

Scout24 Code of Conduct



Scout24



„Make it happen“

Leadership Message

As a result of our continuous broadening of our range of services, the legal requirements and regulations around the activities of the Scout24 group also keep increasing. As one of the leading digital marketplaces, we are aware of this responsibility.

Acting with integrity as well as leading by example are core elements of our company culture. They are the basis of our behavioral code – our Code of Conduct. It provides a binding framework for the organizational behavior expected from all of us and is both our aim and a promise:

we expressly commit ourselves to the principles we expect from each other at Scout24, and we assure to adhere to them consistently. This also pertains to the relationship we have with our customers, consumers, our business partners and it applies to our corporate-social responsibility.

Dear Scouts, this Code of Conduct provides us with guidance and confidence for our daily actions. Our personal integrity makes an important sustainable contribution to the continued success of Scout24. “Winning with Integrity”, we count on you!

Tobias Hartmann
Chief Executive
Officer

Dr. Dirk Schmelzer
Chief Financial Officer

Ralf Weitz
Chief Product & Technology
Officer

Dr. Gesa Crockford
Chief Commercial Officer



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Why this Code of Conduct?

Scout24 supports, challenges and develops its employees¹. We promote an environment and a corporate culture in which we all can perform at our best and meet the expectations of consumers and customers.

The intention of this Code of Conduct is to provide a reliable framework for acting responsibly, meeting legal requirements and living up to our ethical and social values. Our goal is to protect both Scout24 and individual employees from potential damages resulting from misconduct.

Our Code of Conduct defines the framework of how we conduct our business based on the legal requirements we need to consider:

- Laws
- Regulations (regulatory requirements)
- Policies
- Procedures
- Contracts

In enforcing the Code of Conduct, Scout24 observes all relevant and applicable laws and regulations, and considers any cultural, country-specific differences international standards such as the ten principles of the UN Global Compact, the Universal Declaration of Human Rights, the ILO core labor standards and the Women Empowerment Principles. We are also committed to environmentally and socially responsible corporate governance.

The code is not only of legal importance, but also of significant economic relevance. Compliance with the Code significantly reinforces Scout24's reputation in the markets in which we operate, as well as in the eyes of regulators, the public and our owners. Most importantly, the Code effectively and sustainably protects ourselves – provided that we all live the Code of Conduct.

It is tremendously important for the continued success of our business that we can make use of all the opportunities in this fast-paced environment. At the same time we must always act responsibly and in compliance with legal requirements. This Code of Conduct helps us do just that.

¹ This Code applies to all employees of all Scout24 entities, including all members of the executive leadership team and all other managerial employees, irrespective of position or title. It also applies to any freelancers and contractors working under the direction of Scout24. For simplicity of reference, the terms „employee“ and „Scout“ will be used with this comprehensive understanding throughout this document.





When in doubt: Consult!

Ask someone! Consult when you don't understand something, when you are unsure about something, or when you need some advice. Your first point of contact should always be your line manager. If for some reason that does not appear appropriate under the circumstances you may at any time also contact one of our specialists. The chapter on "Important Contacts" provides you with a list of relevant contacts by topic, and you can also find guidance on our Compliance team site in the Scout24Hub.

To support and to enhance a common understanding of our Code of Conduct we offer special trainings, and we provide specific policies, procedures and guidelines for relevant topics.

Finally, this Code of Conduct is also intended for use by our customers, suppliers, contractors and consultants as well as by our business partners. This way we demonstrate also to the public that we are committed to our values of acting responsibly and sustainably.

Our Core Values

Our values define who we are, what we do, and most importantly how we do it. They define our culture – our “DNA” – and require us to act responsibly. Our “Core Values” are a fundamental element of our performance management and are a clear commitment to acting in accordance with our values:

Data Driven:

We pay special attention to protect sensitive corporate and personal data. We store and process data in accordance with legal requirements.

Learning:

We take every opportunity to reflect, recover and learn. We recognize failures early and are able to adapt quickly to changed market situations and changes in the legal environment. We continuously improve our processes and internal workflows by our lessons learned.

