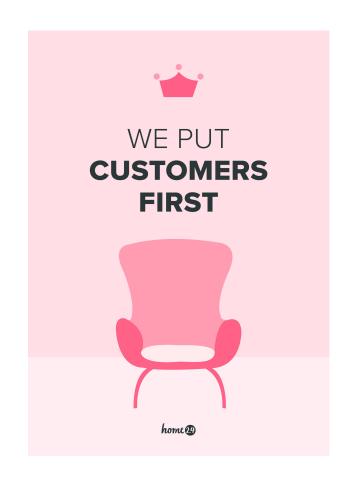


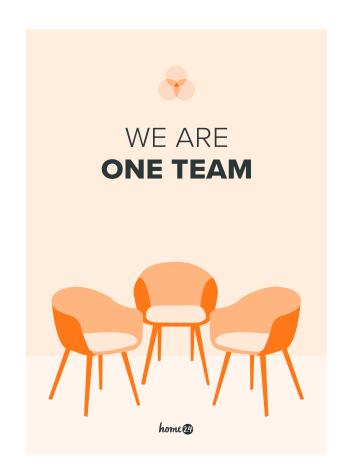
# Code of Conduct



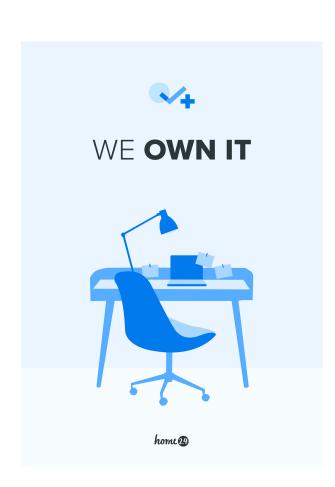
#### **Dear Homies**,

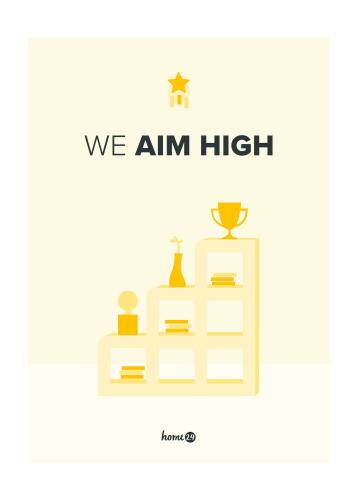
Together with our team and our business partners, we at home24 work every day to make it possible for people to have a beautiful home. We encourage creative ideas and create a culture of trust in which everyone has the chance to take responsibility themselves. In everything we do, we work as a team and take care that all Homies feel comfortable. We have defined our values together. All six values are equally important components of the home24 DNA, and describe what our company stands for. We attach great importance to living our values. The Management Board is personally committed to this.

