raw material extraction to effective energy/material provision and also includes the auxiliary energy and cost of materials to produce energy plants and transport systems.

Vonovia does not have any GHG emissions that are subject to regulated emission trading systems.

For the extrapolation, measures and circumstances are considered as precisely as possible. The GHG emissions for the base year reported in the presentation of the GHG emission reduction targets and greenhouse gas balance (see → E1-4 and → E1-6) include Deutsche Wohnen's portfolio. When determining Scope 3 emissions for the upstream and downstream value chain, we use average data or proxies:

- a) The GHG emissions for Scope 3.1 are calculated using emission factors derived from representative measures in the German housing industry by the German Real Estate Economics Institute (Institut für Immobilienökonomie (IIO)) on behalf of the housing industry association VdW Rheinland. For the base year 2021, this process was only applied to Vonovia's portfolio at that time due to limited data availability.
- b) GHG emissions for Scope 3.2 are determined using emissions factors based on the building construction type, which were developed through a comprehensive life cycle assessment of a reference house conducted by a specialized architecture firm.

Even though extrapolations and average emission factors can lead to certain deviations, these methods help to reduce uncertainties and offer a well-founded basis for the analysis. The degree of accuracy is already high due to the use of actual measures and the high degree of detail inherent to model house calculations.

Market-based emission factors were used to determine Scope 2 emissions from district heating where these were available in qualified form. Otherwise, location-based emission factors were used. In the 2025 fiscal year, market-based emission factors accounted for 71% in relation to district heating supply. An emission factor of zero was used to determine Scope 2 emissions from electricity consumption (market-based), as the corresponding energy volumes are sourced from green electricity. In 2025, 78% (previous year: 85%) of the green electricity was covered by guarantees of origin, while 22% (previous year: 15%) was sourced through a power purchase agreement (PPA, for electricity from renewable wind energy).

The GHG emissions (Scope 1 and 2) indicated include all fully consolidated companies. Emissions from companies in which Vonovia holds a minority interest are to be allocated to Scope 3.15 Investments in accordance with the GHG Protocol. This category has not been classified as significant.

Scope 3 greenhouse gas emissions were mainly calculated based on emission factors from recognized databases. Primary data from suppliers or other partners in the value chain was not used.

Vonovia has defined the following Scope 3 categories as **significant**:

- > Scope 3.1 Purchased goods and services: GHG emissions from the production and installation of building materials and materials for maintenance, energy-efficient modernization, "Optimize Apartments" measures and heating system replacement. GHG emissions are calculated using emission factors created by external experts on the basis of typical measures taken by various companies in the housing industry. The emissions were calculated by multiplying the corresponding units of the measures implemented (modernized m² of living area) by the relevant emission factors.

- > Scope 3.2 Capital goods: GHG emissions from the production of building and other materials used for the new buildings completed in the fiscal year in question. GHG emissions are calculated using an in-house Excel tool for the integrated calculation of greenhouse gases, primary energy requirements and circularity (ÖBIGK) throughout the life cycle, which calculates the emissions using a reference house approach for various types of construction. The generic emission factors of the German Federal Institute for Research on Building, Urban Affairs and Spatial Development (BBSR) are used for the individual materials and components used in the various types of building construction.
- > Scope 3.3 Fuel and energy-related emissions (not Scope 1 and 2): GHG emissions from the upstream chain of energy sources not reported as Scope 1 or Scope 2 emissions (e.g., for the extraction and transportation of fuels or the production and transportation of electricity and district heating) – both for the wholly owned housing stock and for apartments owned by Vonovia that belong to a residential property owners' association (WEG) (their Scope 1 and 2 emissions are reported as Scope 3.13 emissions).
- > Scope 3.11 Use of sold products: GHG emissions from the operation of newly constructed residential units sold in the relevant fiscal year (provision of heat and warm water) over a lifespan of 50 years (in line with the recommendation of the Association of German Housing and Real Estate Companies (GdW)). Declining GHG intensity of district heating and electricity is assumed over the course of the property's useful life. This matches the assumed trend for the company's own portfolio.
- > Scope 3.13 Downstream leased assets: GHG emissions generated from household electricity used by customers in their homes for electrical appliances (excluding general electricity or electricity required for heat and warm water). The corresponding electricity consumption is estimated based on a method developed at sector level, since real data is not available to the landlord. User electricity for commercial units was extrapolated based on average values for types of use. The national emission factor for electricity is used to calculate emissions (location-based). In addition, GHG emissions are taken into account. These result from the supply of heating and warm water to rental units that are owned by Vonovia and belong to a residential property owners' association (WEG).

The following Scope 3 categories have been classified as **insignificant**:

- > Scope 3.4 Upstream transportation and distribution: partly included in categories 3.1. and 3.2, emission level not material
- > Scope 3.5 Waste: emission level not material
- > Scope 3.6 Business travel: emission level not material
- > Scope 3.7 Employee commuting: emission level not material
- > Scope 3.8 Upstream leased assets: n/a
- > Scope 3.9 Downstream transportation and distribution: Vonovia does not sell any products that are transported
- > Scope 3.10 Processing of sold projects: Vonovia does not sell any products that are processed further
- > Scope 3.12 End-of-life treatment of sold products: emission level not material
- > Scope 3.14 Franchises: n/a
- > Scope 3.15 Investment: emission level not material

Vonovia does not currently have or finance any projects of its own aimed at decomposing or storing greenhouse gases, nor does it contribute to such projects in the upstream or downstream value chain. We are currently assessing which appropriate measures will be implemented in the future to achieve net-zero emissions.

Vonovia does not use any in-house CO₂ pricing system. External statutory CO₂ prices and assumption regarding their future development are included in the internal financial feasibility calculations.

GHG Intensity per Net Revenue

	2024		2025	% 2025/2024
	Total	Thereof continuing operations	Total (continuing operations)	Total
Total GHG emissions (location-based) per net revenue (t CO ₂ e/€ million)	261	273	266	97.4%
Total GHG emissions (market-based) per net revenue (t CO ₂ e/€ million)	256	267	253	94.7%

Net Revenue for the Calculation of Greenhouse Gas Intensity (€ million)

	2024		2025
	Total	Thereof continuing operations	Total (continuing operations)
Net revenue used to calculate GHG intensity	7,464	7,080	6,746
Net revenue (other)	-	-	-
Total net revenue (financial statements)	7,464	7,080	6,746

E5 Resource Use and Circular Economy

ESRS 2 SBM-3 – Material Impacts, Risks and Opportunities and Their Interaction with Strategy and Business Model

Material Impacts, Risks and Opportunities

Within the scope of our materiality assessment, we identified **one material IRO** related to “resource use and circular economy”:

> Contribution to Resource Consumption

We currently expect our actual material impact “**Contribution to resource consumption**” to have an influence on our business model, strategy and value chain in the short term. Part of Vonovia’s current and future business activities involves further developing its neighborhoods, which includes modernizing and maintaining existing buildings, as well as constructing new ones. Construction products and building materials from primary production are used for these activities, which involves significant resource consumption (including concrete, steel, stone, sand, gravel, wood, insulation and synthetic materials). This contributes to overall resource consumption. This material impact affects the upstream value chain. In the long term, the negative impact could contribute to a future shortage of resources, which would have a negative effect on Vonovia in the form of rising material prices.

Resilience of Our Business Model

The resilience of Vonovia’s strategy and **business model** is analyzed and evaluated annually as part of risk management (see → **ESRS 2 GOV-2**). First-level executives below the Management Board are responsible for identifying and assessing risks within their areas of responsibility during the semi-annual risk inventory process. The risk management horizon and the evaluation period extend five years beyond the reporting year. Risk management assessments focus on net risks.

To assess the resilience of our business model in terms of its ability to cope with the material impact of its contribution to resource consumption, we analyze the services associated with material inflows in the areas of vacant apartment modernization, energy-efficiency modernization, maintenance/major repairs and new construction/development, as well as the quantities involved. As this analysis was conducted in this specific form for the first time in the reporting year, it is not yet possible to draw any conclusions from past experience. In the future, this process will allow us to identi-

fy, early on, which materials and crafts involve the most considerable inflow of resource and to take targeted action with partners in the value chain to reduce the proportion of virgin resources. No shortage of resources (suppliers and raw materials) or any major changes in regulatory requirements are expected in the short or medium-term period covered by our assessment. We do not anticipate any significant dependencies based on our current analyses.

E5-1 – Strategies Related to Resource Use and Circular Economy

Vonovia’s business strategy is geared toward **extending the life of our buildings** by modernizing buildings and neighborhoods with a view to the long term. This is why we are creating additional homes using resource-efficient strategies, namely by means of vertical expansion on top of existing buildings. This approach requires fewer resources than new construction, as existing building structures can be used and extra stories are usually added using timber frame construction methods.

Vonovia also has a **climate, environmental and energy policy** that addresses the issues of resource use and circular economy. In this policy, Vonovia expresses its commitment to promoting the use of resource-conserving and recyclable materials, products and services at all stages in its value chain. This applies to the impacts in both the upstream (reduction in resource use, use of materials made of secondary and renewable raw materials) and the downstream value chain (better options for reuse or recyclability). The climate, environmental and energy policy was approved by the Management Board and applies across the Group. The business areas are responsible for implementing it. The policy is published on both the intranet and the Internet, and can be consulted by all employees and external stakeholders.

We are aiming to establish the **circular economy** as an element of sustainable construction and, in the long term, to increase the use of renewable raw materials and reduce the use of virgin resources in our construction products as well as to promote a closed material loop in the building sector by using recycled materials.

In 2024, our development subsidiary BUWOG implemented a sustainability standard for development (NHSD) that is applied to all project developments. This sets out the requirement to extend the useful life of buildings by incorporating a large proportion of floor plans that are suitable for a large variety of lifestyles. To ensure the successful establishment of the NHSD, BUWOG has introduced a review of the

aspects covered by the standard within the milestones set as part of the planning process.

E5-2 – Actions and Resources Related to Resource Use and Circular Economy

Vonovia implements the following actions on a permanent basis across the Group to address the policies described in → E5-1 and the material impacts described in that section:

Space efficiency: When planning new builds, Vonovia takes care to ensure optimal space efficiency across the Group, with simple cubic volumes and compact floor plans that result in efficient resource and energy consumption per square meter of living area and per resident.

Floor plans suitable for a wide variety of lifestyles: During the planning stages, we pay particular attention to ensuring that floor plans are suitable for a wide variety of lifestyles. This means that we design buildings in such a way that rental apartments can be extended or reduced in size at short notice and with minimal spending on materials if need be at a later date, or converted into offices or doctors' surgeries, for example. These measures increase the appeal and lifespan of the property and reduce the resources required for any conversion work. As part of this action, we have developed an Excel tool for the integrated calculation of greenhouse gases, primary energy requirements and circularity (ÖBIGK), which determines the total quantities and recyclability of the various structural elements in our new builds in accordance with ISO 20887. This tool is used for all projects in the early planning phase.

Modular construction and modernization: a key lever for reducing resource requirements lies in the use of modular construction and modernization. Prefabricating building components optimizes the use of material and minimizes waste on the construction site. In series production, any quantities remaining, for example from blow-in insulation, can be collected and fed back into the production process. Vonovia has concluded a strategic partnership with Gropyus, a company that has developed an innovative manufacturing process for modular timber construction. In 2024 and in the reporting year, a total of four projects comprising 373 residential units were approved and launched. Thanks to prefabrication, these projects will reduce the use of mineral, non-renewable raw materials and increase the use of biological raw materials, such as wood and cellulose. Further projects using this method are in the planning stages.

When it comes to modernization, too, we are increasingly focusing on a high degree of prefabrication, which also saves resources compared to conventional modernization methods and significantly reduces waste on the construction site. In the reporting year, we performed serial modernization work on 145 residential units in various locations. Work also commenced on a further 265 residential units in the reporting year. As part of the growth strategy and contribution to Vonovia's climate pathway, the company will continue to expand its serial modernization efforts significantly over the coming years.

Promoting innovation: Vonovia launched the Vonovia Construction Contest in 2024 to identify innovative construction products and materials. The evaluation criteria used in the competition include the recyclability of the solutions, either through the extensive use of recycled materials or through the particularly good reusability or recyclability of the construction products.

Minimum standards for suppliers and business partners: in general, all contractors working on our construction sites are also contractually obliged, under our Business Partner Code, to comply with the statutory provisions governing the separation, recycling and disposal of materials.

E5-3 – Targets Related to Resource Use and Circular Economy

Vonovia has not set any specific targets for resource use and the circular economy at present, as an appropriate pool of data has to be created and commercial viable solutions have to be developed first.

E5-4 – Resource Inflows

The **main resource inflows associated with our operations** relate to construction products and building materials used in new construction, modernization and maintenance. They include, for example, concrete, steel, stone, insulation materials, windows, roof tiles, tiles, plaster and other finished construction products made of plastic, ceramics and metal. The most important biological building material is wood. As Vonovia is the client, and not the executing company, in the area of development/new construction, it does not purchase the building materials and products used itself. Our contractors generally purchase building products through retailers, or directly from manufacturers. Modernization and maintenance work is carried out either by the company's own technical service, Vonovia Technischer Service GmbH, or by subcontractors. In both cases, the building materials tend to be purchased via retailers. Information on the proportion of biological materials from sustainable sources and the quantity of recycled materials is kept in the upstream value chain and is not usually communicated along with other product specifications. To date, Vonovia has neither imposed requirements on subcontractors and retailers regarding these aspects nor has it requested information in a structured and systematic manner. This is why, at the level of our own operations, the information required to verify sustainably sourced biological materials and reused or recycled secondary components, products and materials is not available to us. Vonovia plans to implement suitable procedures for obtaining this information in the future.

Resource Inflows

	2025
	Total (continuing operations)
Total resource inflows (thousand metric tons)	788.9
New Construction	536.5
Modernisation and Maintenance	252.3

The **resource inflows in new construction** are calculated using an in-house Excel tool for the integrated calculation of greenhouse gases, primary energy requirements, mass and circularity (ÖBIGK) throughout the life cycle, which calculates the various parameters using a reference house approach. This involves determining the structural components and their corresponding mass based on the type of construction and the areas on which the project is being implemented (above ground and underground). The total mass of a project is allocated to the year in which the project was completed, even if the building was constructed over more than one period. This ensures consistency with general reporting and GHG accounting.

As far as data on **mass in connection with modernization and maintenance** is concerned, the data taken as a basis includes the service items invoiced in Germany and recorded in the system in the reporting year. This information is used to define those service items that, according to criteria including the type of service, number of entries per service item in the reporting year and minimum weight per unit, involve a significant inflow of resources. The weights of the materials used were obtained from manufacturer specifications or comparable reference products, e.g., from the ÖKOBAUDAT platform provided by the Federal Ministry of Housing, Urban Development and Building (BMWSB). Services that were not invoiced using unique service numbers were extrapolated using product category-specific factors. The data for Austria and Sweden was extrapolated based on the assumption that new construction and modernization work is carried out in the same way and using the corresponding investment volumes.

The data calculated, in particular for modernization and maintenance, is based on a series of assumptions and contains a significant share of extrapolations and estimates based on reference products and average weights per product category. Although this method creates a certain degree of uncertainty, it represents the best possible approximation, with reasonable outlay, given the variety of materials used. Due to the component-based reference house approach, the model house calculation reveals a higher degree of accuracy for new construction resource inflows than the data on modernization.

ESRS S1 Own Workforce

ESRS 2 SBM-3 – Material Impacts, Risks and Opportunities and Their Interaction with Strategy and Business Model

Material Impacts, Risks and Opportunities

Within the scope of our materiality assessment, we identified **six material impacts, risks and opportunities (IROs)** related to our own workforce:

- > Employee satisfaction due to fair remuneration
- > Employee satisfaction based on work-life balance
- > Employee satisfaction through opportunities for participation
- > Lack of a sense of belonging due to insufficient promotion of diversity
- > Employee satisfaction through professional development opportunities
- > Lower employee turnover and targeted recruitment of skilled workers through working conditions that are tailored to the needs of employees and the company

In order to successfully implement Vonovia's business strategy and model in all business areas (see → [ESRS 2 SBM-1](#)), a broad-based workforce comprising highly qualified employees is a must. This is why Vonovia's HR strategy is aimed at recruiting suitable employees for the company and its new business areas in a targeted manner as well as to retaining existing employees and providing them with further training. This allows the HR strategy to support change processes within the company and support the company with its transformation. It contributes to all material IROs relating to Vonovia's own workforce. Employee satisfaction plays a key role in this respect. It is influenced by various factors.

The positive impact "**Employee satisfaction due to fair remuneration**" aims to boost employee productivity and reduce/counteract employee turnover. This is to be ensured through fair and transparent pay for all occupational groups. This impact is directly linked to Vonovia's business model, as qualified employees are required for the company's operations and to implement transformation processes, and ensuring competitive pay for these very employees has a direct impact on personnel expenses.

Comprehensive social management, flexible working hours models and appropriate investment in employee issues have a positive impact on "**Employee satisfaction based on work-life balance**." This means they can help give the company a competitive edge in terms of recruiting and retaining relevant employee groups.