Proactive:

We act in a responsible manner. Personal accountability is the belief that we are fully responsible for our own actions, consequences and results. It's a choice and an expression of integrity.

One Team:

We respect each other, celebrate success and embrace diversity. We unite diverse people, cultures, capabilities and ideas. We embrace a diversity of viewpoints to recognize the value of individuals' differences at all levels of the company.



Data-Driven



We use data to execute the right decisions for our customers and consumers.

Proactive



We strive for improvements and take over accountability.

Learning



We take every opportunity to reflect, recover and learn.

One Team



We respect each other, celebrate success and embrace diversity.

Leading by Example: Our Leadership Behaviours

Actions speak louder than words: Exemplary behaviour that is both ethically and legally acceptable is a responsibility of every leader.

Ethical, responsible, integrity- and value-based behaviour of management significantly influences the compliance behaviour of everyone. At Scout24 we lead by example.

We expect from all members of our management team that they credibly live up to our values, to assure the appropriate "Tone at the Top". This way they underline their responsibility for decision-making based on values and integrity, and they confirm their position as role-models, in accordance with our Core Values and our Leadership Behaviours.

Don't just talk the talk ...
Walk the walk!



Focus on Impact



We commit to decisions and prioritize for success.

Empowering



We trust our experts, listen to them and give them freedom.

Growth Mindset



We drive change, handle failures well and appreciate feedback.

People Builder



We leverage employees' performance and develop their potential.

Integrity

Winning with Integrity – Everyone’s acting with integrity is the foundation for a trusting and co-operative working environment. Compliance with laws and regulations of the jurisdictions in which we do business is an integral part of our corporate responsibility and our corporate values. These include all rules applicable to Scout24, which are updated regularly in line with our agile approach to reflect new business processes and methodologies, and which must be observed at all times.

Compliance with laws and regulations as well as appropriate usage of Scout24 assets and resources is part of our corporate responsibility.

We always seek to fulfil our professional duties and all associated responsibilities, both within and outside of our organization, with the highest degree of professionalism, competence, diligence and integrity. In doing so, we respect the rights of others and refrain from incurring damage to our customers and consumers, our brands, the Scout24-Group, and to our colleagues. This also means that we firmly oppose any form of extremism, as it not only contradicts our values as a company, but also the basic principles of a democratic society,

which is based on respect, tolerance and diversity. We condemn racism, xenophobia and discrimination. If we discover extremist statements or behavior among our employees, users, customers or business partners, we reserve the right to terminate the cooperation immediately.

In addition, we keep our assets and resources safe, and we use them only for appropriate business purposes, unless other separate regulations, corporate rules or general corporate practices demand otherwise.

We understand compliance with the Code of Conduct is a joint responsibility.

For us, compliance with the Code of Conduct is an ongoing process, during which we provide mutual support to one another. Together with our market segments and functions, our colleagues responsible for compliance identify regulations that are material and relevant to Scout24, and they monitor, that the market segments and functions enforce their observance. We know that the demands on our behavior grow along with our business activities. We take this into account during our day-to-day work activities. We stay informed about changes to relevant regulations and guidelines applicable to our work, and we apply them in timely manner.

What does this mean for me?



- Make sure that your decisions and your actions are in line with the Code of Conduct, applicable laws, and relevant regulations.
- Take care to comply with written rules (i.e. organizational and competence policies, process descriptions).
- You should always be aware of reputational risks that could result from your actions and decisions.
- Ensure that statements you make online and in social networks do not harm Scout24.

Ask someone if you have questions, doubts, or if something is unclear! You should (usually) first approach your line manager and/or directly contact Risk Management & Compliance. If this appears inappropriate for any reason, you can also consult our external ombudsman (Vertrauensanwalt) through our Compliance Hotline (see “Where to Get Help – Compliance Hotline)

Customers, Employees, and Society

We are committed to our customers.