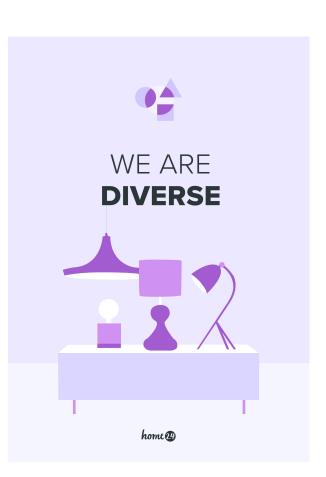










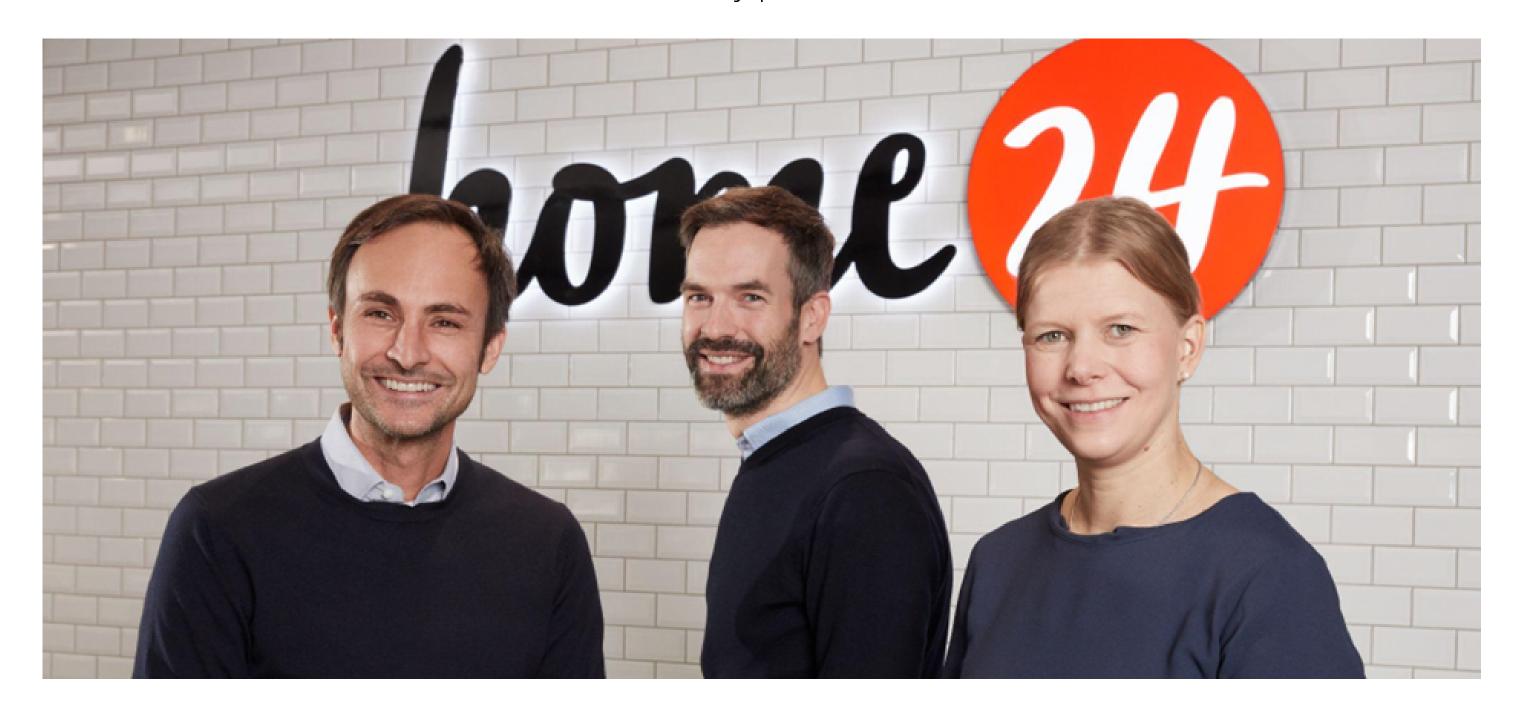


Along with our corporate values, honesty, integrity and respect are important cornerstones of our daily actions, and build the foundation for our long-term success as one of the leading home & living e-commerce platforms. Only when acting with integrity, complying with laws, and adhering to our ethical principles home 24 will continue to be perceived as a strong and trustworthy company in the future.



For the continued existence and business success of home24, it is not only the success itself that is significant, but also the way in which this success is achieved. Our business success should therefore never take precedence over law and order, or morals and integrity. This Code of Conduct provides the necessary guidance to follow this principle as well as our corporate values. Violations of this Code harm our company and all those who are dedicated, passionate and enjoy working for home24. We therefore expect from all Homies to strictly adhere to the requirements of this Code. We expect our managers to model legally sound behavior and integrity while ensuring that all Homies are aware of and understand the Code of Conduct and the behavioral requirements it describes. If violations of this Code become known, they are to be reported to the Governance, Risk and Compliance (GRC) Team or via the Whistleblower Hotline. Contact information is located in Section 3 of this Code.

Every Homie contributes to the reputation of and to strengthening trust in home24. Let's create and maintain a corporate culture that we can all be proud of and that shows that home24 is a trustworthy partner.





This Code of Conduct ("CoC") describes minimum standards all Homies of home24 must adhere to. The CoCis based on our jointly defined corporate values and the core values of honesty, integrity, respect, trust and fairness.

Our CoC does not prescribe behavior for individual situations in detail. Instead, it contains principles that serve as guidelines for all Homies in their day-to-day work and describe how we shape our daily cooperation. Therefore, we expect all Homies to act in accordance with this CoC. In addition, we expect all Homies to know and adhere to the standards described in this document and to remind others of them when necessary. This CoC applies to the entire home24 Group. In addition to the CoC, home24 publishes further policies and guidelines when necessary and appropriate. Together with the CoC, these form binding principles of conduct that must be carefully read, understood and followed.

Failure to comply with the CoC or other applicable policies and guidelines will result in disciplinary action and may result in termination of employment for serious violations, regardless of the individual's position. When Homies raise concerns, we expect our managers to listen carefully, take all concerns seriously, maintain confidentiality and take action to address their extraordinary responsibilities.



### WE PUT CUSTOMERS FIRST

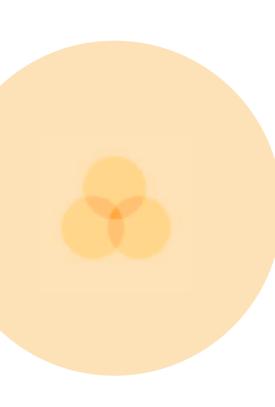
#### We put our customers at the center of every decision we make.

