

TAG Immobilien AG policy statement

on respect for and observance of human rights and environmental obligations

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I. Introduction

TAG Immobilien AG (hereinafter referred to as “TAG”) is a real estate company based in Germany specialising in residential real estate whose business model is aligned to the long-term letting of affordable housing. In addition to real estate management, TAG provides other services for its own portfolio, such as caretaker and trades activities as well as energy and multimedia services. In its operating business, TAG primarily maintains business relationships with companies domiciled in Germany and the European Union.

As a large housing company, we are aware of our corporate responsibility and our impact on society and the environment. We therefore align our actions not only to economic, but also to ecological and social aspects. In this respect, sustainability has traditionally always been embedded in our corporate activities. Respect for and observance of human rights is a self-evident element of this value-oriented corporate governance. This policy statement on respecting and observing human rights also reflects our commitment to social responsibility and sustainable development and additionally describes our approach to observing human rights and environmental due diligence obligations in accordance with the German Supply Chain Due Diligence Act.

II Scope of application

This policy statement applies to TAG Immobilien AG and its Group companies based in Germany. Companies belonging to the TAG Group that have their registered offices in other European countries have undertaken to adopt this policy statement subject to any specific requirements under national law.

III. Commitment to respect and uphold human rights

We are committed to respecting and upholding human rights on the basis of the following international standards:

- United Nations Universal Declaration of Human Rights,
- United Nations Guiding Principles on Business and Human Rights,
- OECD Guidelines for Multinational Enterprises,
- The internationally acknowledged eight core labour standards of the International Labour Organisation (ILO).

The fundamental values enshrined in these standards form the basis of value-oriented corporate governance and are firmly embedded in TAG’s business principles in particular. It is a matter of course for us to respect human rights, to work towards protecting them and to prevent our business activities from having any adverse effects on human rights. We are actively committed to respecting and up-

holding human rights and expect the same of our employees. Our business principles form the binding basis for how we operate and guide our employees in conducting themselves in a manner that is beyond reproach both legally and ethically.

IV. Measures for observing human rights and environmental due diligence obligations

The German Supply Chain Due Diligence Act provides the legal framework for German companies to fulfil their human rights and environmental due diligence obligations. TAG undertakes to observe human rights and environmental due diligence obligations in an appropriate manner in order to prevent, exclude or minimise any human rights and environmental risks and to put an end to any violation of human rights or environmental obligations. For this purpose, TAG has established an appropriate risk management system that entails regular as well as ad-hoc risk analyses, the implementation of appropriate and effective preventive and corrective measures, as well as a complaints procedure and an effectiveness review. TAG uses a software-based tool to achieve this goal.

1. Responsibilities

Ultimate responsibility for the implementation of this policy statement is borne by the Management Board of TAG Immobilien AG and overseen by it together with management staff, so that everyone within the TAG Group is aware of their own responsibility for respecting and observing human rights and for putting this commitment into practice on a daily basis.

The Management Board has appointed a Human Rights Officer who is responsible for monitoring risk management in accordance with the German Supply Chain Due Diligence Act. Together with Core Team 1 of the German Supply Chain Due Diligence Act project group, the Human Rights Officer reports regularly and on an ad-hoc basis to the Management Board of TAG Immobilien AG on the observance of human rights and environmental due diligence obligations under the German Supply Chain Due Diligence Act.

2. Risk analysis

The internationally recognised frameworks for the protection of human rights and the German Supply Chain Due Diligence Act define the following legal guarantees, among others:

- ban on child labour, exploitation and human trafficking,
- freedom from discrimination,
- occupational safety and avoidance of related health hazards,
- right to receive an appropriate wage,
- the right to form trade unions or employee representative bodies,
- avoidance of harmful soil change or water pollution,
- ban on the unlawful confiscation of land,

- protection from torture,
- ban on the manufacture, use and disposal of mercury-added products, mercury compounds and mercury waste,
- ban on handling, collection, storage and disposal of waste in a non-environmentally-friendly manner.

TAG conducts annual and ad-hoc analyses of human rights and environmental risks using a risk-based approach in its own area of business as well as in the areas of business of its direct suppliers.