We prioritize co-determination as a topic in our overarching HR strategy and continuously take action to achieve the positive impact of "**Employee satisfaction through opportunities for participation**." Within this context, social dialogue as well as general information for, and representation of, the workforce regarding employee rights, are strengthened by works council members.

We see diversity as an important part of our corporate culture and have made it a firm component of our corporate mission statement. Vonovia's various business areas, spanning different countries and urban areas, call for a diverse workforce, both professionally and personally, and comprehensive diversity management. This makes promoting diversity essential for our business model. It is a separate component of our HR strategy and addresses the negative impact of a "**Lack of a sense of belonging due to insufficient promotion of diversity**." As a result, we take ongoing action to avoid scenarios in which diversity is not given the priority it deserves among managers and in hiring or promotions, for example. If a corporate culture that is free from discrimination is not promoted proactively and only insufficient internal diversity targets are set, this has a direct impact on our employees, e.g., in the form of potential individual cases of discrimination and a reduced sense of loyalty to the company. Promoting diversity will become even more important going forward as the shortage of skilled workers becomes more pronounced. If a lack of a sense of belonging leads to employee turnover and staff shortages, this could have an impact on the continuation of our rental business and the associated service quality. This means that the action Vonovia takes to promote diversity has a material impact on the sense of belonging and, as a result, on reducing this negative impact.

The positive impact “**Employee satisfaction through professional development opportunities**” results from the long-term career prospects offered by various training and career paths as well as further training opportunities for all Vonovia employees. Well-trained employees in both the technical trades and in commercial positions within our core business are crucial for our business model, especially in light of innovations in business operations with regard to the energy and heating revolution, and new regulatory requirements. We have also established a comprehensive training and development approach as a central component of our HR strategy. First, our efforts serve to increase expertise and knowledge as well as to foster an exchange of experience among employees, which gives them more opportunities for advancement. This results in higher levels of satisfaction and longer staff tenure. What is more, our customers benefit from improved service quality thanks to better trained employees.

The impacts described above mean that implementing a successful HR strategy opens up the material financial opportunity of “**Lower employee turnover and targeted recruitment of skilled workers through working conditions that are tailored to the needs of employees and the company.**” By securing jobs in the long term and creating fair working conditions, Vonovia can position itself as an attractive employer, enabling it to keep employees at Vonovia as it competes with other companies on the labor market. At the same time, a differentiated and efficient recruitment strategy as well as action to strengthen the employer brand and reputation can have a positive impact on the recruitment of new skilled employees and, as a result, on our transformation and growth process. This can also increase the level of professionalism and innovation potential in the workforce, improve service quality and feed into higher levels of customer satisfaction as a result. Making our employees more likely to stay with our company also reduces employee turnover and, in doing so, reduces transaction costs. As a result, we expect to see a positive impact on our financial position, financial performance and cash flows. The period spanning the current or following reporting year is too short to allow us to pinpoint any major positive financial effects on Vonovia’s financial position.

Resilience of Our Business Model

In general, the resilience of Vonovia’s strategy and **business model** is analyzed and evaluated annually as part of risk management (see **ESRS 2 GOV-2**). In order to evaluate the resilience of our business model in terms of its ability to cope with the material impacts and opportunities, we monitor the development of our key performance indicator “employee satisfaction” on an ongoing basis. As a central KPI, it provides information regarding our appeal as an employer, which, in turn, is important for the targeted recruitment of skilled workers and for reducing employee turnover. The development in this KPI shows that employee satisfaction remains at a high level. The half-yearly risk assessment carried out by Risk Management identified the shortage of skilled workers as a potential risk with regard to the company’s own workforce. This risk is closely linked to employer attractiveness and employee satisfaction. It is, however, currently considered to be low in terms of both potential damage and probability of occurrence. We can therefore conclude that our existing measures strengthen the resilience of our business model with regard to the workforce, and prevent material risks from emerging for our business model.

Target Groups

All individuals in Vonovia’s workforce who could be affected by the company’s material impacts are covered by the disclosures made in accordance with → **ESRS 2** and are therefore included in them.

Vonovia’s employees can be split into two categories: **employees working in the technical trades and employees with commercial and administrative roles**. Only individuals employed by Vonovia are included in the analysis of the workforce affected by those impacts that have been identified as material. Self-employed workers, non-salaried employees, workers of third-party companies and agency workers may be involved in Vonovia’s core business in Germany in both a commercial/administrative and technical/trades-based role. However, our strategic concepts and measures in response to the impacts are primarily applicable to our in-house employees who are directly employed by Vonovia. As they have fixed employment contracts with Vonovia, they are legally bound by our employment agreements and conditions and have access to our company user infrastructure.

The impacts described affect the two groups of employees as follows: Tasks that are central to our value chain – from caretaker work and green space maintenance to the implementation of modernization work – are largely carried out by our own **technical and trades employees**. Despite a targeted insourcing strategy aimed at ensuring the availability of skilled tradespeople and technical workers on construction sites, the shortage of skilled workers is, however, having a significant impact on the skilled trades at Vonovia. We will therefore only be able to prevent quality restrictions, mounting workloads and, as a result, dissatisfied employees who end up leaving the company, if we manage to position ourselves as an attractive employer.

Our **commercial and administrative employees** work in particular in administration, customer service and portfolio management in our business areas. As we place particular emphasis on fast and reliable customer service, we have our own customer service centers in Essen, Dresden and Berlin, where over 1,000 employees deal with our customers' concerns on a daily basis and in several languages. These areas of activity are also being impacted by demographic change, meaning that we expect to see a shortage of qualified staff here, too, in the future.

As part of the **transition plans to reduce any negative impact on the environment** and achieve environmentally friendly and greenhouse gas-neutral activities, there is an opportunity for Vonovia's employees to explore new (training) occupations, fields of activity and training areas. Our measures to achieve a greenhouse gas-neutral housing stock by 2045 include the refurbishment of building structures/envelopes and the installation of photovoltaic modules and heat pumps, which require the appropriate technical expertise in the trades for installation and maintenance. Commercial employees also require expertise in areas such as sustainability strategy, innovation management, digitalization and HR, which will also call for corresponding changes to existing job profiles and the creation of new functions.

Ambitious transition plans combined with a shortage of skilled workers in the areas concerned could, however, create a heavy workload for employees in these areas.

In our [Declaration of Respect for Human Rights](#), we specifically highlight the relevance of global human rights standards to us. Neither we, nor any of our partners tolerate forced or child labor under any circumstances. We also make sure to comply with all relevant legislation in Germany, Austria and Sweden. We make sure that all changes to the law are reflected in our processes. Our [Code of Conduct](#) provides clear expectations for how the company and its employees are expected to behave.

We strive for full transparency in our compliance with human rights and all relevant standards along the entire supply chain. Our stakeholders, too, increasingly expect this transparency – from raw material extraction to sales. We therefore oblige external partners and service providers to comply with the following requirements:

- > [Business Partner Code](#),
- > General Terms and Conditions of Purchasing,
- > Vonovia SE's general terms and conditions for building services
- > Vonovia SE's general terms and conditions for planning services
- > Individual agreements as part of our structured supplier management

In the context of the overall statutory framework set out above and thanks to the precautions taken, no cases of forced labor or child labor have come to light at any of our business locations in Germany, Austria or Sweden, or in any area of activity within our value chain. Given the preventive measures taken, we do not anticipate any elevated risk of forced labor or child labor.

Lower employee turnover and targeted recruitment of skilled workers through working conditions that are tailored to the needs of employees and the company presents a financial opportunity for the company in connection with its entire workforce.

The revision of our materiality assessment (for details, see [→ ESRS 2 IRO-1](#)) resulted in the following changes regarding the material IROs for ESRS S1:

- > The title of the material positive impact "Promotion of employees' professional development" used in the previous year has adjusted and is now referred to as "Employee satisfaction through professional development opportunities."

> In order to provide the best reflection of our HR strategy, the material impacts identified in the previous year, “Employee dissatisfaction due to lack of co-determination,” “Employee satisfaction through co-determination” and “Promotion of diversity in the workforce” were re-phrased as “Employee satisfaction through opportunities for participation” and “Lack of a sense of belonging due to insufficient promotion of diversity.” At the same time, the positive impacts relevant to our HR strategy, namely “Employee satisfaction based on appropriate remuneration” and “Employee satisfaction based on work-life balance” were identified as material.

> The material opportunity “Financial opportunity through appeal as an employer” was refined linguistically and renamed “Lower employee turnover and targeted recruitment of skilled workers through working conditions that are tailored to the needs of employees and the company.”

SI-1 – Policies Related to Own Workforce

All of the material IROs identified as part of the materiality assessment for the subtopics “Working conditions” and “Equal treatment and opportunities for all” are embedded in our long-term HR strategy, which aims to attract and retain highly skilled and satisfied employees in the long term. The HR strategy supports Vonovia’s business strategy.

Vonovia has identified a material financial opportunity in **lower employee turnover and targeted recruitment of skilled workers through working conditions that are tailored to the needs of employees and the company**, which will help it combat the prevailing **shortage of skilled labor**. This opportunity is directly linked to the material impacts on employee satisfaction

- > through professional development opportunities,
- > through opportunities for participation,
- > due to fair remuneration and
- > based on work-life balance.

The various subcomponents of our **HR strategy** address these impacts identified as described above, as well as the opportunity. The strategy was approved at Management Board level and is implemented, managed and developed centrally throughout the Group by the HR department. This also includes the business areas in Austria and Sweden.

The overarching objectives of this strategy are to secure the long-term success of Vonovia’s business and the associated jobs and, as a result, to attract qualified employees to Vonovia and keep them with the company in the long term.

This overarching strategic concept for HR has been integrated into our corporate management, with regard to sustainability aspects, via the **Sustainability Performance Index (SPI)**, which includes two **sub-indicators: employee satisfaction and the proportion of women in management positions at the first and second level below the Management Board**. For detailed information on the SPI and the tracking of targets, please refer to → **ESRS 2 GOV-3** and → **SI-5**.

In our quest to achieve our goals, we are using recruitment, targeted HR resource planning and the insourcing of skilled workers in technical areas and the trades to counteract the shortage of skilled workers and demographic change. Part of the concept also involves **promoting the development of skilled workers and employees and retaining them at the company (talent management)**. At the same time, we are working on our **organizational development** and on establishing an **innovative, open and dynamic corporate culture**. This includes short, medium and long-term implementation and management phases embedded in a steering cycle at Management Board and Supervisory Board level that is supported by an overarching internal strategy process and is monitored by both this entity and the HR department with regard to the progress made.

Vonovia’s business strategy is bolstered by strategic HR modules, which manifested themselves in three parallel “horizons”: in the short term, the foundation is laid for good staff performance and its immediate requirements are prioritized and addressed, such as remuneration and recruitment issues, as well as the topic of equality and equal opportunities (first horizon). Our aim is to strengthen employer branding, establish talent and performance management processes and provide existing employees with even more targeted training, support and development opportunities as they progress on their individual career paths. In the medium term, strategic recruitment is to be used to attract further qualified specialists for new roles in the company’s core business, for example in procurement, sales, modernization and development, in order to provide HR support to Vonovia’s growth strategy. In addition, we intend to make increasing use of digitalization potential – including

AI-supported solutions – to be able to meet the challenges of recruiting, which are brought about by the shortage of skilled workers, even more efficiently in the future (second horizon). In the long term, our HR strategy will focus on further developing and further establishing those aspects that promote leadership and corporate culture, in particular moves to promote gender equality and equality of opportunity within the company, as well as creating links with leadership concepts (third horizon).

The HR strategy is presented and made available as part of the steering cycle and in the corresponding implementation phases at management level. The responsible managers are tasked with implementing the measures derived from the strategic components referred to above in their business areas. Affected employees are also informed of any relevant strategic developments, changes and new features relating to their employment relationships before they are implemented through topic-specific information channels such as the intranet, video calls and (executive) emails. Regular employee surveys and the involvement of employee representatives allow employee interests to be incorporated into the (further) development of the HR strategy.

Vonovia uses the [Code of Conduct](#), as the basis for addressing the material negative impact of a lack of a sense of belonging due to insufficient promotion of diversity and the associated strategy for “Promoting Workforce Diversity,” as a central guideline for behavior that is consistent with Vonovia’s values and regulations. The [Code of Conduct](#) sets out provisions governing aspects such as conduct, preventing corruption, conflicts of interest, information and data protection, discrimination, environmental protection and protecting company property. It applies to all Vonovia employees in Germany and has also been adopted in Austria and Sweden, with modifications to take account of country and organization-specific differences. In addition, reports of non-compliance (e.g., in suspected cases of discrimination or violence in the workplace) are submitted using the relevant whistleblowing channels (see [S1-3](#)) and, if the facts are confirmed, sanctions are imposed based on formalized processes.

Operational responsibility for the implementation, monitoring and further development of this concept is shared between the HR, Legal, Compliance and Data Protection, Corporate Communications and Internal Audit departments. Ultimate responsibility lies with the Management Board. The [Code of Conduct](#) takes the form of a Group works council

agreement that was drafted and signed as a collaborative effort between the company and the Group Works Council.

The European legal framework in which Vonovia operates with its business model is strictly regulated and overseen in the markets in Germany, Austria and Sweden. This applies in particular to **fundamentally enshrined human rights**, to which Vonovia attaches great importance irrespective of the legal framework. Compliance with, and the fostering of, these rights is reflected in our ethos and mission statement. We adapt our guidelines to changing conditions as needed on a case-by-case business.

In our [Declaration of Respect for Human Rights](#), which applies throughout the Group, we communicate our clear conviction for a pluralistic democratic society and zero tolerance of human rights violations and our commitment to respect human rights in all aspects of our business. We adhere to the core labor standards of the International Labour Organization (ILO), the UN Guiding Principles on Business and Human Rights, the principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises as well as complying with the Universal Declaration of Human Rights (UDHR). Our [Code of Conduct](#) also takes account of our stance regarding respect for human rights. We make both documents available on our [corporate website](#).

From a human rights perspective, Vonovia’s business model means that **compliance with labor and social standards** on construction sites is of particular relevance. Some trade/construction activities in Germany are carried out by the company’s own technical service – and therefore by our employees. This lessens the risk of non-compliance with labor and social standards.

A **due diligence process** to avoid scenarios in which business activities have negative impacts on people and the environment forms the core of compliance with the minimum safeguards. Taking the OECD Guidelines as a basis, Vonovia has implemented all of the recommended due diligence steps. The analyses conducted in 2023 and 2024 with regard to human rights and environmental risks for our own operations and the supply chain are reviewed annually to ensure they are up to date and adjusted if necessary.

To address risks identified in relation to topics such as fair working conditions (adequate remuneration and social protection), freedom of association or anti-discrimination and equal treatment, we develop measures that we regularly review for appropriateness and effectiveness. Since 2023, for

example, we have been offering an e-learning program to raise awareness of our human rights due diligence obligations among our employees. Vonovia has set up various confidential procedures that allow reports on potential abuses (such as human rights violations) by both internal and external parties, including anonymous reports. We conduct in-depth investigations, or have an external reporting office conduct them, into indications of human rights violations within our own operations or in the supply chain that come to our attention via the various formal **reporting channels** (see → **S1-3**). Whistleblowers are given full protection from retaliation throughout the entire process.

As Vonovia operates in geographical areas (Germany, Austria and Sweden) where child labor, human trafficking and forced labor are prohibited and punishable by law, these issues are considered to entail low risks for the company based on a due diligence analysis. Consequently, these issues are not the main focus of Vonovia's HR strategy. Vonovia complies stringently with the statutory provisions that apply in its business areas and explicitly rules out these forms of human rights violations by means of corresponding Group policies. As a result, there is no risk of human trafficking, forced labor or child labor. Nevertheless, we carry out regular risk analyses, and ad hoc risk analyses if required, for our own business and for our supply chain. We describe our approach to risk analysis and the risk areas in our Declaration of Respect for Human Rights, which we update on a regular basis.

The company uses its professional **health and safety management policy** to minimize potential hazards and promote a working atmosphere that effectively protects all employees from health risks in the workplace. We design working processes and structures that are conducive to good health and offer preventive health care programs as part of our corporate approach to health management.

Our **Group guideline on occupational safety** defines the occupational safety standard that applies throughout the Group. The company undertakes to assess health hazards in the workplace and to implement the necessary safeguards based on this assessment. The guideline thus serves to protect employees from possible risks and hazards as they go about their individual, day-to-day work as well as to prevent potential hazards in advance to the greatest extent possible. It defines the associated responsibilities and duties at Vonovia. The resulting instructions help managers to live up to their occupational safety responsibilities. In line with our Group policies, the Management Board is informed once a

year about all occupational health and safety measures and the accident figures for the previous year.

Vonovia's HR strategy, which explicitly includes preventing discrimination, covers the following grounds for discrimination: ethnic origin, skin color, gender, sexual orientation, gender identity, disability, age, religion, political opinion, national origin or social background, as well as other forms of discrimination covered by EU and national law.

A general ban on discrimination against people with disabilities is enshrined in Article 3 (3) of Germany's constitution, the Basic Law (Grundgesetz), and in the Federal Participation Act (Bundesteilhabegesetz). This ban is substantiated by the objective of enabling participation and self-determination for people with disabilities, including in areas relevant to the labor market.

