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Hypoport SE
non-financial report
for 2021



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Information about the report's content and framework

The non-financial report is based on the CSR Directive Implementation Act (CSR-RUG) and has been produced since 2017. It supplements our financial reporting with details of key non-financial aspects of our business activities in the following areas: treatment of employees, environmental matters, combating corruption, social responsibility and human rights.

The separate combined non-financial report ('non-financial report') of the Hypoport Group for 2021 is published in accordance with section 289b et seq. and section 315b et seq. of the German Commercial Code (HGB). The statements made in this non-financial declaration for the Group relate only to the subsidiaries included in Hypoport SE's consolidated financial statements, over which Hypoport SE is able to directly or indirectly exercise control. Because the individual entity Hypoport SE did not have more than 500 employees on average in 2021, it is not required to produce its own non-financial report.

According to the CSR-RUG, Hypoport must report on material risks linked to the Hypoport Group's own business activities. Material risks are risks that have a very high probability of occurrence and have, or will have, a severe negative impact on the non-financial aspects of our business activities. According to the Management Board of Hypoport SE, such risks do not exist in the Hypoport Group.

National and international guidelines for sustainability reporting correspond only in certain respects with the reporting requirements under the CSR-RUG. The terminology used in these guidelines is also different to that used in the CSR-RUG, making the reporting less transparent. Hypoport has therefore decided to produce a non-financial report without reference to any guidelines.

Business model

Hypoport SE is the parent company of the companies in the Hypoport Group (together referred to as 'Hypoport Group'). The Hypoport Group is engaged in the development and marketing of technology platforms for the financial services, property and insurance industries (fintech, proptech, insurtech). Hypoport's subsidiaries are grouped into four segments: Credit Platform, Private Clients, Real Estate Platform and Insurance Platform.

The companies within the first two segments (Credit Platform and Private Clients) are primarily involved in the development of technology platforms for the brokerage of financial products for private residential mortgage finance and the provision of finance to small and medium-sized enterprises. The Real Estate Platform segment is involved in the development of software for the sale, valuation, financing and management of residential properties. The fourth segment – Insurance Platform – develops integrated software solutions for insurance product distributors and B2C insurtech start-ups.

A detailed description of the business models of the Hypoport Group can be found in the 'Business and economic conditions' section of the annual report of Hypoport SE.

The value chain of a software technology company in the financial, property and insurance industries has significantly fewer links than the value chain of an industrial company. The services offered by the companies in the Hypoport Group are for the most part produced using the Group's own resources. This means the supply chain risk is extremely low. Hypoport mainly works with suppliers in the areas of facility management and office services. Nearly all the service providers engaged are legal, IT or business consultancies. To date, no sustainability criteria have been defined for the engagement of these suppliers and service providers.

Within the scope of its business activities, the Hypoport Group takes its environmental, social and corporate governance responsibilities towards society seriously. Taking a structured approach, Hypoport therefore continually monitors developments in the German technology and financial services markets and analyses how these developments will affect the business activities of the Group. Against this backdrop, Hypoport identified its material CSR topics. The priority was to select topics that are directly connected to the business success and financial performance of the Hypoport Group. This materiality assessment revealed that the treatment of employees, environmental matters and the prevention of corruption have a connection with the business activities of the Hypoport Group. This non-financial report therefore focuses on these three topics.

Environment

The Hypoport Group takes numerous operational measures to meet its responsibility to limit the impact of man-made climate change. The strategic framework is set by the Management Board of Hypoport SE. The decentralised structure of the Hypoport Group means that the translation of the strategy into specific policies and the operational implementation of environmental measures is devolved to the subsidiaries. This organisational form enables us to rapidly implement environmental strategies in the individual subsidiaries within a clear framework defined by the Management Board and Supervisory Board of Hypoport SE.

The environmental commitments and strategy of the Hypoport SE Management Board and Supervisory Board are as follows:

- Hypoport acknowledges the existence of man-made climate change.
- Hypoport commits to protecting the environment and creating environmental awareness.
- Hypoport commits to reducing emissions and releases of greenhouse gases, reducing waste and using natural resources and energy more efficiently wherever reasonably possible.
- Hypoport commits to using clean energy sources instead of fossil fuels wherever reasonably possible.
- Hypoport commits to reporting regularly and consulting with stakeholders on environmental issues.

Through these commitments and areas of focus, we have already achieved a number of successes:

Energy and water usage

Virtually all the Hypoport Group's energy now comes from completely carbon-neutral, next-generation hydro-electric or wind power plants based in northern Europe, all of which are not more than six years old. The 'HNK Neu 100' energy tariff has been certified by the TÜV Rheinland e.V. product standards authority.

Selecting the right energy supply contracts is important for reducing energy consumption. IT procurement at Hypoport SE also has a key role to play in this regard. More than 95 per cent of the computer hardware used by the Hypoport Group has an ENERGY STAR label or an eco declaration. The hardware is purchased exclusively from certified vendors such as Lenovo (laptops), Apple (laptops) and Dell (monitors).

Carbon emissions

As well as saving energy, Hypoport SE has also successfully reduced its greenhouse gas emissions in order to make a positive contribution as part of our corporate environmental responsibility. At many of our offices, we use the Quooker drinking water system in combination with the LEOGANT upgrade. Following installation of the system, the regular deliveries of bottled water reduced sharply, saving 12,589kg of CO₂ on the transport of bottled water. Plastic bottles are no longer used in any part of the Hypoport Group. One of the measures used to achieve this was switching to sustainable glass bottles ('Soulbottles').

To avoid unnecessary emissions generated by business travel between the Hypoport Group's two main sites, Berlin and Lübeck, we have invested in cutting-edge video-conferencing technology.

Only hybrid or modern diesel vehicles are used as company cars. Hypoport offers its employees various services that help to reduce emissions, such as the Company's own underground bicycle store, free rental bikes and pool cars that, for example, enable employees to travel together to company events.

The Hypoport Group's products and services have a high environmental benefit because they help to mitigate the effects of man-made climate change.

The consultancy and technology services in the area of corporate finance provided via Hypoport subsidiaries REM Capital AG and fundingport GmbH enable companies in the German SME sector to invest in energy efficiency, resource efficiency and research and development in relation to environmental matters. In 2021, around 80 per cent of Hypoport's revenue from the corporate finance business was directly attributable to environmental matters and resulted in a significant reduction in greenhouse gas emissions by German SMEs. This includes revenue from the brokerage of loans under energy efficiency programmes funded by the KfW development bank and the public funding programme for energy-efficient buildings (new building, renovation, residential, commercial), KfW energy efficiency programmes for production facilities and process engineering, KfW environmental programmes for production facilities, energy efficiency in the economy for production facilities and process engineering, international renewable energies projects and a programme to transform the vehicle manufacturer and supplier industry (focusing on electric vehicles).

Hypoport subsidiary Dr. Klein Wowi Finanz AG has been advising the German housing sector since 1954. In recent years, its focus has increasingly shifted to energy efficient programmes and low-emission building projects. In 2021, new loans of €258 million were brokered from Germany's KfW development bank for the purpose of reducing emissions. This represented 13 per cent of the total volume of loans brokered (€1.98 million).

