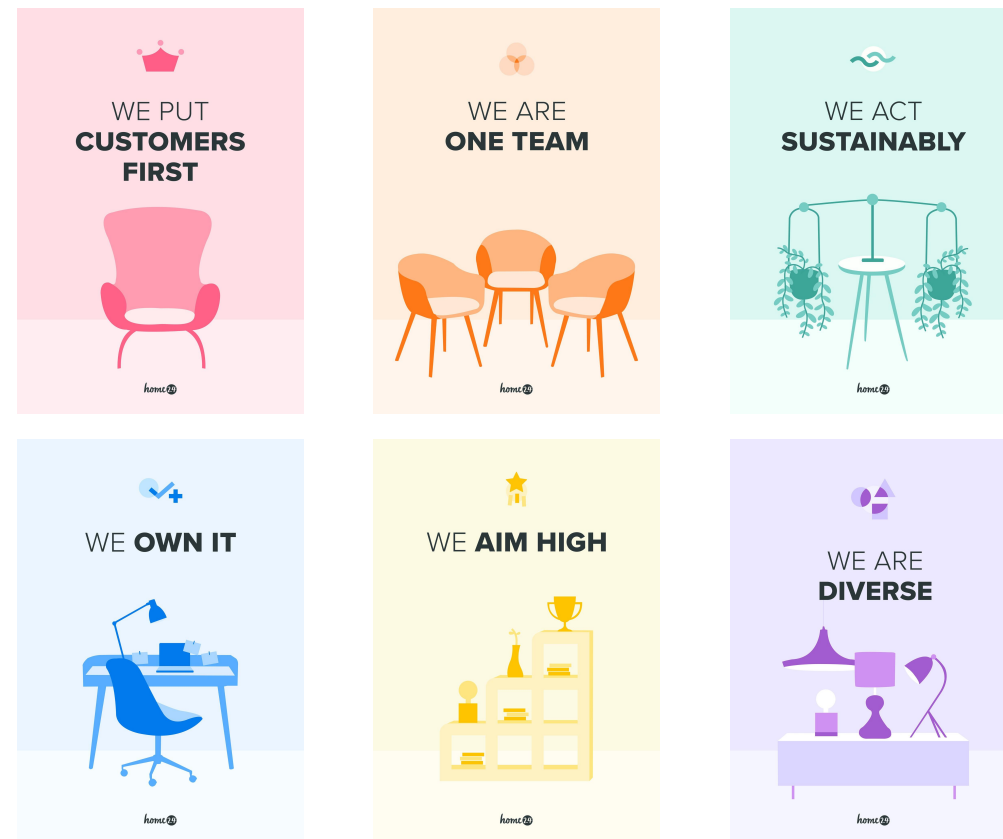


# Code of Conduct

## Dear Homies,

Together with our team and our business partners, we at home24 work every day to enable people to have a beautiful home. We encourage creative ideas and create a culture of trust where everyone has the opportunity to take responsibility. In everything we do, we work as a team and make sure that all Homies feel comfortable. We have defined our values together. All six values are equally important parts of the home24 DNA and describe what our company stands for. Living our values is very important to us. The management is personally committed to this.



In addition to our corporate values, honesty, integrity and respect are important cornerstones of our daily actions and form the basis for our long-term success as one of the leading e-commerce platforms for home & living. Only by acting with integrity, complying with the law and adhering to our ethical principles will home24 continue to be perceived as a strong and trustworthy company.

For the continued existence and business success of home24, it is not only the success itself that is important, but also the way in which this success is achieved. Our business success must never take precedence over law and order, morality and integrity. This Code of Conduct provides the necessary guidance to follow this principle and our corporate values. Violations of this Code harm our company and all those who work for home24 with dedication, passion and enjoyment. We therefore expect all Homies to strictly comply with the requirements of this Code. We expect our managers to model lawful behaviour and integrity and to ensure that that all Homies are aware of and understand the Code of Conduct and the behavioural requirements it describes. If violations of this Code become should be reported to the Governance, Risk and Compliance (GRC) team or via the [Whistleblower Hotline](#). Contacts Information can be found in Section 3 of this Code.