The German **General Act on Equal Treatment (AGG)** provides a framework - in Germany - for access to advertised jobs through the prohibition of discrimination under labor law. As a result, it also influences the management of recruitment and hiring processes, working conditions and the area of continuing professional development at Vonovia by virtue of the ban on discrimination under labor law. The Federal Disability Equality Act (BEinstG) in Austria and the Swedish Anti-discrimination Act (Diskrimineringslag) apply in a comparable framework. In addition to a strict ban on discrimination, Vonovia, as a private-sector company, is obliged to implement appropriate strategies to promote the employment of individuals with disabilities in its own operations. These are set out in a corresponding Group works agreement (the "Inclusion Agreement") between the Group Works Council and the Group with regard to various areas of application (e.g., integration and employment of people with disabilities, management training, workstation design and professional development). The various Group companies (e.g., the holding company, customer service, engineering, etc.) also have dedicated representatives for severely disabled employees who are on hand to answer formal or work-related questions. If cases of discrimination arise, individuals with disabilities can use our reporting channels (e.g., AGG mailbox, hotline, ombudsperson), which are used to record and investigate suspected cases and take appropriate action if a case of discrimination or harassment is confirmed (see also → **G1-3**).

SI-2 – Processes for Engaging with Own Workforce and Workers' Representatives about Impacts

Through an annual **employee satisfaction survey** conducted via an online questionnaire, we provide our workforce with a platform for dialogue and a space to give anonymous feedback – also in subsequent team workshops – allowing employees to share their views on working conditions, collaboration and company culture. This approach specifically addresses the management of our material positive impact, “Employee satisfaction through opportunities for participation,” while also contributing to our material financial opportunity associated with “lower employee turnover and targeted recruitment of skilled workers through working conditions that are tailored to the needs of employees and the company” by enabling employees to actively shape their working conditions and voice their opinions. The underlying questionnaire is developed and regularly updated with the support of an external service provider. Our target is to achieve a participation rate of at least 70%. A full survey was conducted in the current fiscal year. This is held every two years with partial surveys being conducted in the years in between. The participation rate in the fiscal year under review stood at 84%, as against 77% for the last interim survey in 2024. After the last partial survey conducted in 2024, interdepartmental formats were launched for improving Group-wide collaboration and measures were initiated to facilitate systematic follow-up in teams with low levels of employee satisfaction, among other action. This should have a positive impact on the strategy and the underlying objectives of increasing employee satisfaction.

Annual and systematic **feedback discussions** foster a culture of continuous improvement, appreciation and mutual trust. In addition to annual performance reviews, employees participate in a summer feedback session. As part of the annual summer appraisal process, employees provide their managers with direct feedback on their leadership behavior using an anonymous, voluntary digital questionnaire with the aim of improving both this behavior and teamwork. Following this, the entire team and the respective manager hold a meeting to jointly agree on actions to strengthen collaboration. This appraisal is used by the majority of Vonovia employees across the entire Group (excluding trainees, (working) students, marginal employees, temporary staff and interns).

Employee representatives, understood as works councils under the Works Constitution Act (BetrVG), are included in the sustainability statement. At Vonovia, the SE Works Council of Vonovia SE serves as the representative body, with regular updates also provided to the Group Works Council in Germany. The Vonovia SE Works Council includes employee representatives from Germany and Austria. The Swedish subsidiary's employees have not yet established employee representation. The SE Works Council is informed annually about changes to reporting content due to new materiality assessments, significant adjustments to the survey process and the implementation of recommendations from the external auditor's review of the sustainability statement. Employee representation also features a representative body for people with severe disabilities and representatives for young employees and trainees.

Our employees are also free to form trade unions and exercise their statutory right to **freedom of association**.

Responsibility for engaging with employee representatives and incorporating their input into company policies lies with the Chief Human Resources Officer (CHRO) and the Head of HR at Vonovia.

Vonovia and the Group Works Council have adopted a company-wide [Code of Conduct](#) that explicitly includes respect for human rights. The Code of Conduct allows the Group Works Council to negotiate with the Management Board on its interpretation and application. It also provides consultation options with compliance officers or representatives from departments such as Internal Audit or HR. This ensures that employee perspectives are consistently considered.

Vonovia evaluates the effectiveness of collaboration with its employees through the annual employee satisfaction survey. The effectiveness of collaboration with the Works Council is not reviewed. However, managers on the first, second and third levels below the Management Board are surveyed every year regarding their satisfaction with Works Council management.

SI-3 – Processes to Remediate Negative Impacts and Channels for Own Workforce to Raise Concerns

Vonovia strives to create fair and transparent working conditions while offering employees avenues to address individual workplace concerns anonymously and in compliance with data protection regulations. Employees can engage with representatives such as works councils or seek mediation in conflict situations.

Vonovia has implemented a comprehensive **complaint management system**, which includes channels for reporting potential cases of corruption, discrimination and human rights violations (see → G1-3). Reports of potential or actual misconduct can be directed to beschwerdestelleagg@vonovia.de, the responsible ombudsperson, or a hotline managed by an external law firm, which is also available to employees. The Labor Relations/Labor Law team handles access to the AGG mailbox and case-specific processing is carried out by this team, HR Business Partners or Compliance employees. Individuals also received targeted training on the subject of sexual harassment in 2025 in order to provide an additional personal reporting channel in a quest to foster trust. The names of these individuals are available on the intranet. Any suspected cases reported are investigated immediately and, if confirmed, individual sanctions are imposed.

Our **employee survey** did not point to any lack of a sense of belonging due to insufficient promotion of diversity among our employees. This allows us to conclude that the action we have taken adequately addresses this impact.

We asked questions regarding compliance functions within the company as part of our employee satisfaction survey. Among other things, the questions allow us to draw conclusions regarding knowledge of the reporting channels available. If most employees are aware of these channels, it will demonstrate their effectiveness – through the direct involvement of our workforce – in enabling the reporting of potential or actual misconduct by employees. In addition, individuals who submit reports via the whistleblowing system (BKMS) are asked how satisfied they are with the system.

Anonymous reporting channels are communicated to employees and business partners through training and the company website. Reports, particularly those that could reveal the identity of the reporting individual, are treated confidentially and handled exclusively by selected and specially trained staff. Further details are provided in → G1-3. We ensure that our employees are familiar with and trust these channels by actively communicating about them and using them regularly.

SI-4 – Taking Action on Material Impacts on Own Workforce, and Approaches to Managing Material Risks and Pursuing Material Opportunities Related to Own Workforce, and Effectiveness of Those Actions

We take targeted action to implement our HR strategy to address our material opportunity associated with **lower employee turnover and targeted recruitment of skilled workers through working conditions that are tailored to the needs of employees and the company**, which results directly from the material impacts of employee satisfaction

- > due to fair remuneration,
- > based on work-life balance,
- > through opportunities for participation and
- > through professional development opportunities.

The necessary measures are determined based, in particular, on the evaluations of our employee satisfaction survey. This survey and our other formats, like qualitative surveys and turnover analyses, allow us to ensure that our established measures remain effective and appropriate and do not entail any negative impacts on our employees. Our efforts enhance Vonovia's image as a secure and trustworthy employer, increasing our ability to recruit and retain skilled workers long-term. This means that they contribute to the overarching objective of our HR strategy: to find suitable and satisfied employees for, and retain them within, the company, and to support the corporate change processes.

In the reporting year, our comprehensive package of measures for successful **recruitment** continued to focus on the further development of our application and recruitment process, our training concept, the recruitment of specialists from abroad, and the targeted further training of skilled technical and auxiliary staff. We are implementing these measures for our own operations in Germany. As the shortage of skilled workers looks set to continue over the coming years, we aim to keep enhancing our processes in this area.

In the reporting year, we successfully implemented the visual employer brand that was developed on the basis of persona development, market analyses and expert interviews, and communicated it both internally and externally. This process involved developing a comprehensive, target group-oriented creative concept that takes account of all focus groups relevant to Vonovia. Our plan for 2026 is to further expand the rollout of our employer brand, strengthen Vonovia's visibility as an attractive employer in Germany and further increase our standing among our focus target groups. We expect to have the first set of reliable impact and success indicators for the action taken at the end of 2026.

Given the tight labor market, we aim to keep our employee turnover as low as possible. In the 2025 fiscal year, this employee turnover was 15.3%, which corresponds to a decrease of 1.4 percentage points compared to the previous year. To combat the skills shortage while promoting workforce diversity, we will continue to focus on recruiting skilled workers from Colombia for roles in electrical installation, landscaping, photovoltaic system expansion and technical services in Germany.

As a specific measure to achieve high **employee satisfaction** and employer attractiveness, as well as to reduce employee turnover, we offer the majority of our workforce permanent employment contracts. Over 90% of our employees across the Group held such contracts during the reporting year. We only employ agency workers in exceptional cases. Additionally, only regular employment relationships exist within the Group; we do not employ seasonal workers or pseudo self-employed individuals. We have a corresponding Group guideline in place in Germany to ensure this. In Sweden, the involvement of the HR department in the commissioning process ensures that the statutory requirements governing bogus self-employment are reviewed and complied with.

In the reporting year, more than 99% of Vonovia employees across the Group were covered by **collective agreements**. Collective agreements, renegotiated regularly, safeguard workers' interests.

To safeguard our employees' purchasing power, we have introduced a compensatory inflation bonus which became a permanent feature of gross monthly salaries starting in 2025. In addition to fixed salary components, all employees who have been with the company for at least one year as of December 31 of the previous year are eligible to participate in the employee share program. A large number of employment contracts also feature other variable salary components, which generally include both performance-related and company results-related components. These measures apply to the majority of Vonovia employees in Germany (excluding trainees, temporary staff and marginal employees).

A works agreement was also concluded and introduced in 2025 for employees of Vonovia's holding company (excluding executives, students on sandwich courses, working students, interns, trainees and marginal employees) to launch a grading system and a functional architecture. This grading system creates a transparent framework that highlights the development prospects and career opportunities open to employees in various career models. This sort of framework can also serve as a starting point for ensuring

remuneration that is commensurate with market standards and for attracting and retaining skilled workers.

Initial and further training are highly relevant both to Vonovia's commercial success and to satisfaction among our employees. As a company that offers a large number of traineeships, Vonovia invests in the structured development of its young employees. With this goal in mind, we completed our craft academy in Berlin, focused on vocational training and education, in the reporting year to support and create ideal training conditions. The academy is equipped in line with state-of-the-art technical and digital standards, and will serve as a blueprint for the opening of further training sites based on the same model. Three further locations in Germany are already in the concrete planning stages for 2026.

Digitalization plays an increasingly important role in our traineeship approach. We have implemented digital learning platforms, such as the Ulmer Learning Portal for gardener apprentices. In addition, we expanded our training software and digital learning management systems for Germany during the reporting year. Beyond this, we will continue to optimize and standardize our training processes.

To boost **employee satisfaction through professional development opportunities**, suggestions from the employee survey were incorporated into the immediate design of new offerings and digital learning formats as part of the Vonovia Academy's expansion during the reporting year. The **Vonovia Academy** centrally organizes the entire range of training, qualification and development formats for employees in Germany (including those who work part time) into an online catalog. Our traineeship offerings aim to build and expand the skills and knowledge of employees, focusing on specific roles, functions and needs. In addition to traditional formats like e-learning, online, hybrid and in-person training, we also offer materials for on-the-job learning and peer learning. Thanks to the wide range of development measures available, our employees are able to complete targeted professional, methodological and personal training and obtain professional certifications or qualifications. We also cooperate with external university partners and offer advanced qualifications in the skilled trades as well as part-time and sandwich study programs. By aligning selected initiatives with specific business areas and roles, we ensured that training offerings were tailored to needs during the reporting year. These include, in particular, training and skill requirements arising from societal megatrends such as climate change. On-demand and e-learning programs, such as digital training within our leadership development pro-

gram, as well as additional programs for our employees, aim to make upskilling at Vonovia an even more flexible and personalized experience in the future. For example, managers can discuss ideas and receive advice from professional coaches on specific aspects and challenges associated with change processes. During the reporting year, new training courses, curated learning content and guidelines were continually being added to the wide range of programs in Germany to ensure that current and future requirements are met. As part of our extensive development program for managers, core competencies, among other things, covering all aspects of good leadership and basic knowledge on innovation topics (e.g., on integrating sustainable action into one's own area of responsibility), are to be taught in line with the leadership philosophy.

Our range of individual development opportunities will be expanded in Germany in the future to include a program to support young, talented individuals. This program has been in the development stages since this year and is scheduled to be established for the first time in 2026. This program aims to support young high-performers and high-potentials, assisting them in areas such as making a decision on whether to pursue a career as an expert or in management.

In order to address satisfaction regarding **opportunities for participation**, we conducted annual and systematic **feedback sessions** (both bottom-up and top-down) throughout the Group in addition to the employee satisfaction survey in the reporting year (see → S1-2 and → S1-13). These are intended to foster a culture of continuous improvement – among both employees and managers – of appreciation and mutual trust as well as to improve teamwork.

In terms of **work-life balance**, we are focusing on **more flexible working models and working environments** that are tailored to our employees' individual needs. Our HR processes support more flexible working through works agreements that enable mobile working. These works agreements apply to administrative staff at Vonovia Holding, Customer Service, Technical Service, Residential Environment Service and BUWOG. We also offer our employees temporary and permanent part-time contracts, care leave, etc. as well as the use of various flexitime models. We are also driving the gradual expansion and further development of digital processes at Vonovia. This includes making mobile devices available, ensuring secure data traffic outside the office infrastructure and using digital meetings, which are available to the majority of our employees throughout the Group.

In order to further develop future collaboration in modern working environments in the reporting year, Vonovia implemented the "New Work @ Vonovia" project, which focuses on the corporate headquarters in Bochum and aims to offer our employees an attractive working environment that meets their individual needs. The initiative covers a total of four focal topics, including the structuring of various working models, state-of-the-art workplace design, digital tools and technologies, and training concepts for managers and employees alike.

To better **support work-life balance**, Vonovia also offered benefits beyond monetary remuneration to employees in Germany during the reporting year. These include offers such as Jobrad bike leasing, our company pension scheme, vacation apartments, and various partnerships with sports and fitness providers as well as advisory services, for example related to our corporate approach to health management.

Since measures to create working conditions geared toward employee needs are part of a continuous process and are regularly adapted to current circumstances, no specific timeline for completion exists, unless a timeline has been defined for individual measures.

The **effectiveness** of the strategies and actions described in → S1-1 and → S1-4 is tracked with the help of various analyses. The effectiveness of our **work-life balance** measures is ensured by analyzing the results of our employee satisfaction survey, which allows employees to provide feedback and suggest improvements. A sub-indicator in the full survey, which assesses employees' perspectives on the compatibility of work and family life, also provides further information on satisfaction in this area. In the reporting year, approval for this sub-indicator was at 85%.

We measure the success of our training program and Vonovia's appeal as a **training provider** based on training numbers and the training rate. The number of trainees in Germany once again increased in 2025 from 662 in 2024 to 735. This value corresponds to a training rate of approximately 5.8% (in Germany).

We track how successful our **recruitment measures** have been based on the number of new hires. Our aim is to ensure that the number of new hires remains at least at the same high level seen in the previous year. In the current reporting year, we hired 2,355 new employees (2024: 2,075). For 2025, one of our goals was to bring additional skilled workers from Colombia into employment at Vonovia. Currently, there are

already 80 electrical installation and landscaping workers from Colombia (2024: 65) employed at Vonovia.

The determination of the necessary and appropriate measures to address the material impact “**Lack of a sense of belonging due to insufficient promotion of diversity**” is first of all based directly on our objective to ensure equal opportunities for women in particular, i.e., to increase the proportion of women in management positions at the first and second levels below the Management Board. Second, suggestions provide us with corresponding incentives, which we receive from our workforce in our employee satisfaction survey. This also ensures that the action we take does not have a negative impact on our workforce. Appropriate and necessary measures are also identified, evaluated and implemented following thorough assessment. If, for example, an increased number of discrimination cases are reported through our complaint channels, this also prompts adjustments to our measures.

As part of its commitment to a discrimination-free working environment, Vonovia has implemented a comprehensive **complaint management system**, which was operational across the Group during the reporting year (see section → S1-3). For example, affected employees can report incidents of discrimination through the whistleblowing hotline – a web-based reporting system – or to an appointed ombudsperson. In Austria, a works agreement addressing discrimination, sexual harassment and bullying in the workplace has been in effect at BUWOG since spring 2024. This agreement defines discrimination and harassment in the workplace and establishes mechanisms for reporting and addressing incidents to prevent and respond to incidents of discrimination effectively.

We are continuously implementing further measures in this context and adapting our actions to changing conditions. Vonovia regularly updates its **training programs for discrimination-free behavior**. Since 2023, employees in Germany have had access to free e-learning on “Recognizing and reducing biases and stereotypes.” In order to more firmly anchor the issue of diversity at the strategic level of the company, Vonovia offers a voluntary leadership development program focused on topics like unconscious bias. Simultaneously, diversity has been established as a key criterion in the management development program.

