



Business Partner Code

An entrepreneurial partnership can develop only in an atmosphere of mutual trust and openness. Therefore Vonovia (hereinafter also referred to as “we”) expects integrity and reliability as well as economically, legally and ethically correct conduct from its employees and every business partner who works or wishes to work for Vonovia throughout the business relationship

Within the framework of this Business Partner Code, we agree the following rules with our business partners. Compliance – including by any subcontractors that may have been approved – shall be documented in a comprehensible manner.

1 Compliance with Laws and Generally Accepted Standards

1.1. Valid laws and regulations, in particular anti-corruption regulations, generally applicable international standards regarding social and environmental responsibility, and internationally recognized human rights, including existing laws to prevent modern slavery, are followed by our business partners.

2 Prevention of Corruption and Money Laundering

2.1. We and our business partners refrain from promising or granting any gifts or other benefits to the employees of Vonovia or of our business partners as well as of third parties working indirectly or directly for Vonovia where this exceeds the obviously customary scope of business and/or the internal regulations of Vonovia. Gifts or benefits to Vonovia employees exceeding a value of EUR 50.00 have to be reported to the Compliance Officer of Vonovia in advance. The granting of cash or cash equivalents is generally not permissible.

2.2. In the context of awarding contracts, we and our business partners refrain from exerting unfair influence on employees of Vonovia, of our business partners or of third parties working directly or indirectly for Vonovia

2.3. Collusion on Vonovia-related business with other bidders, business partners and/or suppliers is explicitly rejected.

2.4. Unethical business practices such as fraud, bribery and corruption are reliably prevented by implementing policies, systems and processes.

2.5. All applicable statutory provisions regarding the prevention of money laundering shall be followed.

3 Environmental Protection

3.1. Our business partners ensure the safe conduct of business operations, minimization of environmental impact and compliance with applicable environmental protection laws and environmental permits.

4 Origin of Materials

4.1. Our business partners ensure that goods and materials supplied to Vonovia have not been procured or manufactured in an illegal or unethical manner.

5 Conflicts of Interest

5.1. Business and personal connections of companies, subcontractors or their employees to current and former Vonovia employees or their related parties are made transparent. All conflicts of interest that could adversely affect the business relationship are to be avoided. Connections of any kind are to be reported to the Compliance Officer of Vonovia.

6 Fair Cooperation

6.1. When determining requirements and performing services, our business partners always provide us with only the volume that is necessary and economically viable for Vonovia.an.

6.2. Our business partners shall notify our employees as early as possible if any service specifications are visibly incomplete and provide written justification for any supplements prior to commencement of the work.

6.3. When billing for services, only the actual amount of work performed is billed.

6.4. The intention to commission third parties with the performance of services shall be notified to our employees as early as possible.

6.5. Our business partners commit their own suppliers and subcontractors to follow the principles and values listed in this declaration and systematically trace the commitment within the business relationship.

7 Confidentiality, Data Protection and Protection of Assets

7.1. Our business partners guarantee that all relevant data protection provisions are complied with in its area of responsibility - in particular for the data processing that takes place during the provision of services. The business partner undertakes to familiarize the employees entrusted with the contractually agreed tasks and activities with the relevant data protection provisions and to oblige such employees to observe the confidentiality of data processing. The business partner further undertakes to protect confidential information appropriately in order to prevent misuse. It shall use the personal data provided only in an appropriate manner and in compliance with the law.

7.2. Our business partners guarantee that any information they receive in the course of their cooperation with Vonovia will be treated confidentially and will not be passed on to third parties. The business partner takes necessary measures to protect information and keep it confidential.

7.3. All applicable data protection laws and regulation shall be complied with.

7.4. Our business partners protect Vonovia assets against theft, misappropriation or waste.

8 Insider Trading

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

9 Accounts and Records

9.1. Our business partners maintain complete accounts and records that fully document all business transactions in a transparent manner and are kept in accordance with applicable laws and regulations.

10 Antitrust Law, Economic and Trade Sanctions

10.1. Our business partners do not engage in any activities that could demonstrably be construed as anti-competitive, abusive or unfair and comply with applicable antitrust and competition laws and regulations.

10.2. Laws and regulations governing the export and import of goods, products and services, including those related to economic and trade sanctions, are followed.

11 Dealing with Employees and Subcontractors

11.1. Our business partners create fair working conditions and refrain from any form of unethical or illegal working conditions (e.g., harassment or physical violence, any form of slavery, illegal employment, serfdom and forced or compulsory labour, including child labour).

11.2. Our business partners provide safe workplaces that comply with generally accepted labor standards.

11.3. Employees shall not 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 shall be respected.

11.4. Our business partners shall ensure that wages, working hours, vacations and leaves of absence of employees and any external subcontractors that may have been hired are in accordance with applicable law and/or agreements. Business partners shall respect the right of their employees to freedom of association and collective bargaining autonomy.

As part of this cooperation, it is important to us that our business partners, by approaching the responsible Vonovia employees in good time and in an open manner, take responsibility for preventing errors and cooperate in eliminating errors on their own initiative.

We empathically point out that in the event that a business partner or one of its employees or subcontractors working for Vonovia should demonstrably and persistently violate this Business Partner Code, we reserve the right to exclude the business partner temporarily or permanently from the awarding of contracts and reserve the right to take further legal steps.

Furthermore, a proven material violation of this Business Partner Code and the associated breach of trust - being an important cause - may lead to an immediate termination of the current employment relationship. This applies in particular to violations which may lead to liability of Vonovia or to reputational damage.

Our business partners undertake to fully inform their employees involved in a business relationship with Vonovia - and any subcontractors that may have been hired - about the contents of the Code.

By signing the attached duplicate, each business partner explicitly acknowledges the Vonovia Business Partner Code.

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

(Anonymous) reports of misconduct or concerns can be made:

GSK Compliance telephone hotline 089 / 288 174 88 30 (09:00 a.m. – 06.00 p.m.) as well as at the email address compliance-vonovia@gsk.de

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

Date/Signature/Stamp Business Partner
