

Code of Conduct

For Values, Trust and Integrity

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1. Note from the CEO

Dear Scouties,

The ethical behaviour of our employees is of vital importance to Scout24. It not only upholds our excellent reputation for integrity but also creates a strong foundation as a well-respected, passionate and progressive company.

By remaining ethical and therefore credible, our ever-evolving range of high-quality customer-centric products and services will continue to be in high demand, and the organisation will continue to thrive.

However, we also recognise that the evolution and diversification of our corporate group and its ever more complex and changing environment may raise questions regarding what is considered appropriate and ethically correct conduct.

This development has led us to create this Code of Conduct as a guide to help define what we at Scout24 mean by ethical behaviour.

We would, therefore, like you to take a few moments to read and take on board the principles contained in this guide. These have been developed to help promote the correct and proper conduct required so you can behave ethically and honestly at all times in your daily work in accordance with our core values.

This Code of Conduct is binding for every Scout24 employee, regardless of role, duties or location. It applies to business matters as well as in the interaction with other employees, third parties, the public, the official authorities, government agencies and institutions.

We feel that if this is followed in accordance with its underlying intent as well as faithfully to the letter, it will allow us to maintain our excellent reputation as a market leader passionate about what we do. It will also help us to remain seen as transparent and fair as an online marketplace and end-to-end service provider which is worthy of trust and commitment.

If you have any questions concerning this document or require clarification on any of the points raised, please contact your manager or the Human Resources Department.

Thank you for your ongoing support and co-operation.

Gilles Despas
CEO Scout24

2. Introductory Note

2.1 Scout24's Commitment

Scout24 Schweiz AG (Scout24) is committed to applying high ethical standards in all our tasks and activities with respect to our staff, customers, business partners and competitors.

Ethical behaviour is a cornerstone of Scout24, and exemplary standards are expected of all employees at all times regardless of location, role or working environment.

2.2 Compliance With Laws and Other Regulations

All employees are expected to comply with the laws and internal and external regulations of their particular jurisdiction in the performance of their work.

If you are unsure of whether a specific action or omission may violate any laws or regulations, you should contact your manager, Human Resources Department or, if deemed necessary, the company's Legal Department.

2.3 Who The Code of Conduct Applies To

This Code of Conduct applies to all employees of Scout24 Group, who as company employees are under obligation to adhere to the principles, rules and guidelines contained in this document. Employees of Scout24 are at all times bound to uphold the ethical behaviour that is the basis of this Code of Conduct, and must be mindful that their behaviour outside of work or on social media may reflect back to their employer or co-workers.

2.4 How To Use The Code of Conduct

This Code of Conduct serves as a guideline for Scout24 employees regardless of location, role or working environment in all their professional activities, business transactions and interactions.

The Code of Conduct is intended to provide guidance and aid for working with customers, suppliers and partners but also internally in our daily work with fellow staff, superiors and subordinates. The Code of Conduct does not regulate every conceivable situation or circumstance and should therefore be applied with common sense and good judgement on a case by case basis and take into account the laws, regulations and customs of the jurisdictions in which Scout24 employees are active.

3. Commitment to Integrity

We are committed to acting with integrity in all our dealings. Acting with integrity does not only prevent improper benefits but means we act in accordance with professional standards as well as applying fairness and sound judgement.

3.1 Conflict of Interest

We always try to conscientiously carry out our duties with respect to Scout24. We avoid any situation in which there could be even the slightest possibility of a conflict between our interests or those of a relative (or any other acquaintance) and the interests of Scout24.

Employees shall always be loyal to their employer.

No employee shall:

- use their position or resources at Scout24 to gain improper benefits personally or for a relative or acquaintance;

In the event of a potential conflict of interest, every employee must:

- immediately discuss the potential conflict situation with their manager or another person within Scout24 who is qualified to handle such cases;
- take all necessary precautions to resolve or avoid a conflict of interest in the first place.

Definition of Conflict of Interest

A conflict of interest arises when an employee's personal interests are inconsistent with those of Scout24 or when an employee uses their position within Scout24 for personal gain and puts their personal interests ahead of their responsibilities to Scout24.