We believe that **increasing equality of opportunity** for women in the company is particularly important. In Austria, the company is aiming to be awarded another equalitA seal of approval, which recognizes measures to promote women’s career advancement within companies, and the necessary documentation was submitted during the reporting year. In Germany, there are no fewer than three programs to promote equality of opportunity for women: the Women’s Network, the Female Leadership Forum and a mentoring program for high-potential female employees. More than 300 participants (2024: around 200) were involved in the Women’s Network in the fiscal year under review. The emphasis is on cross-company networking, e.g., through meetings that involve an introduction to the trade academy in Berlin and the Customer Service in Essen as well as the organization of business lunches. 138 (2024: 135) women have joined the Female Leadership Forum’s distribution list. The central aim of this program, beyond networking, is to increase the visibility and raise the profiles of the female participants, for example through targeted mentoring. The mentoring program was launched for the very first time in the fiscal year, involving eight high-potential female employees. We also have other networks aimed at dialogue and the promotion of diversity, for example addressing issues relating to the LGBTQ community.

By recognizing the ILO core labor standards, which we made binding for the entire Group in 2020 as part of our Group Human Rights Policy, Vonovia showcases its commitment to **gender-equitable pay**. In order to identify and eliminate discrimination regarding pay, we analyze our salary system and disclose our gender pay gap at regular intervals (see → S1-16). Since we introduced this metric at Vonovia back in 2020, we have regularly identified a gender pay gap in favor of female employees. This is because men predominantly work in lower-paid technical and construction roles, while administrative roles, which offer higher remuneration, have a more balanced gender ratio. Consequently, the gender pay gap at Vonovia does not stem from discrimination against male employees but rather from the inherent comparison of different occupational groups with varying educational backgrounds and job-specific remuneration levels.

In addition, the gradual harmonization of social benefits aims to ensure corresponding **equal rights for all employees** in their respective countries of employment. An employee share program, for example, has been launched in Austria, mirroring the program that is already in place in Germany. The regulations on the program have been laid down in a BUWOG works agreement. Following the introduction of a new, standardized retirement pension scheme in 2021, this offer was also available to most Vonovia employees in Germany during the reporting year. In Sweden, the 2025 employee survey showed that 87% of Victoriahem employees believe that all employees have equal opportunities and rights.

Work-life balance is a particularly important focus for Vonovia, which is why all leadership roles are advertised with part-time options. BUWOG in Austria also provides various offerings to support employees in balancing family and work responsibilities. The same applies to Victoriahem in Sweden. The topic of caring for relatives is a key issue that we raise with employees at information events and via the “because we care” app. In 2023, BUWOG also successfully achieved recertification as a family-friendly company by the Austrian Federal Ministry for Labor, Family and Youth. This recertification, valid for three years, remains in effect in 2025 and will continue until the next recertification in the 2026 fiscal year. In Sweden, Victoriahem was singled out as a “Karriärföretagen 2026” (Careers Company) in the reporting year for its inclusive and welcoming work culture and its focus on welfare, participation and sustainable development.

Since measures to prevent discrimination and promote equality of opportunity are part of a continuous process and are regularly adapted to current circumstances, it is generally the case that no specific timeline for completion exists.

The **effectiveness** of our strategies and measures to promote equality of opportunity is monitored using the SPI sub-indicator “Proportion of women in management positions.” For further details, refer to section → **S1-5**. Additionally, the regular collection of data on gender pay gaps (see → **S1-16**) provides overarching insights into the success of our measures to harmonize remuneration models. For further details, as well as information on effectiveness and target achievement regarding discrimination, see section → **S1-3** and **G1-3**.

Overall, we consider our current measures adequate for reducing our material negative impact and contributing to our material positive impacts. Negative impacts from our measures would be reflected in our employee satisfaction survey or through our grievance mechanisms. Based on the results and feedback from these measures (see sections → **S1-3**, **S1-4** and **G1-3** for more information), no such negative impacts have been identified. Our regular, Group-wide review of impacts, opportunities and risks related to our workforce and other material business activities within our value chain ensures early identification of potential future negative impacts and appropriate responses (for more details, see → **ESRS 2 SBM-2** and → **SBM-3**).

Negative impacts from the transition to a more environmentally friendly, greenhouse gas-neutral economy on our workforce could arise if the shortage of skilled labor leads to employee overload due to increased workloads. Other potential impacts include the transformation of specific business areas due to new climate protection regulations, such as transposition of the Energy Performance of Buildings Directive (EPBD) into German law, or emerging market technologies that affect our business processes. This could result in an increased need for recruitment, training and education to implement, manage and further develop new technologies in our core business. The business-related need for energy-efficient renovations and new construction to reduce greenhouse gas emissions creates high demand for skilled workers in both technical and administrative fields. We mitigate these impacts by providing further training for employees in these areas, encouraging long-term retention at Vonovia and recruiting new skilled workers. At the same time, these industry-specific factors could negatively impact employment in certain business areas (e.g., modernization and development) at Vonovia.

Managing these material impacts involves the CHRO and the Head of HR at the highest level. With regard to the management of identified impacts, we have implemented structural measures in the HR department. The topics of remuneration and equal opportunities are specifically addressed and systematically pursued by the relevant organizational units within the department.

SI-5 – Targets Related to Managing Material Negative Impacts, Advancing Positive Impacts, and Managing Material Risks and Opportunities

Our overarching targets for a successful transformation and growth process call for a successful HR strategy for recruiting and retaining employees. One of the challenges we face in this regard is the shortage of skilled workers. To maintain our appeal as an employer at least at the same level as the previous year and as such to counteract the negative effects of the skilled-labor shortage, retain employees at Vonovia in the long term and recruit new hires, we pursue the overarching goal of **consistently high employee satisfaction**. Employee satisfaction is also one of the six management-relevant sub-indicators of the Group-wide Sustainability Performance Index (SPI), which we use to track our target achievement. We can evaluate potential areas for improvement by analyzing our employee satisfaction survey. Employee satisfaction is also directly linked to working conditions at Vonovia, which result from our following material IROs:

- > Employee satisfaction through professional development opportunities,
- > Employee satisfaction through opportunities for participation,
- > Employee satisfaction due to fair remuneration, and
- > Employee satisfaction based on work-life balance.

The satisfaction score relates to the entire Group and is based on the aggregated approval rating, the so-called Retention Index, in the employee survey (agreement with the overarching question: “All in all, I can say that this is a great place to work.”). The retention index (2025: 84% / 2024: 78%) itself consists of five questions and, in combination with the employee turnover rate, is a suitable tool for measuring the impact that our HR measures have on employee retention. Since the methodological structure of the survey is tailored specifically to Vonovia’s personnel measures and employee structure, the consolidated approval rating can only be compared to a limited extent with survey methods used by other companies. The SPI targets are set within the framework of five-year planning for each sub-indicator. Target achievement is determined at the end of

the year based on the actual values achieved. For 2030, we are pursuing the medium-term goal of achieving and maintaining an **approval rating of at least 77%**. The baseline value for progress measurement is the previous year, with the current reporting year serving as the baseline year. The approval rate came to 85% in the reporting year (2024: 79%). No changes were made to our targets during the reporting period. This means that the actual value of employee satisfaction improvement in the reporting year corresponds to the planned value. Since this is a sub-indicator of the SPI (for further information, see → [ESRS 2 GOV-3](#)), it is monitored directly by the Management Board.

Regarding the objective of achieving gender equality and empowering women within the company, we have set the target of increasing and maintaining the **proportion of women in management positions** at the first and second levels below the Management Board to **at least 30% by 2030**. When setting the target, we were guided by the representation of women in the Group as a whole. The metric that we use to track our progress toward this target and determine whether any adjustments need to be made to the action we are taking applies to the entire Group and is directly linked to our material impact, namely a lack of a sense of belonging due to insufficient efforts to promote diversity. As another sub-indicator incorporated into the SPI, the proportion of women in leadership positions is subject to the five-year planning target value. The baseline value for progress measurement is the previous year, with the current reporting year serving as the baseline year. In the reporting year, our proportion of women in management positions stood at 26.7% (2024: 25.8%). This means that the actual value for the reporting year does not match the planned value of 29.5%. We nevertheless still consider it realistic that we will be able to achieve the medium-term target of at least 30% by 2030. Since this is a sub-indicator of the SPI, it is monitored directly through reporting to the Management Board. No changes were made to our targets during the reporting period.

Both targets directly reflect the goal of the policy formalized within our overarching HR strategy, which is to:

> use a growth and transformation campaign to secure the long-term success of Vonovia's business and the associated jobs and, as a result, to recruit and retain skilled employees at Vonovia over the long term and

> develop and establish an innovative, open, and dynamic corporate culture that promotes equal treatment and opportunities over the long term.

No employees or employee representatives were involved in the target-setting process.

S1-6 – Characteristics of the Undertaking's Employees

Characteristics of the Company's Employees

Number of Employees	2024		2025
	Total	Thereof continuing operations	Total (continuing operations)
Employees by gender			
Male	9,506	8,571	9,040
Female	6,462	3,485	3,668
Other	-	-	-
Not reported	-	-	-
Total number of Employees	15,968	12,056	12,708

Characteristics of the Company's Employees

Number of Employees	2024		2025
	Total	Thereof continuing operations	Total (continuing operations)
Employees by country			
Germany	15,076	11,164	11,849
Austria	367	367	365
Sweden	525	525	494

Characteristics of the Company's Employees

	2024				2025			
	Male	Female	Other	Total	Male	Female	Other	Total
Number of employees								
Total	9,506	6,462	-	15,968	9,040	3,668	-	12,708
Thereof continuing operations	8,571	3,485	-	12,056	9,040	3,668	-	12,708
Number of permanent employees								
Total	8,435	5,703	-	14,138	8,179	3,285	-	11,464
Thereof continuing operations	7,661	3,095	-	10,756	8,179	3,285	-	11,464
Number of temporary employees								
Total	1,071	759	-	1,830	861	383	-	1,244
Thereof continuing operations	910	390	-	1,300	861	383	-	1,244
Number of non-guaranteed hours employees								
Total	-	-	-	-	-	-	-	-
Thereof continuing operations	-	-	-	-	-	-	-	-
Number of full-time employees								
Total	8,655	3,715	-	12,370	8,546	2,575	-	11,121
Thereof continuing operations	8,071	2,454	-	10,525	8,546	2,575	-	11,121
Number of part-time employees								
Total	851	2,747	-	3,598	494	1,093	-	1,587
Thereof continuing operations	500	1,031	-	1,531	494	1,093	-	1,587

Employee Turnover

	2024		2025
	Total	Thereof continuing operations	Total (continuing operations)
Number of employees who have left the undertaking during the reporting period*	2,709	1,953	1,885
Employee turnover in the reporting period in %	17.7	16.7	15.3

* In addition, there were 285 departures in the care segment in 2025. This results in a total number of departures in the financial year of 2,170.

For the disclosure of data on employee characteristics, we use headcount instead of full-time equivalents. The number of employees is determined according to the counting method of the German Commercial Code (HGB). This includes part-time employees and excludes the Supervisory Board, the Management Board, trainees, employees whose employment relationship is suspended due to parental leave and employees in the absence phase of phased retirement.

The HGB counting method has also been applied to employees in Austria and Sweden.

For employee turnover, all exits are considered based on HGB counting, excluding temporary workers, working students and employees in marginal employment. The number of exits takes into account the Care segment that was sold during the fiscal year up until the date of the business area's discontinuation. The employee turnover rate is only calculated on the basis of continuing operations. We apply the definition of the European Public Real Estate Association (EPRA) for calculating turnover: exits during the fiscal year (excluding integration-related exits) / number of employees as of December 31, 2025 x 100%. We do not use average values but rather a reporting date assessment as of December 31, 2025.

Typically, employees at Vonovia are hired on permanent contracts. In Germany, Austria and Sweden, employees have a legal entitlement to part-time work, and part-time requests must be considered. As a result, the part-time rate is driven by individual employee needs rather than HR strategy.

The same data collection method as in → S1-6 is applied for the disclosure of employee figures in other sections of this business report.

S1-7 – Characteristics of Non-Employees in the Undertaking's Own Workforce

Vonovia employs a total of 52 non-employees (2024: 63), primarily in the "employment placement and temporary staffing according to NACE Code N78 (temporary agency workers)" sector. The company does not employ self-employed contractors.

The fluctuations as against the previous reporting period are due to different project requirements. The number of temporary agency workers remained stable during the year.

The counting method for non-employees follows the approach used in → S1-6 of this standard, based on HGB headcount disclosures as of December 31, 2025.

Vonovia primarily deploys temporary agency workers to handle workload peaks in project contexts or short-term surges in demand. They do not replace regular employment relationships, and their numbers generally remain below 1% of the total workforce. Fluctuations result from varying project needs.

S1-8 – Collective Bargaining Coverage and Social Dialogue

Collective agreements cover 99% of Vonovia employees. Some employees at Vonovia Germany are subject to multiple agreements, including a collective agreement for the establishment of works councils and a wage agreement.

Employee representation within the framework of social dialogue covers 99% of Vonovia employees.

There is an SE Works Council based on a corresponding agreement, as well as a Group Works Council in Germany.

Collective Bargaining Coverage and Social Dialogue

	2024				2025			
	Collective Bargaining Coverage		Social dialogue		Collective Bargaining Coverage		Social dialogue	
	Employees – EEA (for countries with >50 empl. representing >10% total empl.)	Employees – Non-EEA (estimate for regions with >50 empl. representing >10% total empl.)	Workplace representation (EEA only) (for countries with >50 empl. representing >10% total empl.)	Workplace representation (EEA only) (for countries with >50 empl. representing >10% total empl.)	Employees – EEA (for countries with >50 empl. representing >10% total empl.)	Employees – Non-EEA (estimate for regions with >50 empl. representing >10% total empl.)	Workplace representation (EEA only) (for countries with >50 empl. representing >10% total empl.)	Workplace representation (EEA only) (for countries with >50 empl. representing >10% total empl.)
	Total	Thereof continuing operations	Total	Thereof continuing operations	Total	Thereof continuing operations	Total	Thereof continuing operations
Coverage rate								
0–19%								
20–39%								
40–59%								
60–79%								
80–100%	Germany	Germany			Germany	Germany		

SI-9 – Diversity Metrics

Diversity Metrics

	2024			2025	
	Total	Thereof continuing operations	In %	Total (continuing operations)	In %
Gender distribution at top management*					
Male	186	173	68.6	170	73.3
Female	85	60	31.4	62	26.7
Other	-	-	-	-	-
Age distribution of employees					
Under 30 years	2,095	1,621	13.1	1,741	13.7
Between 30 and 50 years	7,822	6,168	49.0	6,518	51.3
Over 50 years	6,051	4,267	37.9	4,449	35.0
Unknown	-	-	-	-	-

* First and second levels below the Management Board.

S1-10 – Adequate Wages

As in the previous year, Vonovia ensures adequate wages for all employees in line with applicable benchmark values.

The company adheres to the legally established minimum wage in Germany, and to the collectively agreed minimum wage for the occupational group or sector concerned in Austria and Sweden, in accordance with Directive (EU) 2022/2041 of the European Parliament and Council.

S1-11 – Social Protection

Legal requirements in the countries where the Group operates ensure full social protection for all Vonovia employees (100%, also 100% in 2024). This coverage includes protection against loss of earnings due to illness, unemployment, occupational accidents, incapacity to work, parental leave, and retirement.

S1-12 – Persons with Disabilities

Persons with Disabilities

in %	2024		2025
	Total	Thereof continuing operations	Total (continuing operations)
Percentage of own employees with disabilities*			
Male	3.5	3.3	3.1
Female	4.1	3.2	3.0
Other	-	-	-
Total	3.8	3.3	3.1

* According to the social law definition for disabled status pursuant to SGB IX Chapter 2 in Germany or BEinstG, Art. II Chapter 2 in Austria (degree of disability of at least 50%). In Sweden, the collection of data regarding people with disabilities is not permitted for legal reasons. The figures refer to Germany and Austria, taking into account the total number of employees for both countries according to S1-6.50.

S1-13 – Training and Skills Development Metrics

Training and Skills Development Metrics

	2024			2025	
	Total	Thereof continuing operations	In %	Total (continuing operations)	In %
Employees who have received a performance and career development review					
Male	3,080	2,915	34.0	5,938	65.7
Female	2,797	2,231	64.0	2,383	65.0
Other	-	-	-	-	-
Total	5,877	5,146	42.7	8,321	65.5
Percentage of target checks in %	81.8	93.0	-	81.1	-
Average number of training hours*					
Male	5.4	5.5	-	5.8	-
Female	7.7	10.3	-	7.5	-
Other	-	-	-	-	-
Total	6.3	6.9	-	6.3	-

* Includes only training/education recorded by the Vonovia Academy.

SI-15 – Work-Life Balance Metrics

Work-Life Balance Metrics

in %	2024		2025
	Total	Thereof continuing operations	Total (continuing operations)
Percentage of employees entitled to family-related leave*	83.8	96.2	96.5
Percentage of eligible employees who have taken family-related leave			
Male	3.4	3.4	3.4
Female	5.3	7.0	6.9
Other	-	-	-

* A legal entitlement exists in Austria and Sweden for all employees. No 100% entitlement to leave for family reasons exists in Germany, as there is no statutory right to paternity leave.

