

Aareon

Code of Conduct

for employees

version: March 2025



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The Code of Conduct sets out
the values and beliefs that shape us
as Aareon Group.

The resulting principles of behaviour
apply to all of us, and we are all
responsible for upholding them together
every day.

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Intro



Preface

Dear colleagues,

At Aareon, we are committed to creating economic value while positively impacting society. Our Code of Conduct serves as a guide for ethical business practices and compliance with laws.

Each of us plays a key role in upholding these values, ensuring ethical conduct in our daily work and leaving a lasting, positive legacy.

We count on you and our entire ecosystem – including clients, partners, and suppliers – to carefully evaluate every decision and ensure that all actions taken on behalf of our organisation are legal, fair, and in line with this Code, our policies, and applicable laws or regulations.

Together, we strive for excellence, innovation, and success with integrity, shaping a brighter future for Aareon and the communities we serve.

Thank you for your contribution.

Sincerely,
your Aareon management board

What do we stand for?

Sustainable spaces for all

We are Europe's trusted provider of SaaS solutions for the property industry, inspiring our clients and driving positive change.

Our mission is more than our work – it is our passion: connecting people, process and property, bringing the ecosystem closer together. We make digitalisation a reality, helping our clients manage and sustain their properties effectively while providing superior digital experiences for everyone involved.

Embracing the industry's responsibility, we are dedicated to a more sustainable future. Our commitment encompasses environmental, economic, and social dimensions, empowered by technology that promotes affordable housing and energy efficiency for a brighter tomorrow.



What purpose does the Code of Conduct serve?

The Code of Conduct serves as a guiding framework that outlines the values, principles, and ethical standards expected from all members of Aareon Group.

Its purpose is to ensure consistent, responsible behaviour, promote compliance with laws and regulations, and foster a culture of integrity and accountability.

It helps employees make ethical decisions in their daily work and maintain a positive, transparent environment within the organisation.

It demonstrates a clear commitment to ethical behaviour at all times and helps maintain and strengthen our stakeholders' trust – an essential factor for Aareon Group's success.

Respect and compliance with the law

We prioritise compliance with the laws and regulations of the countries in which we operate. This includes but is not limited to local, country-specific and international laws, as well as relevant public and private regulations. This fundamental principle guides our actions and decision-making.

We are committed to understanding and adhering to the legal frameworks governing our business operations. Additionally, we respect and uphold internationally recognized human rights.

By adhering to the law purposefully, we demonstrate our commitment to ethical conduct and responsible business practices, fostering trust and confidence among our stakeholders.

Using the Code to make good decisions

Everyone is responsible for behaving ethically and with integrity. Please ask yourself...

All employees, officers and directors are expected to understand and follow this Code. The guidelines set forth here are intended to help you make decisions that reflect our core values in your daily work. It is important that you are aware of our position on the key ethical and legal issues that shape our business operations around the world.

Would I feel at ease explaining this action to my family or friends? It is important to act not only in accordance with the letter of the law, but also in its spirit. Let common sense and good judgment guide you in making decisions about business conduct. If you are ever unsure about the right thing to do, always seek advice before proceeding.

Please ask yourself:

1. Does it align with our company's core values?
2. Is this action in compliance with the law?
3. Is this action morally and ethically acceptable?
4. Am I treating others as I would like to be treated myself?
5. Would I feel at ease explaining this action to my family or friends?
6. Would this action or decision enhance our reputation if it were made public?

If you can answer **YES** to all questions, move forward.

Not sure? STOP!

Review applicable policies, check with your manager if necessary, or ask the respective experts for support.



What to do in case of a violation?

Toll-free hotline:

From Germany:

+49 800 3800 999

From other countries:

+49 69 99998839

Availability:

Mon. - Fri.

from 09:00 a.m. - 05:00 p.m.

(German and English)

Whistleblowing System

We are committed to maintaining a transparent, ethical, and accountable work environment. We encourage all employees to speak up if they witness or suspect any violations of laws, regulations, or our Code of Conduct. Whistleblowing plays a critical role in identifying and addressing misconduct early.