Here are some examples of situations to be aware of where a conflict of interest between an employee and Scout24 might potentially arise. In any of these scenarios, it is important to apply common sense and extra special care that all company rules and guidelines are correctly observed:

- Second jobs/part-time jobs
- Running your own business
- Intellectual property, e.g. inventions, patents and copyrights
- Inappropriate customer and vendor agreements
- Co-worker romantic relationships
- Romantic relationships or close friendships with individuals working in competing organisations
- Entrepreneurial opportunities both in and out of work
- Gifts and entertainment invitations
- Improper use of free allocation for listings on S24 platforms

3.2 Fairness towards third parties

We will always endeavour to treat third parties, such as clients, suppliers, consultants and competitors, with fairness and integrity. We avoid making false, misleading or deprecatory statements about third parties and are fair in our interactions with all our business partners.

No employee shall:

- publicly discredit, denigrate or disparage third parties;
- make false, misleading or unsubstantiated statements about competitors, their products or services;
- treat third parties unfairly, disrespectfully or in a derogatory manner.

Every employee must:

- ensure all comparisons to competitors and their products and services are always substantiated, accurate and not misleading;
- obtain prior advice from the Legal Department on all agreements or arrangements with customers that appear to reduce competition.
- make sure that Scout24's suppliers observe all applicable legal provisions in the country of manufacture or sale.
- make every attempt to prevent unfair behaviour of Scout24 employees to third parties, such as clients, contractors, suppliers and competitors.

Definition of fairness

Fair, respectful and non-discriminatory behaviour is an absolute requirement in all our internal relationships and our negotiations and general interactions with external third parties. Our treatment of third parties, such as clients, suppliers, contractors and competitors, has a significant effect on the external image and reputation of Scout24 and impacts the way Scout24 and its employees are viewed and treated by such third parties.

3.3 Anti-Discrimination

We treat ALL employees fairly and without discrimination. Discrimination means any verbal, physical, visual or other behaviour, which is harassing, demeaning, unjust, prejudicial or offensive to other employees or other persons. In most countries, discriminatory behaviour is punishable by civil and/or penal law.

No employee shall:

- discriminate against other employees or other persons based on age, nationality, religion, origin and ethnic background, disability, marital status, place of birth, pregnancy, race or colour, previous convictions, gender or sexual orientation;
- intimidate or bully employees or other persons verbally, physically, visually or in any other way;
- sexually harass or make derogatory comments based on the gender or sexual orientation of another person;
- deliberately spread false information or malicious rumours about other employees or any other persons.

Every employee must:

- treat all other employees or any other persons respectfully, regardless of their rank, sex, gender orientation, age, religion or origin;
- communicate with their manager (or Human Resources representative or the 'Speak Up' service) if they feel they have been discriminated against by another employee.

3.4 Honesty and Trustworthiness

All employees will act honestly and with trust towards Scout24, and take obsessive care when it comes to safely protecting the interests of Scout24 including all confidential, classified or sensitive information.

No employee shall:

- exaggerate expenses on expense forms or incur unnecessary or inappropriate expenses in the performance of their duties;
- make fictitious transactions (e.g. pay invoices without adequate return service or craft fictitious contracts);
- state financial results deliberately in an inadequate way;
- use Scout24 data, including information on Scout24's business partners or intermediaries, for personal purposes or otherwise misuse such information;
- be dishonest to oneself, our co-workers, our users and partners, our shareholders or our subsidiaries.

Every employee must:

- handle financial matters pertaining to Scout24 honestly and with discretion and integrity;

3.5 Company Property

All property of Scout24 will be respected, used with care, and for its intended purposes.

All employees shall:

- respect the property, including furniture, furnishings, work equipment and tools as well as the buildings and other company-owned assets;
- use the work and resources made available exclusively for business or other approved purposes.

We will not tolerate any theft, fraud, abuse or intentional damage to company property.

3.6 Supporting and Helping Others

We are fully committed to supporting each other to help all individuals achieve the very best for their own development and for Scout24. To do this, it is important to create the right working environment and culture free of any bullying, intimidation or prejudice of any other unwelcome kind. We foster a working environment where employment is solely based on aptitude, ability and qualifications.