For us, our customers are always our first priority. We support them in a long-term partnership. We know the business environment in which our customers operate, and we offer them solutions tailored to their needs. Our collaboration is based on team spirit, trust, reliability, commitment, honesty, common sense, and selfconfidence – externally and internally.

We value the commitment of our colleagues.

We promote a motivational and respectful working environment where our employees may apply their entire potential. We aim to attract and support highly qualified and committed employees, and retain them at Scout24. We are convinced that we are enriched by our colleagues' diversity which provides differing points of view and skills.

We guarantee a safe work environment and comply with locally applicable laws and regulations regarding workplace health and safety. All forms of forced and child labor and all forms of modern slavery, including human trafficking, are prohibited. National regulations and international standards for the protection of minors must be complied with. We are committed to neither knowingly causing nor supporting human rights violations.

We guarantee the right to freedom of association and collective bargaining. Employees have the right to assemble in accordance with the relevant laws, the ILO core labor standards and to form or join trade unions and employee representative bodies.

We comply with all laws regarding equal opportunities especially the

equal professional development for all employees. We do not differentiate or discriminate against employees based on ethnic background, skin color, gender, age, religion, disability, sexual orientation, nationality, or other irrelevant attributes. If there are unjustified differences in remuneration, we are actively working to balance them out.

We do not tolerate any discrimination against employees.

We do not tolerate any form of discrimination, harassment, threatening, or other hostile or abusive behavior in our workplace. Similarly, we do not tolerate false or malicious statements or actions, which could harm our customers, colleagues, shareholders of Scout24, or the community. It is our aim, and we have put relevant procedures in place, to resolve any problems respectfully, confidentially, and quickly.

In all our business activities, we remain constantly aware of the significance of environmental and community sustainability.

We regard social responsibility as an integral component of our actions and as an investment in the community and, therefore, also in our own future. This is why we support, amongst others, sporting and cultural activities, we show commitment on social responsibility and sustainability.

What does this mean for me?

- Immediately inform Customer Care about customer concerns.
- Take the opinions of your colleagues into consideration.
- Retain a fair and respectful attitude towards your colleagues.
- Be aware of the consequences of your actions and decisions with regard to our customers, our coworkers, and our communities.
- Refrain from any form of discriminatory or harassing behavior towards your colleagues or customers.
- If you are personally discriminated against or harassed, you can confidentially approach People or the Compliance department. Alternatively, you can also contact our external ombudsman (Vertrauensanwalt) through our Compliance Hotline or our anonymous whistleblower system BKMS® (see "Where to Get Help – Compliance Hotline")



Conflicts of Interest

We resolve conflicts of interest in the interest of Scout24.

Conflicts between the interests of our customers and the interests of Scout24 and our employees can arise in various situations of our daily business activities. In addition, situations can arise in which the personal interests of our customers or employees may differ from the interests of Scout24. We are at all times attentive and have the knowledge and the skills to recognize and manage conflicts of interest and – to the extent possible – avoid them.

If a conflict of interest cannot be avoided in fact or in appearance, we disclose it in a timely manner. In doing so, together with the appropriate departments of our company (i.e. Risk Management & Compliance, Legal, People) we look for suitable measures for acting in the best interests of Scout24.

We do not use our position or the position of Scout24 to pursue our own personal interests or the interests of related parties or persons close to us.

We do not engage in external activities such as political engagements, if they could harm the reputation of Scout24. Such activities may only be pursued if they do not collide with the interests of Scout24 and if there are no issues with competition. In addition, other secondary employment is only permissible if Scout24 has been informed about it.

We furthermore will not invest, directly or indirectly, in a competitor of Scout24, if such investment affects viable interests of Scout24. Exceptions require explicit and written consent by Scout24.

We do not grant nor do we accept benefits, which could potentially cause conflicts of interest and subsequently result in damages to Scout24 or our customers.

What does this mean for me?

