

Scout24 SE

Policy statement on respect for human rights

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Scout24 is a **leading German digital company**. With **ImmoScout24**, the digital marketplace for residential and commercial property, we have been **successfully** bringing **together owners, agents, tenants and buyers for more than 25 years**. With over **19 million users per month** on the website and in the app, ImmoScout24 is the market leader for digital property marketing and search in Germany. ImmoScout24 is continuously developing new products and building a **networked ecosystem** for renting, buying and commercial properties in Germany and Austria to increasingly digitalise real estate transactions. Scout24 is a European stock corporation and a member of the MDAX and DAX 50 ESG. The Scout24 Group has a total of more than **1,000 employees**.

In this policy statement, we express our commitment to respecting human rights and environmental obligations within the value chain. This declaration sets the Scout24 Group's human rights strategy, which reflects our obligations under the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz - LkSG). Due to their size, individual subsidiaries are not obliged under the LkSG to issue their own policy statements. We are aware that the processes for complying with our human rights and environmental due diligence obligations are an ongoing task. We therefore regularly review this policy statement and will update it if necessary.

This Declaration of Principles on Respect for Human Rights of Scout24 SE was adopted by the Management Board on 23 December 2024.

Tobias Hartmann
Chief Executive Officer

Ralf Weitz
Chief Product & Technology Officer

Dr Dirk Schmelzer
Chief Financial Officer

Dr Gesa Crockford
Chief Commercial Officer

Our commitment to respect for human rights

We are aware of our corporate responsibility and are committed to minimising negative impacts on human rights and the environment along our entire value chain. To prevent or minimise human rights violations along the entire supply chain. Our understanding and our human rights due diligence processes are based in particular on the following international reference instruments, to which we are committed:

- Universal Declaration of Human Rights and Guiding Principles on Business Human Rights of the United Nations.
- The core labour standards of the International Labour Organization (ILO) with their four basic principles on freedom of association and the right to collective bargaining, the elimination of forced and child labour and the prohibition of discrimination in respect of employment and occupation.
- The Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD).
- The [United Nations Sustainable Development Goals \(SDGs\)](#).
- [The ten principles of the UN Global Compact](#).
- The [UN Women's Empowerment Principles](#).

Our expectations of employees and business partners

We expect all our employees and business partners, suppliers and service providers to comply with the principles of our [Code of Conduct](#). It represents a binding framework for everyone and is therefore both a requirement and a guideline.

In implementing our legal obligations under the LkSG, we expect our employees to contribute to the best possible fulfilment of our human rights and environmental due diligence obligations through their daily decisions.