SI-16 – Remuneration Metrics (Pay Gaps and Total Compensation)

Remuneration Metrics (Pay Gaps and Total Compensation)

	2023		2024		2025
	Total	Thereof continuing operations	Total	Thereof continuing operations	Total
Total gender pay gap in %*	2.5	-5.7	-0.4	-6.7	-1.8
Ratio of the annual total remuneration of the highest-paid individual to the median annual total remuneration of all employees**	-	-	96.4	-	104.1

* Calculation: (Hourly Pay male - Hourly Pay female)/Hourly Pay male.

** Determination of the denominator according to HGB methodology. For employees without time tracking, actual working hours were estimated.

The gender pay gap measures the difference between the average earnings of female and male employees, regardless of job profile.

At Vonovia, the gender pay gap favors female employees, as men predominantly work in lower-paid technical and construction roles, while administrative roles, which offer higher remuneration, have a more balanced gender ratio. Consequently, the gender pay gap at Vonovia does not stem from discrimination against male employees but rather from the inherent comparison of different occupational groups with

varying educational backgrounds and job-specific remuneration levels.

To calculate the average salary used in determining the gender pay gap, Vonovia considers the actual gross salary, where measurable, including elements such as benefits in kind, pension contributions, capital-forming benefits, and non-cash benefits such as company cars. This is assessed in relation to the actual paid working hours, which include paid absences such as vacation and continued wage payments during illness.

SI-17 – Incidents, Complaints and Serious Disputes Related to Human Rights

In the fiscal year, 26 (2024: 7) incidents of discrimination, including harassment, were reported. These include any cases reported within the Care segment before the segment ultimately left the Group.

Additional complaints regarding human rights violations received via our whistleblowing channels amounted to 6 (2024: 0) during the fiscal year.

No significant fines, sanctions, or compensatory payments related to the above-mentioned incidents and complaints were incurred during the reporting year or the previous year. Consequently, our income statement does not include any expenses in this regard.

During the reporting period, no serious incidents relating to human rights were identified in connection with the company's own workforce.

ESRS S4 Consumers and End-Users

ESRS 2 SBM-3 – Material Impacts, Risks and Opportunities and Their Interaction with Strategy and Business Model

Material Impacts, Risks and Opportunities

Within the scope of our materiality assessment, we identified **four material impacts, risks and opportunities (IROs)** related to consumers and end-users:

- > Contribution to affordable homes
- > Housing tailored to tenants' needs
- > Influence of accessibility and service quality on customer satisfaction
- > Increased quality of living for tenants through contribution to neighborhood development and infrastructure

All four material IROs have an impact on our tenants and, as a result, on our customer relationships.

The tangible and positive impact **"contribution to affordable homes"** first of all outlines the effects of strictly adhering to regulatory rent-related frameworks (e.g., rent indices, standard local comparative rents, rent caps, price controls) on the reliability and stability of landlord-tenant relationships, thereby securing affordable homes.

Second, the impact relates to additional measures for various customer segments – such as special vested rights for tenants over the age of 70, hardship management, the use of social managers, offering publicly funded housing – that allow us to address low-income and vulnerable customer groups so that they can remain in their apartments for as long as possible or continue to have access to affordable homes.

By creating new, demand-oriented and – in part – subsidized homes in neighborhoods, we are helping counteract the shortage of available homes and mitigate rising rents, also for existing tenants. This relates to local markets where we can offer new construction to a variety of target groups. This impact is tied primarily to urban agglomerations characterized by high demand for homes.

The rental of homes forms the core business of Vonovia. In order to be able to provide these homes in the long term, Vonovia relies on stable rental development. Rent indices, particularly qualified ones, are based on recognized scientific methods and provide us with the guidance we need. In Germany, rent indices are compulsory for cities with more than 50,000 inhabitants. For a stable and reliable housing market, such regulatory frameworks are thus essential to ensure security and continuity for customers and landlords.

Given the massive housing shortage and the fact that there are no signs of the market situation easing, we do not believe that there is currently any need to adjust our business model or strategic alignment.

Our focus on different customer segments is reflected both in our development activities and in our portfolio and the products we offer, which cater to customer demand for modern home amenities. We combine freely financed and price-controlled new home construction for our own portfolio (Development to hold) and for sale (Development to sell). We also remain focused on reducing construction costs to provide sustainable, affordable homes for diverse target groups while introducing a share of subsidized homes to the market.

The positive impacts on customer relationships are thus rooted in the company's strategy and business model. In addition to the short-term impact, we also expect to see a medium to long-term positive follow-up effect for our customers, as our business model is stable, we plan to build new homes to hold in our own portfolio, and both leases and rent trends also have an impact in the medium to long term.

By offering **"Housing tailored to tenants' needs,"** in particular by creating homes that meet people's needs as they age, we can significantly increase the length of time that people with physical disabilities can stay in their own residences. This extended autonomy positively impacts their living conditions and health as they age. Targeted measures (e.g., accessible housing) enable us to retain existing tenant groups and attract new ones. This creates direct impacts on our customers.

By 2035, demographic change in Germany will have created a need for around 3.7 million fully accessible homes. Only around 1.2 million senior-friendly homes are available at present. This gap is already evident today and will only become more pronounced in the coming years. Even low-threshold (structural) measures can have a positive impact and increase the supply of suitable housing. This is reflected in our product range for accessible partial modernization and new construction, which we have integrated into our long-term investment strategy and business model.

The positive impacts associated with the **“influence of accessibility and service quality on customer satisfaction”** result from ensuring consistently high service and product quality and from swiftly processing customer inquiries. This allows customers’ varying needs to be identified and addressed in a timely manner. As (potential) tenants are the core target group in our business model, their satisfaction has a key impact on our strategy, our value chain and our processes. It makes a decisive contribution to the acceptance of, and demand for, the housing we offer among tenants and individuals looking for an apartment. As changes in customer satisfaction can have tangible effects in the short term – e.g., in the form of lower demand, more complaints – we survey customer satisfaction levels on a quarterly basis and respond to negative trends with targeted measures at the regional and neighborhood levels. We continuously work on improving service quality and implement corresponding measures (see here section → **S4-4**). These measures therefore make a major contribution to this impact, and have a direct effect on our customers, whose satisfaction depends on their implementation.

The positive impact **“Increased quality of living for tenants through contribution to neighborhood development and infrastructure”** encompasses the effects of neighborhood development that is specifically geared to the needs of stakeholders as well as positive synergy effects resulting from better neighborhood infrastructure. This benefits not only our customers, but also other users of the neighborhood (downstream value chain).

Neighborhood development activities help to develop socially and ecologically sustainable places for people to live together in central urban locations and in metropolitan areas, improving the quality of living of the people who live there. In the long run, this can result in a more needs-based or environmentally friendly portfolio, better infrastructure connections, greater diversity or a higher level of education/average income in the neighborhood. This allows for a reduction in the anticipated costs – for example through modernization measures that are optimized at neighborhood

level – and accelerates sustainable neighborhood development.

The holistic neighborhood approach is mirrored in the company’s strategy and business model: around 77% of Vonovia’s strategic portfolio in Germany is located in around 755 contiguous neighborhoods. In this context, we understand a quarter – as per the definition of the German Housing and Real Estate Companies (GdW) – as a visually coherent urban development structure that is seen by its residents as a distinct area and that represents an area for action in which the residential real estate company can make a difference and see positive effects. It generally comprises at least 150 apartments (see → **Portfolio in Rental Business**). Vonovia’s investment, rental and development programs tie in with this portfolio composition – particularly along our strategic climate pathway (see → **ESRS E1**). This makes the holistic neighborhood approach the management level for all ecological, infrastructure-related, rental-related and social measures. The same also applies to our new construction and development activities. Consequently, this approach has – and indeed will continue to have – a significant influence over the company’s strategic direction. Our neighborhood development measures are a direct result of Vonovia’s business strategy and are consistent with the overarching goal of providing housing that meets the needs of all individuals.

The observation period for this impact is limited to a short-term horizon, as it is influenced to a significant degree by the neighborhood-focused investments made in the fiscal year, or planned for the following year. A long-term positive impact can also, however, be expected if several effects related to improved quality of living at neighborhood level are interrelated and reinforce each other in a positive way.

The higher Vonovia’s share of homes in contiguous neighborhoods and the more extensive the measures initiated, the more direct and impactful the neighborhood infrastructure measures will be and the more they will foster customer satisfaction.

In the 2024 reporting year, we reported separately on the two company-specific disclosures “Living at fair prices” and “Neighborhood development and contribution to infrastructure.” As part of the **revised materiality assessment process** (see → **ESRS 2 IRO-1**), the allocation was adjusted and the topics were incorporated into ESRS S4. As a result, the corresponding IROs – “Contribution to affordable homes” and “Increased quality of living for tenants through contribution to neighborhood development and infrastructure” – as reported under ESRS S4 as of the 2025 reporting year.

The revision also resulted in the following changes for ESRS S4 in particular:

- > The material negative impact reported on in 2024 – “Reduced tenant satisfaction due to limited accessibility and service quality” – was dispensed with. The title of the other material positive impact reported in the previous year – “Improved customer satisfaction through better accessibility and service quality” – has been amended and the impact is now referred to as “Influence of accessibility and service quality on customer satisfaction” (still classified as material).
- > The material opportunities reported in the previous year, namely “Reduced tenant turnover through the creation of homes that meet people’s needs” and “Financial opportunity from increased customer satisfaction and service quality”, were no longer classified as material in the reporting year.
- > The impacts classified as material in the reporting year – “Contribution to more affordable homes for tenants by adhering to regulatory frameworks” and “Contribution to more affordable homes for tenants through new construction and development activities” – have been combined in one impact, “Contribution to affordable homes,” as their content overlaps.

Resilience of Our Business Model

In general, the resilience of Vonovia’s strategy and business model is analyzed and evaluated annually as part of **risk management** (see → [ESRS 2 GOV-2](#)).

To evaluate the resilience of our business model in managing our key impacts, we continuously analyze trends in **customer turnover** and **customer satisfaction**. This analysis has shown that our customer turnover remains consistently low and our customer satisfaction consistently high. Our management platform provides customers with both a centralized customer service department and local contacts (e.g., caretakers, craftsmen, real estate managers, technicians and landlords), enabling us to constantly address customer needs and concerns.

The high **demand for affordable housing in metropolitan areas** and the existing gap between supply and demand is not set to change in the medium term.

This ensures that our current measures strengthen the resilience of our business model, with no material risks identified.

Target Groups

The core target group comprises tenants in Germany, Austria and Sweden as well as potential tenants and buyers and customers for property-related services such as green electricity, insurance and multimedia. The information provided in the ESRS S4 reporting framework generally applies to all (potential) tenants and buyers.

Our customers are not end-users of products or services that are harmful to health, increase the risk of chronic diseases or could have a negative impact on rights such as rights to privacy, data protection, freedom of speech or non-discrimination. They do not require detailed product or service information to avoid potentially harmful use and do not belong to particularly vulnerable groups, such as children or financially vulnerable individuals who could be adversely affected by marketing or sales strategies. When it comes to “homes that meet people’s needs,” older or physically impaired tenants represent a customer group that has special needs regarding the homes they live in. These needs are taken into account without any material IROs related to impacts on the health of this target group being identified.

S4-1 – Policies Related to Consumers and End-Users

Affordable Housing Tailored to Tenants’ Needs

As a responsible company, we want to meet the **basic human need for housing** and provide affordable housing that is tailored to tenants’ needs as part of this quest. We express this in our Business Philosophy.

We aim to offer **long-term homes** to as many people as possible. The challenge here lies in being able to offer a broad supply of housing at fair, transparent and market-oriented prices, even in a more challenging environment, while at the same time pursuing our climate objectives, which include a greenhouse gas-neutral housing stock by 2045. At the same time, our aging society, a result of demographic change, means that our customers’ needs are changing, too. Our annual investment program for accessible (partial) modernization is our way of implementing our policy for creating housing that is senior-friendly/tailored to tenants’ needs. This policy targets the senior-friendly refurbishment of vacant apartments (during tenant transitions). By 2030, we are aiming to ensure that **approximately 27% of apartments rented out annually in Germany have**

been (partially) modernized to make them accessible (see → S4-5). The approach also includes fully accessible new construction.

Social responsibility and the transparency of our rents are decisive factors in this context. Through investments in core business activities – rental, refurbishment and new construction – we aim to ease the current housing market situation.

Compliance with regulatory requirements is a must for us. Applying the relevant regulation helps us to offer fair rents – particularly in tense rental markets – and to rent properties out without discriminating against any particular group. This offers particular benefits for our new customers, to whom we can offer reliable rental conditions. However, we also recognize the potential risk of regulatory frameworks for rents and rent caps as well as (construction) standards and regarding potential restrictions on the recoverability of investment expenses and ancillary costs, or the transfer of residential properties to public ownership, developing in an unfavorable direction for Vonovia, directly influencing the company's financial performance. In our rental operations, we always observe the applicable country-specific legislation, monitoring compliance through our local regional organization and systematic support from our central portfolio management team.

Our policy for creating affordable homes applies across the entire Group and relates to our own operations. An exception is Sweden, where rents are generally set as part of a binding, consensual process involving negotiations between tenants' associations and landlords. Increases tend to occur annually and after refurbishment to a higher standard. In Sweden, the scope for rental pricing is narrower than in other markets, particularly Germany, resulting in less pronounced implementation of these policies there.

The policy for creating senior-friendly homes also applies to the company's own operations, but is limited to Germany and focuses on the target group of older customers.

The Management Board makes the key decisions regarding the strategic direction of the rental business. The same also applies to our investment program aimed at accessible (partial) modernization. Following approval by the Management Board, the concrete planning and execution of measures are carried out by local representatives in the different regions.

Customer Satisfaction

Customer satisfaction is instrumental in the success of a company. This means we **aim to maintain consistently high customer satisfaction**, reflected in the positive development of the Customer Satisfaction Index (CSI). The CSI is a sub-indicator of our non-financial performance indicator, the SPI (for more information on the SPI, please refer to → **ESRS 2 GOV-3**). For us, it is closely tied to customers being happy with our service quality and the accessibility of our customer service. In this regard, Vonovia has implemented a **central and digital property management platform**. This is an ERP-based application with company-specific configurations that enables the efficient and effective management of our housing portfolio (own business area) in Germany. This platform also forms the basis for the successful digitalization of our process chains. This fully end-to-end digitalized process ensures significant efficiency advantages and scalability, represents substantial cost benefits and serves as a key differentiating factor in the competitive market. Vonovia has adapted the expertise from this platform and its centralized and local property management processes for the property management business in Austria and Sweden, in line with the requirement profiles that apply in those markets. The implementation of this policy is overseen by the Management Board.

The management platform and access to a large customer base represent a material intangible resource for Vonovia.

Quality of Living Through Neighborhood Development and Infrastructure

The **size of the overall portfolio and Vonovia's presence** in neighborhoods in (major) cities and metropolitan areas enable a neighborhood-based, holistic management and development approach. Portfolio enhancement measures are planned holistically and implemented sequentially in a neighborhood context to develop socially and ecologically sustainable places for people to live together in central urban locations and in metropolitan areas, improving our customers' quality of living in the process. We use corresponding synergy effects to achieve energy-efficient building refurbishment in line with our climate pathway, contribute to the energy revolution and actively drive the infrastructure transition, without losing sight of the need to ensure commercial viability that any private-sector company has to meet.

This approach also applies, in particular, to our new construction activities, which, to the greatest extent possible, are aligned with the neighborhood concept and are already designed as part of the planning process such that holistic measures can be applied.

The size of the portfolio – in tandem with the neighborhood approach – represents a key intangible resource for Vonovia.

The neighborhood approach is embedded in various **investment programs** (including modernization, heating system replacement, photovoltaics, senior-friendly housing, maintenance) and is reflected systemically in the geographical categorization by urban quarters/clusters. Both the decarbonization tool (DKT, see → **ESRS E1**) and the portfolio management investment calculator are based on the segmentation of the portfolio into neighborhoods.

Segmentation by urban quarters based on the definition above is only used for the German market segment at present (see → **Portfolio in Rental Business**). Neighborhood-based approaches are also pursued in Sweden and Austria.

The Management Board (and in particular the CRO) is responsible both for the decision to structure the portfolio and for the resulting segmentation into urban quarters and urban clusters as well as for fundamental investment decisions. All measures resulting from this decision for a specific neighborhood area are planned and reviewed in the respective regional business areas before they are implemented, working in collaboration with central portfolio management.

Policy Availability

We convey our core values externally through our corporate principles and mission statement, which are publicly available on our website, as well as our communications and public relations efforts. Additionally, our customer website provides direct access to information and contact options, such as those related to our social management initiatives. We determine tenant satisfaction regarding rent levels through customer surveys, which offer customers the opportunity to highlight any issues. Similar surveys are conducted for new construction projects, allowing us to gather customer feedback at those locations on the product.

