

TAG Immobilien AG

human rights policy statement

Contents

- I. Introduction
- II Scope of application
- III. Declaration on respect for and observance of human rights
 - 1. Anti-discrimination/ social interaction/ equal treatment
 - 2. Fair working conditions/ workplace health and safety
 - 3. Sustainability / environmental protection
 - 4. Supply chain
 - 5. Privacy/ data protection/ confidentiality
- IV. Complaints procedure
- V. Reporting

I. Introduction

As one of the major residential real estate companies in Germany, TAG Immobilien AG considers respect for and observance of human rights to be an integral part of its corporate policy. This commitment forms the material basis for daily interaction within the TAG Group as well as with business partners, customers and other stakeholders.

TAG Immobilien AG's business principles call for respect of human dignity and commitment to protecting and observing human rights in all aspects of the company's business activities. The business principles form the basis for all internal guidelines and work instructions.

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.

In its operating business, the TAG Group primarily maintains business relationships with companies based in Germany and other parts of the European Union and assumes that these business partners are likewise committed to respecting and observing human rights and to complying with the applicable legal requirements in Germany and the European Union.

II Scope of application

This policy statement applies directly to all TAG Group companies that have their registered offices in Germany, i.e. in addition to TAG Immobilien AG, all companies in which TAG directly or indirectly holds a majority interest (hereinafter also referred to as "TAG" for short).

Companies belonging to the TAG Group that have their registered offices in other European countries, notably in Poland, have undertaken to adopt this policy statement in the light of any specific requirements under national law.

III. Declaration on respect for and observance of human rights

TAG is committed to respecting and observing human rights on the basis of the United Nations Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. The OECD Guidelines for Multinational Enterprises and the eight core labour standards of the International Labour Organisation (ILO), which define universal minimum standards for decent work in the areas of freedom of association, prohibition of discrimination in respect of employment and occupation, abolition of child labour and forced labour, as well as occupational health and safety, are also authoritative standards and guidelines on which TAG bases its business activities.

TAG reviews its value chain for potential risks to human rights compliance and for any evidence of breaches of human rights. TAG can address these risks appropriately by means of the measures derived from the following key areas of action. The individual departments are responsible for implementing the human rights standards in the individual fields of action.

1. Anti-discrimination/ social interaction/ equal treatment

TAG firmly opposes any form of discrimination by its employees against other employees, customers and business partners on the grounds of nationality or ethnic origin, gender, religion or belief, disability, age or sexual identity and has enshrined this in its internal policy governing the promotion of diversity and the prevention of discrimination (“anti-discrimination policy”).

TAG attaches great importance to ensuring that the daily contact with customers and business partners and the interaction among all employees is characterised by mutual respect, individual appreciation and courtesy in accordance with TAG’s corporate culture.

At TAG, all employees have the same opportunities for training and further education and equal access to social benefits. Equal treatment and equal opportunities regardless of origin, gender, age, sexual identity or physical impairment are a matter of course. Different perspectives, experiences, cultures, ways of thinking and approaches resulting from employees’ background and origin, encourage the submission of suggestions and ideas for TAG’s further development. TAG does justice to the diversity of its tenants especially through its social activities aimed at promoting and supporting children, young people, families and older people in particular. TAG has set out its principles and guidelines on social commitment in its social policy.

In accordance with these values, TAG’s management works and interacts with the elected employee representatives in a cooperative and constructive manner for the benefit of the employees and the company as a whole because employee co-determination is also an important part of TAG’s corporate culture and does not merely result from the company’s obligation to conform to legal requirements.

2. Fair working conditions/ workplace health and safety

TAG offers its employees fair and good working conditions as a basis for their individual development and personal advancement, e.g. through internal and external training and opportunities for further education. Many of the benefits offered by TAG, especially flexible working time models, enable employees to find an appropriate work/life balance.

To promote its employees’ health, TAG encourages them to take part in sporting activities and preventive health care, which TAG supports by offering health days.