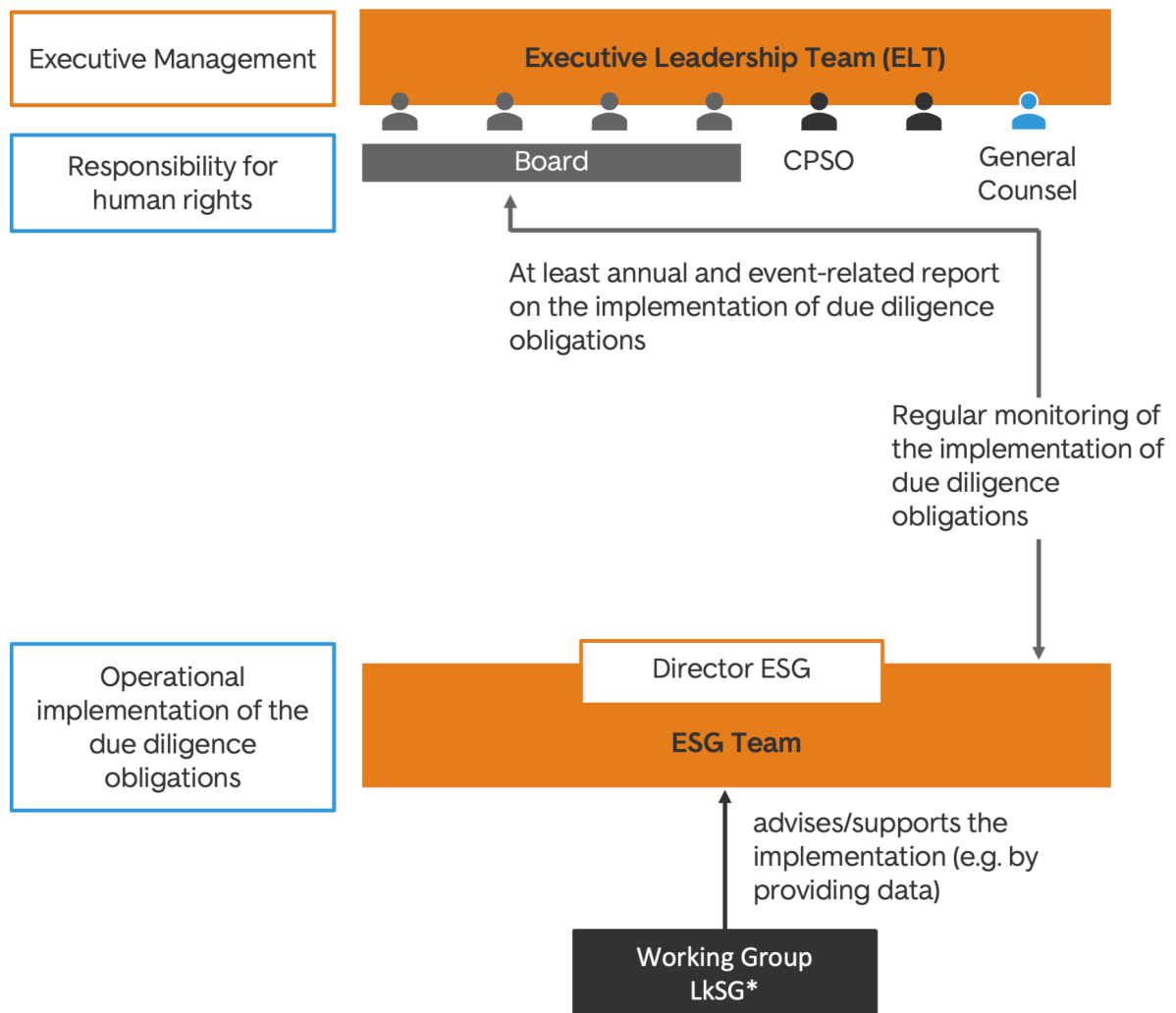
We not only place high demands on ourselves, but also our business partners, suppliers and service providers to comply with social and ecological standards in equal measure. The behavioural principles of our Code of Conduct are therefore part of the respective contractual agreements.

Measures to implement our duties of care according to LkSG

In order to effectively fulfil our human rights and environmental due diligence obligations, we have established an appropriate and effective risk management system in accordance with the LkSG. We see the handling of human rights and environmental risks as a process that we are gradually anchoring in our operational structures and improving where necessary.

Governance

Responsibility for safeguarding human and environmental rights in its own business area and along the supply chain, and thus for the effective implementation of the LkSG in the Scout24 Group, lies with the Board - supported by an operational governance structure.



*Members: Procurement, Risk Management, Legal/Compliance, ESG, People Team, Sales

Risk management

At the heart of our risk management is a systematic and targeted risk analysis in which we identify and assess the potential and, where applicable, actual risks of our business activities for people and the environment. As part of our risk analysis, we consider the following risk areas, both for our own business division and for our direct suppliers:

- Violation of the ban on **child labour**.
- Violation of the ban on **forced labour** and all forms of **slavery**.
- Disregard for **occupational health** and **safety** and **work-related health hazards**.
- Disregard for **freedom of association, freedom of unionisation and the right to collective action**.
- Violation of the prohibition of **unequal treatment** in employment.
- Violation of the prohibition of withholding an **appropriate wage**.
- Destruction of the natural basis of life through **environmental pollution**.
- Unlawful violation of **land rights**.
- Violation of the prohibition on hiring or using private/public **security forces** if human rights are impaired by them due to a lack of instruction or control.
- Prohibited production and use of substances within the scope of the Stockholm Convention on Persistent Organic Pollutants (**POPs**) and non-environmentally sound handling of waste containing POPs.
- Prohibited import/export of **hazardous waste** within the meaning of the Basel Convention.

