

## Annex 1 to KR-36 Whistleblower system:

### Rules of procedure for handling whistleblower reports (including violations of human rights and/or environmental due diligence, violations of legal provisions, violations of company rules, etc.)

#### Who is responsible for human rights and environmental complaints, as well as for reports of violations of legal provisions or company rules?

The Compliance & Data Protection department is responsible for setting up the complaints procedure and whistleblower systems. Vonovia's Chief Compliance Officer is also the Human Rights Officer (Section 4 (3) LkSG).

If you have any questions about the whistleblower system/complaints procedure or the rules of procedure, please contact the Compliance & Data Protection department at [compliance@vonovia.de](mailto:compliance@vonovia.de). Further information (e.g. on the whistleblower channels) and contact details can be found at:

<https://www.vonovia.com/ueber-uns/strategie-und-werte/compliance>

The employees of the Compliance & Data Protection department and the Chief Compliance Officer always act impartially and independently and are not subject to any instructions when processing reports or complaints. They are also obliged to maintain confidentiality and secrecy (more on this under point 4).

#### What kind of complaints or reports can the whistleblower systems be used for?

You can use the whistleblower system to report suspected or actual violations of legal requirements, guidelines or Vonovia's Code of Conduct – particularly in the areas of corruption, money laundering, antitrust law and capital market law (insider trading). Of course, it is also possible to report information or complaints about suspected or actual violations of human rights or environmental laws and due diligence obligations.

#### Which channels can be used to submit reports/complaints?

Whistleblowers can use the following channels to submit reports or complaints:

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

Email address: [compliance@vonovia.de](mailto:compliance@vonovia.de)

Phone: +49 (0)234 314-1524

Ombudsperson:

Phone: +49 (0)162 2383834

Email: [ombudsperson@vonovia.de](mailto:ombudsperson@vonovia.de)

In addition, the external law firm GSK Stockmann is at your disposal with our whistleblower hotline. You can reach them by telephone Monday to Friday from 09:00 – 18:00 or by email at:

GSK Compliance telephone hotline: 089 288 174 8830

Email address: [compliance-vonovia@gsk.de](mailto:compliance-vonovia@gsk.de)

Further information can be found here:

<https://www.vonovia.com/ueber-uns/strategie-und-werte/compliance>

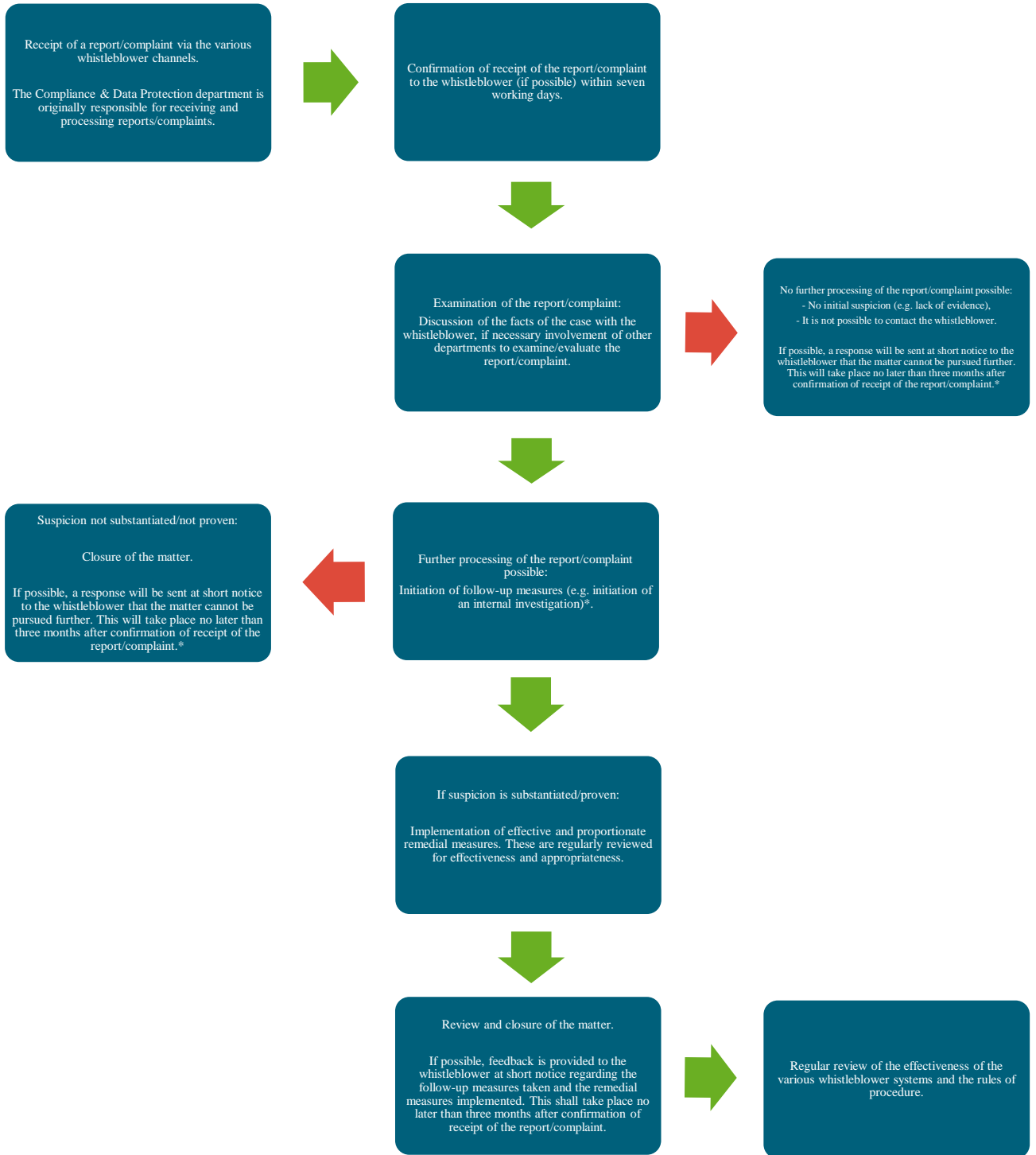
The use of the whistleblower channels is always **free of charge** for you.

#### Do whistleblowers have to fear disadvantages/punishments?

Whistleblowers are particularly protected by the Whistleblower Protection Act and our Code of Conduct. Among other things, the following measures serve to protect whistleblowers:

- The reports or complaints are only processed by selected and specially trained employees (need-to-know principle),
- The reports or complaints, especially if conclusions can be drawn about the identity of the whistleblower, will be treated confidentially.

The protection against intimidation and reprisals by whistleblowers applies to all employees as well as to business partners, customers and other external third parties who have reported suspected or actual misconduct in good faith. This also applies if the whistleblower is not personally affected by the reported facts.



\*: If necessary, further appropriate follow-up measures will be taken, such as forwarding the report to a competent authority, etc.