

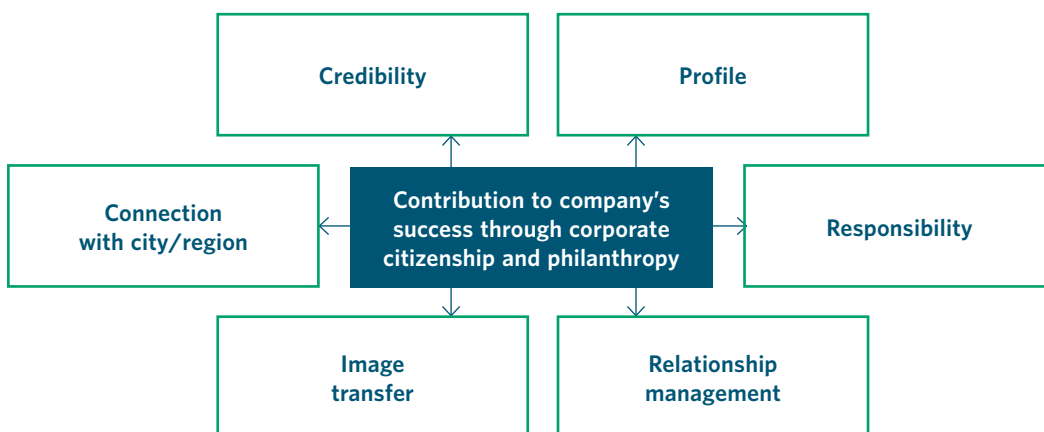
Group Donations & Sponsorship Guidelines

Preamble

Vonovia SE is a European real estate company that has established itself as a market leader, making it a focal point of attention for customers, investors, stakeholder organizations, policymakers, the business world and the general public. As a landlord with a strong sense of social and ecological responsibility, assuming responsibility for the people living in our apartments, the residential environment around them, and for society and nature, is part of Vonovia's philosophy.

Vonovia offers a range of social support measures to create value for all of its stakeholder groups – in particular for its customers, their neighbors, the communities they live in and the company's own employees. These activities also serve to shape and communicate the company's image (see graphic).

By ensuring that social concerns are reflected in its business activities, the company purposely assumes shared responsibility for society at large. Vonovia's activities in these areas are designed to present the company, and what it stands for, to the outside world, contributing to Vonovia's success in the process. This allows Vonovia to address defined target groups even without resorting to large-scale advertising campaigns, and to create an emotional bond with the company/the Vonovia brand.



1 Preliminary Remarks

1.1 Aims and Objectives of the Guidelines

These Guidelines describe, and set out provisions governing, the content-related requirements and overall conditions for corporate citizenship and philanthropy measures as well as the various ways in which these measures can be used. It also sets out process descriptions and defines responsibilities and competencies for the planning and implementation of these support measures.

These Guidelines update the previous “Group Guidelines KR-22 Donations and Sponsorship” in order to take into account the greater variety of measures and changes in the way in which the company assumes its social responsibility.

The Guidelines are designed to ensure that Vonovia SE sends out a consistent message to all of its stakeholders and that its corporate citizenship and philanthropy activities are based on a common concept in terms of their content. A consistent approach helps the company to achieve a targeted social impact and to foster a positive reputation. This also provides Vonovia with more entrepreneurial leeway. The Guidelines also help to ensure the regularity and efficiency of the company’s organizational procedures.

In order to ensure that these Guidelines are always up to date in terms of the implementation of the company’s strategy, they will be reviewed and, if necessary, amended at regular intervals, at least every two years. Material amendments and addenda to these Guidelines must be justified to, and approved by, the Management Board.

1.2 Scope

These Guidelines are binding for all business areas and companies belonging to Vonovia SE.

2 Objectives of Corporate Citizenship and Philanthropy

2.1 Why Is Vonovia Committed to Corporate Citizenship and Philanthropy?

Vonovia’s corporate citizenship and philanthropy activities are aimed primarily at achieving the following objectives:

- > Helping to develop communities (quality of living) in general and, as a result, to increase the value of the properties in that part of the portfolio
- > Promoting social cohesion and diversity to help stabilize the foundation for a pluralistic and democratic society
- > Supporting (groups of) individuals in need
- > Helping to make communities more eco-friendly
- > Helping to convey a positive public image of the company
- > Establishing networks and active involvement in urban society (local visibility and participation)
- > Supporting and showing appreciation for the engagement shown by Vonovia SE employees

2.2 In Which Areas Is Vonovia Committed to Corporate Citizenship and Philanthropy?

All support measures have to relate to regions in which the company has properties and/or to the field of activity in which the company operates. This means that they generally relate to, or have an impact on, the properties in Vonovia’s portfolio, meaning that they benefit our customers as directly as possible, but can also include broader target groups of the company, such as day care centers in Vonovia housing estates, if necessary or appropriate.

