

## **Rules of Procedure for Hypoport SE's Whistleblowing System**

These rules of procedure regulate the procedure for submitting reports via Hypoport SE's whistleblowing system pursuant to section 8 of the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz, LkSG) and to sections 12 et seq. of the German Whistleblower Protection Act (Hinweisgeberschutzgesetz, HinSchG).

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### **1. What is the objective of Hypoport SE's whistleblowing system?**

The objective of Hypoport SE's whistleblowing system is to minimize risks in the Hypoport network and its supply chains (early warning system) and to prevent or stop violations (access to appropriate remedies) to protect the success of the Hypoport network, its employees and other stakeholders.

### **2. Who can submit reports and what types of reports can be submitted?**

Any person in Germany or abroad can submit reports via Hypoport SE's whistleblowing system.

The following reports can be submitted via Hypoport SE's whistleblowing system:

- reports of violations that fall within the scope of application of the the Whistleblower Protection Act,
- reports of violations of other relevant laws, the Hypoport Group's Code of Conduct and applicable internal company policies, and
- reports of human rights and environmental risks and violations of human rights and environmental obligations within the scope of application of the German Act on Corporate Due Diligence Obligations in Supply Chains in Hypoport SE's own business area or at a direct or indirect supplier of a company in the Hypoport network.

### That is important:

Only those reports are to be submitted for which there is sufficient reason to assume that they are true. In cases of doubt, the report must be labelled as a suspicious activity report.

General requests received via Hypoport SE's whistleblowing system are not processed as part of this procedure.

### 3. How can I submit reports?

Reports can be submitted via the following internal reporting channels:

#### In writing

##### **Personal/Confidential**

Hypoport SE  
Hinweisgebersystem  
Heidestraße 8  
10557 Berlin

#### Electronic

The digital whistleblowing system "Hintbox" offers web-based access for submitting reports in text form and by voice message and is available in German and English.

[Link to Hintbox](#)

Regardless of its form, each report can be submitted either by name or anonymously. The report can be submitted anonymously by not providing any information that would allow the person making the report to be identified. However, we would like to encourage people not to submit reports anonymously. This simplifies further processing.

#### This should be noted:

Information received via the internal reporting channels is only checked during normal office hours.

#### External reporting offices

If none of the internal reporting channels are suitable, external federal and state reporting offices are available. For reports relating to the supervisory area of the Federal Financial Supervisory Authority ("BaFin"), this is the [BaFin reporting office](#). [The Federal Cartel Office has set up a reporting office](#) for violations of European and German competition law. The external reporting offices of the federal states are responsible for reports regarding the respective local and state administrations. If no other reporting office is responsible, reports can be made to [the reporting office of the Federal Office of Justice](#). The external reporting offices each provide information on their respective reporting procedures in a separate section of their websites. The Federal Office of Justice also provides information on the relevant reporting procedures of European Union organs, institutions, or other offices on its website.

However, we would like to emphasize that internal reporting channels are often the better way to ensure effective investigations and quickly eliminate any risks.

### 4. What happens to the incoming message?

- Upon receiving the report, the whistleblower will get a confirmation of receipt within seven days.
- First, the incoming report is checked to ensure that the underlying facts fall within the scope of application of Hypoport SE's whistleblowing system, which specific facts are involved, and which company or supplier is affected.
- In the next step, the underlying facts are clarified and examined as part of an objective procedure. Incriminating and inculpatory facts are equally included in the examination. The report will be discussed with the whistleblower if there is a possibility of getting in contact and if this is desired. The whistleblower can provide further information at any time. Persons or

companies affected by the report also have the opportunity to be heard. The presumption of innocence applies as long as a violation has not been proven.

- If it is determined during the investigation that a violation is imminent or has already occurred, remedial measures are initiated immediately and their implementation is followed up. In addition, a proposal for further action and suitable preventive measures are drawn up based on the findings from the investigation and review of the facts.
- Within a maximum of three months of receiving the confirmation of receipt, the whistleblower will - where legally permissible - receive feedback on the measures planned or already taken and the reasons for them.
- In accordance with the legal requirements, the company's internal documentation on the complaints procedure will be retained for at least seven years in accordance with the LkSG and for three years for all other reports, unless a longer retention period is required. Afterwards, the data will be deleted.

## **5. How are whistleblowers protected?**

Whistleblowers who submit information in good faith will be protected. Discrimination and penalties will not be tolerated.

The report and the identity of the whistleblower will be treated confidentially. Confidential and personal data can only be passed on if this is necessary and legally permissible. This also applies after the investigation has been concluded. Exceptions may apply in the context of official investigations or court proceedings.

In addition, reports received via Hypoport SE's whistleblowing system are only processed by selected persons, see section 6.

## **6. Who is responsible for processing incoming reports?**

The initial processing of reports is handled centrally by employees of Hypoport SE and Hypoport hub SE from the Compliance department, who act impartially, i.e. independently, are not bound by professional instructions and are obliged to maintain confidentiality, particularly when processing reports via Hypoport SE's whistleblowing system.

Other responsible departments or a relevant authority may also be consulted to clarify and examine the facts and to initiate measures. This is done in accordance with the principle of necessity and in compliance with all legal requirements.