



Code of Conduct for Business Partner

Preamble

An entrepreneurial partnership can only develop in an atmosphere of mutual trust and openness. Vonovia is committed to providing for safe working conditions in our supply chain, ensuring that all employees are treated with respect and dignity and that business activities are conducted with environmental responsibility, transparency, honesty and integrity. Therefore, we expect all our business partners, including but not limited to our suppliers, to conduct their business in accordance with the principles expressed in this Code of Conduct for Business Partner and to comply fully with the laws and regulations of the countries they operate in.

Furthermore, to ensure that regulations are complied with throughout the supply chain, we also expect our business partners to commit their own business partners, i.e. suppliers, contractors and service providers, to comply with the standards and principles defined in this Code of Conduct for Business Partner.

When making procurement, purchasing or other selection decisions, we take compliance with this Code of Conduct for Business Partner into account. It is our declared intention to work together closely with our business partners to achieve continuous improvement through appropriate communication, audits and follow-up assessments.

Non-compliance with this Code of Conduct for Business Partner or non-cooperation with our auditors can lead to the termination of a business relationship.

Our business partners play an important role in Vonovia's success. The shared commitment to ethical and sustainable practices forms the basis for our business success, and this Code of Conduct for Business Partner sets out the requirements we expect our business partners to fulfil in order to work successfully with us.

In the framework of this Code of Conduct for Business Partner, we agree the following rules with our business partners. Compliance is to be documented in a comprehensible manner.

1. Compliance with laws and due diligence obligations relating to human rights and the environment

- 1.1. Applicable laws and regulations, in particular anti-corruption regulations, international standards relating to social and environmental responsibility and internationally recognised human rights are to be complied with by our business partners.
- 1.2. Our business partners are to ensure that they fulfil their due diligence obligations relating to human rights and the environment along their own supply chain:

Human rights

Vonovia respects the human rights of all its own employees and treats them with dignity and respect. Our business partners are to observe all applicable national employment rights and the core work standards of the International Labour Organization (ILO).

Our business partners are to observe and respect internationally recognised human rights such as the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, etc.

Child labour

Our business partners are only to engage employees or workers who have reached the respective minimum age according to the applicable national legislation. Our business partners are to observe and respect the rights of children.

Forced labour and modern slavery

Our business partners are to respect the principle of freely chosen employment and reject any form of forced or compulsory labour, serfdom or any other form of modern slavery.

Fair working conditions

Our business partners are to pay wages, remuneration and social benefits that at least correspond to national laws, regulations or agreements. The applicable national laws and regulations on working hours and holidays are to be complied with.

Occupational health and safety

Our business partners are to comply with at least the national standards for a safe and hygienic working environment. They are to take appropriate action to ensure health and safety at the workplace.

Equal opportunities

Our business partners are not to tolerate any discrimination against employees and workers on grounds of skin colour, ethnic origin, gender, age, nationality, social background, disability, sexual orientation, religion or ideology.

Freedom of association

Our business partners are to uphold freedom of association. They are to grant their employees and workers the right to express their interests on the basis of the applicable national legislation and respect the right to engage in collective bargaining.

- 1.3. If our business partners become aware of violations of human rights and/or environmental due diligence obligations - either in their own business area or in their supply chains - they are to take immediate action to end the violation and inform Vonovia without delay of the

possible or established violations. If the violation cannot be ended by our business partners alone, they are to work together with Vonovia to resolve it.

- 1.4. Our business partners are responsible for ensuring that goods and materials delivered to Vonovia comply with applicable laws and requirements and have not been obtained or produced in any other way by illegal and/or unethical means.
- 1.5. Our business partners are responsible for the secure conduct of business operations, the minimisation of environmental pollution, compliance with applicable environmental protection laws and the procurement of and compliance with environmental permits:

Protection of the environment

Our business partners are to minimise any environmental impact and use resources sparingly. Natural resources, including water, fossil fuels and minerals, are to be conserved by practices such as changing production, maintenance and plant processes, substituting materials, reusing, preserving and recycling or other means. Our business partners are to strive to reduce their consumption of energy, water and non-renewable resources. Our business partners are to work to measure their greenhouse gas emissions and voluntarily commit to reducing them. Our business partners are to observe all applicable laws and regulations on the prohibition or restriction of certain substances in products and in manufacturing, including regulations on recycling and disposal, ideally by furnishing proof of suitable management systems for environmental protection and energy management (e.g. in accordance with DIN EN ISO 14001 or EMAS and / or ISO 50001). Our business partners are to reduce the impact of their activities on biodiversity, climate change and water scarcity.

Hazardous/non-hazardous materials

Our business partners are to avoid hazards to people and the environment. Chemicals, waste and other materials that pose a threat to people and the environment are to be identified and handled in a manner that ensures their safe handling, transport, storage, use, recycling or reuse and disposal. Air emissions of volatile organic chemicals, aerosols, corrosives, particulates and ozone depleting substances are to be characterised, monitored, controlled and treated as appropriate. Certain chemicals - e.g. persistent organic pollutants (POPs) and all forms of use or treatment of mercury - are to be avoided.

Substances on the ECHA candidate list in accordance with the REACH Regulation Article 59 (10) and products containing these substances are to be avoided or, if they cannot be avoided, used under controlled conditions.

Procurement of minerals

Our business partners are required to exercise due diligence when procuring conflict minerals. The relevant minerals include tantalum, tin, tungsten and gold. Our business partners need to ensure that these are sourced in accordance with the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognised framework for conducting due diligence.