3.7 Bribery and Granting Advantages

Our relationships with external parties are based on merit, trust, our special know-how, and the high quality of our products and services. All employees should perform their business activities free of any unlawful activity or passive influence.

No employee shall:

- bribe or offer a bribe (this includes; a kickback, hush-money or pay-off) to a public official or any other individual with the intention to influence a decision or obtain an undue favour, sweetener or confidential information from them;
- grant advantages (payments, gifts or similar) to a public official or any other individual if such behaviour is unlawful or unethical and improper or could influence or give the appearance of influencing such individual's relationship with Scout24.

Definition of Bribery:

Bribery means offering or directly or indirectly granting benefits, such as gifts, loans, rewards, payments or other advantages to a person, regardless of whether the person is a public official or another person to cause such person to act dishonestly or unlawfully or commit a breach of confidence in connection with their work or position. Bribery of public officials and business partners is considered a criminal offence in most countries.

Definition of Granting Advantages:

Granting advantages means offering or granting benefits, such as gifts, rewards, payments or other advantages to a person in connection with such person's work or office, regardless of whether the person is a public official or another person. Granting advantages to public officials is in Switzerland absolutely forbidden and punishable by penal law.

Making small gifts (max CHF 200) to business partners is allowed, as and if it is usual and customary and provided that this is not prohibited by law or the other party's known business practices.

Employees shall:

- only accept invitations from existing and potential customers, suppliers, competitors or partners of Scout24 to business meals or entertainment events if participation serves the interests of Scout24 and does not violate any legal or ethical principles and is in relation to and in the extent of usual business practices.

Definition of Accepting Gifts, Advantages and Entertainment:

Accepting gifts, advantages and invitations (such as sporting, leisure or entertainment events) is the counterpart of active bribery and granting advantages described above. Invitations must be within the limits of customary business hospitality.

If gifts, advantages and invitations are made or offered to influence an employee and in return cause such employee to grant a favour or advantage in connection with their work, this is passive bribery and may be considered a criminal offence.

If gifts, advantages or invitations are made without expectation of a specific advantage in connection with the employee's work, they may be accepted, provided that the above conditions are met.

Every employee may accept gifts, advantages or invitations:

- if appropriate and customary in the jurisdiction where they work;
- if they are not of a personal nature but provide the potential for legitimate networking;
- if they can be regarded as promotional gifts and discounts or if such gifts and advantages are also customarily and lawfully offered to others having a similar relationship with the person or entity granting the advantage;
- participation in business meals and entertainment events shall be undertaken with the necessary caution, be in accordance with the business practices of the country concerned (max CHF 200 per person) and serve exclusively to initiate or improve business relationships.

No employee shall:

- accept or allow a relative or acquaintance to accept any gift or other advantage from a person if given or offered to obtain an advantage in connection with any work assigned by Scout24 or if it could give the appearance of influencing Scout24's business relationship.

3.8 Money Laundering

We comply with all the applicable legal, regulatory and internal anti-money laundering regulations. We will not tolerate any unlawful actions in respect of the receipt or concealment of origin of funds, and strictly adhere to the obligations of due diligence to combat money laundering.

Definition of money laundering:

Money laundering is the act of disguising the origin of money or other property derived from criminal activity.

3.9 Conduct towards Scout24 competitors

The most serious violations of the provisions of competition law include arrangements between competitors. Agreements or arrangements among competitors regarding prices, conditions of sale or production volumes and the division of markets are always unlawful. Employees of Scout24 shall not participate in such agreements or arrangements. Extreme caution is advised as to the practice of poaching.

4. Environment

We respect the environment and act in a way that is environmentally responsible. We pay attention to the conscious and careful handling of natural resources in order to strive to avoid any excessive ecological burden. We, at all times, take into account the most environmentally-friendly and sustainable option available to us.

5. Health & Safety

We protect and respect the personal health and safety of all our employees. We strictly observe all the relevant labour laws and regulations that are in force at any given time, and provide legally compliant employment contracts and safe working conditions. The opinions of our employees are important to us and always welcome at any time.