We offer products and services that create great experiences, making our customers feel at home. We tailor our work to their needs and continuously strive to find the best solutions for our customers. We are data-driven in our decision-making and listen to our customers to learn from their stories. We use their input to deliver best performance, drive innovation and find effective solutions to challenges.

The trust of our customers is essential to our success. home24 expects all Homies to treat our customers' data with the utmost care and to ensure that all our products are safe and meet our quality standards. Our success is determined by the safety and reliability of our products. A large number of legal requirements concerning the development, production, approval and sale of our products serve to ensure the safety of our products. The quality management department ensures compliance with all legal requirements. To ensure product safety, we ensure process documentation according to our high requirements and continuously develop the set standards.

Identified problems are to be reported immediately to relevant departments and persons in the organization. In case of questions, Homies can contact the Supplier Management or the GRC Department at any time.





### WE ARE ONE TEAM

### We are interested in the points of view and interests of our Homies and achieve our goals together.

We are a community of individuals connected by trust, respect and support for each other. We create a collaborative work environment that thrives on a culture of open feedback, mutual respect and fun. We excel at valuing each other, as well as supporting each other, and always try to do our best - together. As Homies, we can rely on each other.

In our daily work, we strive to treat each other with respect, honesty and tolerance and to look out for each other. In order to make the best possible decisions together, we encourage constructive and inclusive discussions and actively listen to learn from each other, regardless of position, background, age or other characteristics. Direct dialog between managers and employees is expected and supported accordingly by home24. Therefore, we promote a feedback culture in all directions.

We strive for long-term cooperation with every stakeholder (Homies, suppliers, customers, etc.). Thus, we focus on win-win solutions to foster trust and cooperation.



### WE ACT SUSTAINABLY

### We aim for long-term solutions that have a positive impact on our customers, our Homies and our planet.

In view of the climate crisis and global social grievances, the United Nations (UN) have agreed to seventeen global Sustainable Development Goals (SDGs). Companies hold a responsibility to make their best possible contribution to achieving these goals and to achieving sustainable development. At home24, we want to live up to this responsibility. In concrete terms, this means that in our pursuit of economic success, we always take into account the social and ecological impact of our actions. We respect and protect resources - every day and in everything we do. We search for opportunities to give something back. We don't base our actions on short-term, quick success, but aim to create sustainable solutions that have a positive impact on the environment and people's lives. We therefore also expect our Homies to treat resources with respect and, through their work, to help us fulfill our responsibility to operate in a socially responsible manner.

We also pursue our principle of acting sustainably in our upstream supply chain. We therefore carefully select our business partners and ensure that they meet our internally set quality and sustainability standards. Within the scope of their activities, all Homies can and should contribute to home24 living up to its social, ecological and economic responsibilities.

If you have any questions or ideas about sustainability @home24, please feel free to contact us by email: <a href="mailto:sustainability@home24.de">sustainability@home24.de</a>.



### WE OWN IT

### We encourage personal responsibility from start to finish.

We take responsibility and hold each other accountable. We define our goals together and determine our responsibilities clearly. We believe in the strengths of our Homies and support each other in achieving the best possible results. We look beyond our respective tasks to keep home 24's goals in mind. We celebrate our successes, learn from mistakes and develop new approaches to solutions.

Therefore, we expect all of our Homies to contribute their ideas. Suggestions, concerns and feedback are always explicitly welcome. In doing so, our Homies take responsibility for their work so that we can make valid decisions and continue to develop as a company every day.

Personal responsibility also includes compliance with internal and external requirements. It is therefore the duty of all Homies to keep themselves informed about legal requirements and changes. Compliance training helps our Homies understand the key legal boundaries. In case of questions or doubts, you can contact the legal (<u>Legal@home24.de</u>) or GRC department (<u>GRC@home24.de</u>).

home24 does not tolerate violations of laws, as these weaken the trust of our stakeholders and can lead to significant fines, civil claims, reputational damage or criminal prosecution. Some legal requirements that our Homies are responsible for complying with - in addition to their substantive responsibilities for their duties - are described below. In many cases, however, the obligations of our Homies cannot be limited to the legal terms described below. That's why home24 expects all Homies to work prudently to avoid violating the law, even beyond this Code.



### WE OWN IT

#### **Anti-corruption**

Corruption and bribery are contrary to our commitment to integrity and violate the trust of our stakeholders. home24 expects all Homies to reject any form of corruption or bribery and not to offer it under any circumstances. The same applies to (but is not limited to) extortion, fraud or theft. All Homies must strictly adhere to the <u>Group Policy Anti-Corruption</u>, which, among other things, defines in detail how to deal with corruption matters (e. g. dealing with gifts, public officials, etc.).