In 2021, the share of loans brokered on the Europace credit platform attributable to KfW was around 6 per cent. They included the following KfW development programmes for environmental matters:

- No. 151: Purchase or complete redevelopment
- No. 152: Individual measures
- No. 153: Energy-efficient construction
- No. 167: Heating systems, renewable energies
- No. 261: Energy-efficient construction
- No. 262: Energy-efficient renovation

Information on potential risks: In the context of environmental matters, there are no risks that have a very high probability of occurrence and have, or will have, a negative impact on the aspects of our business that are subject to reporting requirements.

Notification form: Proportion of revenue generated from goods or services that are associated with taxonomy-aligned economic activities – disclosure for 2021

Notification form: Proportion of revenue generated from goods or services that are associated with taxonomy-aligned economic activities – disclosure for 2021

Economic activities (1)	Code(s) (2)	Absolute revenue (3)	Proportion of revenue (4)
A. TAXONOMY-ELIGIBLE ACTIVITIES		€'000	%
A.1. Environmentally sustainable activities (taxonomy-aligned)			
Revenue from environmentally sustainable activities (taxonomy-aligned) (A.1)		0	0%
A.2 Taxonomy-eligible, but not environmentally sustainable activities (not taxonomy-aligned activities)			
Revenue from taxonomy-eligible, but not environmentally sustainable activities (not taxonomy-aligned activities) (A.2)		0	0%
Total (A.1 + A.2)		0	0%
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES			
Revenue from taxonomy-non-eligible activities (B)		446,346	100%
Total (A + B)		446,346	100%

Explanatory note:

The proportion of revenue stated in column 4 is calculated as the part of the net revenue from goods or services, including intangible goods, that are associated with taxonomy-aligned economic activities (numerator), divided by net revenue (denominator). The revenue includes income reported in accordance with International Accounting Standard (IAS) 1 paragraph 82(a) as amended by Commission Regulation (EC) No 1126/2008 (for further information, see Article 8 (2) (a) of Regulation (EU) 2020/852 and Article 2 (5) of Directive 2013/34/EU).

Notification form: Proportion of CapEx generated from goods or services that are associated with taxonomy-aligned economic activities – disclosure for 2021

Economic activities (1)	Code(s) (2)	Absolute CapEx (3) €'000	Proportion of CapEx (4) %
A. TAXONOMY-ELIGIBLE ACTIVITIES			
A.1. Environmentally sustainable activities (taxonomy-aligned)			
CapEx from environmentally sustainable activities (taxonomy-aligned) (A.1)		0	0%
A.2 Taxonomy-eligible, but not environmentally sustainable activities (not taxonomy-aligned activities)			
Construction of campus in Lübeck	(7.7 Purchase or ownership of buildings)	240	0%
Construction of campus in Lübeck	(7.7 Purchase or ownership of buildings)	12,732	24%
Construction of building in Sofia	(7.7 Purchase or ownership of buildings)	3,317	6%
Construction of building in Sofia	(7.7 Purchase or ownership of buildings)	171	0%
Construction of campus in Lübeck	(7.7 Purchase or ownership of buildings)	197	0%
Leasing of electric vehicles	(6.5 Transportation by motorcycles, passenger cars and light commercial vehicles)	1,187	2%
CapEx for taxonomy-eligible, but not environmentally sustainable activities (not taxonomy-aligned activities) (A.2)		17,843	34%
Total (A.1 + A.2)		17,843	34%
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES			
CapEx for taxonomy-non-eligible activities (B)		34,687	66%
Total (A + B)		52,530	100%

Explanatory note:

In addition to its capital expenditure on leasing rights for electric vehicles, Hypoport SE has incurred a high level of capital expenditure in the construction of a campus project at the company headquarters in Lübeck and in a building in Sofia, Bulgaria. Both projects are being built to high energy standards and will be used for the provision of services or for administrative purposes.

The figure in column 4 'Proportion of CapEx' is calculated as the numerator divided by the denominator in accordance with the notes below (see Article 8 (2) (b) of Regulation (EU) 2020/852).

Denominator

The denominator encompasses additions to property, plant and equipment and intangible assets during the year under review before depreciation, amortisation and any remeasurements, including those resulting from remeasurements and impairments for the year concerned and excluding fair value changes. The denominator also encompasses additions to property, plant and equipment and intangible assets resulting from business combinations.

As a non-financial enterprise, Hypoport uses the International Financial Reporting Standards (IFRS) pursuant to Regulation (EC) No 1126/2008, which means that capital expenditure includes costs based on the following standards:

- IAS 16 Property, Plant and Equipment, paragraph 73 (e) (i) and (iii);
- IAS 38 Intangible Assets, paragraph 118 (e) (i);
- IFRS 16 Leases, paragraph 53 (h).

Leases that do not result in the recognition of a right to use the underlying asset are not recognised as capital expenditure.

Numerator

The numerator is the portion of the capital expenditure contained in the denominator that:

a) relates to assets or processes that are associated with taxonomy-aligned economic activities, or

b) is part of a plan to extend taxonomy-aligned economic activities or to convert taxonomy-eligible into taxonomy-aligned economic activities ('CapEx plan') under the conditions described below, or

c) relates to the acquisition of output from taxonomy-aligned economic activities and individual measures through which the target activities are carried out in a low-carbon manner or the emission of greenhouses gases is lowered, and from other economic activities that are listed in the delegated acts enacted in accordance with Articles 10–15 of Regulation (EU) 2020/852, and provided that these measures have been implemented and are ready for use within 18 months.

The aforementioned CapEx plan must satisfy the following conditions:

a) the plan must either aim to expand the taxonomy-aligned economic activities of the enterprise or adapt the taxonomy-eligible economic activities so that they will be taxonomy-aligned within five years;

b) the plan must be published at aggregated economic activity level and approved by the Management Board.

Hypoport SE has not used a CapEx plan to calculate the numerator.

Notification form: Proportion of OpEx relating to goods or services that are associated with taxonomy-aligned economic activities – disclosure for 2021

Environment

Hypoport SE non-financial report

Notification form: Proportion of OpEx relating to goods or services that are associated with taxonomy-aligned economic activities – disclosure for 2021

Economic activities (1)	Code(s) (2)	Absolute OpEx (3) €'000	Proportion of OpEx (4) %
A. TAXONOMY-ELIGIBLE ACTIVITIES			
A.1. Environmentally sustainable activities (taxonomy-aligned)			
OpEx from environmentally sustainable activities (taxonomy-aligned) (A.1)		0	0%
A.2 Taxonomy-eligible, but not environmentally sustainable activities (not taxonomy-aligned activities)			
OpEx for taxonomy-eligible, but not environmentally sustainable activities (not taxonomy-aligned activities) (A.2)	(7.3 Installation, maintenance and repair of energy efficient devices)	319	8%
Total (A.1 + A.2)		319	8%
OpEx for taxonomy-non-eligible activities (B)			
Total (A + B)		3,617	92%
Gesamt (A + B)		3,936	100%

Explanatory note:

The proportion of OpEx shown in column 4 is calculated as the numerator divided by the denominator in accordance with the information below (see Article 8 (2) (b) of Regulation (EU) 2020/852).

