

Implementation of the suggestions of the Government Commission on the German Corporate Governance Code

In addition to the recommendations, the German Corporate Governance Code (the "Code") contains a number of Suggestions. Compliance with these Suggestions does not have to be disclosed in accordance with legal requirements. Die VONOVIA SE has implemented all relevant Suggestions (Date of Code: 27. June 2022, state of implementation: December 2023). More information is listed below:

Nr.	Code-Item	Suggestions of the German Corporate Governance Code	fulfilled?
A1	A.4	[...]; third parties should also be given this opportunity [to report, in a protected manner, suspected breaches of the law within the enterprise].	yes
A2	A.6	The Supervisory Board Chair should be available – within reasonable limits – to discuss Supervisory Board-related issues with investors.	yes
A3	A.7	The Chair should take into account that the General Meeting should be completed within four to six hours.	yes
A4	A.8	In the event of a takeover offer, the Management Board should convene an Extraordinary General Meeting at which shareholders will discuss the takeover offer and may decide on corporate actions.	This will be reviewed if needed, but was not necessary in 2023.
A5	G.14	Change of control clauses that commit to benefits in the case of early termination of a Management Board member's contract due to a change of control should not be agreed upon.	yes
A6	G.18	Supervisory Board remuneration should be a fixed remuneration.	yes

This overview informs about the implementation of the Suggestions of the Code at the time of the publication of the Declaration of Conformity 2023 concerning the implementation of Recommendations of the Code in December 2023. It does not imply that VONOVIA SE intends to continue to implement the Suggestions unchanged or not to comply with them after the specified date. VONOVIA SE assumes no obligation to announce changes immediately and to update the overview.