

Policy statement on respect for human rights and the environment

Aareon

1 Foreword

For human rights and the environment - Our commitment to a sustainable future

For Aareon Group GmbH (hereinafter "Aareon"), recognising and respecting human rights and the environment is an integral part of our self-image.

As a company, we are committed to ethical principles that serve as a guide for decisions and actions and ensure that our values act as a moral compass.

Aareon is a provider of SaaS solutions for the European property industry. The company digitalises property management with user-oriented software solutions. These simplify and automate processes, support sustainable and energy-efficient action and network those involved in the process. As a result, property companies can realise new value creation potential.

This policy statement reflects our responsibility in relation to value creation and the supply chain by incorporating and expanding on the principles of our Code of Conduct. We implement applicable laws and regulations, respect international standards and strive to comply with and prevent violations of human rights and environmental requirements in our business activities. This policy statement applies to Aareon Group GmbH and its subsidiaries in which Aareon Group GmbH directly or indirectly holds more than 50% of the shares.

The management board of Aareon AG* has approved this updated policy statement on 11 February 2025.

2 Our commitment to respecting human rights and the environment

We are aware that our collective efforts influence our corporate culture. Each and every one of us plays a crucial role in bringing our moral compass to life. By living our values and adopting our defined principles, we pave the way for ethical behaviour in our daily work.

2.1 Human rights

Our commitment includes respect for internationally recognised human rights in all our business activities and along our value chains. This includes in particular

- The prohibition of child labour and forced labour
- The prohibition of all forms of slavery and discrimination
- Strengthening the freedom of association
- Mutual respect, regardless of age, disability, religion, social background, ethnic or cultural diversity, gender or sexual orientation and identity
- Adherence to occupational health and safety
- The payment of fair wages
- The prohibition of environmental pollution

In addition to our internal policies and guidelines, we are guided by international standards and frameworks.

*Aareon AG was transformed into Aareon Group GmbH by way of a change of legal form (in accordance with the resolution of the Annual General Meeting of 26 February 2025). The validity of this policy statement remains unaffected.

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We are guided in particular by the values of the International Bill of Human Rights and the core labour standards of the International Labour Organization (ILO), the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.

2.2 Our expectations of our employees and suppliers

Our expectations regarding respect for human rights and the environment are set out in our corporate guidelines and management systems:

- Aareon Code of Conduct for Employees¹: This Code of Conduct, which is binding for all employees, anchors the most important guidelines and principles for action and behaviour in our daily work processes and in our corporate culture, both at a national and international level.
- Aareon Code of Conduct for Suppliers²: This Code of Conduct sets out the requirements for our suppliers with regard to sustainability criteria, including the expectation that social, ethical and environmental requirements are taken into account.

Our standards are not only important to us, but also to our suppliers. Our contracts with direct suppliers contain clear rules on compliance with these principles. Aareon expects its suppliers to comply with the values and principles set out in the Code of Conduct for Suppliers, and to endeavour to ensure that their suppliers in the supply chain also adhere to these principles. In addition, we expect our business partners to provide information on how exactly they implement these principles in their business activities when required. This collaborative

partnership is essential in order to jointly promote a sustainable and ethically responsible business world.

3 Process description

3.1 Risk management and risk analysis

As part of an annual risk assessment, human rights and environmental risks are analysed at suppliers and in the company's own business. The risk scenarios are identified, evaluated and prioritised on the basis of abstract and concrete risk analysis. The parameters 'country' and 'sector' are used as assessment factors in the abstract risk analysis. The concrete analysis determines the level of risk after taking into account the impact of all existing measures and controls.

A scoring model based on official indices serves as a reference for the risk assessment:

- If the master data of suppliers or the company's own companies correspond to a risky combination of sectors and countries, further analysis are required.
- If necessary, appropriate measures are defined and imposed on the supplier or implemented in the supplier's own business area.
- The effectiveness of these measures is subsequently monitored and tracked. If they are not effective, a careful review must be carried out to determine whether the contract with the supplier can be terminated and the supplier replaced by a risk-free supplier.