- Disclose any personal or other relationships that could give rise to conflicts of interest to Risk Management & Compliance, as well as other circumstances relevant to a potential conflict of interest.
- Notify People in writing of any remunerated outside employment, and apply for a written approval. Approvals are usually granted if there are no objective reasons preventing secondary employment.
- Be cautious during vendor selection if any personal relationships are involved. Always disclose any relationships before making a selection!
- Do not accept or grant any benefits, including invitations or gifts, if they may be perceived to be influencing business decisions, or if this may cause such an impression in appearance to third parties.
- Familiarize yourself with our internal standards for avoiding and handling conflicts of interest. You will find them on our Compliance team site in the Scout24Hub.



Data Protection, Communication, and Transparency

Our customers' trust in us and our brands is a valuable asset, no less on the part of our coworkers, our investors and the public. We handle the data we collect or receive from our customers, consumers, and business partners responsibly and in consideration of personal rights. Accordingly, our reporting must always be correct and truthful.

We treat data absolutely confidential and we communicate professionally.

We protect the data of our customers, business partners and coworkers by complying with policies & procedures on information security and data protection. We treat this data responsibly and use it only in accordance with the law.

Statements made in the name of Scout24 employees are consistent, precise, and factually correct. Also, Corporate Communications or Investor Relations is always consulted with regard to any communication directed towards the public.

Information about Scout24 and our business activities are disclosed in accordance with statutory obligations after having been agreed with the respective departments (for example within the scope of annual financial statements or consolidated financial accounts).

Legal disclosure obligations, such as pricing disclosures, annual (consolidated) financial statements, data protection, etc. are complied with by the Scout24 employees responsible. In case of doubt, our legal department will assist with the clarification of legal requirements.

Where necessary, Scout24 assists and cooperates with authorities, auditors, consumer protection organizations and anti-trust regulators and supports their work.

All employees of Scout24 should be aware that their opinions and actions in public, especially on social media, may be attributed to Scout24. This applies even if they do not present themselves as Scout24 employees. Therefore, all employees are obliged to maintain the image and good reputation of Scout24 by their actions, opinions and appearance in public, especially on social media. We do not tolerate any xenophobic, racist, discriminating statements or the distribution of illegal contents by Scout24 employees. This especially applies for employees in exposed or higher management positions within Scout24.



What does this mean for me?

- Consult and involve Legal, Data Protection or Risk Management & Compliance as early as possible in the product development process.
- Consistently protect information such as company documents and records as well as customer and consumer data against unauthorized access.
- Always pay attention to where you have business-related discussions and how you transmit information electronically or in hard copy format.
- If you privately appear outside of Scout24 in a manner in which you could be perceived to be a representative of Scout24, make clear that you are acting in a private capacity.
- If you are asked by (external) third parties to provide an official statement from Scout24, always consult with Corporate Communications in advance.

Confidential Information and Insider Knowledge

In connection with our business activities, we may obtain access to confidential corporate data and information. Such may include company or business secrets (i.e. codes, data of customers and users, market strategies, product plans, etc.), but also valuable insider information (i.e. numbers, data, financial information, planned acquisitions and the like). The term insider information especially covers all types of specific information which are non-public and capable of influencing the stock market price of Scout24 shares in case of disclosure.

We protect our company and business secrets, insider information and any other confidential information, keep them secret, and never use them for our own benefit or for the benefit of a third party.

We only use our company information in the scope of our ordinary business processes or other official tasks. If we suspect misuse of our business secrets, confidential information or insider knowledge, we immediately inform the persons responsible (Risk Management & Compliance, Data Protection, or our external ombudsman ("Vertrauensanwalt")) via our Compliance Hotline.

We always comply with the specific regulations for listed companies regarding insider information.

Under no circumstances will we use business secrets or insider information to pursue our personal interests or the interests of third parties. Especially with regard to insider information, special rules of conduct apply. Misuse of such information is subject to legal consequences.



What does this mean for me?