Workplace safety and health protection enjoy high priority at TAG. Regular comprehensive occupational health and safety measures such as safety instructions, workplace inspections and professional occupational health, safety and medicine services provided by external specialists assure employees of a safe workplace.

3. Sustainability / environmental protection

TAG applies the most energy-efficient, environmentally friendly and thus sustainable solutions possible in its purchasing activities. For this purpose, it evaluates the procurement of products and services over the entire expected life cycle.

TAG has set itself the goal of actively contributing to environmental and climate protection, e.g. by reducing its carbon emissions, boosting energy efficiency, using resources such as water and energy sensibly and consciously, avoiding refuse and waste water and protecting flora and fauna. One major focus is on climate protection and TAG’s contribution to capping

global warming at 1.5 degrees Celsius under the Paris Agreement entered into at the 21st UN Climate Change Conference in 2015. TAG aims to be largely carbon-neutral by 2045 and is implementing a decarbonisation strategy to achieve this.

TAG has documented the principles underlying its sustainable and environmentally conscious actions in guidelines (“Green & Social Procurement” and “Environmental Policy”).

4. Supply chain

TAG’s core business is the rental 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. As a basis for working with its business partners, TAG has drawn up the Business Partner Code (<https://www.tag-ag.com/ueber-die-tag/compliance/standard-titel>), which forms an integral part of its contractual relationships with its business partners.

TAG expects fair, reliable and legally and ethically impeccable business practices on the part of its business partners that provide for respect for and observance of human rights in their relations with their employees, business partners and subcontractors. This particularly includes employing staff on healthy, fair and safe working conditions. Illegal or unethical working conditions (e.g. forced labour, child labour and clandestine employment) are not tolerated. Similarly, discrimination of business partners’ employees on the grounds of nationality or ethnic origin, gender, religion or belief, disability, age or sexual identity is not tolerated. The statutory requirements pertaining to wages and working hours must be complied with. Business partners must ensure that all goods to be delivered to TAG, such as materials and equipment, have been procured or manufactured in compliance with the applicable legal requirements and subject to respect for and observance of human rights.

TAG does not tolerate any violations of the Business Partner Code by its business partners. Any proven violation and the breach of trust resulting from this may lead to a temporary or permanent suspension of the business relationship. We also reserve the right to take further legal action.

5. Privacy/ data protection/ confidentiality

TAG respects the privacy of its employees, customers and business partners and protects their personal data and all confidential information in its possession. TAG has implemented a data protection policy and issued supplementary work instructions for individual departments to ensure that personal data is protected and processed in accordance with all data privacy requirements in the TAG Group. Questions and comments on data protection can be sent to datenschutz@tag-ag.com. The data protection policy and the contact details for TAG’s data protection officer and data management are published on TAG’s website. TAG’s data management and the data protection officer provide information on data protection matters and monitor compliance with data protection regulations.

IV. Complaints procedure

The employees of the TAG Group can report any suspected compliance and legal violations as well as suspected violations of human rights and internal guidelines to their line managers

and to the Compliance Office of the TAG Group at compliance@tag-ag.com. A contact form on the intranet is available to employees for submitting information anonymously.

In addition, business partners and other third parties can also report suspected compliance violations as well as suspected violations of human rights to the Compliance Office of the TAG Group at compliance@tag-ag.com.

In addition, business partners, other third parties and employees of the TAG Group have the option of submitting information - including anonymously - concerning suspected compliance violations to an external body (<https://www.tag-ag.com/ueber-die-tag/compliance/hinweisgebersystem>). All reports are investigated and addressed promptly.

These rules are specifically incorporated in TAG's internal whistleblowing policy.

V. Reporting

TAG reports annually on the fulfilment of its human rights due diligence obligations in its sustainability report.

The Management Board carefully and continuously reviews this human rights policy statement and its implementation in the TAG Group and revises it where necessary.

The Management Board

Hamburg, December 2022