



CODE OF CONDUCT

**Europace**

We all bear responsibility

# **Code of Conduct of Europace AG**

## **We all bear responsibility**

- What is right? What is necessary? How to avoid damage? How do I make the right decision? Responsibility is a great motivator. It can be a burden, but it is also an obligation to ourselves and to the community, society and the company to make sure that everything goes as well as possible. That we do what is necessary and right.

Responsibility becomes visible on many levels. The company bears responsibility for the people in it, for the shareholders and stakeholders, and for society. As entrepreneurs with an eye on the company, we make a contribution to this. People in the company even more so.

This Code of Conduct is intended to provide guidance. For us as entrepreneurs, but above all for everyone in the company. This document is the supplement to the legal obligations that apply to Europace. Concerning the moral obligations, the ethics and values that apply to Europace. It is the guiding principle for our actions. As people in the company. We can all take responsibility. Contribute to doing what is right, to defining what is right. We can act on our own. How? This is what this Code of Conduct describes.

Three perspectives are important to us as entrepreneurs. The Ecological Perspective for our contribution to a more sustainable future. The Economic Perspective that enables us to make these contributions, that secures our existence, that gives us the opportunity to grow, to be there for talented people, to pay fairly and that lets us be fair and humane despite all the demands to not only perform well, but perform extremely well. And the Social Perspective. Which integrates the latter. This allows us as a company to look after families, to integrate children into our everyday working life, to be mindful of the demand to perform well in the face of private worries and needs, and to ensure that we can protect ourselves from the adversities of everyday life, the challenges in life and all that we need in order to properly integrate our lives and work.

## **Imprint**

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## 1. The Ecological Perspective

- Europace is a technology company and contributes to the Hypoport network. Our technology is not directly linked to improving our climate or our habitat and yet we can do something and are doing something. We as employees in the company make decisions, influence results and choose our behaviour. We would like Europace to be guided by the following guidelines:

### **Environmental protection concerns all of us**

We are open to ideas. We support with our time and resources and engage in dialog. At every level, in all roles. To act when we become aware of something. Being transparent when we want to make a change. We move forward on these tensions for a more sustainable world.

### **Sustainable instead of cheap**

Many of us make purchasing decisions. Do we use sustainable products? Do we rely on sustainable providers? Do we avoid waste? Do we strive for a balance? And how long do we use our hardware? That is in our own hands. Every single one. Anyone who is faced with a decision.

**Saving instead of wasting**

We are at home in a modern building. DGNB - certified in the Gold category. Our water treatment is energy-saving. We centralise waste separation, have the first e-charging stations, and use sustainable products wherever possible.

**Remote instead of on site**

What was possible before Corona is the new normal. We do not plan a business trip for every appointment. If we can and we want to, we work remotely. We prefer to take the train instead of flying and offset the CO2 emissions of our company vehicles right from the start. It is in our hands. With our decisions and our own weighing of interests.

## 2. The Economic Perspective

- We want people in our society to be able to make their own financial decisions and for financing to be a natural part of every life plan. And for that, we are creating the most advanced technology for the best financing of the 21st century. That makes us successful. This gives us the opportunity to do three things:
- We invest in people. We continue to pay fairly and justly.  
Do not have a gender pay gap. Investing in talent and talent programmes.
  - We invest in innovation and our platform. We are continuously expanding our infrastructure, investing in new products, making financing smarter and offering consumers a modern financing experience. Wir investieren bei Hypoport in ein Ökosystem intelligenter Produkte in den
  - We invest in Hypoport. In an ecosystem of intelligent products in the areas of insurance, home ownership and financing and make our contribution to this.

- Each and every one of us can make a contribution. By deciding, performing and sharing. In doing so, we integrate the following perspectives:

#### **A secure infrastructure**

We create secure, stable products, are familiar with our IT security policies and integrate the highest standards into our product development and software solutions.

#### **Responsible data protection**

We only process personal data if we need the information to perform a work task. We all share responsibility for protecting the information of our partners and their customers. Our guidelines are not only anchored in law, but also in Europace AG's data protection management system. This also applies to our own data. We treat these data just as confidentially as those of our partners.



### **Protection of intellectual property**

In addition to Europace trade secrets, we also treat information from partners confidentially. In order to act in accordance with the guidelines and rules, we have laid down everything that needs to be observed in our Inner Source Principles and in the Open Source Policy.



### **Insider trading**

As a listed company, our parent company Hypoport SE is subject to capital markets law. Since we communicate transparently and confidentially at Europace - and share non-public information internally when it is necessary to accomplish tasks - we rely on the Group-wide Insider Trading Prevention Policy.

### **Fair competition**

We promote and demand fair competition. We stand up for this, oppose unfair methods and enable a free market with fair conditions on our platform.



### **3. Code of Conduct at Europace events**

- To expand and stabilize our network, we use events, community meetings, all forms of exchange opportunities, meetings, presentations, speaker contributions and much more. These interactions are always professional in the context of work with our stakeholders and intended to promote networking and collaboration, as well as knowledge building.

