

## **Hypoport SE's Policy Statement on The Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz)**

### **Introduction**

The Hypoport Group is a leading network of technology companies for the credit, housing and insurance industries, offering innovative and technology-based solutions for the digitalization and optimization of financial, residential real estate and insurance processes. The Group's parent company is Hypoport SE, which focuses on its role as a strategic and management holding company.

We, Hypoport SE, are issuing this policy statement to meet our obligations under section 6 (2) of The Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz - LkSG) and our responsibility to comply with human rights and environmental obligations in our own business area and our supply chain. It contains a description of our approach to managing such risks and also includes our human rights and environmental expectations of the members of our management teams, our employees and our suppliers.

This policy statement therefore applies both to Hypoport SE's own business area and to our suppliers. Hypoport SE's own business area includes all companies in the Hypoport Group over which Hypoport SE exercises a decisive influence within the meaning of the LkSG (hereinafter referred to as the 'Hypoport Group').

### **Our Expectations**

Hypoport SE is committed to its responsibility for human rights and the environment in its own business area and in its supply chains in accordance with the relevant legal regulations.

We are aware of our impact on society and the environment. We therefore expect the members of our management teams and the employees of the Hypoport Group to respect human rights and environmental obligations as described in detail in the LkSG, to set a good example and to stand up for them as far as they are able. This applies in particular to the risks assessed as potentially relevant in our risk analysis in accordance with the LkSG.

The Hypoport Code of Conduct also sets out the fundamental values for ethical and responsible conduct that apply throughout the Hypoport Group, including fairness, transparency, integrity, respect and equal opportunities. The Hypoport Code of Conduct is binding for all members of our management teams and employees of the Hypoport Group and, in addition to the core values, also documents specific requirements for individual conduct, for example in the areas that are considered potentially relevant for the Hypoport Group under the LkSG. Furthermore, Hypoport's principles for cooperation were developed and introduced in 2016 and these principles were fundamentally updated in 2022. The "Diversity" principle in particular emphasizes the importance of diversity, equality and inclusion for the success of our actions.

The members of our management teams and our employees are required to report breaches of the law, the Hypoport Code of Conduct, the Hypoport Principles and other compliance regulations.

We also expect our suppliers to protect human rights and the environment as required by the LkSG and described in detail there. We also expect suppliers to set up appropriate due diligence processes and to appropriately address expectations regarding compliance with human rights and environmental obligations along their own supply chain.

### **Fulfillment of due diligence obligations**

Our human rights strategy aims to identify and minimize human rights and environmental risks in all relevant business processes and to prevent, end or minimize the extent of violations of human rights or environmental obligations. To achieve this goal, appropriate measures have been implemented in our own business area and in our procurement processes. These include the following in particular:

- Carrying out risk analyses,
- Implementing appropriate preventive measures in our own business area and for direct suppliers,
- Establishment of a complaints procedure,
- Documentation and reporting,
- Regular effectiveness reviews and
- Appointment of a person responsible for monitoring LkSG risk management.

### **Conducting Risk Analyses**

We conduct risk analyses in our own business area and regarding our suppliers to identify human rights and environmental risks. Within the framework of an abstract risk analysis using a risk analysis tool, potential human rights and environmental risks are initially identified based on predefined risk factors. For our own business area, this data is supplemented with already available internal data on potential risks. If a relevant risk is identified during this process, a concrete risk analysis is conducted in the next step, including a request for an individual rating through questionnaires and possibly additional verification measures. The human rights and environmental risks identified in this manner are then appropriately weighted and prioritized. The following factors are crucial in this assessment:

- The nature and scope of the business activities of the Hypoport Group,
- The influence of the Hypoport Group company on the direct perpetrator,
- The typical severity, potential reversibility and likelihood of the violation and
- The nature of the contributing actions of the Hypoport Group company.

The Hypoport Group does not manufacture tangible goods and relies on a homogeneous supplier structure for the provision of its services, primarily consisting of suppliers based in Germany and the EU from the sectors of information and communication, financial and insurance services, as well as consulting services.