The risk analysis is carried out at regular intervals, but at least once a year, as well as whenever there are significant changes in the supply chain, e.g. due to new business partners, locations or products.

It is software-based, has a two-stage structure and begins with an abstract risk analysis regarding the aforementioned risk areas. When determining an abstract risk value (so-called gross risk), we consider our entire supply chain as well as our own business division, utilising country and industry-specific risk profiles in particular, as well as a media screening.

Particularly when our abstract risk analysis identifies increased risks, we then take a closer look at the suppliers concerned, which is known as a concrete risk analysis. Questionnaires are one of the tools we use for this. The aim of this risk analysis is to precisely identify potential or actual risks of violations of human and environmental rights in our own business area and within our supply chain.

Our risk analysis carried out in 2024 did not identify any significant risks for our own business division. In our direct supply chain, low potential risks were identified in the areas of forced and child labour, unsafe working conditions, lack of occupational health and safety, discrimination, environmental damage and illegal resource extraction caused by suppliers and service providers from the transport & logistics and furniture manufacturing sectors. On the topics mentioned, our Code of Conduct, which were confirmed at the beginning of the collaboration. We have therefore contacted the suppliers concerned and asked them for a statement.

Preventive and remedial measures

We use the knowledge gained from the regular and event-related risk analyses to support strategic decisions for the business or the implementation of suitable preventive and remedial measures.

The aim of our **prevention measures** is to prevent any violation of a human rights or environmental obligation by minimising the risks caused by our business activities or to which we contribute. We have taken the following preventive measures to date:

- Publication of this policy statement and anchoring in the company.
- Definition of clear responsibilities and a governance structure for our human rights and environmental due diligence obligations in accordance with the LkSG.
- Further development of our Code of Conduct (CoC) for employees and business partners, suppliers and service providers, particularly considering the requirements of the LkSG.
- Risk-based training and sensitisation of selected employees through regular exchange formats and training on topics relevant to the LkSG.
- Exchange and involvement in industry initiatives.

If a violation of human rights or environmental obligations is identified, we take appropriate **remedial action** without delay. These are aimed at preventing or ending violations or minimising the extent of the violation.

In the concrete implementation of preventive and remedial measures, we value a cooperative approach and dialogue with our business partners. However, we reserve the right to terminate a contract or an entire business relationship as a last resort, particularly in the event of serious violations.

Complaints mechanism

In accordance with the German Supply Chain Due Diligence Act (LkSG), Scout24 has set up a complaints procedure. Complaints and indications of human rights and environmental risks as well as violations of Scout24's due diligence obligations can be reported there – regardless of whether they concern the supply chain or the company's own business area.

The [rules of procedure](#) provide information on the main features of the complaints procedure, access to the procedure and how to reach it, as well as responsibilities, and how incoming reports and complaints are processed. Our whistleblowing system provides a way the whistleblower to communicate with Scout24 confidentially and, if necessary, anonymously. We review the effectiveness of our complaints procedure once a year and on an ad hoc basis. once a year and on an ad hoc basis.

No reports of possible violations of human rights or environmental due diligence obligations were received via the complaints mechanism in 2024.

Reporting and documentation

From the 2024 financial year, we will report annually to the Federal Office of Economics and Export Control (BAFA) on the fulfilment of our human rights and environmental due diligence obligations. This includes the results of the risk analyses, the preventive measures taken and the progress made. We submit and publish the report on our [website](#) in accordance with legal requirements.

