

VONOVIA



Business Partner Code of Conduct

As of: 06/2026



Preamble

The development of an entrepreneurial partnership can only take place in an atmosphere of mutual trust and mutual openness. Vonovia is committed to ensuring that working conditions in our supply chain are safe, that all employees¹ are treated with respect and dignity, and that business operations are conducted in an environmentally responsible manner and with transparency, honesty and integrity. Therefore, we expect all of our business partners, including but not limited to our suppliers, to conduct their business in accordance with the principles set forth in this Business Partner Code of Conduct and to fully comply with the laws and regulations of the countries in which they operate.

To ensure compliance throughout the supply chain, we also expect our business partners to commit their own business partners, i.e. suppliers, contractors and service providers, to the standards and principles defined in this Code of Conduct.

We will consider compliance with this Business Partner Code of Conduct when making procurement, purchase, or other selection decisions. It is our stated intention to work closely with our business partners to achieve continuous improvement through appropriate communication, audits and follow-up assessments.

Failure to comply with this Business Partner Code of Conduct or to cooperate with our auditors may result in the termination of a business relationship.

Our business partners play an important role in Vonovia's success. The common understanding of ethical and sustainable action forms the basis for business success, and this Business Partner Code of Conduct sets out the requirements for business partners for successful cooperation with us.

Within the framework of this Business Partner Code of Conduct, we agree on the following rules with our Business Partners. Compliance must be documented in a comprehensible manner.

¹ For reasons of linguistic simplification alone, only the masculine form is used. In terms of content, people of all gender identities are always meant.

1. Compliance with laws as well as human rights-related and environmental due diligence obligations

- 1.1. Applicable laws and regulations, in particular anti-corruption regulations, international standards regarding social and environmental responsibility as well as internationally recognized human rights are complied with by our business partners.
- 1.2. Our business partners ensure that they comply with their human rights and environmental due diligence obligations along their own supply chain:

Human rights

Vonovia respects the human rights of all its employees and treats them with dignity and respect. Our business partners comply with all applicable national labour laws and the core labour standards of the International Labour Organization (ILO).

Our business partners observe and respect internationally recognized human rights such as the United Nations (UN) Charter of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, etc.

Child labour

Our business partners only employ employees or workers who have reached the appropriate minimum age in accordance with the applicable national legislation. Our business partners observe and respect the rights of children.

Forced Labor and Modern Slavery

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

Fair working conditions

Our business partners pay wages, compensation and benefits that are at least in line with national laws, regulations or agreements. The applicable national laws and regulations on working hours and holidays are complied with.

Occupational health and safety

Our business partners comply with at least the national standards for a safe and hygienic working environment. They act appropriately to ensure health and safety at work.

Equal opportunities

Our business partners do not tolerate discrimination against employees and workers based on skin color, ethnic origin, gender, age, nationality, social origin, disability, sexual orientation, religion or belief.

Freedom of association

Our business partners respect freedom of association. They grant their employees and workers the right to represent their interests based on applicable national legislation and respect the right to collective bargaining.

- 1.3. If our business partners become aware that there are violations of human rights-related and/or environmental due diligence obligations - both in their own business area and in their supply chains - they will immediately work to put an end to the violation and inform Vonovia immediately of the possible or identified violations. If the violation cannot be terminated by our business partners alone, they will work together with Vonovia to bring it to an end.

- 1.4. Our business partners ensure that goods and materials supplied to Vonovia have been obtained or produced illegally and/or unethically in compliance with applicable laws and regulations, as well as in any other way.
- 1.5. Our business partners ensure the safe conduct of business operations, minimization of environmental impact, compliance with applicable environmental protection laws and procurement and compliance with environmental permits:

Protection of the environment

Our business partners minimize any impact on the environment and use resources sparingly. Natural resources, including water, fossil fuels, and minerals, are conserved through practices such as modification of production, maintenance, and plant processes, substitution of materials, reuse, conservation, and recycling, or other means. Our business partners strive to reduce their consumption of energy, water and non-renewable resources. Our business partners work to measure their greenhouse gas emissions and voluntarily commit to reducing them. Our business partners comply with all applicable laws and regulations prohibiting or restricting certain substances in products and manufacturing, including the regulations for recycling and disposal, ideally by demonstrating suitable management systems for environmental protection and energy management (e.g. according to DIN EN ISO 14001 or EMAS and/or ISO 50001). Our business partners are reducing the impact of their operations on biodiversity, climate change and water scarcity.

Hazardous/non-hazardous materials

Our business partners avoid hazards to people and the environment. Chemicals, waste and other materials that pose a risk to people and the environment must be identified and managed in a way 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 shall be characterised, monitored, controlled and treated as required. Certain chemicals – such as persistent organic pollutants (POPs) and all forms of use or treatment of mercury – should be avoided.

Substances from ECHA's candidate list for the REACH Regulation Article 59 (10) and products containing these substances are avoided or, if they cannot be avoided, used under controlled conditions.

Mineral Sourcing

Our business partners need to take a close look at the procurement of conflict minerals. Our business partners exercise reasonable care. Relevant minerals include tantalum, tin, tungsten, and gold. Our business partners must ensure that they are sourced in accordance with the Organisation for Economic Co-operation and Development (OECD) Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognised due diligence framework.

2. Prevention of corruption and money laundering

- 2.1. Applicable laws and regulations, in particular anti-corruption regulations, international standards regarding social and environmental responsibility and internationally recognized human rights, are followed by our business partners.
- 2.2. When awarding contracts, our business partners refrain from exerting undue influence on employees of Vonovia, our business partners or third parties who work directly or indirectly for Vonovia.