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





# WE PUT CUSTOMERS FIRST

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

We provide products and services that create great experiences and make our customers feel at home. We tailor our work to and constantly strive to find the best solutions for our customers. We are data-driven and listen to our customers to learn from their stories. We use their input to deliver the 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 depends on the security and reliability of our products. To ensure the safety of our products, we are subject to a wide range of legal requirements relating to the design, manufacture, approval and sale of our products. The Quality Management Department ensures that all legal requirements are met. To ensure product safety, we maintain process documentation in accordance with our high standards and continually develop the standards set.

Identified problems must be reported immediately to the relevant departments and people in the organisation. In case of questions, Homies can contact Commercial 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 united by trust, respect and support for one another. We create a collaborative working environment that thrives on a culture of open feedback, mutual respect and fun. We excel at valuing and supporting each other and always trying to do our best - together. As Homies, we can count 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. To make the best 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 dialogue between managers and Homies is expected and encouraged at home24. We therefore encourage a culture of feedback in all directions.

We strive for long-term cooperation with all stakeholders (Homies, suppliers, customers, etc.). We therefore focus on win-win solutions to promote 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) has agreed on 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<sup>[1]</sup>. 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 environmental impact of our actions. We respect and protect resources - every day and in everything we do. We look for opportunities to give back. We don't base our actions on short-term success, but on creating sustainable solutions that have a positive impact on the environment and people's lives. We therefore expect our Homies to treat resources with respect and, through their work, to help us fulfil our responsibility to operate in a socially responsible manner.

Our commitment to sustainability extends to our upstream supply chain. We carefully select our business partners and ensure that they meet our internal quality and sustainability standards. All Homies can and should contribute to home24's social, environmental and economic responsibility.

If you have any questions or ideas about sustainability @home24, please feel free to contact us by email: [sustainability@home24.de](mailto:sustainability@home24.de).

[1] Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs. (Definition of the World Commission on Environment and Development of the United Nations (UN))



# WE OWN IT

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

We take responsibility and hold each other accountable. We set our goals together and clearly define our responsibilities. We believe in the strengths of our Homies and support each other to achieve the best possible results. We look beyond our individual tasks to keep the goals of home24 in mind. We celebrate our successes, learn from our mistakes and develop new solutions.

That is why we expect all our Homies to contribute their ideas. Suggestions, concerns and feedback are always welcome. In this way, our Homies take responsibility for their work so that we can make sound decisions and grow 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 abreast of legal requirements and changes. Compliance training helps our Homies to understand the most important legal boundaries. If you have any questions or doubts, you can contact the GRC department ([GRC@home24.de](mailto:GRC@home24.de)).

home24 does not tolerate violations of the law, as these weaken the trust of our stakeholders and can lead to significant fines, civil claims, reputational damage or criminal prosecution. Some of the 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 requirements described below. That's why home24 expects all Homies to work prudently to avoid breaking 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 [Group Policy Anti-Corruption](#), which, among other things, defines in detail how to deal with corruption issues (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 ([whistleblower@home24.de](mailto:whistleblower@home24.de) or anonymously via the [whistleblower questionnaire](#)).

## **Conflicts of interest**

A conflict of interest within the meaning of this CoC exists when the private interests of Homies conflict 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 [Group Policy Anti-Corruption](#).

In case of conflicts of interest that cannot be avoided, we expect you to report the situation to your manager or via our [Conflict of Interest Disclosure Form](#).



# 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 [antidiscrimination@home24.de](mailto:antidiscrimination@home24.de) or report the incident anonymously via our [whistleblower questionnaire](#).

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: [whistleblower@home24.de](mailto:whistleblower@home24.de)
- Phone: +4930 201634-779
- Online questionnaire (ENG): [Whistleblower Questionnaire](#) (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.

## IMPRESSUM

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

Version	Preparer:	Updated on:	Published on:	Changes:
3.0	Cagla Cirak	10.04.2022	10.04.2022	Update of the CoC due to the adjustment of the company values - comprehensive change.
3.1	Cagla Cirak	31.03.2023	31.03.2023	Annual update