If you become aware of behaviour that you believe does not comply with the principles of our Code of Conduct, you can report it to the following persons or departments:

- manager
- works council
- complaints office
- compliance
- data protection officer
- whistleblowing system

We ensure that all reports are handled confidentially and without retaliation. Employees who raise concerns in good faith are protected, and their courage helps safeguard the integrity and values of our company. Reporting channels are available to all, and every concern is taken seriously.

Our principles of conduct

Our principles of conduct at a glance



= Social Responsibility & Workplace Culture



= Corporate Social Engagement & Public Relations



= Environmental Responsibility & Sustainable Practices



= Governance & Ethical Business Practices

01.

Equal opportunities and
diversity

02.

Workplace behaviour and
harassment

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Money laundering and
terrorist financing

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Taxes and levies

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Confidentiality and
transparency

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Data Protection and GDPR

01. Equal opportunities and diversity

We value diversity, equity, and inclusion, providing a safe, inclusive workplace where everyone has fair access to opportunities.



At Aareon, we are committed to equality and respect for all employees, fostering a diverse and inclusive workplace.

Discrimination of any kind is strictly prohibited, and we work to ensure fairness and equity for everyone. Through education and awareness, we address unconscious biases and provide equal opportunities.

Embracing diversity helps us unlock employee potential, drive innovation, and better serve our clients and communities.

Things to keep in mind:

- Treat all colleagues with dignity and respect, regardless of their background and value and celebrate the diversity of our workforce as a strength.
- Recognise that discrimination based on protected characteristics is strictly prohibited.
- Foster an inclusive culture where everyone feels valued and empowered to contribute and advocate for fair access to opportunities for all employees.
- Be aware of and actively work to address unconscious biases that may impact decisions and opportunities.
- Lead by Example: Model behaviours that reflect our commitment to equality and inspire others to do the same.

02. Workplace behaviour and harassment

We maintain a zero-tolerance-policy towards harassment, ensuring a respectful and inclusive work environment.

We promote a respectful and inclusive work environment where all employees are treated with dignity. Harassment, including sexual harassment, verbal abuse, bullying, and offensive behavior, is strictly prohibited, and we maintain a zero-tolerance policy towards such actions.

Our commitment to respect and inclusivity allows employees to express themselves freely, without fear of harassment or discrimination. We encourage prompt reporting of any incidents through clear and confidential channels. Retaliation against whistleblowers is strictly forbidden.

By fostering a culture that condemns harassment, we create a workplace where everyone can thrive, contribute their best, and achieve their professional goals. This dedication reinforces our commitment to equality, respect, and the well-being of our workforce.

Things to keep in mind:

- Foster a culture of respect and inclusivity.
- Zero Tolerance for Harassment: Understand that harassment of any form is strictly prohibited.
- Promptly report any incidents of harassment or offensive behaviour – Use available confidential reporting mechanisms for complaints.
- Recognise that retaliation against whistleblowers is forbidden.
- Be an ally to coworkers and support those who may be experiencing harassment.
- Engage in behaviours that promote a collaborative and thriving work environment.

03. Health and safety

We prioritise the health and safety of employees fostering a safe work environment.



At Aareon, we prioritise the health and safety of our employees by ensuring a safe working environment. We actively promote accident prevention and employee well-being through established standards, awareness campaigns, and a commitment to continuous improvement.

Creating a culture of safety requires open communication and active participation from all employees. We conduct regular assessments to drive ongoing enhancements in our health and safety practices. Aareon's dedication to health and safety extends to the well-being of everyone involved, fostering a secure and productive workplace that contributes to our overall success and prosperity.

Things to keep in mind:

- Always prioritise the health and safety of yourself and others in the workplace and adhere to all health and safety regulations and company policies.
- Engage in practices that prevent accidents, look out for the well-being of coworkers and promote a culture of safety.
- Promptly report any hazards or unsafe conditions to the appropriate personnel.
- Participate in health and safety trainings and employee networks to stay informed about best practices.