Denominator

The denominator includes direct, non-capitalised costs relating to R&D, building renovation activities, short-term leasing, maintenance and repairs and all other direct expenditure in connection with the day-to-day maintenance of property, plant and equipment by the enterprise or a third party to whom the activities are outsourced, which are necessary to ensure that these assets continue to function effectively.

Non-financial enterprises that use national GAAP and do not capitalise right-of-use assets must, in addition to the costs stated in the first subparagraph of number 1.1.3.1 of this annex, also include leasing costs in the operating expenses.

Numerator

The numerator is the portion of the operating expenses contained in the denominator that:

a) relates to assets or processes that are associated with taxonomy-aligned economic activities, including training and other adaptation requirements for employees, and direct non-capitalised costs in the form of research and development, or

b) is part of a CapEx plan to extend taxonomy-aligned economic activities or facilitates the conversion of taxonomy-eligible economic activities into taxonomy-aligned economic activities within a predefined period (see explanatory note to the 'Proportion of CapEx'), or

c) relates to the acquisition of output from taxonomy-aligned economic activities and to individual measures through which the target activities are carried out in a low-carbon manner or the emission of greenhouses gases is lowered, and to individual building renovation measures as specified in the delegated acts enacted in accordance with Articles 10 to 15 of Regulation (EU) 2020/852, and provided that these measures have been implemented and are ready for use within 18 months.

Research and development costs that are already included in the CapEx KPI are not reported as OpEx. These costs are therefore not counted twice.

The numerator must also contain the portion of OpEx that is required to adapt the economic activities to climate change pursuant to Annex II of the Delegated Act on EU climate taxonomy. The numerator must include a breakdown of the part of the OpEx that is envisaged as a significant contribution to climate change adaptation.

Social

Doing business and corporate citizenship go hand in hand for the Hypoport Group. The social responsibility commitments and strategy of the Hypoport SE Management Board and Supervisory Board are as follows:

- Hypoport commits to employment security and responsible workforce restructuring, especially to the avoidance and minimisation of compulsory redundancies and large-scale lay-offs. In the unlikely event of compulsory redundancies, Hypoport commits to implementing measures to mitigate the consequences for employees made redundant.
- Hypoport promotes an equal opportunities culture. It prohibits and will not tolerate discrimination on the grounds of personal characteristics such as age, disability, ethnic origin, family status, race, religion, gender, sexual orientation or social origin, particularly in connection with recruitment practices, promotion, pay and access to further training and development. The Management Board of Hypoport SE will not tolerate bullying or abuse of power and is committed to stamping out such behaviour.
- Hypoport is committed to a level playing field and the pursuit of a fair marketing strategy. It resolves not to sponsor mega-events or donate to political parties or lobbying organisations if the purpose of such sponsorship or donations is to exert undue influence. Hypoport therefore does not sponsor mega-events and does not donate to political parties or lobbying organisations. For many years, individual teams at Hypoport SE and its subsidiaries have made donations to a range of community projects, mainly in Germany.

Through these commitments and areas of focus, we have already achieved a number of successes:

Diversity issues

For example, women already occupy just under 30 per cent of management positions at Hypoport. This proportion is relatively high compared with the proportion of women on the STEM degree courses of relevance to Hypoport (approx. 25 per cent) in Germany and the proportion of women in management positions (approx. 15–30 per cent) (see IAB Brief Report from the Institute for Employment Research (IAB)) in the German credit, real-estate and insurance industries.

Gender distribution in the Hypoport Group	2020	2021
Percentage of women in management positions	-	27.7%
	-	44.0%
Percentage of women in the overall workforce	-	62.9%
Percentage of women in management positions relative to percentage of women in the overall workforce	-	14
Women in the executive management team at the subsidiaries	-	118
Total number of members of the executive management team at the subsidiaries	-	10.6%
Women in the executive management team as a percentage of members of the executive management team at the subsidiaries		

At Hypoport Management Board level, responsibility for diversity issues rests with CEO Ronald Slabke.

Talent recruitment and retention

The employees are a crucial competitive factor for the business models of the Hypoport Group. The lasting success and ongoing evolution of our group of companies are essentially guaranteed by a suitably qualified and highly motivated workforce. The skills, dedication, creativity and motivation of these employees determine our ability to compete and adapt for the future. Our organisational and professional development work is therefore always geared to finding, recruiting, retaining and developing talented people and making them want to work for Hypoport.

The concept for the recruitment and retention of employees is therefore designed so that employees identify particularly strongly with, and develop an enduring passion for, their work, their particular Group company and the Group as a whole.

For example, Hypoport has a one-year graduate trainee programme that introduces graduates to the central functions of Hypoport SE and gives them an overview of the Hypoport Group.

The Hypoport Group takes various steps aimed at ensuring employees are able to structure their working hours usefully and plan their free time. These include various part-time models for all employees (also available to managers), flexible working hours and the option of working from home. Employees also have the option of taking ten days' unpaid holiday in addition to their contractually agreed holiday entitlement (30 days). Long-serving employees can take longer-term unpaid sabbaticals if they wish. There are also options for taking short-term unpaid special leave, for example to care for family members or in the event of the death of a close relative. Special leave can also be taken for training and education purposes. This broad range of measures coupled with the high degree of individual responsibility, self-determination and freedom for employees to shape their own roles creates a good work-life balance for employees of the Hypoport Group.

An attractive working environment is a crucial criterion when it comes to recruiting and retaining talent. Consequently, Hypoport continually updates the systems and equipment in its workplaces. For example, all new workstations are designed in accordance with ergonomic standards and the office concept of Hypoport's premises in Berlin won the German Design Award 2022. Hypoport also fosters its employees' sense of identification with the Company by offering appealing sporting activities and a wealth of non-salary benefits, including dependant care settings such as kindergarten places and offices where employees can take their children to work, health days and company events.

Hypoport's efforts in this area are paying off, not only through a healthy number of applications from new talent but also in the form of awards for the Hypoport Group's employer-of-choice brand. In 2021, Hypoport won the Leading Employer Award, which puts Hypoport in the top 1 per cent of the 160,000 companies analysed. For further information on the award and the methodology, see <https://www.leading-employers.org/>.

The Hypoport Group takes steps to develop the individual employees and provide them with further training. Staff appraisal interviews – known as development and performance dialogues – are held at least twice a year and provide a setting in which managers and their staff can hold a structured discussion about aspirations, development opportunities and performance incentives. At the end of the process, suitable staff development measures are suggested.

In addition to the regular feedback they receive during the probationary period, new employees have a scheduled feedback meeting after 100 calendar days where they are given an assessment of their performance to date, their integration into the team and an indication of whether they will pass the probationary period. New employees are also asked at this meeting about how they feel about the work assigned to them, the management style of their superior and the team integration. This ensures collaborative working and a continuous process of learning from one another.

Once a year, in partnership with leading market research organisation Gallup, we carry out a survey of all employees throughout the whole Hypoport Group. The most important KPI established by the survey is the degree of identification with the Hypoport Group. In the employee survey conducted in 2021, around 97 per cent of the participants answered 'satisfied', 'very satisfied' or 'extremely satisfied' in response to the question 'How satisfied are you with your company as an employer?' This strong approval rating shows that our organisational and professional development initiatives are effective. The initiatives relating to the treatment of employees are aimed at ensuring this figure always remains over 90 per cent.