Considering the business activities of the Hypoport Group, industry- and country-specific conditions, as well as the aforementioned supplier structure, the following risks have been assessed as potentially relevant for us and our supply chain:

- Violation of occupational safety and health risks related to work,
- Violation of the right to freedom of association, the right to organize and the right to collective bargaining,
- Discrimination in employment and
- Denial of fair wages.

### **Preventive Measures in Our Own Business Area**

In our own business area, we establish appropriate preventive measures. Depending on the risk, these may include the following actions:

- Implementation of the procedures as well as human rights and environmental expectations set forth in this Policy Statement within relevant business processes,
- Development and implementation of suitable procurement strategies and purchasing practices to prevent or minimize identified risks,
- Conducting training in relevant business areas and

- Conducting risk-based control measures to verify compliance with the human rights and environmental expectations contained in this Policy Statement.

### **Preventive Measures for Direct Suppliers**

In our procurement policy, we have established which preventive measures should be implemented for and in relation to direct suppliers. Depending on the risk, these may include the following actions:

- Consideration of the human rights and environmental expectations of Hypoport SE when selecting a direct supplier,
- Obtaining a contractual assurance from a direct supplier that it adheres to the human rights and environmental expectations of Hypoport SE and adequately addresses them throughout its supply chain, e.g., by sending a Supplier Code of Conduct or agreeing to a contract amendment,
- A contractual obligation to participate in training conducted by Hypoport SE regarding Hypoport's human rights and environmental expectations and
- Agreement on appropriate contractual control mechanisms and their risk-based implementation to verify compliance with the human rights and environmental expectations, e.g. by sending a Supplier Code of Conduct or agreeing to a contract amendment.

### **Remedial Measures**

In the event of an identified existing or imminent violation of a human rights or environmental obligation in our own business area or with a direct supplier, appropriate remedial measures will be taken immediately to prevent, terminate or minimize such a violation. In the domestic business area of Hypoport SE, the remedial measure must lead to the termination of the violation. In the foreign business area or at companies affiliated with Hypoport SE according to § 2 Paragraph 6 Sentence 3 LkSG, the remedial measure must generally lead to the termination of the violation.

If the (imminent) violation concerns a direct supplier, it may be assessed on a case-by-case basis, in collaboration with the respective supplier, which specific remedial measures need to be taken. In individual cases, terminating the business relationship with the supplier may also be considered.

### **Measures Regarding Indirect Suppliers**

If we have substantiated knowledge of a possible violation of a human rights or environmental obligation by an indirect supplier, we will adjust our risk management and promptly take the following actions as needed:

- Conducting a risk analysis,
- Agreeing on appropriate preventive measures with the perpetrator,
- Developing and implementing a concept to prevent, terminate or minimize the violation of a human rights or environmental obligation and
- If necessary, updating this Policy Statement accordingly.

### **Complaint Procedure**

To create transparency and to gain early awareness of human rights and environmental risks or corresponding violations of obligations arising from economic activities in our own business area or that of a direct supplier, as well as to derive appropriate preventive and remedial measures from this, we have established a central whistleblowing system in accordance with the provisions of the LkSG. In designing and applying the complaint procedure, the following features have been particularly considered:

- Clarity and easy accessibility for everyone,
- Confidential handling of all reports,
- Competent processing,
- An objective process for fact-finding and

- Ensuring the protection of whistleblowers from reprisals.

Further details can be found in the [Rules of Procedure for Hypoport SE's Whistleblowing System](#).

Reports can be submitted through the following internal reporting channels:

#### In Writing

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

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.

#### **Documentation and Reporting**

We document the fulfillment of our due diligence obligations and retain this documentation in accordance with the provisions of the LkSG. We will report annually on the fulfillment of these due diligence obligations for the past financial year, as required by the LkSG. The reports will then be made available on our website at <https://www.hypoport.com/>. Until then, we refer to our Non-Financial Report, which is also available on our website at <https://www.hypoport.com/investor-relations/corporate-governance/>.

#### **Effectiveness Review**

We review the effectiveness of the aforementioned measures annually and as needed, updating them if necessary from an appropriateness perspective. This is how we work towards their continuous improvement and ensure, in the long term, that relevant human rights and environmental requirements are adequately considered in our own business area and supply chains.

Hypoport SE  
The Executive Board