2.3 Who or What Does Vonovia Support?

Vonovia SE supports individuals and/or groups and organizations so that it can promote interesting projects, ideas and people in a range of social and ecological areas.

The activities and objectives of the initiatives that receive our support have to be consistent with the company's business and communication objectives and have to strike the right balance in terms of outlay and impact. Projects or events with a limited time frame should be expected to have a positive impact long after they have come to an end.

Vonovia and its subsidiaries do not make donations to political parties (see Code of Conduct, Point 10). We do not sponsor individuals from the political sphere or associations.

Our support activities focus on measures that **strengthen a sense of community in the neighborhood, serve to enhance diversity and promote a vibrant residential environment**. This applies to both social and environmental support measures. The measures should be chosen to address specific societal needs.

3 Forms of Social Engagement

3.1 Cash Donations and Donations in Kind

The term "donation" refers to a voluntary contribution (**made without the donor getting anything in return**) made either in cash or in kind in various areas of society, usually (but not necessarily) with a certain purpose. The fact that donations are intended for a specific purpose does not mean that a donor has to leave its own interests out of the equation entirely. A scenario, for example, in which the donor is publicly thanked or in which its donation is otherwise made public (e.g., by simply displaying the logo, but without linking to the company's website), is still considered to be a donation made without the donor getting anything in return.

Donations to charitable, benevolent or church-based organizations are tax-deductible as business expenses provided that an officially recognized donation receipt is issued by the institution that received the donation. Vonovia must not have any sort of commercial relationship with the recipient of the donation. Donations to charitable, benevolent or church-based institutions are generally VAT-exempt. Fiscal treatment of donations outside of Germany may differ and must be taken into account accordingly.

Vonovia generally donates to local projects and institutions that operate in, and have an impact on, the places in which our properties are located. Donations are designed to meet a particular need that these projects and institutions have. These donations can (and should) result in positive (media) coverage of the company. Donations can include financial contributions as well as donations in kind (building materials, furnishings, tools, advertising material, etc.).

3.2 Sponsorship

"Sponsorship" refers to measures taken by Vonovia to support or promote individuals, groups and/or organizations by providing money, non-monetary resources and services in the fields of sport, culture, the church or academia, in social or ecological areas or areas of similar socio-political importance. One key characteristic of sponsorship is the target-oriented collaboration between the sponsor (Vonovia) and the sponsored party.

Sponsorship is always on a **quid pro quo** basis (unlike a donation, where the donor receives nothing in return). Ideally, there should be a balance between what is given and what is received in return.

The services rendered by the sponsor, in this case Vonovia, are usually based on a contractual agreement between the sponsor and the recipient of the services (sponsorship agreement), setting out provisions on the nature and scope of the services on both sides. Sponsorship measures are generally subject to VAT. Subject to certain conditions, these payments can also be classed as business expenses and the VAT paid can be claimed/deducted as input tax. Fiscal treatment of donations outside of Germany may differ and must be taken into account accordingly.

Sponsorship is a marketing instrument and forms part of Vonovia's public relations work. It serves as a strategic communication tool to help boost Vonovia's profile and build the company's image. It allows Vonovia to address and maintain relationships with its target group in a non-commercial manner. The image of the sponsored individual or group/organization can be used for the company's own purposes or transferred to Vonovia's image (or that of its subsidiaries), and the company's products can be transferred and used for its own communication objectives.

3.3 Cooperation With Partners

While donations are characterized by the provision of support as a one-off measure, and sponsorship involves a clear advertising link to the company, cooperation with social organizations presents Vonovia with an opportunity to establish long-term partnerships in the quest to achieve shared social and ecological goals. This makes it an essential element of Vonovia's work to develop its corporate citizenship and philanthropy. The main objectives and characteristics of cooperation with these partners include:

- > The development and pursuit of shared social/ecological goals by bundling competencies, services and networks
- > Building trust with stakeholders from society at large in order to strengthen the company's social anchorage and build its reputation
- > Knowledge transfer and identification of innovation potential arising in the social/ecological domain for Vonovia
- > Image transfer of the cooperation partners for our own corporate purposes

Cooperation with social organizations generally takes place within an overall framework and has a special communicative effect. This means that cooperation projects like these (e.g., with NABU, Germany's largest environmental organization, or various social welfare organizations) have to be coordinated with Corporate Communications.