As the Hypoport corporate culture is defined by the autonomy of employees and their freedom to shape their own roles, the continuing professional development of all staff is very important. The Group has established a central e-learning platform for this. Employees and managers are offered around 124 courses a year. In 2021, 3,357 staff took part in these training sessions, which means an average of around 1.5 courses a year per employee. The objectives and possible courses are discussed at least once a year in the annual development dialogues between staff and managers. Evaluation of the courses shows a high level of satisfaction among participants.

Hypoport employees share in the Company's success (when the annual revenue and EBIT guidance is achieved) and Hypoport rewards long service in the form of a bonus-based share scheme for which employees are eligible after just five years. The Company also offers its employees a company pension plan.

In addition to creating positive working conditions for existing employees, high priority is given within the Hypoport Group to the recruitment and integration of new talent. The Company engages with suitable candidates both online, via popular job portals or via video chat, for example, and offline at events such as careers fairs.

Working conditions

The Hypoport Group avoids non-regular forms of employment such as contract labour from temporary employment agencies as far as possible. All technology platforms are programmed, maintained and continuously improved by inhouse staff. Only in exceptional cases when higher staffing levels are required does the Company call on external programmers. Hypoport has a long-established network of freelance developers that it can call on in these circumstances. As a result, fixed-term contracts are rare at Hypoport and account for an absolute minimum of employment contracts. They may be used for example during periods of parental leave or when staff are on long-term sick leave. 98 per cent of employment contracts at Hypoport are regular and permanent.

Hypoport is in favour of freedom of association. It has therefore set up the HEB (Hypoport Employee Board), a central employee representative body at holding company level.

There have been no large-scale redundancies within the Hypoport Group in recent years. In particular, there have been no redundancies involving more than 1,000 employees or more than 5 per cent of the workforce in the last ten years. The number of employees has risen almost five-fold in the last ten years from 489 (31 December 2011) to 2,332 (31 December 2021). For more details, please refer to the annual reports. Despite the negative economic impact of the coronavirus crisis since the beginning of 2020, almost 400 new jobs have been created at Hypoport over the past two calendar years.

Hypoport looks after the mental wellbeing of its staff and has been working with the highly respected Fürstenberg Institute for a number of years as part of its mental health management programme. The Institute uses modern, networked, occupational health management measures, employee and management counselling and CPD and coaching courses to help people in companies to stay mentally healthy, satisfied and productive. Support can be provided at one of nine centres across Germany or via online coaching, whichever the employee prefers. The Fürstenberg Institute's quality management system has been certified in accordance with ISO 9001 by the product standards regulator TÜV Süd.

Human rights

Hypoport SE is of course committed to the observation of human rights and the prevention of forced and child labour. It does not tolerate any violations of the UN's Universal Declaration of Human Rights. The Hypoport Group's business activities are almost exclusively limited to services within Europe or Germany. This means the risk of human rights violations within the supply chain is extremely low. As in past years, Hypoport was not aware of any human rights abuses at suppliers, customers or business partners in 2021.

Responsible products and sales practices

The companies of the Hypoport Group make a valuable contribution to society through their advisory services and technology platforms.

Through the digitalisation of the credit, real-estate and insurance sectors, the Hypoport Group is creating greater transparency and efficiency in these markets.

Every year, the Hypoport credit platform and the Private Clients segment enable hundreds of thousands of people to realise their dream of home ownership, thereby making an important contribution towards solving major social problems in Germany, such as poverty in old age or low home ownership rates.

28 per cent of the volume of mortgage finance brokered by Dr. Klein Privatkunden is for private new-build activities. 52 per cent is used to fund the purchase of owner-occupied housing. This means that 80 per cent of the wholly owned Hypoport subsidiary's business volume is playing an important role in helping to solve the housing shortage, one of the most pressing social problems in Germany. Follow-up financing accounts for 14 per cent of the volume of mortgage finance, meaning that this business also supports rent-free living in old age and the reduction of old-age poverty in Germany.

In 2021, the share of loans brokered on the Europace credit platform attributable to KfW was around 6 per cent. They included the following KfW development programmes for social matters:

- No. 124: Owner-occupied housing
- No. 151: Purchase or complete redevelopment
- No. 152: Individual measures
- No. 159: Senior-friendly conversion

The business models for the public-sector and private-sector housing industries create financing opportunities for new-home building projects and energy efficiency programmes and thus help to solve social and environmental problems such as poverty in old age and carbon emissions.

The business models in corporate finance give German SMEs the financial flexibility that they need in order to make energy savings and fund renewable energy projects around the world. This helps to mitigate the climate damage caused by CO₂.

Through its business models alone, Hypoport is thus playing its part in solving two of the most pressing problems to have faced society for many years: the housing shortage and climate change.

IT security/data protection

The Hypoport Group is based in the European Union and has its headquarters in Germany. All processing of personal data is therefore subject to the General Data Protection Regulation (GDPR). Every Hypoport company that has data processing processes also has an appointed data protection officer. Larger Hypoport companies also have data protection coordinators and data protection teams to support the work of the data protection officer. There are defined minimum standards within the Hypoport Group that every company is required to adhere to through the company agreements with the parent company. Eleven guidelines and standards have been defined:

- Data privacy and information security policy
- IT user policy
- Storage location policy
- Mobile IT systems and working from home policy
- Private IT systems policy (BYOD)
- Mobile data storage media policy
- Suppliers and service providers IT policy
- Security incidents IT policy
- Access management policy
- Network security policy
- Administrator policy

An information security system (ISMS) that complies with the VdS 10000 standard has been implemented to ensure that data is protected. VdS 10000 is a standard used by the German insurance industry and is upward compatible to ISO 27001. The Management Board has also appointed an information security officer for the Group.

On the basis of these high IT security and data privacy standards, Hypoport SE commits to the following principles:

- To notify data subjects in a timely manner of policy changes or data breaches
- To store user data in a lawful and transparent way, with explicit consent of the data subject where required
- To limit the collection and processing of user data to the stated purpose
- To require third parties with whom the data is shared to comply with Hypoport's policies
- To implement leading data protection standards

The data protection notices concerning the collection, use, sharing and retention of data, including the right to object, are publicly available on the Company website: <https://www.hypoport.com/privacy-policy/>.

Relevant IT systems are centrally managed and monitored. Regular system back-ups are also carried out to prevent data loss and system malfunctions as far as possible. An IT audit is conducted every year. All employees receive regular training on data security and privacy.

Client responsibility

The companies of the Hypoport Group predominantly operate a B2B business model. Communication with our customers and the users of our B2B platforms is therefore carried out directly by a key account manager. Complaints about products or services are investigated promptly on a bilateral basis and any problems rectified. Customers of the B2C business models of our Dr. Klein Privatkunden brand also have the opportunity to raise complaints. The complaints management process is carried out online and is fully transparent. At <https://www.drklein.de/kundenbewertungen.html>, all customers can rate the advice they have received and raise any complaints. The complaints process is handled in compliance with data privacy guidelines. Currently, just under 65,000 customers rate their Dr. Klein advisors with 4.9 out of a possible 5.0 points. The recommendation rate is between 98 and 99%.