2. Avoidance of corruption and money laundering

- 2.1. Applicable laws and regulations, in particular anti-corruption regulations, international standards relating to social and environmental responsibility and internationally recognised human rights are to be adhered to by our business partners.
- 2.2. In the context of awarding contracts, our business partners are to refrain from exerting unfair influence on Vonovia's employees, our business partners or third parties who work directly or indirectly for Vonovia.
- 2.3. Our business partners are to expressly reject unfair agreements concerning business related to Vonovia with other bidders, business partners and/or suppliers.
- 2.4. Our business partners are to implement guidelines, systems and processes to reliably prevent unfair and illegal business practices such as fraud, bribery and corruption.
- 2.5. All applicable legal regulations for the prevention of money laundering are to be adhered to by our business partners. Especially when implementing the identification obligations under money laundering law to clarify the ultimate beneficial owners, our business partners and Vonovia are to work together in a spirit of trust.

3. Conflicts of interest

- 3.1. Conflicts of interest are to be avoided at all times. Any business and personal connections between employees, managers, etc. of the business partner and Vonovia employees must be disclosed immediately, completely and transparently if they could result in a conflict of interest.

4. Cooperation based on partnership

- 4.1. When determining requirements and carrying out services, our business partners are only ever required to indicate to Vonovia the necessary and economically expedient amount.
- 4.2. Any specifications of services that are recognisably incomplete are to be reported by our business partners to our employees as soon as possible and any supplements justified in writing before work begins. When invoicing services, our business partners are only ever to charge for the scope of services actually provided. If our business partners intend to commission third parties with the provision of services, they are to inform our employees as soon as possible.
- 4.3. Our business partners are to oblige their own suppliers and subcontractors to adhere to the principles and values set out in this declaration and systematically monitor this obligation within the business relationship.
- 4.4. Within the context of our cooperation as partners, it is important to Vonovia that our business partners take responsibility for preventing errors by approaching the relevant Vonovia employees openly and in good time, and that they work to rectify errors on their own initiative.

5. Confidentiality, data protection and protection of assets

- 5.1. Our business partners are to ensure that all relevant data protection regulations are complied with in their area of responsibility - in particular with regard to data processing carried out in connection with the provision of services within the business relationship with Vonovia. Our business partners undertake to familiarise the employees assigned to carry out the contractually agreed tasks and activities with the relevant data protection regulations and to obligate them to maintain the confidentiality of the data processing. Our business partners are also to undertake to appropriately protect confidential information in order to prevent misuse. They are only to use the personal data provided in an appropriate, legally compliant manner.
- 5.2. Our business partners guarantee that they will treat information received in the course of their cooperation with Vonovia confidentially and will not pass it on to third parties. The business partner is to take the necessary measures to protect information and keep it confidential.
- 5.3. All applicable data protection laws and regulations are to be adhered to.
- 5.4. Our business partners are to protect Vonovia's assets against theft, misappropriation, criminal damage, embezzlement or other actions resulting in (financial) disadvantages.

6. Insider trading

- 6.1. Our business partners are to avoid insider trading by not buying or selling securities of Vonovia or any other company as long as they have access to specific insider information that is not available to the general investing public and that could influence an investor's decision to buy or sell stocks.

7. Business accounts and records

- 7.1. Our business partners are to keep complete business accounts and records that transparently document all business transactions without gaps and are managed in accordance with applicable laws and regulations.

8. Antitrust law, economic and trade sanctions

- 8.1. Our business partners are not to engage in any activities that could demonstrably be construed as anti-competitive, improper, or unfair and to abide by the applicable antitrust and competition laws and regulations.
- 8.2. Laws and regulations governing the export and import of goods, products and services, including those relating to economic and trade sanctions, are to be adhered to by our business partners.

9. Compliance with the Code of Conduct for Business Partner

- 9.1. Vonovia reserves the right to check compliance with this Code of Conduct by our business partners, also after the conclusion of a contract. Our business partners are to actively support such checks.
- 9.2. Violations are to be remedied immediately, in particular violations of human rights and environmental obligations. If this is not possible in the near future, our business partners are to immediately draw up and implement a plan to end or minimise such violations. The measures taken are to be documented and communicated in an appropriate manner and their effectiveness and appropriateness checked. In case of a suspected violation, our business partners are to immediately investigate the potential violations and inform Vonovia of the measures taken to solve the problem.
- 9.3. Our business partners are obliged to fully inform their employees engaged in the context of a business relationship with Vonovia - and any subcontractors involved - about the content of the Code of Conduct for Business Partner.
- 9.4. Any violation of this Code of Conduct for Business Partner represents a significant impairment of the business relationship between Vonovia and our business partners. Our business partners are to inform Vonovia within a reasonable period about the measures taken to prevent future violations. Should our business partners fail to fulfil these obligations within a reasonable period of time or should the violation of this Code of Conduct for Business Partner be so serious that Vonovia cannot be expected to continue the business relationship, Vonovia reserves the right to terminate the business relationship.

VONOVIA

If you have any questions about the rules set out in this Code of Conduct for Business Partner or are unsure on how to conduct yourself in a particular situation, please contact compliance@vonovia.de.

If you have any general questions about the supply chain, environmental provisions or human rights issues, please contact us using the following e-mail address: humanrights@vonovia.de

Information on misconduct or any concerns can also be reported - anonymously - through our whistleblower systems:

GSK Compliance telephone hotline can be contacted on **089 / 288 174 88 30** (09.00 a.m. – 06.00 p.m.) and by email at compliance-vonovia@gsk.de

BKMS whistleblower system: <https://www.bkms-system.com/vonovia>



Date

Signature

Business partner's stamp