3.3.1 Provision of Premises

One special form of cooperation – and one that is particularly relevant for Vonovia – relates to premises that Vonovia makes available to social institutions and organizations. With strong links to the business area concerned, Vonovia can make a significant positive contribution by providing discounted or rent-free premises.

Premises are provided on a local level and any such measures should take account of the needs of the local environment.

Premises can be made available both for commercial purposes and as homes. Typical areas in which these measures are used include:

- > Housing in strained residential property markets for target groups that are particularly relevant from a social perspective (e.g., preschool teachers, nursing care workers, police officers, etc.)
- > Housing for vulnerable individuals (e.g., refugees, the homeless, dementia sufferers, etc.)
- > Commercial premises for social institutions (e.g., neighborhood offices, welfare centers, cultural institutions, youth clubs, etc.)

3.4 Employee Engagement

Employee engagement (also known as corporate volunteering or employee volunteering) involves the company's employees taking action to support social or ecological projects or institutions by contributing their time and skills.

As well as expressing social responsibility, volunteering also has an impact in terms of human capital development (team building, strengthening social skills, retention, etc.).

3.5 Foundations

Vonovia also uses foundations to show its corporate citizenship and philanthropy by providing support to tenants, the rental environment, and in cases of social hardship. The company is currently involved in five foundations: Vonovia Stiftung (Vonovia foundation), Vonovia Mieterstiftung e.V., Stiftung Mensch und Wohnen, Stiftung Pro Bochum and Geheimrat Huber-Stiftung. The foundations act independently and are not covered by these Guidelines. In general, however, it is always important to check - where the geographical location allows - whether donations or sponsorship measures can also be handled via Vonovia's foundations.

4 Organization

4.1 Allocation of Funds and Coordination

Requests for donations and sponsorship are received by a whole number of different areas within the company. Providing support in response to such external requests should represent a smaller part of Vonovia SE's corporate citizenship and philanthropy activities. A more target-oriented approach is the proactive development and acquisition of support measures, as these tend to be a better fit for the company.

Responsibility for approving and implementing measures with a regional focus lies with the regional managers of Vonovia's business areas, who have direct contact with customers. The Corporate Communications department is on hand to provide advice in the context of the Guidelines.

Exceptions include those regional measures that are financed by a central budget for Corporate Communications. The regional managers have the right to propose such measures. The measures are then subjected to a suitability check performed by Corporate Communications, which then gives the measures the green light.

The regional managers are responsible for obtaining a corresponding donation receipt for all regional donation measures and sending it (the original document) to the central tax department.

Measures forming part of larger initiatives are coordinated by the Corporate Communications department. This department is also responsible for communication related to donation and sponsorship measures and for preparing information for the purposes of sustainability reporting. This means that Corporate Communications should be informed of any planned measures and their scope.

More extensive social or ecological cooperation projects can be initiated, coordinated and implemented by all companies and business areas of Vonovia SE. The requirements of these Guidelines must be given due consideration and Corporate Communications must be involved in the process. Measures to make premises available are the responsibility of Real Estate Management, with decisions on such measures being made, and the measures themselves been coordinated, on a decentralized basis. In order to enable comprehensive reporting on this key social engagement approach, Corporate Communications must be provided with information on the measures concerned.

Measures relating to the engagement of Vonovia SE employees have an impact on human capital development. As a result, the company's HR department has to be involved in volunteering measures. Corporate Communications is involved in the associated communication measures in the same way as it is involved in the other measures specified in these Guidelines.

Country-specific measures are coordinated by the relevant national companies and are supported by the local Communications departments. This is done in coordination with the Corporate Communications department of Vonovia SE. At BUWOG, responsibility for implementing the measures lies with the company's own Corporate Communications department.

The available data is used to prepare an annual corporate citizenship and philanthropy report on the activities performed, and the budget funds used, that is presented to Vonovia's Management Board. This report is prepared by the Corporate Communications department and is also used for the purposes of sustainability reporting.

4.2 Communication

The Corporate Communications department is responsible for communicating information on Vonovia SE's corporate citizenship and philanthropy. This department must therefore be informed of all key measures in advance. Suitable internal and external communication tools are selected and coordinated by the central department. Specific regulations in this regard are set out in greater detail in the "Group Guidelines KR-15 Communication."

In line with Vonovia's stronger regional focus and positioning, regional communication is of particular importance. In particular, this sort of communication has the potential to effectively support the objectives that Vonovia pursues with its corporate citizenship and philanthropy activities (see 2.1.).

4.3 Approval Thresholds

The approval thresholds are set out in the "Group Guidelines KR-28 Approval Thresholds and Decision-Making Power."