Any suspected, actual, attempted or potential case of corruption or bribery involving Homies or business partners must be reported (<a href="mailto:whistleblower@home24.de">whistleblower@home24.de</a> or anonymously via the <a href="mailto:whistleblower@home24.de">whistleblower questionnaire</a>).

#### **Conflicts of interest**

A conflict of interest within the meaning of this CoC exists if the private interests of Homies collide with the corporate interests of home24. Even gifts or invitations from business partners can lead to conflicts of interest. Therefore, we limit the value of gifts in a business context and only allow invitations to a reasonable extent. For more information, please see the <u>Group Policy Anti-Corruption</u>.

In case of conflicts of interest that cannot be avoided, we expect you to report the situation to your manager or via our <u>Conflict of Interest Disclosure Form</u>.



### WE OWN IT

#### Data protection and data security

home24 protects all data with appropriate technical measures against unauthorized access, unauthorized and improper use, loss as well as premature destruction in compliance with the legal framework. In addition, all Homies are responsible for ensuring that our data security and data protection standards are complied with without exception. The Data Privacy Policy contains the relevant guidelines for handling data. Therefore, we expect all Homies to handle data carefully and judiciously in accordance with the need-to-know principle.

### **Capital market compliance**

As home24 is a listed company, we are subject to the requirements of capital market law. Insider trading and market manipulation of any kind are strictly prohibited and will not be tolerated by home24. We inform all Homies, especially those on the insider list, about any applicable regulations and conduct capital market compliance training. Further requirements are detailed in our Capital Market Compliance Policy.





## WE AIM HIGH

### We want to get a little better every day.

For us, entrepreneurial thinking means constantly questioning the status quo. We see challenges as opportunities for new growth. We experiment and look for the best ideas to constantly achieve better results. We continuously develop as individuals and thus also the entire company.

To support our employees in this process, the main pillars of our HR strategy are a broad range of learning and training opportunities and the identification and support of individual development paths. We also pay particular attention to the empowerment and development of our managers. We would like to explicitly motivate all our Homies to take advantage of our training opportunities and to grow beyond themselves on a daily basis.



### WE ARE DIVERSE

We celebrate and respect our differences. We are committed to achieving the highest possible level of equality and inclusion in the workplace.

We are very proud of our diverse Homie community. Our different backgrounds, cultures, ethnicities, faiths, genders, sexual orientations and disabilities enrich us. Each unique perspective makes us more diverse and stronger. Our work environment allows for flexibility and addresses diverse needs. We are personally committed to greater fairness and inclusion. We are convinced that this will help us unleash the full potential of home24.

Actively seeking different perspectives is also encouraged by our managers. We expect the same from our Homies. Together, we thereby create a workplace in which everyone feels good.

To comply with this principle, we do not tolerate any behavior that would endanger or compromise the safety or dignity of our Homies or others. We do not accept any bullying, insulting or derogatory statements, discrimination or harassment. To protect all Homies from such behavior, home24 takes appropriate measures. These include our anti-discrimination training, which is mandatory for all Homies.

If you experience or observe a case of direct or indirect discrimination, (sexual) harassment or bullying, you can contact the Anti Discrimination Team at <a href="mailto:antidiscrimination@home24.de">antidiscrimination@home24.de</a> or report the incident anonymously via our <a href="mailto:whistleblower">whistleblower</a> <a href="mailto:questionnaire">questionnaire</a>.



If you experience a violation of this Code of Conduct, or other inappropriate behavior, or have questions (e. g. about compliance), the Governance, Risk and Compliance Team (GRC) is available to you in person or anonymously as follows:

- E-mail: <u>whistleblower@home24.de</u>
- Onlinefragebogen (DE): <u>Whistleblower Fragebogen</u> (anonymously)
- Onlinefragebogen (ENG): <u>Whistleblower Questionnaire</u> (anonymously)

We protect all Homies who in good faith report an incident or assist in the investigation of a possible violation of the law or our Code of Ethics and grant them anonymity. Homies who report incidents may not be disciplined for doing so under any circumstances. Every report will be taken seriously and investigated promptly. If necessary, appropriate action will be taken.

#### **IMPRINT**

home24 SE Otto-Ostrowski-Str. 3 10249 Berlin E-Mail: grc@home24.de

Management Board: Marc Appelhoff (Chairman), Brigitte Wittekind, Philipp Steinhäuser Chairman of the Supervisory Board: Lothar Lanz Legal seat: Berlin | Registered with the local court Charlottenburg (Berlin), HRB 196337 B

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