- Confidential information may neither be mentioned, nor disclosed or shared with any unauthorized persons.
- Sending confidential information via e-mail to a personal or private e-mail address is prohibited. Any other means of distribution that lie outside of our corporate communication channels is similarly not permitted.
- Pay particular attention in selecting the appropriate recipients when sending confidential information.
- Never use confidential company information for your own personal gain or for the benefit of a third person.
- When disclosing confidential information, consider whether such disclosure is necessary for the performance of your official duties ('Need to Know' principle)

Criminal Acts

We are firmly opposed to any form of fraud, for example in the form of false statements, forgery or manipulation, bribery and corruption as well as any other white-collar crime. Bribery of (potential) business partners or public officials is expressly prohibited. Likewise, we do not allow ourselves to be influenced by benefits and inducements. Any attempts at bribery must be reported immediately by each employee to their line manager or the Compliance department. We have set out the individual requirements in a separate guideline, which you can access on our intranet. In addition, every employee must comply with the regulations and laws against money laundering. All suspected cases that indicate money laundering must also be reported immediately to the respective supervisor or Compliance.

As one of the leading online platforms, we have significant responsibility towards our customers, employees, investors, and to the public. Our actions always endeavor to meet high ethical standards. Of course, this requires that we act within the boundaries of the law and that we take action against any form of criminal conduct (i.e. fraud, bribery, or corruption) within our area of responsibility.

We are aware of and we comply with the applicable policy on avoiding conflicts of interest, which also addresses the acceptance and granting of benefits (i.e. invitations and gifts). Detected violations of internal and external regulations will be sanctioned.

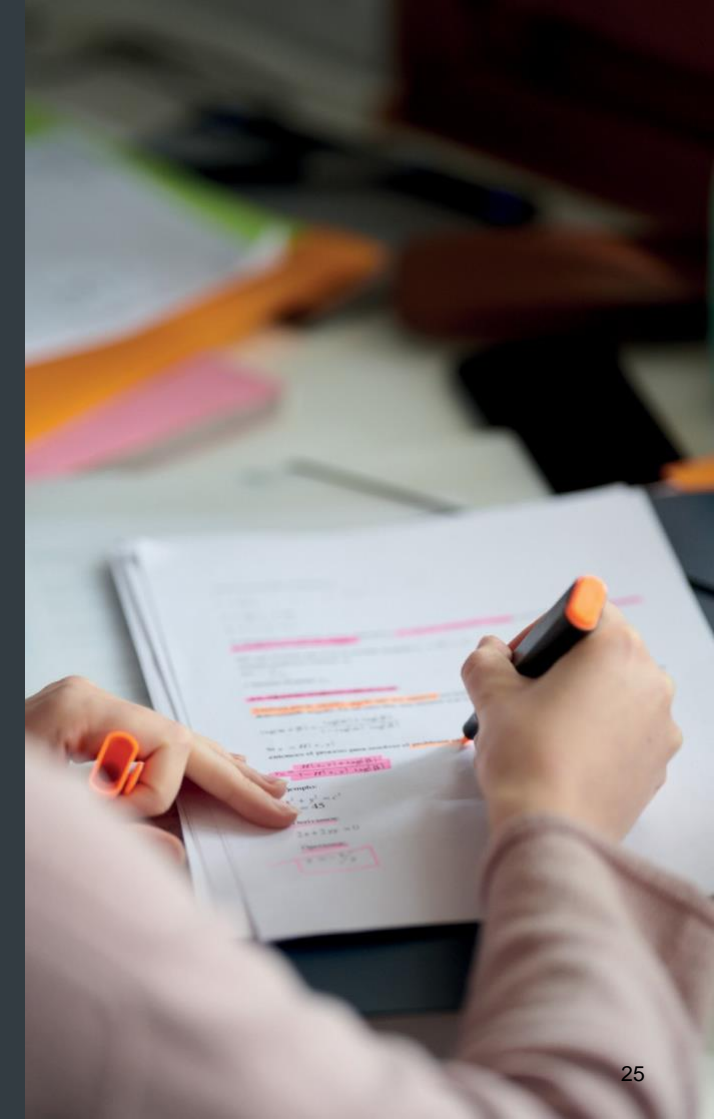
We do not participate in any transactions or business activities if we suspect that they could be connected to bribery or corruption.