04. Professionalism and qualifications

Empowering Excellence Through Professionalism and Continuous Learning



At Aareon, professionalism and qualifications are key to our success. We value expertise, diligence, motivation, and continuous learning.

We tackle tasks with professionalism, following all rules and agreements. Conflicts are resolved respectfully, considering everyone's interests.

Managers provide regular, constructive feedback to support growth. By fostering a culture of professionalism and improvement, we empower employees to contribute to Aareon's success.

Things to keep in mind:

- Approach every task with diligence and a high level of professionalism and pursue opportunities for personal and professional growth through continuous learning.
- Address conflicts with respect, considering the interests of all parties involved and be open to receiving constructive feedback and offer it to others to support growth.
- Maintain a positive attitude towards challenges and view them as opportunities for learning.
- Encourage and assist team members in their professional development.
- Ensure that assessments of performance are honest, regular, and equitable.

05. Official appearances and representative duties

We maintain integrity in Official Appearances and Representative Duties.

We represent Aareon Group to the best of our ability, knowing that the company's reputation relies heavily on the behaviour of its employees.

Employees must ensure that all communications reflect the integrity, trustworthiness, and professionalism of Aareon Group, reinforcing our commitment to maintaining a positive reputation.

Those who speak or communicate on behalf of the Group carry a special responsibility to act professionally and uphold the company's values.



Things to keep in mind:

- Always communicate in a professional manner that reflects well on the company.
- Ensure that all statements and actions align with the company's communication protocols, values of honesty and transparency.
- Ensure that all information shared is accurate and clear.
- Only authorised employees should speak or communicate on behalf of the Group.
- Consider the potential impact of your personal words and behaviour on Aareon Group's reputation, both inside and outside of work.

06. Product responsibility, ESG and sustainability

We consider the respect of human rights, social matters and the protection of natural resources in our products and supply chain as an essential part for the long-term success of the company.

We are committed to minimising our environmental impact and positively contributing to the communities we serve. Aareon complies with environmental regulations, adopts sustainable practices, and supports initiatives that promote social welfare. Our goal is to reduce our ecological footprint while engaging in community projects and fostering lasting relationships. By aligning our business practices with sustainability, we aim to leave a positive legacy for future generations. In developing new products and services, we consider the interests of all stakeholders and adhere to sustainable product development processes. We do not create products that conceal risks or mislead users about their features, ensuring our offerings accurately reflect their true nature. This commitment underscores our dedication to ethical practices and responsible innovation.

Things to keep in mind:

- Reduce our ecological footprint in all operations and comply with environmental laws and standards.
- Engage in initiatives that promote social welfare.
- Address the interests of all relevant stakeholders in product development.
- Stick to sustainable product development processes.
- Avoid products that conceal risks or mislead users.
- Align practices with sustainability and social responsibility.
- Make decisions that benefit future generation.

07. Politics and society

At Aareon, we recognize our role within a democratic society and our responsibility to the community, ensuring that societal interests and the well-being of society are at the forefront of our decision-making.

At Aareon, we see ourselves as integral members of a democratic society, fully aware of our responsibility as a company within the community.

We prioritise societal interests and the well-being of the community when making decisions, ensuring that our actions contribute positively to the society as a whole.

As part of our commitment to corporate citizenship, we support various projects and initiatives that align with our organizational goals. However, we maintain a clear stance against donating to or supporting religious groups, political parties, politicians, or related organisations to ensure that our contributions remain focused on community welfare and development.

Things to keep in mind:

- Recognize Aareon's role in contributing positively to society.
- Always consider the well-being of the community in decision-making processes.
- Contribute to projects and initiatives that align with Aareon's goals and community welfare.
- Do not donate to or support religious groups, political parties, politicians, or related organisations.
- Ensure transparency in our community engagement efforts and contributions.
- Encourage diverse perspectives in discussions about societal impact and community initiatives.

08. Fairness and competition

We uphold free and fair competition and responsible business practices, complying with competition laws and do not engage in any unfair business practices.