Respect for Human Rights

All human rights-related obligations and frameworks applicable to Vonovia also apply to our customers. In our  **Declaration of Respect for Human Rights**, which is binding throughout the Group, we communicate our clear conviction for a pluralistic democratic society and zero tolerance of human rights violations along with our commitment to respect human rights in all aspects of our business. This includes the exclusion of discrimination of any kind, for example in the allocation of housing.

We adhere to the core labor standards of the International Labour Organization (ILO), the UN Guiding Principles on Business and Human Rights and the principles of the UN Global Compact as well as complying with the Universal Declaration of Human Rights (UDHR).

Compliance with these principles is a top priority when it comes to implementing the policies described above. Please refer to → **ESRS 2 GOV-4** for more information on the monitoring process.

In the markets where we operate, there are also extensive legal protection mechanisms in tenancy law and social charters to safeguard customers against human rights violations.

Consumers or end-users are not directly involved in this process. However, customers can report violations of human rights or suspected cases of discrimination through various channels. Reported cases are followed up immediately, ensuring our customers are indirectly involved in monitoring compliance with the stated principles and guidelines. By handling rentals primarily through our own employees, who are directly bound to follow the stated principles and guidelines, rather than external brokers, we minimize the risk of non-compliance. During the reporting year, we did not become aware of any cases of non-compliance with the guiding principles described above.

Further details about our whistleblower channels can be found in → S4-3 and → G1-3.

S4-2 – Procedures for Engaging with Consumers and End-Users Regarding Impacts

Vonovia actively involves its customers in decision-making and activities through quarterly **customer surveys** conducted by an external service provider. The Customer Satisfaction Index (CSI), based on 25 individual questions, measures customer satisfaction. This index is specifically tailored to Vonovia and is therefore not comparable to other customer satisfaction analyses or indices. The CSI also evaluates the effectiveness of collaboration with customers, allowing them to provide positive or negative feedback, which we use to respond and adapt accordingly.

The surveys address topics such as service and product quality (e.g., apartment amenities, noise levels, safety and cleanliness in the residential environment and housing estates), brand perception, customer loyalty, and overall satisfaction. Feedback helps us refine customer care, respond to customer needs, and assess maintenance, modernization measures, and repair activities for buildings, outdoor areas, and neighborhoods. The results are then analyzed by all of our operational departments. Measures are then derived based on customer feedback, implemented and reviewed at the neighborhood level to further improve the quality of service and quality of life.

Ongoing **dialogue with tenant and consumer protection organizations** on an ad hoc basis are also particularly important to us so that we can address and respond to tenant interests in a consolidated and targeted manner. This process is focused not only on dialogue with the central top-level associations, the German Tenants' Association, the Austrian Tenants' Association and the Swedish Tenants' Union, but is also implemented at regional or local level with tenants' associations and neighborhood advisory councils in particular. Customers can also communicate directly with Vonovia employees during tenant meetings, modernization meetings, or through on-site caretakers. The Management Board and our Corporate Communications team (Public Affairs) lead exchanges at the central level, while Vonovia's regional managers handle local contact. Interactions with political and administrative bodies also ensure customer concerns are brought to our attention.

We take as many requests and suggestions from tenants, cities and municipal authorities into account as possible when planning our neighborhood measures. We therefore inform them of our plans ahead of time, in addition to inviting them to discuss projects and take an active role in shaping them (for example, at information events, neighborhood walks, through our caretakers and neighborhood managers, participation mailboxes or tenant consultations).

In addition to engaging with tenant and consumer advocacy organizations, we maintain contact with welfare service providers and other charitable organizations and associations. Dialogue and resulting collaborations help us understand the concerns of specific groups, such as older people and those at risk of or experiencing homelessness, and translate these insights into tailored offerings. This applies especially to individuals with refugee backgrounds.

S4-3 – Processes to Remediate Negative Impacts and Channels for Consumers and End-Users to Raise Concerns

Customer concerns can vary widely, requiring either straightforward or more complex procedures to address them effectively.

Strict protocols and standard processes are in place to manage risks and ensure compliance with safety obligations, particularly to prevent health and safety hazards. If a customer concern involves a hazardous situation, immediate measures are taken, such as eliminating mold, addressing Legionella contamination or repairing water damage.

Most concerns relate to tenancy issues or the cleanliness and condition of buildings and their surroundings. Customer service or local caretakers can resolve issues directly or refer them to the appropriate internal department for further action. These representatives/customer service employees are accessible via phone, the customer app, digital contact forms on the website or, in the case of local contacts, also in person. The primary tool for evaluating the effectiveness of our corrective measures and feedback channels is our customer satisfaction survey. We also evaluate customer tickets and analyze processing times when customers contact us. All of our customers also have access to our **whistleblower and complaints channels** (see → G1-3).

In order to raise awareness of this among regional managers responsible for rental operations and to protect potential customers, we developed the brochure “Fair play in new rentals” back in 2022 and distributed it to all relevant functions within the company. Among other things, it clarifies the right procedure for dealing with demands for commission from third parties and explains which channels can be used to report misconduct and who the correct contact is for questions and reports. The brochure continues to serve as a guide for employees.

Staff handling complaints are bound by confidentiality and are the only ones with access to complaints and related communications. Data is stored only as long as necessary for its intended purpose. After reviewing reported incidents, individual, proportionate measures are taken on a case-by-case basis. The whistleblower system is easily accessible via the [company's website](#). By ensuring anonymity, the system protects individuals from retaliation. Regular use of the channels indicates that customers are aware of them and consider them to be reliable. This trust is supported by low-barrier access to whistleblower channels, which are available in eight languages (see also [G1-3](#))

[S4-4 – Taking Action on Material Impacts on Consumers and End-Users and Approaches to Mitigating Material Risks and Pursuing Material Opportunities Related to Consumers and End-Users, and Effectiveness of Those Actions](#)

Since all of the measures that are outlined below are part of a continuous process, there is generally no specific timeline for their completion, unless a timeline has been defined for individual measures.

[Actions for Affordable Homes that Meet Tenants' Needs](#)

In order to implement our policy of providing affordable homes that meet tenants' needs for as many people in society as possible, we take the following actions with regard to the impacts that have been classified as material:

As regards **housing affordability**, we focus on **fair rent pricing**. Our rental prices are based on local rent prices, and, if available, on certified rent indices. Our involvement in rent index commissions, including providing data, in numerous locations helps ensure their accuracy and fairness. We monitor compliance with all applicable regulatory frameworks through our central rental management team.

Across the Group, the average rent price came to € 8.38/m² (2024: € 8.01/m²) in the 2025 fiscal year, and in Germany to € 8.19/m² (2024: € 7.89/m²), which corresponds to an organic increase in rent of 4.1% (2024: 4.1%).

Index-linked rents, i.e., rents linked to inflation, make up just around 2% of our lease agreements. The average rent excluding ancillary expenses in our portfolio remains below 30% of the average disposable household income of tenant households in Germany.

In Germany, the costs of energy-related refurbishments can be passed on in the net rent – within a specific framework. The government has limited companies' ability to pass on costs to € 3/m² (€ 2 in the case of rents under € 7/m²). The resulting increase in the rent is balanced out for customers through a reduction in heating costs. When passing on refurbishment costs, we are always mindful to ensure that the burden placed on our customers is socially just and offer individual solutions as part of our social management system. That said, reasonable compromises must be made in favor of additional climate change mitigation measures. In the 2025 fiscal year, an average of € 0.75/m² in refurbishment costs was passed on (2024: € 1.25/m²).

We also offer **publicly funded housing**. Our business model ensures that we are always integrated into the urban society where we offer homes. In numerous cities and municipalities, we also offer subsidized and independently financed homes for people on low incomes – in Germany around 27,000 (2024: 33,700) of our homes are currently price-controlled – and are responding to specific challenges with services tailored to local needs.

The supplementary voluntary agreements that we conclude with cities and municipalities include, for example, provisions governing fair rental conditions, the construction of new apartments or the strengthening of municipal housing construction companies and joint neighborhood development.

We also offer price-controlled homes in Austria and Sweden. Almost 18,400 (>90%) apartments in Austria and 100% of our approximately 40,000 apartments in Sweden are price-controlled. In total, around 16% of our entire portfolio is therefore subject to rent caps. By **creating new, demand-oriented and – in part – subsidized homes** in neighborhoods, we are helping counteract the shortage of available homes and mitigate rising rents, particularly for existing tenants. Through our development subsidiary, BUWOG, Vonovia constructs homes for both portfolio retention and sale, focusing on highly sought-after urban areas. A total of 2,090 (2024: 3,747) residential units were completed in this area in 2025, 800 (2024: 1,276) units for our own portfolio and 1,290 (2024: 2,471) units to be sold to third parties.

The **use of public subsidies** helps us to make existing and new housing affordable for our customers and, at the same time, to implement climate protection measures. This contributes to a balanced tenant structure in our neighborhoods. We remain focused on optimizing construction costs and we have adopted the “Basic House” policy (see → **ESRS E1** and → **ESRS 2 SBM-1**) to provide sustainable, affordable homes for diverse target groups while introducing a share of subsidized homes to the market.

Accessible construction and refurbishment allows us to create **homes that meet tenants’ needs** – particularly for people with restricted mobility. In our portfolio, low-threshold structural measures as part of a (partial) modernization to create accessible spaces are often sufficient to significantly increase the level of living comfort in old age. Homes that are completely barrier-free, according to German industry standard DIN 18040-2, are only necessary in very rare cases. As an additional measure, we have developed a criteria catalog for construction measures for barrier-free (partial) modernization. This catalog is applied following an assessment of existing properties to determine potential areas for reducing barriers and the scope of modifications. Additionally, portfolio tenants can request age-appropriate upgrades through our program “Age-appropriate modernizations in response to tenant requests.” If a care level is determined, partial costs can be recovered by the respective health insurance. As a further measure, we plan our new buildings to make them highly accessible and wheelchair-friendly.

In addition to structural measures, the social infrastructure in the neighborhood also plays a key role. As a result, we have introduced further measures to address our impact on “Housing tailored to tenants’ needs,” such as **senior-friendly apartments, services and neighborhood meet-ups**, for example.

Vonovia also has a **comprehensive hardship and social management system in place**. Our objective is to support people’s ability to pay so that they can stay in their homes and their homes remain affordable. To this end, we offer individual support measures ranging from rent rebates to assistance with housing allowance applications and relocation assistance. A team of social managers who have been trained specifically to assist with such matters are on hand to help.

We do not want our customers above the age of 70 to have to worry about their livelihoods due to rising rent levels. We really don’t want them to lose their homes with us. This is why we support people aged over 70 if the standard local comparative rent changes. We support customers who feel that their apartment is too large but would like to stay in their neighborhood, for example, by switching apartments.

As part of our hardship regulations, we apply uniform standards based on those of welfare associations in the event of refurbishment work. These standards were developed in collaboration with the tenants’ association and other residential real estate companies, and help to ensure greater reliability and transparency in cases of hardship. In recent years, we have been able to achieve a positive outcome in the vast majority of hardship claims and provide direct assistance to the affected customers, for example by reducing or waiving the modernization allocation.

We are committed to ensuring that the rules of the game are followed in the housing market. This also applies in scenarios involving illegal subletting or apartment misuse, which can make it difficult for everyone to access the rental market fairly and can also place additional strain on the rental markets. In order to curb the associated abuse of the system, we take appropriate measures to combat fraud within the context of the applicable data protection regulations.

Finally, we offer **homes for vulnerable target groups**, i.e., for people who are homeless or at risk of becoming homeless, as well as refugees. The “Housing First” approach ensures that homeless people are provided with a standard tenancy agreement with all of the normal rights and obligations, regardless of any mental or physical health conditions that they might have. It is only after this that they are offered help in order to get some stability into their lives. Vonovia provides homes for this purpose across Germany as part of numerous cooperative initiatives. This is also a focus of our support for refugees.

The measures relate primarily to the German market, but also apply to some extent in Austria and Sweden.

The investment program for accessible (partial) modernization is implemented in this form exclusively within the German portfolio. The elimination of barriers is also, however, taken into account in the relevant building regulations in Austria and Sweden.

We allocate **significant financial resources** to manage our considerable influence on “housing tailored to tenants’ needs.” In the fiscal year under review, for example, € 807.5 million was invested in modernization measures/our portfolio. An additional € 354.0 million was invested in new construction (to hold) and € 811.2 million in maintenance. The total amount of € 1,972.7 million corresponds to the figures disclosed in the financial report. Investments at a similar level are planned for the coming fiscal year (see the → [Forecast Report](#)).

Measures for fair rental pricing (impact “Contribution to affordable homes”) do not lead to significant operational or capital expenditure. Instead, they tend to limit revenue, as potential margins are not fully realized. New construction, on the other hand, involves operational expenditure. In 2025, this came to € -30.0 million (2024: € -25.0 million, see → [Earnings performance – Development segment](#)). Investments in new construction (to hold) rose considerably to € 354.0 million in the reporting year (2024: € 224.5 million, see → [Earnings performance – Rental segment](#)).

Customer Satisfaction Measures

Our actions to boost customer satisfaction are aimed at **continuous service and product improvements, quick response and processing times within the customer service department and enhanced accessibility**, such as expanding digital channels.

One key measure in relation to the policy for customer satisfaction is our **centralized customer service centers, supported by decentralized local contacts** in Germany, which ensure fast and reliable service, directly contributing to our goal of a high level of satisfaction. Our central, multi-lingual and long-term customer service centers in Essen, Dresden and Berlin act as the first port of call, whereas our caretakers, craftsmen and landlords look after the needs of customers on location. This structure allows us to identify customer dissatisfaction early and respond immediately.

We also maintain a **central and permanent knowledge and training management system** to enhance customer satisfaction. We continued our focus on developing the skills of our employees throughout the Group as a whole during the reporting year to meet the needs of our customers. The Training & Quality department collaborates here with HR to provide a comprehensive training catalog of around 120 training modules tailored to employees’ learning needs. Regular dialog formats ensure performance and quality. The aim is to guarantee the same level of quality for the entire portfolio in Germany. A high level of service and quality in turn contributes to our overriding goal of a high level of satisfaction as part of the management policy on customer satisfaction.

Our digitalization policy during the reporting year included implementing **self-service functions** across the Group, with a particular focus on tenant apps. We can use these customer apps as a particular example of how we map the full customer journey: from the apartment search process, including arranging viewing appointments, to the digital conclusion of contracts and all other issues affecting existing customers, such as ancillary expense bills, through to the concerns of customers moving out of our properties and former customers. The Mein Vonovia and DeuWo Digital apps have already been downloaded over 1.7 million times, with approximately 260,000 active users. The app portfolio also includes the BUWOG-Kunden app. The app features are being continually enhanced.

We also focus on **extensive supplemental communication** across the Group, including during the reporting year. For example, our website provides comprehensive, multilingual information on important housing-related topics, such as energy-saving tips for our customers.

We provide **extensive personnel resources** to manage customer satisfaction and our key impact “Impact of accessibility and service quality on customer satisfaction.” Over 1,000 employees work in our customer service centers, and additional local staff, including caretakers, craftsmen, and landlords, directly contribute to managing this material impact. This structure enables customers to directly assess how we manage this material impact, either on site or through our customer service centers.

Actions to Increase Quality of Living for Tenants Through Contribution to Neighborhood Development and Infrastructure

Environmental and social aspects go hand in hand as part of our central, holistic neighborhood approach. Vonovia is equally committed to both aspects and to promoting social interaction in the local community. Measures to strengthen shared living and measures to drive the greenhouse gas-neutral transformation of the housing stock only become manageable, effective and efficient through the neighborhood approach. With our multidimensional neighborhood development approach, which targets the actual impact we have identified as material, different strategic components are applied individually to each neighborhood. These measures relate to the German market and focus on the clustering by neighborhoods (urban quarters) described in → [ESRS 2 SBM-3](#) in our strategic portfolio:

We perform **building upgrades aimed at energy efficiency** and install **photovoltaic systems** on our own properties. Sequential energy-efficient upgrades to our own housing stock in line with our climate pathway, the use of innovative heating and electricity concepts (e.g., district heating grids and our heat pump cubes), the expansion of renewable energy supply systems (especially using photovoltaics) and establishing smart links between these systems within the neighborhood are central elements of our climate strategy, which are particularly effective in the neighborhood thanks to the exploitation of synergy effects and economies of scale (see → [ESRS E1](#)).

We are also expanding our **neighborhood infrastructure** (green and communal areas, playgrounds, establishment of local suppliers, educational and social facilities). A large number of diverse measures are being developed in order to meet the needs of the neighborhood concerned.

The **provision of premises for social facilities** plays a key role. Freely accessible space that can be used by the public can be seen as a key criterion for neighborhoods that offer quality of living and, thanks to additional opportunities for networking and the diverse ways in which spaces can be used, increases the variety of services on offer and quality of life for all users in the immediate vicinity. This is why, in the 2025 fiscal year, we made 88,000 m² or 13.9% of our commercial space available for social and community purposes (e.g., senior citizens’ centers, day-care centers, rooms for childcare, etc.). With our flexible “freiRaum” neighborhood concept, we also offer free, low-threshold locations for local initiatives and groups to allow people to get involved in social events and to network in our neighborhoods.