We actively and appropriately seek information about our business partners. We take such information into consideration when making our decisions and attentively analyze our business relationships. Scout24 has binding rules and procedures for investigating suspicious activities in connection with other criminal acts and in the context of our ordinary business operations. These can be found on our Compliance team site in the Scout24Hub.

We support the investigating authorities within our area of responsibility and are aware of all channels established by Scout24 for reporting commercial crime.

What does this mean for me?

- Do not accept or grant any benefits, including invitations or gifts, if they may be perceived to be influencing business decisions, or if this may cause such an impression in appearance to third parties.
- Immediately report any cases of suspected fraud or other violations of laws or regulations (including internal regulations) to the appropriate contacts.
- Consult any of the available contact persons if you think you may be involved in a case of bribery, fraud, or other commercial crime.



Risk Management, Finance, Taxes and Contracting

We assess our risks consistently and proactively.

Active risk management is an important component of the governance structure at Scout24. Our actions are based on a rational and consistent approach to risks and opportunities. The individual elements of risk management comprise, in their totality, a system which ensures the identification, analysis, assessment, continuous monitoring and reporting of risks.

We maintain our accounts correctly and completely.

We ensure that all business transactions are appropriately recorded in our books in accordance with existing rules and processes, and in compliance with all applicable generally accepted accounting principles. Our accounting, financial reporting and regulatory reporting are completed in a timely, precise, correct, complete and truthful manner. They correspond to the respectively applicable legal and regulatory requirements.

We support our auditors to the best of our knowledge and belief.

Financial planning is conducted on the basis of reasonable premises and reflects future earnings contributions, taking existing accounting regulations into account. Opportunities and risks will be equally considered.

We comply with national and international tax regulations, and reject any form of abusive tax planning.

We explicitly commit ourselves to compliance with all tax-related obligations. We perform responsible tax planning, which considers both our legal obligations as well as the interests of our investors. We reject abusive tax planning, yet we utilize available opportunities for a legitimate optimization of our tax position. When introducing new products, we ensure adherence to the requirements prescribed by tax legislation.

We comply with all applicable processes when entering into contracts.

Our contracting is subject to clear responsibilities. We comply with all applicable processes including the involvement of our legal department, consideration of signature rights and applicable approval requirements (i.e. the supervisory board). We comply with our budgets and manage them responsibly; we supervise contractual relationships and coordinate special terms and conditions with the appropriate contact persons (i.e. early termination rights, other non-standard clauses). We archive in accordance with legal requirements.

What does this mean for me?



- Inform yourself about your duties to avoid tax-related risks as far as they apply to your area of responsibility, and consult with the finance/tax departments in relevant matters.
- Act responsibly, with necessary degree of care, and always in the interest of Scout24.
- Ensure that all information you provide to the finance and controlling departments is always on time and correct, in particular those related to the preparation of financial statements, the planning process and reporting.
- When making decisions, weigh the risks and returns for your Scout24-vertical and for the Scout24 group.
- Coordinate any non-standard contract clauses, terms and conditions with our legal department and inform about early termination rights.

Business partners, suppliers and service providers

Scout24 works with many business partners, including cooperation partners, distribution partners, suppliers, sales personnel, contractors, consultants and agents, as well as providers of goods and services. We expect all our business partners and their employees to comply with the rules set out in our Code of Conduct as well as the following rules of conduct.

Laws and ethical standards

Our business partners must comply with all laws applicable to their companies as well as the principles of the United Nations Global Compact, the Universal Declaration of Human Rights and the ILO core labor standards. In the event of a breach of these principles, we reserve the right to terminate the cooperation without notice.

Business integrity and anti-corruption

We, as Scout24, guarantee that we always act according to the highest standard of integrity. Our business partners therefore reject and take actions against any form of bribery, corruption, blackmail or embezzlement, active or passive, and ensure the compliance with all applicable national and international anti-corruption laws and regulations.

Data protection and information security

Our business partners commit to protect confidential information and use it exclusively as contractually agreed.

Advertising and competition

Our business partners agree to comply with applicable competition and antitrust law as well as respect all standards and requirements for fair advertising and competition.