Information on potential risks: In the context of social responsibility, human rights and the treatment of employees, there are no risks that have a very high probability of occurrence and have, or will have, a negative impact on the aspects of our business that are subject to reporting requirements.

Corporate governance

Management Board and Supervisory Board

Ronald Slabke (CEO) is the member of the Management Board of Hypoport SE with responsibility for the treatment of employees, environmental matters and the prevention of corruption. Social responsibility and human rights are the responsibility of the Management Board as a whole. The key performance indicators for the non-financial aspects of managing the Company are reviewed at practical intervals and evaluated by the Management Board of Hypoport SE. This enables any variances to be identified at an early stage so that appropriate corrective action can be taken.

The members of the Supervisory Board are freely elected at regular intervals by the shareholders at the Annual Shareholders' Meeting.

All members of the Supervisory Board have excellent knowledge in the area of risk management. They have acquired this expertise in their previous roles as supervisory board members or as management board members or CEOs with responsibility for areas such as internal audit, compliance and market risk. For further information, see their detailed career histories.

Mr Dieter Pfeiffenberger

Personal data:

Date of birth: 15 May 1957

Birthplace: Aldenhoven, Germany

Education:

1990–1991	Diploma in banking administration (ADG) – Academy of German Cooperatives
1986–1988	Cooperative banking administration – Academy of North German Cooperatives
1983–1985	Banking administration, Hamburg Banking Academy
1980–1982	Traineeship in banking

Career:

since May 2019	Chairman of the Supervisory Board of Hypoport SE, Berlin
from Jul 2017	Independent management consultant
Jan 2013–Jun 2017	Head of Mortgage Finance at <ul style="list-style-type: none"> - <i>Deutsche Postbank AG</i> - <i>Product management for mortgage finance for the Postbank Group (Postbank, DSL Bank, BHW),</i> - <i>Mortgage finance sales</i> - <i>DSL Bank division,</i> - <i>Commercial real-estate finance</i>
Sep 2012–Sep 2017	Supervisory Board member at PB Firmenkunden AG, Bonn
Sep 2012–May 2017	Supervisory Board member at BHW Kreditservice GmbH, Hamelin
Aug 2012–Nov 2013	Supervisory Board member at BSQ Bauspar AG, Nuremberg
Apr 2010–Jun 2013	Chief Executive Officer at BHW Bausparkasse AG <ul style="list-style-type: none"> - <i>Product marketing, building society operations, Cooperative business, international business, legal affairs, internal audit, Compliance, chairman of the market risk committee</i>
Oct 2009–Mar 2010	Management Board member at BHW Bausparkasse AG <ul style="list-style-type: none"> - <i>Product marketing, building society operations</i>
Jun 2007–Aug 2011	Supervisory Board chairman at Easyhyp GmbH
Jan 2007–Sept 2009	General Representative at BHW Bausparkasse AG <ul style="list-style-type: none"> - <i>Head of Product Marketing, Building Society Operations</i>
Jun 2000–Dec 2012	Head of DSL Bank division, Deutsche Postbank AG
Mar 1994–Jun 2000	Head and director of the Hamburg branch of DSL Bank
Oct 1991–Feb 1994	Deputy head of the Hamburg branch of DSL Bank
Jan 1982–Sep 1991	Head of Corporate Lending, Volksbank Hamburg (Reg. East)

Mr Roland Adams:

Personal data:

Date of birth: 30 May 1959
Birthplace: Solingen, Germany

Education:

1980–1987 Studied psychology and economics at the Ruhr University Bochum, graduating with a degree in psychology
1977 university entrance qualification, Schwertstrasse School in Solingen

Career:

since Jan 2016 Member of the Advisory Board of Hengster, Loesch & Kollegen GmbH, Frankfurt am Main

since May 2015 Vice-chairman of the Supervisory Board of Hypoport SE, Berlin

since Jan 2012 Vice-chairman of the Board of Directors of Mind Institute SE, Berlin

since Jan 2006 Member of the Supervisory Board of Kretschmar Familienstiftung, Berlin

since Jan 2006 Roland Adams Top Management Consulting, providing advice to banks, financial services companies and insurance companies

Aug 2003–Dec 2005 DROEGE&COMP. International management consultancy, senior partner, head of the financial services competence centre

Jan 1996–Jul 2003 DROEGE&COMP. International management consultancy, partner, head of the financial services competence centre

Jan 1994–Dec 1995 DROEGE&COMP. International management consultancy, member of the senior management team, establishment of the financial services competence centre

Nov 1989–Dec 1993 DROEGE&COMP. International management consultancy, advisor and project manager

Jan 1989–Sep 1989 LANGNESE-IGLO GmbH, product manager

Jan 1988–Dec 1988 LANGNESE-IGLO GmbH, assistant product manager

Sep 1987–Dec 1987 LANGNESE-IGLO GmbH, company trainee

Mr Martin Krebs:

Personal data:

Date of birth: 31 March 1968

Birthplace: Krefeld

Education:

Sep 1987–Jun 1991 European Business School, Oestrich-Winkel: degree in business administration

Jun 1987 University entrance qualification in Heidenheim an der Brenz

Career:

since Sep 2020 Executive director, Scalable Capital GmbH, Munich

since May 2019 Member of the Supervisory Board of Hypoport SE

Jan 2016–Mar 2019 ING Group – Global Head Retail Investment Products and Savings

- *Coordination of the expansion of the investment business in the retail client markets*
- *Establishment of digital asset management at ING-DiBa (in cooperation with Scalable Capital)*

Jul 2006–Dec 2015 ING-DiBa AG – Member of the management board with portfolio responsibilities:

- *Corporate client business (from 2011)*
- *ING-DiBa Austria branch (from 2011)*
- *Treasury*
- *Securities and fund management business, retail clients*
- *Total quality management/complaints handling (until 2011)*
- *Facility management and document logistics*
- *M&A/corporate development*

Representation on the following committees:

- *Association of German Banks (member of the Retail and Business Clients Committee (2007–2013));*
- *Member of the Corporate Clients Committee (2013–2015))*
- *Deutsche Bundesbank (member of the Hessen Regional Advisory Board (2007–2019))*
- *Degussa Bank AG (member of the Supervisory Board (2007–2014))*
- *UNICEF (member of the National Committee (since 2010); member of the Audit Committee (since 2011))*
- *Deutsches Aktieninstitut e. V. (member of the Management Board (2008–2016))*

Jul 2003–Jul 2006	ING-DiBa – General Representative, responsible for: <ul style="list-style-type: none">- <i>Corporate Development unit</i>- <i>Treasury/Asset-Liability Management department</i>- <i>Partner Sales department</i>- <i>Management Board Services/Legal department Member of:</i><ul style="list-style-type: none">- <i>Asset Liability Committee (interest-rate and liquidity risks)</i>- <i>Credit Risk Committee</i>- <i>Operational Risk Committee</i>- <i>Quality Committee (since its establishment)</i>
Oct 2002–Jun 2003	JPMorgan Chase, Senior Vice President, Investment Banking, Financial Institutions Group, Frankfurt
Aug 1991–Sep 2002	Goldman Sachs; <ul style="list-style-type: none">- <i>Executive Director, Financial Institutions Group, Frankfurt (May 1998 – Sep 2002)</i>- <i>Investment Banking, associate in the Financial Institutions Group, Frankfurt (Aug 1994)</i>- <i>Debt Capital Markets, German team, London and Frankfurt (Aug 1993 – Jul 1994)</i>- <i>Investment Banking, analyst in the Advisory Group, German team, London (Aug 1991 – Jul 1993)</i>

In September 2021, the Supervisory Board formed an audit committee from among its members and appointed the Supervisory Board member Martin Krebs as its chairman. Through their degrees in economics and their previous roles as supervisory board members, finance directors or chief executive officers in various banks, Mr Krebs and Mr Pfeiffenberger have the required expertise in accountancy and auditing specified in section 100 (5) of the German Stock Corporation Act (AktG). All three members of the Supervisory Board also have the necessary experience in the sector of relevance for Hypoport because of their previous roles.

