

Aareal Bank Group

Aareal Bank AG, headquartered in Wiesbaden, Germany, offers financing, banking and payment solutions for the property sector and related industries, and is represented on three continents - in Europe, North America and Asia. Aareal Bank comprises the two business segments 'Structured Property Financing' (SPF) and 'Banking & Digital Solutions' (BDS), including the subsidiaries and associated companies allocated to these segments.

As a Group operating in the United Kingdom, we are required to report in detail on the measures that we take to prevent and suppress any forms of modern slavery in our own area of influence. Aareal Bank Group takes the requirements of the UK 'Modern Slavery Act 2015', and its mission of preventing potential forms of modern forced labour and human trafficking in its supply chain, very seriously. Our Group-wide sense of who we are and our fundamental commitment as a corporate citizen are consistent with this goal.

Sustainable management and respecting human rights

We consider respect for human rights to be an inalienable part of our responsibility as a global enterprise with sustainable management practices. This is why we have undertaken not only to strictly comply with all applicable legal requirements but also to uphold human rights within our sphere of influence.

Risk potential and precautions taken

Our business model and our Group-wide business practices help to ensure that the potential risk of Aareal Bank AG being involved in forced labour, human trafficking, child labour or any similar activities that abuse basic human rights can be considered to be relatively small. In order to further reduce this already low risk potential, we have taken a series of precautions:

- **Public commitment to the protection of international human rights**

As a signatory of the United Nations Global Compact, we have made a public commitment to respect and uphold human rights.

- **Code of Conduct with binding requirements for employees**

The Code of Conduct is an integral part of Aareal Bank Group's responsible corporate governance.

It contains binding rules requiring all employees, regardless of their role and work responsibility, to act in a lawful and ethical manner towards clients, business partners and co-workers. The Code of Conduct is based on international Agreements and guidelines such as the Universal Declaration of Human Rights, the conventions drawn up by the International Labour Organization (ILO), and the UN Global Compact.

- **Policy statement on human rights and environmental protection adopted by the Management Board**

Against the backdrop of the German Supply Chain Due Diligence Act ("LkSG"), we have published a policy statement on human rights and environmental protection that describes our human rights strategy. In order to recognise potential human rights and environmental risks in our supply chain, indices such as the Global Slavery Index are also included as a risk factor to be considered as part of the annual LkSG risk analysis.

- **Mandatory compliance training for all employees**

As part of their induction, newly recruited employees attend a training course on the Company's compliance and fraud prevention requirements and the potential consequences of breaching the rules. In addition, they are required to complete training programmes, for example on compliance and criminal acts. If any dubious circumstances –

including abuses of human rights – become known, employees are able to report these via an anonymous whistle-blower channel.

- **Comprehensive review processes prior to establishing a new business relationship**

We use standardised “know your customer” and “know your customer’s business” procedures to gather information on our clients and, where appropriate, other economic beneficiaries, their ownership and control structure, their business models and the source of their equity capital etc. This enables us to evaluate the level of risk associated with the business relationship and define the scope of the due diligence required.

- **Code of Conduct for Suppliers and Business Partners**

The Code of Conduct for suppliers ensures that our high standards are also observed in our immediate supply chain. We perform regular audits/assessments of our suppliers to avert potential risks arising from a failure to observe social or environmental standards.

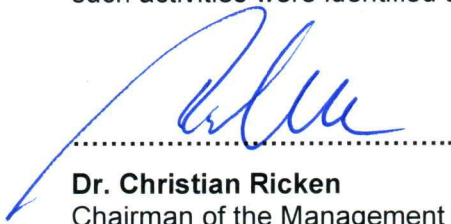
New suppliers and service providers with an order volume in excess of € 100,000 are checked using commercial credit agency reports. Primary suppliers are examined regularly using a supplier evaluation system that assesses their reliability and compliance with the terms and conditions of their contracts, among other things.

- **Transparent reporting on human rights issues**

In Aareal Bank AG's summarised sustainability statement, which is part of the 2024 Annual Report, we report on Aareal Bank's commitments and concepts for protecting and respecting human rights (ESRS S1-1) under the aspect of ‘Respect for Human Rights’. An external assessment of our measures to respect human rights is also carried out by rating companies, e.g. ISS-ESG, which include controversies in the area of human rights in their assessment.

Results of the review for the 2024 financial year

No instances of forced labour, human trafficking or any involvement in or encouragement of such activities were identified anywhere in the Group.



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Dr. Christian Ricken
Chairman of the Management Board