We also take **action to promote state-of-the-art mobility concepts**. These measures support the mobility transition towards lower-emissions (electric) mobility in our neighborhoods. When designing new construction projects, we pay attention to good public transport connections, focus increasingly on bicycle parking spaces and consider providing charging facilities for electric mobility right back at the planning stages. To date, we have installed 128 neighborhood charging stations for electric mobility in our existing neighborhoods, 119 of which are already in operation. We are planning a further 100 locations in 2026. Car and bike sharing services (including for electric vehicles) round off our offering. We are aiming to gradually connect our neighborhoods to municipal cycle path networks.

In the 2025 fiscal year, **we invested a total of € 648 million (2024: € 510 million) in our urban quarters in Germany.**

For 2026, we expect to invest approximately € 907 million in urban quarters.

Effectiveness of the Measures

The **insights from the customer satisfaction surveys** provide the operational departments and management with a **fundamental basis** for decision-making on customer satisfaction. The results give us an insight into whether our actions are appropriate and address our material impacts. The assessments of the satisfaction survey are discussed quarterly in Germany in the regional business areas on site (and directly with the specialist departments in Austria) and measures are developed at the neighborhood/building level. They also include our customers' satisfaction with the neighborhood environment, enabling us to evaluate our neighborhood development measures. In Sweden, too, customer satisfaction is a fundamental benchmark for all business processes.

We use **metrics that are commonplace in the housing industry** to analyze and evaluate the effectiveness and appropriateness of our measures in relation to our contribution to affordable housing that meets tenant needs. Key examples include vacancy and turnover rates, as well as the rent collection rate, which is used to measure payment defaults. We evaluate applications submitted as part of our hardship and social management system to draw conclusions as to the prevalence of these cases and the effectiveness of our supporting measures to protect customers.

Our **Group policies** and our  **Code of Conduct** mean that we are obliged to comply with all legal requirements. Rent pricing in particular is subject to stringent regulation to prevent exorbitant rents, for example. As part of the customer surveys, analyses of response and processing times are also conducted. Our experience shows that accessibility, speed and transparency in service are decisive factors for achieving customer satisfaction. These analyses allow us to identify weaknesses in our service commitments and address them effectively.

No serious incidents relating to human rights have been reported to us in connection with the implementation of our actions.

We use selected additional metrics to track the effectiveness of our measures and the extent to which they meet our objectives. For more information, see → [S4-5](#).

S4-5 Targets Related to Managing Material Negative Impacts, Advancing Positive Impacts, and Managing Material Risks and Opportunities

Affordable Homes That Meet Tenants' Needs

Vonovia has not set any specific targets for the metrics linked to the impact "Contribution to affordable homes," namely "Average rent per square meter," "Number/proportion of price-controlled apartments" and "Average modernization cost allocation (in Germany)". This is because compliance with regulatory standards is not a quantifiable metric but rather reflects the company's fundamental alignment and its dependency on the design of regulatory frameworks, over which the company has no direct influence. The chosen metrics serve as a benchmark to demonstrate the nature of responsible rent setting, particularly in comparison to industry benchmarks.

Additionally, we consider the planned organic rent increase for the following year to be an appropriate approximation for a target metric. This increase aligns with customary local rents or rent indices. Central rental management monitors the development process and all regulatory requirements. For 2026, we anticipate an organic rent increase of approx. 4.2% compared to the 2025 base year.

The metric "**average rent per square meter**" represents the average rent across all rented apartments in Germany, Austria and Sweden. Currency conversion for Sweden is based on the reference date of December 31, 2025. A separate figure covering all rented apartments is reported for Germany as it is Vonovia's core market. The average rent per square meter reflects the monthly contractual rent divided by the rented area. An average value is calculated across all rental properties, with the figure given in euros.

The metric "**Number/proportion of price-controlled apartments**" describes the total number of apartments classified as "price-controlled" within Vonovia's portfolio. To determine the percentage of price-controlled apartments, the number of such apartments is compared to the total portfolio. In Germany, rent restrictions typically apply to publicly subsidized apartments, subject to contractual or statutory cost-based rent limits. In Austria, price controls are based on the applicable rental model outlined in the lease agreement or unit classification. Price controls are generally tied to the organizational structure of the company (at the time the apartment was built). In Sweden, base rents are negotiated annually with local tenants' associations. They must be reasonable and cost-based, leading to collective restrictions that classify all rents or apartments managed by Vonovia in Sweden as price-controlled.

The metric “**Average modernization cost allocation (in Germany)**” represents the average rent increase per square meter for all modernized apartments in Germany during the reporting year. In Germany, the costs of energy-related refurbishments can be passed on in the net rent – within a specific framework. As this cost allocation model does not exist in Austria and Sweden, the KPI applies only to the German portfolio, with the figure given in euros.

The core indicator for adapting apartments to meet the needs of an aging population is the **proportion of accessible (partially) modernized newly rented apartments in Germany**. This includes both measures in the event of a change of tenant and modernizations at the request of the tenant. We assess new rentals based on comparable portfolios and exclude newly constructed homes.

Our medium-term **goal for 2030 is to modernize around 27% of newly rented apartments every year** so that they meet the demands of an aging society. This quantified goal directly aligns with our policy objectives for housing tailored to tenant needs. The reference year for tracking progress on this and all other sub-indicators of the Sustainability Performance Index (SPI) is always the current year. The metric covers all modernization measures carried out as part of the relevant investment program during the reporting year. The criteria for “accessible” align with the product catalog of the German Development Bank (KfW). This KPI applies specifically to the German portfolio.

In the fiscal year under review, we achieved our target, (partially) modernizing approximately 12,900 apartments to be accessible (2024: 11,100 apartments), representing 36.8% (2024: 29.5%) of new rentals in Germany. Since this is a sub-indicator of the SPI (for further information, see → **ESRS 2 GOV-3**), it is monitored directly by the Management Board.

Customer Satisfaction

The core indicator we use to measure customer satisfaction is the CSI. The KPI is derived from 25 questions included in customer surveys. These questionnaires remain unchanged over time to ensure comparability. Approximately 31,000 customers are surveyed each quarter. The CSI applies specifically to Germany. The satisfaction level we use as the basis for calculating the improvement is expressed as a percentage, while the change compared to the previous year is given in percentage points.

Our medium-term **goal for 2030 is to maintain our high level of satisfaction**, which we define as a satisfaction index above 73%, and we aim to achieve this target annually. The target is derived from the peer benchmark provided by the external service provider conducting the satisfaction survey. This quantified goal directly aligns with our policy objectives for customer satisfaction. The reference year for tracking progress on this and all other sub-indicators of the Sustainability Performance Index (SPI) is always the current year. In 2025, we increased customer satisfaction by 1.3 percentage points compared to the previous year, achieving a satisfaction score of 76.5%. Since this is a sub-indicator of the SPI (for further information, see → **ESRS 2 GOV-3**), it is monitored directly by the Management Board.

Quality of Living Through Neighborhood Development and Infrastructure

Regarding the impact associated with “increased quality of living for tenants through contribution to neighborhood development and infrastructure,” we monitor how effective our actions and targets are using the metrics “Neighborhood investments (in Germany),” “Tenant satisfaction with the neighborhood environment (in Germany)” and “Share of socially used commercial space (in Germany).”

The “**Neighborhood investments**” are based on the approach set out in GRI (2016) 203-1, which reflects the status of the development of major infrastructure investments and services supported. It describes the investments in euros that Vonovia made in its strategic portfolio located in urban quarters in Germany as of the reporting date of December 31, 2025. It is calculated as the sum of investments made within this portfolio structure during the reporting year in building upgrades (measures for modernization of energy efficiency and heating), refurbishment of vacant apartments (partial or full modernizations of apartments for full accessibility), capitalized maintenance, new construction completed for our own portfolio (including added stories to existing buildings), and the expansion of photovoltaics. Based on this definition, Vonovia invested approx. € 548 million (2024: approx. € 510 million) in neighborhoods in Germany in 2025.

“Tenant satisfaction with the neighborhood environment in (Germany)” comprises a subset of three questions from the CSI questionnaire for measuring customer satisfaction (see “Customer Satisfaction”). These are added up – with equal weightings – to produce a score. The figure is expressed as a percentage of the average annual value of all “rather good” or “very good” responses from the four CSI questionnaires in a given year. Only Vonovia tenants in Germany are included in the survey. The aim is to maintain this satisfaction figure at a consistently high level (> 80%) in the medium term. The value for 2025 came in at 83.8% (2024: 83.4%).

The “Share of socially used commercial space (in Germany)” is derived from an analysis of the usage type of commercial units. It extracts data covering all types of use of commercial units actively rented out by Vonovia in Germany that were classified in advance as “social.” These include types of use such as a neighborhood office, meeting point, day-care center or use of a space for other educational purposes. These are expressed in relation – in terms of square meters of space – to all rented commercial units in Germany with confirmed usage type. Large commercial units are excluded from this metric. The metric is based on the approach taken in GRI (2016) 413-1, which shows the percentage of operations (in this case rented commercial units) where local community engagement measures were implemented. According to this calculation, around 88,000 m² of commercial units were allocated to social facilities as of the reporting date of December 31, 2025 (2024: around 100,000 m²). This corresponds to 13.9% (2024: 14.0%) of all let commercial units in Germany.

Investments in neighborhoods make up the central framework for action in connection with the material sustainability aspect of “neighborhood development” and the associated impact: “Increased quality of living for tenants through contribution to neighborhood development and infrastructure.” Vonovia has not set any targets for this metric due to the varied nature and number of the various individual measures, which are taken depending on the needs of the neighborhoods concerned. We consider the planned budget targets for the following year, however, to be a suitable approximation tool for investments in neighborhoods in Germany. Successful infrastructure projects and the resulting improved quality of living in cities and neighborhoods can be quantified most specifically – alongside other meaningful indicators – by the investments made in their development.

Further Explanations of the Remuneration-relevant S4 Indicators

The indicators “proportion of accessible (partially) modernized apartments among new rentals in Germany” and “customer satisfaction in Germany” are part of our **Sustainability Performance Index (SPI)**. They are two of the six KPIs linked to remuneration in the sustainability area (see → **ESRS 2 GOV-3**).

The Management Board has set the SPI’s individual indicator targets for 2030, which are closely tied to the company’s five-year investment planning. The relevant key figures are recorded quarterly by Controlling and used in our external reporting and for communication with the capital market. Target achievement is determined at the end of the year based on the actual values achieved. For details about the SPI, refer to → **ESRS 2 GOV-3**. Scientific findings were not considered in setting the targets mentioned under ESRS S4. Additionally, consumers or end-users, or their representatives, were not directly involved in setting the sub-indicator targets of the SPI, tracking performance toward these targets, or identifying areas for improvement.

ESRS G1 – Business Conduct

ESRS 2 SBM-3 – Material Impacts, Risks and Opportunities and Their Interaction with Strategy and Business Model

Material Impacts, Risks and Opportunities

Within the scope of our materiality assessment, we identified **two material impacts, risks and opportunities (IROs)** related to business conduct:

- > Violations of applicable bribery and corruption regulations undermine the confidence that relevant stakeholders place in the company's integrity
- > Positive impacts on employees through the Code of Conduct and the development of a corresponding corporate culture

The two IROs are closely linked to our strategy, as adherence to our [Code of Conduct](#) and the promotion of a corporate culture aligned with it can be positively influenced internally through strategic initiatives and targeted measures. By ensuring that our Code of Conduct is put into practice, we reduce the potential for violations of bribery and corruption regulations. Disregarding these regulations may result in strategic adjustments.

Moreover, our corporate culture and Code of Conduct have direct impacts on people, especially our employees, who benefit from a culture of trust and respect, business conduct that considers the interests of all parties and strict adherence to legal requirements. The negative impact also has direct implications for our employees and other stakeholders (e.g., business partners, customers, shareholders).

Violations of bribery and corruption regulations can have a negative impact on the trust placed in Vonovia's integrity and accountability, particularly with regard to the reliability of management decisions, governance structures and the effectiveness of the compliance culture. Consequently, violations of this nature could have a negative impact on Vonovia's reputation, which could present various challenges for the business model, mainly a decline in its appeal as an employer or a scenario in which shareholders and business partners decide they no longer wish to be involved with Vonovia. As a result, any reported violations are promptly investigated and, if necessary, sanctioned. Further details can be found in the "Resilience of Our Business Model" section and under Disclosure Requirement [→ G1-3](#).

A strong corporate culture, on the other hand, can enhance our appeal as an employer and help address the challenge of skilled labor shortages as well as promoting equality of opportunity (also because the Code of Conduct bans any sort of discrimination).

Our corporate culture strategies have to be viewed in the context of our HR strategy (see [→ ESRS S1](#)).

Resilience of Our Business Model

In general, the resilience of Vonovia's strategy and business model is analyzed and evaluated annually as part of **risk management** (see [→ ESRS 2 GOV-2](#)). To evaluate the resilience of our business model in managing our material impacts, we continuously monitor potential violations of our [Code of Conduct](#) and the number of confirmed cases of corruption and bribery. Analyses from past reporting periods indicate that our systems for detecting bribery, corruption, and violations of the Code of Conduct remain effective in the short, medium and long term. Reported violations are promptly investigated and, if necessary, sanctioned. In the event of a serious corruption or bribery incident, appropriate and effective measures are implemented, including internal investigations into each allegation. The necessary resources are immediately allocated by the Management Board. We also take a preventive approach by raising awareness of compliance topics among employees through mandatory online training on the Code of Conduct and other relevant policies, as well as face-to-face training in some cases. We continuously monitor legal developments to ensure our training programs and policies, such as the [Code of Conduct](#) and [Anti-Corruption Policy](#), are promptly updated in response to any regulatory changes. Our annual risk analysis also helps us identify compliance risks and implement mitigating measures. We can therefore conclude that our current measures strengthen the resilience of our business model and ensure that no material risks emerge for our business model. Although the functionality of our measures is assured, complete protection against such incidents cannot be guaranteed.

The revision of our materiality assessment (for details, see → [ESRS 2 IRO-1](#)) resulted in the following changes regarding the material IROs for ESRS G1:

- > The material risk reported in the previous year “Financial risk from corruption and bribery” is no longer classified as material. This is to ensure consistency and connectivity between the Sustainability and Risk Reports, as this risk is not classified as material in the latter. As no material financial impacts resulting from potential bribery and corruption incidents are expected at Vonovia, this risk is not classified as material and is not included in the Sustainability Report.
- > The negative impact “Violations of applicable bribery and corruption regulations undermine the confidence that relevant stakeholders place in the company’s integrity” was classified as material in the current fiscal year. Although no material financial effects are expected to arise due to potential violations of corruption and bribery regulations, there may be an impact on Vonovia’s various stakeholders if potential violations attract significant media attention. Vonovia addresses this issue by reporting on the material impact of “Violations of applicable bribery and corruption regulations undermine the confidence that relevant stakeholders place in the company’s integrity” in the current fiscal year.

G1-1 – Corporate Culture and Policies for Business Conduct

Vonovia defines corporate governance as responsible, sustainability-driven business conduct and oversight based on trust and transparency encompassing all areas of the company. The Management Board and the Supervisory Board have made a comprehensive commitment to the principles of corporate governance as set out in the German Corporate Governance Code.

These principles are the basis for the sustainable success of the company and serve as guidelines for conduct in the company’s daily management and business. Good corporate governance strengthens the trust of our shareholders, business associates, employees, customers and the general public, boosts corporate transparency and strengthens our Group’s credibility. With balanced corporate governance, the Management Board and the Supervisory Board want to secure Vonovia’s competitiveness, strengthen the trust of the capital market and the general public in the company and sustainably increase the company’s value.

Our **comprehensive set of policies and measures** aimed at preventing compliance violations in connection with corporate governance is consolidated within our **Compliance Management System (CMS)**. The CMS at Vonovia encompasses all policies, regulations and works agreements. The CMS is based on three pillars: prevention, detection and response. Individual aspects of the CMS are reviewed by Vonovia’s Internal Audit department at regular intervals, generally every three years. At the top of our internal compliance framework is the → [Group Compliance Policy](#), which serves as a binding framework linking all policies and regulations to create a unified compliance structure. The Compliance Policy is supplemented by other Group policies, such as those on anti-corruption and whistleblowing.

The CMS applies across the Group and ensures that all transactions and processes comply with all legal and internal requirements. Whenever legislation in Austria or Sweden conflicts with Group-wide rules, a different rule is adopted for the subgroup in the form of a national guideline. The ultimate responsibility for this lies with the respective managing directors.

Vonovia implements the policies described below to address the material impacts and promote its corporate culture. Since the measures to implement the policies that are also outlined below are part of a continuous process and are always adapted to current (legal) circumstances, there is generally no specific timeline for their completion, unless a timeline has been defined for individual measures.

Operational responsibility for the implementation, monitoring and further development of the policies relating to corporate culture, bribery and corruption is shared between the Human Resources, Legal, Compliance and Data Protection, Corporate Communications and Internal Audit departments. Ultimate responsibility lies with the Management Board. The Chief Compliance Officer, who leads the Compliance and Data Protection department, is responsible for identifying compliance risks as well as implementing appropriate preventive and risk minimization measures.