The Supervisory Board has no committees other than the audit committee. All duties relating to nominations, remuneration and sustainability are the responsibility of the whole Supervisory Board.

All members of the Supervisory Board are considered independent under the definition provided in clauses C.6 to C.12 of the German Corporate Governance Code.

Executive pay for the Management Board of Hypoport SE

Remuneration system for the Management Board of Hypoport SE

The remuneration system for the Management Board of Hypoport SE ('remuneration system') is structured in accordance with relevant statutory requirements and the provisions of the German Corporate Governance Code as amended on 19 December 2019 ('DCGK').

I. Remuneration components and adjustment mechanism

The total remuneration for members of the Management Board of Hypoport SE is composed of a basic salary, variable year-end remuneration and fringe benefits. Fringe benefits may include contributions to the cost of health insurance and long-term care insurance, the provision of a company car or a monetary benefit in lieu of a company car. In addition, Hypoport SE bears the cost of maintaining a reasonable level of cover under a directors' and officers' liability insurance policy. The adjustment of the individual remuneration components is determined annually on the basis of consolidated EBIT, three-year EBIT, the three-year EBIT delta and the change in EBIT. Consolidated EBIT is defined as earnings before interest and tax (EBIT) as reported in the Hypoport Group's IFRS consolidated annual financial statements excluding expenses for variable annual remuneration for members of the Management Board of Hypoport SE. Three-year EBIT equals average consolidated EBIT for the three financial years prior to the most recently ended financial year. It is always at least €5.0 million. The three-year EBIT delta equals half of the percentage change in three-year EBIT compared with three-year EBIT in the most recently ended financial year. For example, if three-year EBIT increases by 10 per cent, the three-year EBIT delta is 5 per cent. If three-year EBIT decreases by 10 per cent, the three-year EBIT delta is minus 5 per cent. The change in EBIT equals consolidated EBIT in the most recently ended financial year less three-year EBIT. The basic salary is always at least €204,000.00. It is increased or decreased by the three-year EBIT delta each year. The amount of variable annual remuneration equals a percentage ('bonus rate') of the change in EBIT. The bonus rate is never more than 5 per cent. The bonus rate for the following financial year is increased or decreased each year conversely to the three-year EBIT delta. The level of change equals the three-year EBIT delta as a percentage of the bonus rate. For example, if the bonus rate is 5 per cent and the three-year EBIT delta increases by 10 per cent, the bonus rate is reduced by 10 per cent to a new bonus rate of 4.5 per cent. The variable annual remuneration must be no more than the basic salary for the financial year just ended. This means that at a basic salary of €300,000.00, the total variable annual remuneration can, at most, amount to €300,000.00. The basic salary is paid in twelve equal monthly instalments. The variable annual remuneration is payable by 31 March of the following year, but not before the IFRS consolidated annual financial statements for the Hypoport Group have been adopted. The performance criteria linked to the remuneration components are consistent with the business strategy and the sustainable long-term performance of the Company. The Supervisory Board places particular importance on the Company's performance over the long term and has therefore defined multiyear assessment bases for both the adjustment of basic salary and the determination of variable remuneration. This approach is the best fit for Hypoport SE's requirements as a growth company and for its business strategy. Because of the particular structure of the remuneration system, specific target total remuneration has not been set.

II. Determination of maximum remuneration

In accordance with applicable statutory requirements, the remuneration system specifies an absolute figure at which remuneration is capped. The permitted total remuneration per financial year, including all remuneration components and fringe benefits, is capped at a maximum of €2 million per individual member of the Management Board.

III. Proportion of total remuneration allocated to the different remuneration components

The total remuneration paid to members of the Management Board of Hypoport SE amounts to at least €204,000.00 and no more than €2 million. Within this range, the remuneration may vary as it is linked to the business performance of Hypoport SE. Assuming an increase in consolidated EBIT of 10 per cent in each of the next four years (2022 to 2025) and corresponding adjustments to the total remuneration using the assessment bases specified in clause I, fixed remuneration (€204,000.00) accounts for 25– 30 per cent of the total remuneration while variable remuneration components make up the remaining 70–75 per cent. Based on the aforementioned assumptions, the basic salary accounts for approximately 89 per cent of the total remuneration while variable annual remuneration accounts for approximately 11 per cent. In terms of the relative weighting of basic salary and variable annual remuneration, the latter must not exceed 50 per cent. Of the maximum total remuneration of €2 million, variable annual remuneration can therefore at most amount to €1,000,000.00.

IV. Limitations under extraordinary circumstances, clawback

The total remuneration for each member of the Management Board is capped at a maximum amount of total remuneration as specified above. Moreover, the components of variable annual remuneration are subject to limits on their payment. Due to the variable nature of the assessment bases for remuneration, all components of remuneration can be adjusted up or down in the event of extraordinary circumstances. The Supervisory Board can also claw back some or all of the remuneration paid to members of the Management Board for the preceding financial year by 1 April of the following year (i) if insolvency proceedings are initiated in respect of the assets of Hypoport SE or such proceedings are rejected due to lack of assets or (ii) if variable remuneration components were paid out erroneously on the basis of incorrect data.

V. Remuneration in the event of employment being terminated

In line with recommendations G.12 and G.13 of the DCGK, payments awarded to a member of the Management Board upon early termination of their employment as a board member should be capped at two years' annual remuneration. Furthermore, the payments should not exceed the remuneration that would be owed for the remaining term of the employment contract. Outstanding variable remuneration components for the period until the termination date of the contract should be paid in accordance with the agreed assessment bases and on the contractually stipulated due dates. The employment contracts of all members of the Management Board include a non-competition clause that applies to the two years after the end of the contract. During the period that the non-competition clause applies, Hypoport SE must pay annual compensation equivalent to half of the average contractually agreed remuneration benefits regularly paid out over the previous three years. Any remuneration that the relevant member of the Management Board earns, or wilfully fails to earn, during this period through other work is offset against the compensation paid for the period of prohibition of competition.

However, only that amount is offset by which the sum of the compensation for the period of prohibition of competition and the amount earned elsewhere exceeds the most recently received contractual remuneration by more than 10 per cent, or 25 per cent if the relevant member of the Management Board had to change their place of residence as a result of the prohibition of competition. In the event that compensation for a period of prohibition of competition is paid, any severance payment should be offset against it.