6. Mandates outside the Group and political and public offices

We are open to employees overseeing mandates with an association or a comparable organisation, as well as assuming political and public offices, taking into account the overall interests of the organisation. The details of the licensing and reporting requirements and the responsible licensing authorities for mandates, offices and secondary employment is in accordance with and regulated in a separate policy together with the organisational regulations.

7. Communications

It is of the utmost importance that employees and suppliers such as agents and representatives take special care to make sure that their communications and work information are at all times kept factually correct, fully accurate and appropriate.

Communications include, but are not limited to; email, video conferencing, social media platforms, apps, video-sharing as well as telephone calls and voice messages. It also covers all verbal conversations, as well as any written or printed material (including pictures, graphs and diagrams, etc.).

No employee shall:

- initiate any contact with media representatives or analysts. Any contact with media representatives or analysts must be coordinated and authorized by a member of Scout24 Corporate Communications.

Information concerning the company, its business activities, strategies or other matters may only be passed on internally or externally by employees authorized to do so.

Employees of Scout24 without the above authorization shall:

- direct any enquiries they receive from media representatives or analysts, regardless of how the enquiry was received, to a member of Scout24 Corporate Communications;
- not make any comment on behalf of Scout24 Corporate Communications.

8. Confidentiality

All internal operating documentation and information is the property of Scout24 and/or is deemed to be confidential information.

Employees of Scout24 shall not pass operating documentation and information to third parties or make it known outside the company or accessible to third parties in any other way.

Employees of Scout24 shall ensure through appropriate and reasonable measures that confidential or protected information does not come into the hands of unauthorized persons internally or externally.

The regulation relating to confidentiality, data protection, copyrights, patent rights and inventions are an integral part of all employment relationships of Scout24 (see separate "employment rules").

No employee shall:

- disclose confidential, classified or sensitive information regarding business partners, marketing, products, business concepts, strategies, mergers & acquisitions, etc. to unauthorised individuals or non-employees.

Definition of Confidentiality:

All information relating to Scout24, its business, products, marketing, strategy, business partners, etc. must be kept confidential and safely protected, even if not explicitly designated as confidential.

The misuse of confidential information may be a criminal act. The confidentiality obligation continues even after an employee has left Scout24 employment.

9. Compliance and Control

9.1 Employees' Responsibilities

It is the responsibility of every employee at Scout24 to adhere to the principles established in this Code of Conduct.

The head of the Legal Department at Scout24 is responsible for compliance coordination.

Employees shall report any violation of this Code of Conduct or other relevant facts under this Code via the appropriate channels to the relevant manager or the Legal Department. If an employee has good cause not to contact their manager, the employee may directly contact either a Human Resources representative or use the external 'Speak Up' service provided by Scout24 (see 9.3 below).

Should an employee ever feel they are being retaliated against in any shape or form, they should use the appropriate official channels available to them to put forward their concerns so they may be investigated accordingly.

9.2 Sanctions

Any contravention of these business principles can lead to an internal investigation. The type and extent of any sanctions applied following the investigation depend on the nature, context and gravity of the violation and, in particular, on the contractual and legal provisions of the employment relationship.

9.3 Reporting Violations / 'Speak Up Line'

If for whatever reason, an employee is unable (or unwilling) to approach their manager or the Human Resources department with a potential violation issue, then they also have an authorised external channel available to them. The 'Speak Up Line' allows employees with information on any perceived violations of the Code of Conduct to report them confidentially and, if necessary, anonymously.

The 'Speak Up Line' is operated by an independent company and is available 24 hours a day, 7 days a week and 365 days a year.

There are two options for employees to use this last recourse option:

- Online: By visiting the Speak Up website www.speakupfeedback.eu/web/scout24/ch
- By phone: Calling the Speak Up number 0800-561422

10. Validity

This Code of Conduct was approved by the Board of Directors of Scout24 and came into effect on May 25, 2020. It is within the discretion of the Board of Directors to revise this Code of Conduct at any time.

Scout24 Switzerland AG