We are fully committed to free and fair competition and compliance with competition laws. Anti-competitive practices such as price-fixing, bid-rigging and market allocation are strictly prohibited.

We emphasise no communication or agreements with competitors that manipulate prices, conditions or markets. Boycotts against clients or suppliers are forbidden.

By adhering to these principles, we promote a competitive marketplace, innovation and customer value. Employees are encouraged to familiarise themselves with the competition requirements taught in training sessions and to report any concerns immediately. Upholding free and fair competition benefits clients and stakeholders, fostering a vibrant and ethical business environment.

Things to keep in mind:

- Avoid speaking negatively about our competitors.
- Before sharing any competitive information with third parties, please consult with your manager.
- Please don't ask our clients or suppliers to go against any agreements they may have with our competitors.
- Participating in the circumvention of public procurement regulations is prohibited. Do not offer your clients any advice on aspects of public procurement law.
- Be sure to obtain information about competitors in an ethical and honest way – never through illegal methods or by misrepresenting yourself.

09. Bribery and corruption

We comply with anti-corruption regulations and do not engage in any unfair business practices.

We are committed to combating bribery and corruption. All employees make their decisions independently and sustainably, guided by economic, legal, regulatory, social, ethical, and environmental considerations.

We firmly reject any form of bribery and do not promise, offer, or accept improper benefits, nor do we pass them on. Across all business areas and countries, we actively oppose any attempts at bribery or corruption. Additionally, we support international efforts aimed at preventing bribery and corruption, reinforcing our commitment to ethical and transparent business practices.



Things to keep in mind:

- We have a Zero Tolerance: Aareon does not tolerate bribery in any form.
- Always make decisions independently, based on legal, ethical, and sustainable principles.
- Reject all forms of bribery and corruption, in any form and at any level.
- Do not offer, promise, or accept any improper benefits or advantages.
- Stay vigilant and report any attempts at bribery or corruption within the business.
- Support international and company-wide efforts to combat bribery and corruption and ensure transparency in all transactions and interactions, both domestically and internationally.

10. Gifts and entertainment

We handle gifts and invitations with care and in accordance with market standards.

We give and receive gifts and benefits that align with standard market practices. While exchanging gifts and entertainment can strengthen business relationships, it is important to be mindful of potential conflicts of interest, such as misjudging what is appropriate. To ensure fairness, Aareon allows gifts and entertainment only if they follow normal market standards.



Things to keep in mind:

- Gifts and invitations to business partners and clients must serve legitimate business purposes and should never be given with the intent to influence business decisions. Only accept gifts and invitations if they have symbolic or minimal value.
- Gifts and invitations accepted must be clearly related to professional activities.
- Acceptance of gifts and invitations should not create an obligation or give the appearance of one.
- Business interactions should remain transparent, ethical, and free of undue influence or favouritism.
- Regularly review and adhere to company policies regarding gifts and invitations.

11. Conflict of interests

We must prioritise the interests of Aareon and disclose any potential or actual conflicts of interest.

At Aareon, employees must avoid conflicts between personal and business interests. Using non-public information for personal gain is prohibited. Any potential conflicts should be disclosed promptly and managed appropriately to ensure decisions are not influenced by personal interests. Employees are encouraged to discuss conflicts with their managers to find solutions, promoting transparency and fairness while protecting Aareon's interests.



Things to keep in mind:

- Do not pass any confidential information to third parties or use any confidential information to gain an advantage for yourself, the Aareon Group or any third parties.
- Do not conduct any personal business that clashes with clients' interests or those of Aareon Group.
- Inform your manager without undue delay if potential or actual conflicts of interest exist that influence or could influence your decision or actions.

12. Money laundering and terrorist financing

We combat money laundering, terrorist financing and breaches of sanctions.

We are committed to combating money laundering, terrorist financing, and breaches of sanctions. Aareon strictly complies with national and international sanctions laws and regulations, ensuring our business practices uphold the highest standards of integrity.

