

Business Partner Code for Vonovia SE

An entrepreneurial partnership can develop only in an atmosphere of mutual trust and openness. Vonovia therefore expects integrity and reliability as well as economically and legally compliant conduct from its employees and every business partner who works for or is commissioned by the company on behalf of a third party throughout the business relationship.

To this end, Vonovia agrees with its business partners to the following binding principles of cooperation, which also apply to preliminary suppliers and subcontractors of our partners:

- 1. Compliance with Laws and Generally Accepted Standards**
 - Applicable laws and provisions will be observed, particularly anti-corruption regulations, generally accepted international standards regarding social and ecological responsibility, and international human rights agreements, including existing laws to prevent modern slavery, child labor, compulsory labor and discrimination.
 - Complete books of account and records are to be maintained in accordance with applicable laws and provisions.
- 2. Avoidance of Corruption, Money Laundering and Conflicts of Interest**
 - Any promise or granting of presents/benefits beyond the scope of normal business to employees of Vonovia, their family members, related parties and organizations or third parties working directly or indirectly for Vonovia is to be renounced.
 - In the awarding of contracts, no undue influence may be exerted on Vonovia employees, business partners or third parties working directly or indirectly for Vonovia, and no arrangements may be made regarding Vonovia-related business.
 - All applicable legal regulations to prevent money laundering will be followed and unethical business practices such as fraud, bribery and corruption avoided.
 - Business and personal relationships of employees with Vonovia employees will be made transparent in cases where they could lead to conflicts of interest.
- 3. Safeguarding of Environmental Protection and Traceable Material Sourcing**
 - The conduct of safe business operations ensures that environmental harm is minimized and applicable environmental laws are observed.
 - Materials and goods supplied to Vonovia come from traceable sources, and are not procured or manufactured through illegal or unethical means.
- 4. Safeguarding of Confidentiality, Data Protection and the Avoidance of Insider Trading**
 - Confidential information obtained during the course of cooperation with Vonovia will not be passed along to third parties. All necessary measures will be taken in order to protect this information and to protect the intellectual property of third parties in accordance with all applicable data protection laws and regulations.
 - No trading with Vonovia securities will be permitted in cases involving information that is not available to the investing public and which could influence the decision of an investor to buy or sell securities ("insider information").
- 5. Compliance with Antitrust Law, Economic and Trade Sanctions**
 - No activities that are demonstrably anti-competitive, abusive or unfair will be pursued and applicable antitrust and competition laws and provisions will be observed.
 - Laws and provisions governing the export and import of goods, products and services, including those related to economic and trade sanctions, will be adhered to.
- 6. Fair Dealings with Employees and Subcontractors**
 - All employees work under fair working conditions at safe workplaces to ensure that no forms of unethical or illegal working conditions occur (e.g. harassment, physical violence, slavery, illicit employment, bondage and forced or compulsory labor, including child labor).
 - No one is or will be discriminated against on the basis of origin, gender, sexual orientation, religion, ideology, disability or age. The personal dignity, privacy and personal rights of the individual are and will be respected.
 - Wages, work hours, vacation/leave of absence of employees and subcontractors are consistent with applicable laws and/or contracts. Likewise, the rights to freedom of association and free collective bargaining are respected. Active attempts to poach employees are prohibited.

Vonovia emphatically states that any violation of this business partner code can lead to a temporary or permanent exclusion from the awarding of contracts. In addition, a proven violation of this agreement can lead to the immediate termination of the ongoing work relationship. Vonovia reserves the right to monitor the observance of the business partner code.

With our signature, we expressly accept this business partner code and ensure its corresponding implementation by our responsible employees.

Date, Signature of Business Partner