Social commitment

It is important to us that our business partners take social responsibility very seriously. We therefore prefer the cooperation with business partners who commit themselves long-term and responsible to their social environment and are distinguished by their support for sporting and cultural activities.

Free choice of employment

Our business partners guarantee that no form of modern slavery, human trafficking, child or forced labor is used. Work must always be performed voluntarily. National regulations and international standards for the protection of minors must be complied with. Under no circumstances may employees be younger than 15 years old (or 14 years old if permitted by national law in accordance with ILO Convention 138).

No discrimination, harassment or abuse

Our business partners commit to the principle of equal opportunities and do not tolerate any form of discrimination, harassment, intimidation or other hostile or improper conduct in the workplace regardless of gender, gender identity, sexual identity, race, skin color, ethnic origin, citizenship, ethnicity, religion or belief, disability, age or marital status and other "irrelevant" characteristics. Our business partners undertake to foster a working environment that enables and values inclusion and diversity. The principle of equal pay for employees of all genders for work of equal value should be observed.

Freedom of association and collective bargaining negotiations

Our business partners must allow their employees to associate with others, establish or join any organisations of their choice (or refrain from joining them) and, according to applicable local laws, execute collective bargaining negotiations without interference, discrimination, sanctions or harassment.

Remuneration and working hours

Our business partners must comply with national laws on working hours, vacation days and remuneration. The statutory minimum wage or the minimum standard customary in the industry must at least be observed when remunerating the work performed. In countries or regions where there is no legal or collectively agreed wage framework, special care must be taken to ensure that the wages paid are sufficient for regular full-time employment to cover the basic needs of employees. Illegal or unauthorized wage deductions or wage deductions as a punitive measure are not permitted.

Occupational health and safety

The health, safety and well-being of employees are our top priority. Our business partners guarantee to provide and maintain a safe working environment and the integration of adequate health and safety management practices. This includes the provision of regular training courses for their employees in a language which is comprehensible to them. Employees must also have the right to refuse to perform unsafe work and to report unhealthy working conditions. Our business partners also assure to obtain all the necessary health and safety permits, comply with them and keep them up to date.

Environmental and climate protection

As a non-producing company Scout24 also stands up for environmental and climate protection, aiming to identify and reduce negative impacts on the environment. We expect the same commitment from our business partners. Our business partners are committed to follow the precautionary principle when dealing with environmental problems, to take initiative in order to promote a greater awareness of the environment as well as to speed up the development and distribution of environmentally-friendly technologies.

Compliance with the Code of Conduct

We are aware of and we read the Code of Conduct and base our actions on 'letter and spirit' of its provisions. We recognize that non-compliance with these principles, including any applicable rules (policies & procedures), may affect our individual performance evaluation and, in specific instances, result in disciplinary measures up to and including termination of the employment relationship.

If you see something, say something and: take responsibility!

We immediately inform our line managers, the Compliance Officer, or our external ombudsman ("Vertrauensanwalt") through our Compliance Hotline and our anonymous whistleblower system BKMS® (see 'Where to Get Help – Compliance Hotline') about potential violations of laws, rules, regulations, internal policies, or the Code of Conduct. Reports to the Compliance Hotline can remain anonymous, but should contain sufficient information to allow Scout24 an appropriate investigation into the subject matter.



Scout24 prohibits any form of sanctions directed at anyone who reports a potential violation in good faith or who contributes to an investigation, even if the suspicion of the misconduct eventually lacks sufficient proof to be clearly substantiated. This applies for the reporting of any potential violations of laws, regulations or policies, not only for those submitted through the Compliance Hotline.

**When in doubt:
Consult!**



Where to Get Help – Compliance Hotline

There are many means and ways to get help, and we use those that seem most appropriate under the circumstances. In some situations it may help to consult with someone, in other situations it may even be necessary. Typically, the line manager should be the first and usually also the appropriate contact person.

Additional contacts that can be addressed with requests for help or advice, or who can also be approached with questions in writing are listed in the 'Important Contacts' chapter at the very end of this Code of Conduct.