VI. Offsetting of remuneration for secondary employment

In accordance with recommendation E.3 of the DCGK, members of the Management Board may take up secondary employment – especially supervisory board posts in external companies – only with the approval of the Supervisory Board of Hypoport SE. If a member of the Management Board is appointed to the supervisory board of a Hypoport Group company, the member's remuneration should be reduced by the remuneration granted for the supervisory board post in question, in accordance with recommendation G.15 of the DCGK. In the event that a member of the Management Board intends to take up a post on a supervisory board outside the Group, the Supervisory Board of Hypoport SE will determine in advance whether and to what extent their remuneration will be offset in accordance with recommendation G.16 of the DCGK.

I. Processes

Because the Supervisory Board of Hypoport SE consists of only three members, as specified in the Company's statutes, all aspects of its work, including the definition, implementation and review of the remuneration system, are carried out by the entire Supervisory Board. In accordance with the provisions of the German Stock Corporation Act, the Supervisory Board makes changes to the annual basic salary and sets annual variable remuneration with retroactive effect from 1 January of the respective financial year on the basis of the audited separate and consolidated financial statements for that year and the calculated consolidated EBIT, three-year EBIT, the three-year EBIT delta and the change in EBIT. In this context, the Supervisory Board also continually reviews adjustments to the structure and appropriateness of the remuneration system, collaboratively defines any relevant need for adjustment and prepares the adoption of appropriate resolutions. The main criteria used to assess the appropriateness of remuneration are the functions and responsibilities of each Management Board member and their personal performance. The financial situation, performance and sustainable development of the Company, customary remuneration in a comparable environment and the pay structures for senior management and the general workforce (including changes over time) are also taken into account. Furthermore, the level of remuneration is set so as to be competitive in the market for highly qualified executives. In accordance with recommendation G.8 of the DCGK, subsequent changes to the target values or reference parameters for variable remuneration are not permitted. However, the Supervisory Board may, in exceptional circumstances as defined in section 87a (2) sentence (2) AktG, diverge from the remuneration system temporarily if this is necessary in the interest of the Company's long-term success. The Management Board and the Supervisory Board jointly prepare a report about the remuneration granted and owed to each individual member of the Management Board in the reporting year in accordance with section 162 AktG and present this report to the independent auditor for review and subsequently to the Annual Shareholders' Meeting for approval. In line with recommendation E.1 of the DCGK, all members of the Supervisory Board must immediately disclose any potential

conflicts of interest to the chairman of the Supervisory Board. The Supervisory Board's report to the Annual Shareholders' Meeting discloses any conflicts of interest that arose and the manner in which they were addressed. If a member of the Supervisory Board is affected by a material conflict of interest that is not temporary in nature, their Supervisory Board appointment should be terminated.

Remuneration system for the Supervisory Board of Hypoport SE

The remuneration system for the Supervisory Board of Hypoport SE is structured in accordance with relevant statutory requirements and the recommendations of the German Corporate Governance Code as amended on 19 December 2019 ('DCGK').

I. Remuneration components

The currently applicable remuneration rules for the Supervisory Board, as set out in clause 14 of the statutes of Hypoport SE, were adopted by means of a resolution at the Annual Shareholders' Meeting on 15 January 2020. Clause 14 of the statutes of Hypoport SE is as follows:

"14.1 The members of the Supervisory Board receive annual remuneration in an amount of €40,000.00. The chairman of the Supervisory Board receives double the amount of remuneration, the vice-chairman one and a half times the amount.

14.2 Members of the Supervisory Board who have served for less than a full financial year receive pro rata fixed remuneration in proportion to the period for which they have served on the Supervisory Board.

14.3 The Company reimburses the members of the Supervisory Board for out-of-pocket expenses and any value added tax paid in respect of their remuneration and out-of-pocket expenses.

Supervisory Board members are also reimbursed for the proportion of the premium paid by them for the directors' and officers' liability insurance policy that the Company takes out for the members of the Management Board and Supervisory Board."

The remuneration granted to members of the Supervisory Board of Hypoport SE thus comprises annual fixed remuneration, special remuneration for the chairman and vice-chairman of the Supervisory Board and reimbursement of Supervisory Board members' out-of-pocket expenses and any value added tax paid in respect of their remuneration and out-of-pocket expenses. In addition, Hypoport SE bears the cost of maintaining a reasonable level of cover under a directors' and officers' liability insurance policy.

In line with recommendation G.17 of the DCGK, the remuneration of the Supervisory Board is designed to appropriately reflect the additional time commitment that the roles of chairman and vice-chairman of the Supervisory Board require. Moreover, members of the Supervisory Board should receive only fixed remuneration in accordance with suggestion G.18 of the DCGK in order to ensure the Supervisory Board's independence and enable it to perform its advisory and supervisory functions in an objective manner. The remuneration system does not provide

for variable remuneration components because the workload and liability risk of Supervisory Board members often fluctuate in ways that do not correspond to the success and/or financial performance of the Company. The remuneration granted to the members of the Supervisory Board should be well balanced and appropriate to both the duties and responsibilities of the Supervisory Board members and the situation of the Company; the remuneration rules used by other major listed companies should also be taken into consideration. At the same time, taking up a position as a member or the chairman of the Supervisory Board needs to hold sufficient appeal to attract and retain suitable members.

This is a prerequisite for ensuring that the Management Board is supervised and advised in the best possible way, which – in turn – is key to a successful business strategy and the long-term success of the Company.

II. Processes

The Supervisory Board should regularly review the appropriateness of the remuneration rules and remuneration system for the Supervisory Board and may consult external remuneration experts as necessary. The decision about the final structure of the remuneration system lies with the Annual Shareholders' Meeting.

Pursuant to section 113 (3) AktG, the Annual Shareholders' Meeting must vote on a resolution concerning the remuneration of the Supervisory Board at least every four years. Notwithstanding this requirement, the Annual Shareholders' Meeting may also adopt such a resolution in the event that proposals for changes to the remuneration system are made. The Annual Shareholders' Meeting can thus either confirm the existing Supervisory Board remuneration system or adopt a resolution to change it.

The Management Board and the Supervisory Board jointly prepare a report about the remuneration granted and owed to each individual member of the Supervisory Board in the reporting year in accordance with section 162 AktG and present this report to the independent auditor for review and subsequently to the Annual Shareholders' Meeting for approval.

In line with recommendation E.1 of the DCGK, all members of the Supervisory Board must immediately disclose any potential conflicts of interest to the chairman of the Supervisory Board. The Supervisory Board's report to the Annual Shareholders' Meeting discloses any conflicts of interest that arose and the manner in which they were addressed. If a member of the Supervisory Board is affected by a material conflict of interest that is not temporary in nature, their Supervisory Board appointment should be terminated.

Shareholder rights

The shareholders of Hypoport SE have the option of exercising their voting rights at the Annual Shareholders' Meeting via a proxy or authorised representative. A video recording or live transmission of the Annual Shareholders' Meeting is also available online.

Bribery and corruption policy

The Hypoport Group is committed to the principles of fair competition and the free market economy. We therefore take a firm stance against corruption. We do business solely on the basis of merit and in accordance with the principle of free, unhindered competition.