We strongly believe in the value and importance of an environment where all members of the Europace community feel welcome and safe.

The Code of Conduct outlines the behavior we expect from members of the Europace community who interact at our Europace events.

- Europace positions itself to provide a positive and harassment-free event experience for all participants regardless of age, gender, gender identity and expression, sexual orientation, disability, personal appearance, body size, ethnicity, color, religion, nationality or experience level.

### **3. Code of Conduct at Europace events**

#### **■ Conduct of participants (both externally and internally)**

- Conduct themselves in a manner that facilitates a safe and supportive environment for all. We consider an open and approachable attitude, use of welcoming and inclusive language, and acceptance of constructive criticism to be part of this.
- You do not engage in disruptive speech, derogatory comments, personal or political attacks, or otherwise interfere with the participation of others.
- You will not interfere with the operation of Europace events.
- Intentional intimidation, stalking, persecution, or harassing photography and recording is not permitted.
- You will not engage in any form of harassing, offensive, discriminatory or threatening language or conduct, including but not limited to ethnicity, marital status, age, sexual orientation or other protected categories.

#### **Scope**

We expect all members of the Europace community (participants, vendors, sponsors, speakers, volunteers, presenters, Europace staff, and other attendees) to abide by the principles of this Code of Conduct. The Code of Conduct applies to all Europace conferences, including side events or other gatherings, both internal and external.

### **3. Code of Conduct at Europace events**

#### **■ Consequences**

If we believe someone has violated this Code of Conduct, we may prohibit the participant from attending future Europace events and ask the participant to leave the event.

All decisions are made at our discretion. If we deem it appropriate, we will involve law enforcement.

#### **Contact Us**

You have been harassed or notice that someone else has been harassed, please contact us by email at [konferenz@europace.de](mailto:konferenz@europace.de). Feel free to speak to Europace employees on site at or after the incident.

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### **3. Our responsibility for others**

■ We treat everyone equally. We are all the same. As equal as we are diverse and different. And we are committed to it. Every person - regardless of gender, sexuality, age, origin, world view, or disability - deserves the same respectful treatment. We do not tolerate harassment, discrimination or bullying. This applies to the working environment, when dealing with customers, at events and as a private person in public spaces.

Diversity is important to us and helps us to discover different positions, arguments, ideas, and opinions. Diversity promotes the exchange of ideas and dialogue and creates important stimuli for our further development.

We support activities that serve the good of the community. And we believe that when we help other people, we get a better sense of possible solutions and sharpen our focus.

■ And we expect a culture where people can speak up: We speak openly when conflicts arise or sensitive issues are involved. We are transparent, mindful and respectful of our own and others' views. We like to learn from mistakes, and as people in the organisation we gratefully accept tips.

If you would like to learn more about equal treatment, anti-discrimination and diversity at Europace, take a look at our Guidelines on the Implementation of the AGG.

■ More than words:

Europace's Code of Conduct is not a file that you skim once and then put in a subfolder. We want to harmonise the ecological, economic and social aspects. We also want to ensure compliance. We want everyone to be able to have their share.

And it doesn't matter which position, which hierarchical level, which responsibility someone holds. In the event of violations of legal regulations, guidelines or this Code of Conduct, we want to and must take action. And we review our actions. As part of our internal audit and compliance management system. And with our whistleblower system, it is possible for anyone to express themselves anonymously at any time.

- The Code of Conduct is what guides us as people in the company. Not guidelines for the company. We all bear this responsibility. In our decisions and even when we make no decision at all.

All in order to achieve something together. In the diversity that we are. In the differences that we have.

Be a part of it.

## Über Europace

- Europace, Deutschlands größte Transaktionsplattform für Immobilienfinanzierungen, Bausparprodukte und Ratenkredite vernetzt rund 800 Partnerunternehmen aus den Bereichen Banken, Versicherungen und Finanzvertriebe. Mehrere tausend Nutzer:innen wickeln monatlich über 35.000 Transaktionen mit einem Volumen von über 8 Milliarden Euro über den Markt ab. In der größten Produktgruppe der Immobilienfinanzierungen wurden mit rund 85 Milliarden Euro in 2021 über 20 Prozent aller Immobilienfinanzierungen für Privatkund:innen umgesetzt. In enger Zusammenarbeit mit Vertrieben und Produkthanbietern entwickelt Europace nutzerorientierte Finanzierungslösungen, optimal auf die Bedürfnisse der Verbraucher:innen abgestimmt – für ein Finanzieren mit Leichtigkeit. Die Europace AG ist eine hundertprozentige Tochtergesellschaft der Hypoport SE, die an der Deutschen Börse im Prime Standard gelistet ist. Im September 2021 wurde Hypoport in den MDAX aufgenommen. Europace ist mit dem TÜV Datenschutzgutachten zertifiziert.
- Seit 2018 organisiert sich die Europace AG vollständig holakratisch.

### CODE OF CONDUCT DER EUROPACE AG

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