We do not facilitate money laundering, terrorist financing, or sanctions violations, whether actively or passively. We conduct business only after identifying and verifying our business partners in accordance with legal requirements ("know your customer").

We thoroughly analyse and critically review transactions related to our operations, adhering to international standards set by the relevant supervisory authorities. We expect our business partners to share this commitment and exercise the same level of diligence in their operations.



Things to keep in mind:

- Uphold standards against money laundering and terrorist financing. By adherence to national and international sanctions laws.
- Verify business partners and analyse transactions thoroughly.
- Require compliance from business partners.
- Alert the Compliance department about suspicious activities immediately.

13. Taxes and levies

We ensure transparent and timely adherence to fiscal obligations across all operations.

We are committed to maintaining tax compliance and ethical behaviour in all our operations. Adhering to tax regulations is a key element of governance at Aareon.

Our Tax Compliance Management system ensures that we fulfill our tax obligations both domestically and internationally in a timely and accurate manner. This system is supported by clear responsibilities, detailed process descriptions, monitoring, and risk controls to ensure compliance at every level.

We prioritise transparency and strict adherence to applicable tax laws, fostering trust and sustainability in our financial practices.

Things to keep in mind:

- Ensure full compliance with all relevant tax regulations at both national and international levels.
- Promote open and transparent communication with tax authorities in all jurisdictions.
- Maintain transparency in the structuring of company transactions and internal arrangements and avoid engaging in or supporting any illegal tax practices.
- Do not offer tax advice to clients or assist in any tax planning activities outside of the company's scope, actively prevent any involvement in tax offenses, either directly or indirectly.
- Ensure clear responsibilities and oversight for tax compliance within the organisation.

14. Confidentiality and transparency

We maintain robust business continuity and cybersecurity measures to protect against threats.



Aareon's assets, including physical, financial, and intellectual property, must be used responsibly and protected from loss, theft, misuse, or unauthorised access. We respect third-party intellectual property and industrial property rights and do not use them without authorisation. Confidential and sensitive information should be handled with the highest level of care.

Employees are responsible for safeguarding these assets, adhering to company policies, and maintaining strict confidentiality.

We promote a culture of responsibility through training and awareness programs. Any breaches of security must be reported immediately to uphold our commitment to asset and information protection.

By safeguarding assets and information, we maintain trust with stakeholders and support innovation and long-term success.

Things to keep in mind:

- Use Aareon's physical, financial, and intellectual property responsibly and prevent loss, theft, or misuse.
- Treat confidential and sensitive information with the utmost care to avoid unauthorised access.
- Adhere to all company policies related to asset protection and information security, engage in training programs to stay informed.
- Keep company information private and only share it with authorised individuals.
- Promptly report any incidents of data breaches, theft, or unauthorised access to safeguard company assets.

15. Data Protection and GDPR

We prioritise IT and data security, providing training to protect our digital assets and customer privacy.

Data Protection is part of our business. Aareon takes a responsible approach to all its products and services, from development to marketing and usage, ensuring they meet high standards of quality and security. We prioritise the privacy and security of our IT systems, data, and digital media.

All employees must comply with GDPR, local data protection laws, and company policies related to data protection and information security. This includes ensuring lawful data processing, using authorised systems responsibly, and protecting against unauthorised access or data breaches.

Aareon implements state-of-the-art security measures, both proactive and reactive, and provides regular security training to raise awareness of potential threats.

Employees are expected to handle sensitive data with confidentiality and report any data breaches or security incidents immediately.

By prioritizing IT and data security, we demonstrate our commitment to personal data, protecting sensitive information, and maintaining the trust of our stakeholders.

Things to keep in mind:

- Prioritise IT system, data, and digital media security, understanding your actions affect the company's data protection and trust.
- Follow GDPR, local data laws, and company policies.
- Ensure all data processing is lawful and justified.
- Use only authorised systems for data management.
- Handle sensitive information with care and confidentiality.
- Report any data breaches or security incidents promptly and stay informed by regularly engaging in data protection and security training.

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