If the available means of internal communication seem impracticable in a specific situation, employees may also consult our external ombudsman ("Vertrauensanwalt") through our external Compliance-Hotline or our anonymous whistleblower system BKMS®.

Scout24 engaged an external lawyer as ombudsman, who as such is legally bound to confidentiality. Every submission will be:

- taken seriously,
- treated with strict confidentiality, and
- investigated.

If necessary, reports may be made anonymously.

Scout24 prohibits any form of sanctions directed at anyone who reports a potential violation in good faith or who contributes to an investigation, even if the suspicion of the misconduct eventually lacks sufficient proof to be clearly substantiated. This applies for the reporting of any potential violations of laws, regulations or policies, not only for those submitted through the Compliance Hotline.

The hotline can be reached by phone via +49 (0) 30 31 86 85 79, or by e-mail: compliance-scout24@fs-pp.de. Further information on our Compliance Hotline can be found on our Compliance team site in the Scout24Hub as well as at www.compliance-scout24.fs-pp.de.

Compliance Checklist



Our ethical behavior, that is to say our personal recognition of what is appropriate, what is right, and what is for the wider benefit of us all, should guide our response to the situations that arise in the course of our daily business. Our behavior must be clearly aligned with applicable laws and our Scout24-policies. At the same time, they should reflect wider ethical considerations, including our Scout24-values and commitments. The following checklist has been prepared to help you decide how you should respond - not only when you are faced with a difficult decision, but also in going about your daily business.

If you see something,
say something and:
take responsibility!

When making a decision or following an instruction, please ask yourself the following questions:

- Does my action or my behavior, or the behavior of a colleague, customer, or of one of our suppliers, as far as I can judge, comply with applicable laws?
- Is the decision or the instruction in accordance with the requirements of our Scout24-policies, the Code of Conduct, including our 'Leadership Behaviors'?
- Does my decision or the instruction reflect the right thing to do, is it being driven by responsible professional judgement, and would I not be embarrassed to explain my decision or the instruction if it were made public?

If the answer to any of these questions is 'no' or if you are not sure, you will need to get help. This includes situations where:

- You are uncertain about the interpretation of relevant laws or applicable policies – many of these can be complex.
- Potential actions, non-actions or decisions make you uncomfortable.

Our employees are requested to report any imminent threats resulting from potential or suspected violations of applicable laws or Scout24-policies, in consideration of the circumstances, to avoid damage to Scout24, our coworkers, customers, or our consumers.

Important Contacts

Compliance Officer:

Dr. Christian Ronge
General Counsel
+49 89 44456-1771
+49 151 43273715
Invalidenstraße 65, 10557 Berlin
christian.ronge@scout24.com

External Compliance Hotline:

Dr. Rainer Frank
Sophia Hoffmeister
Fachanwälte für Strafrecht
am Potsdamer Platz
+49 30 31 86 85-79
compliance-scout24@fs-pp.de

You can find the relevant contacts for the following topics on our Compliance team site in the Scout24Hub:

Risk Management & Compliance

Conflicts of interest, confidentiality, compliance with Scout24-policies & processes, anti-corruption and bribery, acceptance and granting of benefits, fraud and embezzlement (including travel expenses), theft and misappropriation, misuse of assets and whistleblower protection.

Data Protection

Data protection, data privacy, personal data, violations of competition or consumer rights regulations

Information Security / Employee Tech

Misuse and unauthorized access to data, electronic communication, and IT-security

Legal

Behavior during investigations, lawsuits or threatened lawsuits, contractual penalties, handling corporate data and business secrets, violations of duties regarding insider knowledge, accounting regulations & external financial reporting, capital market compliance including insider trading, directors' dealings, ad hoc publicity and insurances.

People

Work environment, occupational safety, occupational development, equal opportunities, respect, human rights, discrimination, mobbing & bossing

Facilities

Building security

Corporate Communications / PR

Crisis communication and public relations

Finance / Accounts Payable

Business entertainment & travel expenses (including taxes)

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