The Hypoport Group does not tolerate any form of corruption or other criminal activity such as extortion, fraud, the giving or acceptance of bribes, money laundering and the granting or acceptance of advantages (collectively referred to as 'corruption'). The concept and measures that we use to combat corruption are aimed at preventing any active or passive corruption whatsoever. The key performance indicator used here is the number of violations of the rules. There were no known violations in 2020 or 2021.

Corruption	Number of breaches
2020	0
2021	0

To enforce this, the Management Board of Hypoport SE has implemented a compliance management system (CMS) made up of the following components: risk assessment, compliance organisation, compliance programme, information & communication and monitoring & improvement. The Benefits & Gifts Policy forms part of the compliance programme. It lays down binding rules for our conduct towards our customers, partners and other third parties with regard to gifts and hospitality. Under this policy, small (promotional) gifts such as pens or invitations to business meals are regarded as part of everyday business and even as a form of politeness. All Hypoport Group employees must report gifts and hospitality with a value of €50 or more, which are received or given in connection with their activities at Hypoport, in an online register straight away. The register can be viewed by all Company employees and any missing or incorrect entries can be reported.

In terms of monitoring and improvement, ongoing internal audit activities are another control mechanism and are also used to evaluate and optimise processes for combating corruption. The CMS is the responsibility of the Management Board as a whole; the CEO, Ronald Slabke, is in charge of its operational implementation.

The compliance principles are published on the Company's website as the Hypoport Group Code of Conduct. The Hypoport Group Code of Conduct is reproduced below:

"The Executive Board of Hypoport SE is committed to both legally compliant and ethical conduct within Hypoport SE and across all companies in the Hypoport Group (collectively: "Hypoport"). This Code of Conduct ("CoC") formulates corresponding expectations and is intended to provide guidance for our conduct towards each other, as well as towards our customers, partners and other third parties.

This CoC brings together our most important basic rules and principles in one document, which are binding for us both today and in the future. It provides a framework for orientation and applies equally to each of us – to Executive Management, to managers and to each individual colleague (collectively: "Hypoportler"). It sets a standard for ourselves and, at the same time, sends out a signal to the outside world that we should behave responsibly towards our business partners and the public, as well as in our dealings with each other within the Hypoport Group. Together, we are responsible for the Hypoport Group's reputation. Misconduct by individuals can cause enormous damage to the Hypoport Group as a whole.

However, we also realise that it is not possible to regulate behaviour through guidelines alone. If you are unsure about a particular situation, please check your intended course of action by asking the following questions:

Legality test: Am I sure that my decision is within the framework of legal regulations and internal guidelines?

Publicity test: Could I also stand by my decision if it became public knowledge?

Reversibility test: Could I also accept my decision if it concerned myself?

Only if you can answer all questions with "yes" are you acting in accordance with our basic rules and principles.

f Compliance with legal requirements

We expect every Hypoportler to comply with the legal requirements. It is your responsibility to maintain your knowledge of these yourself. Breaches of legal requirements can lead to considerable reputational damage, fines, claims for damages, administrative offence proceedings or criminal proceedings and can, therefore, have serious adverse consequences for the Hypoport Group or for you personally. We will not tolerate violations of legal requirements and will take action against any such conduct. The following areas, in particular, are important (although not exclusively):

Data protection: The protection of personal data, particularly that of staff, customers and suppliers, is of particular importance to Hypoport. We only process personal data if this is absolutely necessary for the fulfilment of the respective work task, or if it is stipulated by law. No personal data may be processed without the consent of the data subject or another permissible legal basis. Every Hypoportler is jointly responsible for ensuring that our IT and Data Protection Policies are adhered to.

Prevention of insider trading: Essentially, the following applies: If you have information that is not publicly known and that, if it became publicly known, would be capable of significantly influencing the price of Hypoport SE shares, you must not trade in Hypoport SE shares or other financial instruments. You are also not allowed to pass on such insider information. Further explanations can be found in our Policy on the Prevention of Insider Trading.

Prevention of money laundering and terrorism financing: Hypoport complies with its legal obligations to prevent money laundering and terrorism financing and does not engage in such activities under any circumstances. In case of doubt, every Hypoportler is requested to have unusual financial transactions checked by the Finance or Legal team – in particular, those involving cash, which may give rise to a suspicion of money laundering or terrorism financing.

Our business relations

Fair competition: We conduct our business according to the principle of performance and on the basis of free, unhindered competition. We only engage suppliers or service providers after a careful and fair assessment of their performance. Further information can be found in our Procurement Policy.

Fighting corruption: Hypoport will not tolerate any form of corruption or other criminal activity, such as extortion, fraud, bribery and corruption. We expect you to conduct yourself in a lawful manner and in accordance with our policies, in order to avoid even the appearance of corrupt behaviour. For further information, please refer to our Benefits & Gifts Policy.

Avoiding conflicts of interest: We expect every Hypoportler to act in Hypoport's best interests. Conflicts of interest with private interests or other (economic) activities, including those of family members, related persons or organisations, should be avoided from the outset. If they nevertheless arise, they must be resolved in compliance with legal requirements and the applicable Hypoport Policies. The prerequisite for this is the transparent disclosure of the conflict by you.

Conduct vis-a-vis staff

With the Hypoport Principles, we have drawn up comprehensive policies for working together at Hypoport. Furthermore, we live a culture of equal opportunities, mutual trust and respect. We promote equal opportunities and prevent discrimination in the recruitment process and in the promotion or granting of training and development measures. We treat all staff equally, regardless of gender, age, skin colour, culture, ethnic origin, sexual identity, disability, religious affiliation or world view.

Enforcement of the Compliance Principles

Ensuring compliance is the responsibility of each individual Hypoportler. In the event of a violation of legal requirements, Hypoport Policies or this CoC, we will take the necessary organisational, disciplinary and/or legal measures to counter future violations, irrespective of the hierarchical level or position of the person responsible. We have implemented a Compliance Management System for the purpose of, among other things, monitoring compliance with legal requirements, Hypoport's Policies and this CoC in an appropriate manner. In particular, our Internal Audit function regularly carries out corresponding reviews.

In addition, every Hypoportler and also every third party is required to report any breaches of legal requirements, the Hypoport Policies or this CoC. This can be done anonymously via the Rumour Mailbox.

Compliance questions can be asked at compliance@hypoport.de.

* It is noted that the term "Hypoportler" refers to male, female and non-binary individuals in equal measure."

As no passive or active cases of corruption have ever had to be investigated at Hypoport, we assume that the steps we have taken are effective. Our aim for the future is to continue to prevent any breaches of the rules. All compliance policies are reviewed annually or at more frequent intervals if required.

Other than the tax it is legally required to pay in the countries in which it has registered offices, the Hypoport Group does not make any payments to governments or governing parties. For details of tax payments, please see the 'Income taxes and deferred taxes' section in the notes to the consolidated financial statements in the annual report.

Whistleblower programme

The whistleblowing systems are described and made public in the Code of Conduct (see above). Hypoport takes reports of potential violations of laws, Hypoport policies or the Code of Conduct very seriously and calls upon all employees to report such violations immediately via the stated channels (reports can also be submitted anonymously).

In the context of combating corruption, there are no risks that have a very high probability of occurrence and have, or will have, a negative impact on the aspects of our business that are subject to reporting requirements.

Hypoport SE

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