Corporate Culture

Our approach to promoting corporate culture is outlined in our [Code of Conduct](#). On the basis of the Code of Conduct, we define the ethical and legal framework within which we act, ensure commercial success and aim to achieve positive impacts on our employees through a positive working atmosphere and a trusting, constructive management style. It reflects our corporate values and applies to all employees at Vonovia. The focus is on dealing fairly with each other, in particular with our customers, business partners and investors. That is also why we place such an emphasis on compliance with applicable legislation, without exception. Adhering to the legal framework conditions and regulations does not just apply to our own employees but also for the suppliers and service providers we work with.

We also communicate in our [Declaration of Respect for Human Rights](#), which has the same status as a Group policy and which applies throughout the Group, our clear conviction for a pluralistic democratic society and zero tolerance of human rights violations as well as our commitment to respect human rights in all aspects of our business. We adhere to the core labor standards of the International Labour Organization (ILO), the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the principles of the UN Global Compact, which we committed to in 2020. Our Code of Conduct also takes account of our stance regarding respect for human rights.

Through our policy of “Positive impacts on employees through the Code of Conduct and the development of a corresponding corporate culture,” Vonovia aims to foster a corporate culture that supports continuous development and individual potential, promotes diversity, and helps us attract and retain talent. Our corporate culture ensures fair wages and considers principles such as respect and diversity as fundamental. We are also committed to creating a future-oriented, attractive and safe working environment that provides the foundation for our joint success and contributes to the satisfaction of our employees.

Our corporate culture is founded on **transparent reporting and corporate communications**, on corporate governance aimed at the interests of all stakeholders, on fair and open dealings between the Management Board, the Supervisory Board and employees as well as on compliance with the law. Employees are regularly trained on diversity topics (see → [S1-4](#) for details) to raise awareness of inclusion and equality of opportunity, with dedicated programs such as the Women’s Network, Female Leadership Forum, and mentorship initiatives for high-potential female employees (see → [S1-4](#) for details).

Another key **measure** for the promotion of corporate culture is the [Business Partner Code](#), which outlines our expectations and requirements for suppliers, who are required to sign it. These requirements relate to compliance with human rights – from legal conformity and the fulfillment of legal standards for working conditions to an assurance of freedom of association and the exclusion of child labor, forced labor and discrimination. Minerals, and particularly conflict minerals, are also to be procured responsibly in accordance with OECD guidelines. We also expect our business partners to subject their own business partners at all stages in their supply chain to the obligation to comply with the same standards and principles. As part of the needs-based evaluation of our major suppliers and contractors via our partner portal, we strive to ensure that the criteria stated in the Business Partner Code are complied with. In the event of incidents and breaches, a structured management of measures is activated, which – once all other resources have been exhausted – may result in blocks on orders or the blocking of a particular supplier. Long-term cooperation with contractual partners is the responsibility of the Procurement department, enabling any misconduct to be addressed. In Germany and Austria, contractual conclusion is preceded by an automatic check against relevant sanctions lists, with the Compliance and Data Protection department informed immediately in the event of a hit. In Austria, the Procurement department reviews all new creditors and regularly reviews existing ones on a half-yearly basis as part of a compliance check that also includes an inspection of sanctions lists (via KSV1870). Vonovia’s Business Partner Code of Conduct applies across the entire Group. However, local adaptations are permitted within the subsidiaries in Austria and Sweden if required by country-specific or operational considerations.

Corporate culture is a multifaceted topic that cannot be fully captured through singular or multiple quantitative targets, which is why we have not set **measurable, outcome-oriented targets**.

Nevertheless, two **quantitative indicators** of “employee satisfaction” and the “proportion of women in leadership roles” (both of which are sub-indicators of the SPI) serve as reference points for evaluating the effectiveness of our corporate culture policies and actions. Our corporate culture and Code of Conduct make a significant contribution to high levels of employee satisfaction. A large proportion of women in management positions points to a corporate culture that promotes diversity and helps the company to retain talent.

We are aiming to achieve the target of at least 77% employee satisfaction by 2030. The Management Board proposes these targets as part of the LTIP planning process, with validation by the Supervisory Board. Similarly, our target for the proportion of women in leadership roles (first and second levels below the Management Board) is to reach at least 30% by 2030. Additional details can be found in → S1-5.

Four compliance questions were included in the employee satisfaction survey in 2025 for the first time in order to establish a compliance KPI. The specific results are to be used as an opportunity to draw conclusions as to the level of awareness, accessibility of the reporting options and trust in the compliance function. If necessary, appropriate actions are to be taken in 2026 to further develop the three criteria referred to above.

The Compliance Committee also meets quarterly to discuss topics including corporate culture, the current status of the Compliance Management System (CMS) and any necessary adjustments. New policies and measures are developed as needed.

Bribery and Corruption

Vonovia addresses the material negative impact “Violations of applicable bribery and corruption regulations undermine the confidence that relevant stakeholders place in the company’s integrity” through the [Code of Conduct](#), the [Human Rights Policy](#), the [Compliance Guidelines](#), the [Whistleblowing Policy](#), the [Anti-Money Laundering & Terrorist Financing Prevention Policy](#) and the [Group Anti-Corruption Policy](#). These **policies** apply across the Group and are reviewed by Internal Audit as part of a risk-based approach, with local adjustments being made in Austria and Sweden.

The aim is to prevent and combat bribery and corruption to avoid any negative impacts such as bad press, damage to the company’s image and employer brand, rating downgrades, stakeholder trust erosion, and increased costs for Vonovia’s customers, employees and business partners, and to prevent any violations of the law.

Our policies align with IDW (Institute of Public Auditors in Germany) standard PS 980 (September 2022) “Principles of proper auditing of compliance management systems,” which largely corresponds to the United Nations Convention against Corruption. Our **objective** of preventing and combating bribery and corruption, as well as avoiding related incidents, is pursued through the **quantitative indicators** of the “number of convictions and the amount of fines for violation of anti-bribery and anti-corruption laws” and the “total number of confirmed cases of corruption and bribery,” covering both our employees and business partners (for details, see → G1-4).

Vonovia has implemented several **measures** to support its anti-bribery and corruption objectives, including:

- > implementing an annual analysis of compliance risks which analyzes bribery and corruption among many other potential risk areas,
- > an extensive complaints management/whistleblowing system (see → G1-3) and
- > extensive training programs, particularly for functions-at-risk.

The compliance risk analysis, which explicitly covers bribery and corruption risks, has been conducted every year (previously every two years) since the 2024 fiscal year. In addition to a horizontal analysis, this process also includes a root cause analysis and vertical analysis of potential compliance risks for the Group. An analysis and evaluation of compliance risks in the Swedish and Austrian companies is also scheduled on a recurring basis, usually every three years. A decentralized compliance structure with **local contacts** enables direct, easy-to-access support in the various business areas. The Compliance and Data Protection department provides these individuals with ongoing training and support.

Vonovia also established a comprehensive **complaints management system** that allows employees and externals, such as customers and business partners, to report corruption, bribery and other forms of misconduct. Reports are processed by a specially trained, independent team. Details are outlined in Disclosure Requirement → G1-3.

Regular Group-wide training sessions are the cornerstone for preventing misconduct before it happens. A comprehensive catalog of regular and mandatory training events is firmly established and has been adapted to suit internal target groups.

In Germany, all employees (including part-time employees) with access to a company digital device must complete an annual 60-minute training session covering the Code of Conduct (basic compliance knowledge) as a matter of principle. Employees without such devices receive the Code of Conduct as an annex to their employment contract. In Austria and Sweden, all employees are given training on compliance issues (including the Code of Conduct and bribery and corruption) when they join the company and then every year in a 45 to 60-minute refresher session.

In addition to training on the prevention of corruption and bribery, Vonovia also provides its employees in Germany with training on other topics every two years, such as anti-money laundering, data protection, whistleblower protection and the policy for handling inducements and donations/sponsorship arrangements. In addition, the Sales departments in Austria receive two one-hour training sessions a year on preventing money laundering and terrorist financing, and also complete a 45 to 60-minute online training course on preventing corruption.

Further details regarding the anti-corruption and anti-bribery training conducted in the fiscal year can be found under disclosure requirement → [G1-3](#).

Functions-at-risk at Vonovia, with regard to the risk of corruption and bribery, include all managers.

[G1-3 – Detection of Corruption and Bribery](#)

As a **measure** to implement our policy for managing the material impact associated with “Violations of applicable bribery and corruption regulations undermine the confidence that relevant stakeholders place in the company’s integrity,” Vonovia has implemented an extensive Group-wide **complaints management** system (see also → [G1-1](#)). Our Swedish subsidiary operates its own whistleblowing system.

Reports of corruption and bribery can be submitted via the whistleblower portal, which is available in eight different languages; a satisfaction survey promotes engagement of the stakeholders (using the system) and ensures efficiency. The portal complements and extends the existing system of the independent ombudsman and has been integrated into the Business Partner Portal. The ombudsperson is selected and appointed by the Compliance Committee. Reports can also be sent by email or telephone to the compliance hotline set up by the external law firm GSK, the works council, the HR department or the mailbox compliance@vonovia.de. The effectiveness of the system is ensured through various accessible reporting channels, which were intentionally established to provide multiple options for submitting reports. As part of the whistleblowing system (BKMS) process, users are also surveyed on topics such as communication channels for compliance matters, familiarity with compliance processes and support provided by Compliance. Positive feedback was received in all areas. The technical and organizational accessibility of at least one digital and one analog reporting channel for every employee is ensured by the Group, with external support when necessary.

Complaints are treated as confidential and are only processed and evaluated by authorized individuals. Information from the system is not shared with third parties, except when absolutely necessary for processing, in the context of investigations, court proceedings, or when information has to be disclosed due to statutory requirements. Data is stored only as long as necessary for its intended purpose. Our guidelines and the anonymous reporting system provide our employees with full protection against reprisals.

We provide our employees with proactive information on the various reporting channels available. This is achieved on the one hand through mandatory compliance training and on the other, via the intranet or in ad hoc articles published in-house and in employee newsletters. The employee survey also included questions on compliance culture and employees’ understanding of compliance. The use of the channels and feedback from the departments and the works council indicates that our employees are aware of them and consider them to be reliable. After reviewing reported incidents, individual, proportionate measures are taken on a case-by-case basis.

The CEO is responsible for implementation of the entire CMS, including all the policies and measures described. A Compliance Committee comprising the Chief Compliance Officer, compliance officers, the ombudsperson, representatives of the Internal Audit, Risk Management and HR Management departments, the works council and the companies outside of Germany meets on a quarterly basis and regularly adapts the system to current requirements. In this context, the **Chief Compliance Officer** acts as a **central contact point** within the company for compliance matters and suspicions. The Chief Compliance Officer serves as the primary contact for compliance-related questions and concerns, maintaining independence by reporting directly to both the CEO and the Supervisory Board's Audit, Risk and Compliance Committee. In addition, the Chief Compliance Officer is not subject to instructions from other company departments. His activities are supported by the compliance officers and managers in the individual departments.

The Chief Compliance Officer reports directly to the CEO at least once a month and immediately if necessary. The Management Board receives quarterly reports, while the Audit, Risk and Compliance Committee is provided with extensive information semi-annually about compliance issues and corruption as well as existing guidelines and procedures. The compliance report provides information on suspected cases, measures and other compliance-relevant and data protection issues. If required, the entire Supervisory Board is informed.

Information on corporate governance and reporting channels is available to internal and external parties on both the [Investor Relations website](#) and the [corporate website](#). Our employees also receive compliance information on the intranet, while business partners receive it via the [Business Partner Code](#).

In order to address the material negative impact "Violations of applicable bribery and corruption regulations undermine the confidence that relevant stakeholders place in the company's integrity," Vonovia takes further **action** by conducting several **mandatory training sessions** to prevent corresponding violations of applicable corruption and bribery regulations. These training sessions, typically conducted virtually, last between 45 and 60 minutes and cover legal requirements and practical case studies to help employees recognize and appropriately address potential fraud and corruption risks. In Germany, all employees are required to complete an annual 60-minute training session on the content of the [Code of Conduct](#) (basic compliance knowledge), which also covers topics including anti-

corruption and conflicts of interest, among other things. In Austria and Sweden, our employees receive annual compliance training covering anti-bribery and anti-corruption topics as part of a combined training program (for further details, see the explanations on Code of Conduct training under [→ G1-1](#)).

Functions-at-risk are also required to complete additional, mandatory and individually tailored training. In Germany, all managers complete a 45 to 60-minute online anti-corruption training session every two years (in Austria, this training is provided annually). In Sweden, all employees are given training on compliance issues (including bribery and corruption) when they join the company and then every year in a 45 to 60-minute refresher session. Specific employee groups are assigned additional compliance training if they are considered exposed to particular risks. Employees involved in sales, in particular, undergo a 60-minute AML training course every two years.

The training sessions described above were introduced across the Group in the fiscal year, with training for functions-at-risk introduced in Sweden in April 2025.

Functions-at-risk are defined as those with specific exposure to corruption and bribery risks due to their job functions. These risks are mitigated through the assignment of relevant training. This encompasses all managers at Vonovia. In the Group as a whole, around 75% of employees in functions-at-risk have completed the anti-corruption training sessions.

The Management Board undergoes the same mandatory training as all Vonovia employees; the Supervisory Board is not required to participate in compliance or anti-corruption training.

G1-4 – Incidents of Corruption and Bribery

To assess the effectiveness and performance of our anti-bribery and anti-corruption policies, Vonovia tracks the **number of legal convictions** related to bribery and corruption. In the fiscal year, the number of court convictions for bribery and corruption offenses was zero (2024: zero). During the fiscal year, no convictions were recorded, and consequently there were no fines for violation of anti-corruption and anti-bribery laws.

In line with our objective of maintaining the company free of corruption and bribery, we set an annual **quantitative target** of achieving zero corruption and bribery incidents resulting in court convictions. This applies to both our own operations

and our business partners. Stakeholders were not involved in setting these targets. This quantified target directly aligns with our policy objectives for maintaining a corruption-free organization. Since no convictions for bribery and corruption occurred during the fiscal year, we have achieved our objective in this regard.

Ongoing investigations are not included in this metric. The Compliance and Data Protection department monitors compliance with applicable regulations across the Group and oversees any ongoing legal proceedings and related outcomes to ensure target achievement. In the event that Vonovia is subject to fines for bribery or corruption violations, the Compliance and Data Protection department immediately informs both the Management Board and the Supervisory Board. The department also receives monthly reports from subsidiaries in Sweden and Austria.

Since there were no bribery or corruption convictions during the fiscal year, no individual case-specific measures were taken to address breaches of procedure and standards to combat anti-corruption and anti-bribery.

The number of **confirmed incidents of bribery and corruption**, both among our employees and business partners, was 7 in the fiscal year (2024: 2). The number of confirmed bribery and corruption cases takes into account the Care segment that was sold during the fiscal year up until the date of the business area's discontinuation. The cases that materialized in 2025 concerned the rental of apartments in exchange for commission payments. One case involved potential fraudulent actions related to collaboration with subcontractors. The investigations that Vonovia launched without delay resulted in appropriate action being taken. Overall, the number of confirmed cases in this fiscal year is attributable to the further development of the compliance management system and process improvements. In line with our objective of maintaining the company free of corruption and bribery, we set an annual **quantitative target** of achieving zero confirmed corruption and bribery incidents. This applies to both our business operations and our business partners. Stakeholders were not involved in setting these targets. This quantified target directly aligns with our policy objectives for maintaining a corruption-free organization. Since seven confirmed cases of bribery and corruption occurred during the fiscal year, we did not achieve our objective.

The metric refers to confirmed incidents submitted through the compliance mailbox or other whistleblowing channels, which were verified by the Compliance and Data Protection

department through an internal investigation or confirmed by a legally binding court ruling.

Just as with the number of convictions, the Compliance and Data Protection department monitors compliance with applicable regulations across the Group and oversees any ongoing legal proceedings and related outcomes to ensure target achievement. In the event that Vonovia employees are convicted of corruption or bribery and subsequently receive a written warning or are dismissed, or business partners of Vonovia are convicted of corruption or bribery, the Compliance and Data Protection department informs the Management Board. The department also receives monthly reports from subsidiaries in Sweden and Austria. In cases of confirmed corruption involving business partners, the business relationship is terminated or not renewed.

All of the compliance-related concerns reported during the fiscal year, where these were confirmed, were minor. This does not include two cases from 2023 and 2024 as well as one case of bribery and corruption from the current reporting year. In the fiscal year, own employees were dismissed or disciplined in two cases due to corruption or bribery allegations.

There were two confirmed cases in the reporting year related to contracts with business partners that resulted in these contracts being terminated or not renewed.

No public legal proceedings were initiated against the company or its employees during the reporting period. As regards a matter dating back to 2023, criminal proceedings commenced in the reporting year, culminating in the conviction of two former Vonovia employees in January 2026. Vonovia itself was involved in the proceedings as the injured party and joint plaintiff.