¹ <https://www.aareon.com/compliance>

² <https://www.aareon.com/compliance>

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These proactive measures ensure that Aareon not only complies with legal requirements, but also guarantees continuous monitoring and adaptation to potential risks in its own business area and in the supply chain.

3.1.1 Risk analysis in own business area

The risk analysis for human rights and environmental risks in our own business area already resulted in a low risk classification in the abstract analysis. Accordingly, the concrete analysis also showed a low risk. The risk is low due to the fact that our main activities are the development and provision of software solutions within Europe. We are constantly striving to minimize any risks through comprehensive measures.

3.1.2 Risk analysis for suppliers

The risk analysis for human rights and environmental risks in the supply chain showed a low abstract risk in most cases. Individual suppliers showed a medium risk. These risks were also minimised through analysis, evaluation of other available information and specific questionnaires. After the concrete analysis, the supplier risks were categorised as low risk. Our supply chain essentially consists of the procurement of IT hardware and services, which are generally sourced from established and certified suppliers, meaning that no significant risks are recognisable here.

4 Preventive and remedial measures

The results of the risk analyses have an impact on the relevant business processes and our supplier management by defining targets and measures at appropriate points. Our aim is to

protect those who may be (potentially) affected and to identify, prevent or at least minimise negative impacts on their human and environmental rights.

In particular, we have implemented the following measures in our own business division and with our suppliers:

- Publication and implementation of this policy statement
- Group-wide Code of Conduct for employees
- Requiring suppliers to adhere to the Code of Conduct for Suppliers in general agreement and in individual order-related contracts that refer to the terms of the Supplier Code of Conduct as co-applicable terms.
- Appointment of a human rights officer to monitor risk management for compliance with due diligence obligations under the Supply Chain Due Diligence Act
- Further training and awareness-raising of employees
- Derive the need for action from the results of the risk analysis
- Handling and treatment of potential risks or violations reported via the whistleblowing system
- Aareon's product diversity is also certified with product test certificates according to the IDW audit standard, attesting to high quality and security.

Further [certificates at Aareon](#)

If Aareon has a reasonable suspicion or concrete evidence of a possible violation of human or environmental rights, it shall immediately take measures to stop the violation or minimise the risk. If a supplier violates human or

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environmental rights, Aareon will take reasonable and appropriate measures to end the violation within the supply chain. Our aim is to minimise the extent of the harm. In addition, we are committed to providing redress and actively working for positive change.

Aareon reserves the right to exercise its contractual rights against its business partners, in particular by requiring them to assist in clarifying the facts concerning them and to cooperate fully within a reasonable period of time.

5 Complaints mechanism

We have implemented a whistleblower system at Aareon to ensure that we comply with all necessary obligations in our own business area and in our supply chain. The complaints procedure set up by Aareon serves as an early warning system. This system offers our employees, customers, service providers and other external persons the opportunity to report potential violations of due diligence obligations in the supply chain. Human rights and environmental risks can be identified and minimised before people or the environment are harmed. Reports can be made anonymously or non-anonymously, depending on the whistleblower's preference. There is no disadvantage for those who submit a report. The central compliance function of the Aareon Group is the recipient of the reports. It coordinates the further processing of the reports and ensures that all information is treated confidentially.

Weblink to the whistleblower system:

<https://www.aareon.com/compliance>

Free and anonymous whistleblower hotline:

Mon. - Fri.: 09:00 - 17:00

Tel.: +49 800 3800 999

6 Effectiveness control

The appropriateness and effectiveness of the measures to fulfil the due diligence obligations under the Supply Chain Due Diligence Act are reviewed annually and on an ad hoc basis.

7 Documentation and reporting

The implementation of our due diligence obligations is systematically documented and transparently communicated to the outside world. In addition, we will publish the catalogue of questions answered by the Federal Office of Economics and Export Control (BAFA) on our corporate website after the end of each financial year, in accordance with legal requirements. These measures serve to increase our transparency and ensure that the public has easy access to information about our human rights and environmental due diligence efforts.

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