

# Code of Conduct for Business Partners of Deutsche Wohnen SE

---

The Code of Conduct for Business Partners of Deutsche Wohnen SE and its affiliates (“Deutsche Wohnen”) is based on the General Code of Conduct for our employees. The goal of Deutsche Wohnen is to gain and maintain the trust of our customers, employees and business partners through social and responsible action. Our business dealings are characterised by honesty, integrity and openness. Our collaboration with business partners is based on partnership and characterised by mutual respect. The Code of Conduct sets out requirements for our business partners relating to compliance with laws and ethical standards as well as integrity. We respect human rights. We are convinced that it is our social responsibility to base our business relationships on human rights and internationally recognised labour and environmental standards. The principles and minimum requirements described in our Code of Conduct are therefore built on the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights including the basic principles and rights in the eight core conventions set out in the Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation and the human rights set out in the Universal Declaration of Human Rights. Deutsche Wohnen expects its business partners to comply with the principles and rules set out in this Code of Conduct and to ensure that their own business partners, subcontractors and service providers do the same.

## 1. Principles of collaboration

We are convinced that social and responsible conduct secures the future viability of Deutsche Wohnen and its stakeholders, and therefore see it as an important foundation in relation to business dealings with our business partners. We expect our business partners

- to comply with all applicable laws and regulations, in particular relating to anti-corruption, construction, data protection, money laundering, capital markets, antitrust, competition and environmental law,
- to deal fairly and responsibly with their employees,
- to comply with their human rights due diligence and with applicable labour laws, and to ensure that any form of unethical or illegal working conditions, such as illicit work, forced labour, compulsory or child labour, and any form of discrimination based on origin, colour of skin, ethnicity, religion, political belief, gender, sexual orientation, disability, age or other personal characteristics are excluded.

## 2. Compliance and conduct in competition

We do not tolerate any form of corruption or other unethical business practices. Trust, credibility, transparency and openness are fundamental requirements relating to business dealings with our business partners:

- Our business partners do not tolerate any form of corruption or bribery and avoid conflicts of interest that can lead to corruption risks. Business and personal connections to employees of Deutsche Wohnen are made transparent if they can lead to conflicts of interest.
- In connection with their business activities for Deutsche Wohnen, our business partners only grant or accept invitations insofar as they are objectively of insignificant value and appropriate, not in anticipation of improper consideration or other preferential treatment and do not violate applicable law. The same applies to the acceptance, the promise or the granting of gifts, gratuities or other benefits of any kind. Donations of cash, shopping vouchers or other means of payment are excluded. Any invitations or benefits of any kind to public officials are prohibited.
- Donations, sponsorship of individuals, groups, organisations or events (sponsorship) will not be used to obtain unlawful business advantages.
- Any undue influence on employees, business partners or third parties who are directly or indirectly responsible for Deutsche Wohnen in the context of awarding of contracts by Deutsche Wohnen will not be tolerated.
- Our business partners comply with all relevant antitrust and competition laws; in particular they do not enter into agreements or understandings that impact prices, conditions or customer relationships, especially regarding participations in tenders, and do not exchange competitively sensitive information.
- Our business partners comply with all applicable data protection laws and regulations, in particular relating to personal data of employees, business partners and customers.
- All applicable statutory regulations on preventing money laundering are followed. Our business partners take appropriate measures to prevent money laundering in their company.
- Confidential information disclosed in the course of business dealings with Deutsche Wohnen will only be disclosed to third parties with the consent of Deutsche Wohnen. All applicable laws and regulations on insider trading are complied with.

### 3. Sustainability and social responsibility

The assumption of responsibility in society is a key factor of social and corporate responsibility. We therefore expect our business partners to comply with all applicable laws and regulations, and to align their behaviour with the following principles and thereby take into consideration the minimum protection and the basic principle of avoiding significant harm (“do no significant harm” criteria) as set out by Regulation (EU) 2020/852, EU taxonomy regulation):

- Our business partners respect commonly accepted human rights, promote diversity and equal opportunities in their business, and do not tolerate discrimination in the recruitment or employment of staff.
- Through consistent, preventative health and safety protection, our business partners ensure a safe and healthy working environment and fair working conditions. All applicable provisions of labour, health and social security law, in particular regarding working hours and minimum wage, are complied with. The right of workers to form associations, to join them and to bargain collectively is respected.
- Our business partners adhere to the environmental protection laws and standards that apply to them and are committed to the principles of sustainable building and management. We expect our business partners to provide environmentally sound and energy-efficient solutions as part of their services, in particular in the areas of materials and resources, procurement, transport and disposal, and to ensure that goods and materials are not obtained or manufactured in an illegal or unethical manner.

### 4. Compliance with the Code of Conduct for Business Partners of Deutsche Wohnen

- Our business partners expressly acknowledge this code through written declaration or a corresponding contractual clause and ensure that the principles and rules set out in this Code of Conduct are adhered to and implemented by their employees.
- Through the Deutsche Wohnen whistle-blower system, our business partners and their employees, as well as subcontractors and service providers, have the opportunity to report violations of law and regulations that may have a negative impact on Deutsche Wohnen or its business partners. This can be done anonymously if desired. The contact details are available at <https://hinweisgeber.deutsche-wohnen.com>.
- Whistle-blowers shall not be adversely affected in any way.
- Our business partners select their own business partners diligently, in particular subcontractors and service providers which they retain in relation to their business activities for Deutsche Wohnen, and communicate the principles and rules set out in this Code of Conduct or equivalent principles and rules to them and promote compliance of their suppliers with these principles and rules.
- In the event of serious violations of this Code of Conduct, Deutsche Wohnen reserves the right to appropriate sanctions, including the immediate termination of the business relationship and the assertion of claims for damages. In the case of minor violations of this Code of Conduct, the business partner is generally given the opportunity to take appropriate action within a reasonable time to remedy the situation. Deutsche Wohnen reserves the right to verify compliance with the Code of Conduct for Business Partners.