- 2.3. Our business partners expressly reject unfair agreements with other bidders, business partners and/or suppliers regarding Vonovia-related transactions.
- 2.4. Our business partners reliably prevent unfair and illegal business practices such as fraud, bribery and corruption by implementing policies, systems and processes.
- 2.5. All applicable legal regulations for the prevention of money laundering are followed by our business partners. In particular, our business partners and Vonovia work together in a spirit of trust in the execution of the identification obligations under money laundering law to inform the economic ultimate beneficiaries.

3. Conflicts of interest

- 3.1. Conflicts of interest are to be avoided as a matter of principle. Business and personal connections of employees, managers, etc. of the business partner to employees of Vonovia must be disclosed immediately, completely and transparently if these may lead to conflicts of interest.

4. Cooperative partnership

- 4.1. When determining requirements and performing services, our business partners always specify only the necessary and economically sensible scope to Vonovia.
- 4.2. Recognizable incomplete service descriptions are reported to our employees by our business partners as early as possible and supplements are justified in writing before the start of the work. When invoicing services, our business partners always bill only the amount actually performed. Our business partners indicate their intention to commission third parties to perform services to our employees as early as possible.
- 4.3. Our business partners oblige their own suppliers and subcontractors to comply with the principles and values set out in this Statement and systematically comply with the commitment within the business relationship.
- 4.4. As part of our partnership-based cooperation, it is important to Vonovia that our business partners take responsibility for preventing errors and participating in troubleshooting on their own initiative by approaching the responsible Vonovia employees in a timely and open manner.

5. Confidentiality, Privacy and Asset Protection

- 5.1. Our business partners ensure that all relevant data protection regulations are complied with in their area of responsibility – especially in the case of data processing that takes place in the context of the provision of services within the business relationship with Vonovia. Our business partners undertake to familiarize the employees entrusted with the contractually agreed tasks and activities with the relevant data protection regulations and to oblige them to comply with the confidentiality of data processing. Our business partners continue to commit to adequately protecting confidential information to prevent misuse. You will only use the personal data provided in an appropriate manner that complies with the law.

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- 5.2. Our business partners ensure that information they receive in the course of their cooperation with Vonovia is treated confidentially and is not passed on to third parties. The business partner takes necessary measures to protect information and keep it confidential.
- 5.3. All applicable data protection laws and regulations are followed.
- 5.4. Our business partners protect Vonovia's assets from theft, misappropriation, damage to property, embezzlement or other acts that (Assets) disadvantages.
- 5.5. Our business partners may only use artificial intelligence (AI) in the course of their activities if all employees who use corresponding AI systems have been adequately trained beforehand with regard to the data protection, technical and legal requirements of AI. In addition, business partners should have internal guidelines and specifications for the use of AI systems, which include in particular regulations on data protection, data security and compliance. The data may only be processed by authorised persons in the context of the respective activity; any disclosure or making available of the data to unauthorised third parties is to be ruled out. Our business partners also commit not to use the data for training, reworking or further developing AI systems. After the end of the activity or on instructions, all data stored or processed in AI models or systems from the business relationship will be deleted immediately and completely, unless there are any statutory retention obligations to the contrary. In addition, our business partners ensure that all AI systems used meet the applicable legal requirements, in particular the requirements of the European AI Regulation (EU AI Act). Business partners must provide proof of compliance with these requirements upon request.

6. Insider trading

- 6.1. Our business partners avoid insider trading by not buying or selling securities of Vonovia or any other company as long as there is special inside information that is not available to the public investor public and that could influence an investor's decision to buy or sell securities.

7. Business books and records

- 7.1. Our business partners maintain complete business books and records that transparently document all business transactions and are maintained in accordance with applicable laws and regulations.

8. Antitrust Law, Economic and Trade Sanctions

- 8.1. Our business partners do not pursue any activity that could be demonstrably construed as anti-competitive, abusive or unfair, and comply with applicable antitrust and competition laws and regulations.
- 8.2. Laws and regulations governing the export and import of goods, products and services, including those related to economic and trade sanctions, are followed by our business partners.

9. Compliance with the Business Partner Code of Conduct

- 9.1. Vonovia reserves the right to verify compliance with this Code of Conduct by our business partners even after the conclusion of the contract. Our business partners will actively support such audits.
- 9.2. Violations must be stopped immediately, in particular violations of human rights and environmental obligations. If this is not possible in the near future, our business partners shall immediately develop and implement a plan to end or minimize such violations. The measures taken must be documented and communicated in an appropriate manner and checked for their effectiveness and appropriateness. In the event of a suspected violation, our business partners must immediately investigate the possible violations and inform Vonovia of the measures taken to resolve the problem.
- 9.3. Our business partners undertake to fully inform their employees involved in a business relationship with Vonovia - and any subcontractors commissioned - of the contents of the Code of Conduct.
- 9.4. Any violation of this Business Partner Code represents a material impairment of the business relationship between Vonovia and our business partners. Our business partners will inform Vonovia within a reasonable period of time about the measures taken to prevent future violations. In the event that our business partners fail to comply with these obligations within a reasonable period of time or the violation of this Business Partner Code is so serious that Vonovia cannot reasonably be expected to continue the business relationship, Vonovia reserves the right to terminate the business relationship.

If you have any questions about the rules set forth in this Code of Conduct, or if you are unsure how to behave in a particular situation, please contact compliance@vonovia.de.

For general questions about the supply chain, environmental regulations or human rights issues, please contact us at the following email address: humanrights@vonovia.de

Reports of misconduct or concerns can be reported - also anonymously - via our whistleblower systems:

The GSK Compliance telephone hotline can **be reached at** 089 / 288 174 88 30 **(09:00 – 18:00)** **and at the e-mail address** compliance-vonovia@gsk.de.

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



Date

Signature

Stamp Business Partners