The abstract risk analysis is carried out by assessing the country- and industry-specific risks in the company's own area of business as well as in the areas of business of its direct suppliers.

Specific risks are analysed on this basis, particularly with the help of self-assessments performed by direct suppliers and the company's own findings gained from initiating and pursuing business relationships.

In the company's own area of business, the specific risk analysis is carried out with the support of the relevant divisions, particularly the HR department, Group Accounting/ESG, Central Purchasing, Central Technology, Real Estate Management (Head of Real Estate Management (LIM)), Strategic Real Estate Management and the person responsible for occupational health and safety, and the risks are appropriately weighted and prioritised.

On this basis, the following legal guarantees are prioritised for the company's own area of business and with regard to that of its direct suppliers:

- compliance with the occupational health and safety obligations applicable under the jurisdiction of the place of employment,
- equal treatment in the workplace,
- appropriate wages (minimum wage),
- no use of chemicals containing persistent organic pollutants.

3. Preventive and remedial measures

The results of the risk analyses are incorporated in the relevant business areas and our procurement strategy. Our processes already provide for a wide range of measures to mitigate risks. In regular compliance training and a separate human rights training course, we promote awareness of the need for ethical and responsible conduct on the part of every individual at TAG and raise our employees' sensitivity with regard to the importance of human rights. The Business Partner Code, supplier information, annual meetings with direct suppliers and contractual undertakings to respect and uphold human rights are among the measures that have already been established and form an integral part of TAG's procurement and purchasing strategy. They have been adapted and enhanced with the implementation of the due diligence obligations under the German Supply Chain Due Diligence Act. We

have implemented grievance mechanisms to enable complaints and suggestions regarding human rights and environmental risks to be readily reported at any time, including anonymously.

As the insights gained from our risk analyses grow, the preventive measures are continuously reviewed for their effectiveness and revised if necessary.

In the event of a reasonable suspicion or actual violation of human rights or environmental obligations caused by our business activities or the actions of a direct supplier of TAG, we take immediate measures to clarify and put an end to any possible violations of human rights or environmental obligations and initiate and implement the necessary remedial measures.

In this way, we are able to continuously increase transparency and improve human rights and environmental due diligence along TAG's value chain.

4. What we expect of our business partners

TAG's core business is the letting and management of affordable housing. Its supply chains are predominantly regional and subject to legal requirements applicable in Germany and Europe, compliance with which is closely monitored. We are committed to ensuring that our business partners also respect and uphold human rights. With our [Business Partner Code](#), we therefore raise our business partners' awareness and impose on them an undertaking to respect and uphold human rights and to engage in legally and ethically sound business practices. In particular, the Business Partner Code contains rules on human rights and environmental standards, preventing and combating corruption and discrimination, ensuring occupational safety, health protection, minimum wages and the avoidance of conflicts of interest. Every business partner must behave in accordance with these principles and adhere to the standards set out in the business partner code of conduct.

V. Complaints procedure

TAG has established a [whistleblower system](#) with various reporting channels. The whistleblower system enables TAG employees, business partners and other stakeholders to report to TAG any human rights and environmental risks, possible violations of human rights or environmental obligations and potential compliance and legal violations or breaches of internal regulations. Reports can also be submitted anonymously if desired.

Whistleblowers can contact TAG's Compliance Officer or Compliance Counsel by telephone, e-mail or letter. Alternatively, the TAG [digital reporting system](#) can also be used to submit information.

TAG has drawn up [rules of procedure](#) for the complaints procedure and these are published on the Group website. The rules of procedure explain the reporting channels, the responsibilities, the process

as well as the steps taken to ensure the confidentiality of the whistleblower's identity and the avoidance of any recriminations as a result of the complaint.

VI. Documentation/ reporting

The observance of human rights and environmental due diligence obligations is documented on an ongoing basis.

TAG reports annually on the observance of its human rights and environmental due diligence obligations in accordance with legal requirements and publishes this report.

VII. Regular review

This policy statement on respecting and observing human rights, as well as the measures taken to implement it and the complaints procedure are continuously reviewed for their effectiveness and undergo constant further development.

The Management Board

Hamburg, February 2025