

Code of Business Conduct

As of: January 2024

Preface

Dear Readers,

Our law firm bears responsibility - toward clients, business partners, service providers, and employees. HEUKING is aware of this environmental, social, and ethical responsibility. We regard it as a principle of all entrepreneurial activity and legal services.

The HEUKING business conduct specifies our basic ethical understanding and the principles that guide our firm. To strengthen the trust of our clients, service providers, and employees in the firm's integrity and lastly, to promote dialogue on environmental, social, and ethical issues.

Our Code of Business Conduct is based on principles of various international standards. These include the labor and social standards of the International Labor Organization (ILO) and the United Nations (UN) Global Compact.

It is our aspiration that the partnership and all employees of our company recognize, support, and comply with the following Code of Ethics. The goal is to enable future generations to live and do business in a balanced triad of environmental, social, and economic concerns.

Dr. Johan Schneider

Managing Partner for Organization, Business Processes, and Digitalization

Social Responsibility

Human Rights

Respect for individuals and the fundamental human rights enshrined in the Basic Law is, without doubt, a matter for us as a legal and tax consulting firm. All our employees are carrying out their job voluntarily and have the possibility to terminate their contract. If minors are employed at HEUKING, it is done exclusively following German labor laws. In particular, HEUKING does not tolerate harassment or abuse of any kind, as well as inhuman treatment and practices not in line with human rights provisions. Including, among other things, mental cruelty and sexual or personal harassment.

Occupational Safety and Health Protection

We ensure a safe and healthy working environment for all our employees. The ongoing monitoring and assessment of potential risks and associated health hazards are of great importance to us in fulfilling our responsibilities as an employer.

Social Engagement

As a law firm, we have a responsibility toward society in which we operate. We do not define our success solely by the quality of our work for our clients but also by our contribution to the well-being of our community. Therefore, we actively engage in philanthropic projects primarily through monetary and material donations. HEUKING has the goal to have a positive impact and effect sustainable changes in our surroundings. We support and promote organizations and initiatives dedicated to social justice, education, environmental protection, and other societal concerns. Through our social engagement, we aim for sustainable and inclusive development that enhances the overall welfare of society.

■ Diversity, Inclusion and Respect

As an employer, it is a fundamental principle to treat all our employees equally, respectfully, fairly, and appreciatively. Following the Anti-Discrimination Act (AGG), we provide a work environment free from discrimination, harassment, or disadvantage. Through various diversity and inclusion initiatives, we ensure no adverse effects on employees based on their ethnic or cultural backgrounds, mental and physical abilities, gender, religious affiliation, age, sexual orientation, social origin, or gender identity. We value and promote diversity and inclusion within our firm and actively advocate for respectful collaboration.

■ Fair Compensation

HEUKING ensures that working hours and remuneration for our employees comply with applicable laws. Our employees receive a salary in line with industry standards and, without doubt, exceeds the minimum wage set per the national cost of living.

Ecological Responsibility

Environmental Protection

We are committed to strict compliance with all applicable environmental, health, and safety laws and standards. We recognize that our actions are impacting the environment, and thus, we accept responsibility for sustainable development within our firm as well as society in general. Our efforts span all aspects of the firm and focus on the comprehensive, safe, and environmentally sound design of our services, from conception to use. Our goal is to make continuous improvements to conserve resources, minimize environmental impacts, and ensure the health and safety of our employees, clients, and society at large.

Environmental Management

By implementing an appropriate and holistic sustainability management¹ system, we aim to ensure that our firm's operational environmental impacts remain within planetary boundaries². We recognize that as one of the major commercial law firms in Germany, we have a responsibility to protect our environment and strive for continuous improvements in our environmental management to minimize our firm's environmental footprint and have a positive contribution to environmental protection

Reducing Emissions, Resource use and Waste

We are actively committed to the responsible use of natural resources and the protection of the environment³. Our measures include reducing emissions, using energy and water efficiently, avoiding waste, and promoting sustainable procurement as well as the efficient use of natural resources.

¹ Read more in our Corporate Social Responsibility Report.

² Planetary boundaries are a concept introduced by a group of scientists in 2009 to describe the ecological limits within which humanity must operate to ensure sustainable development

³ Read more in our Greenhouse Gas Accounting Report.

Governance Standards

Compliance with Laws and Regulatory Requirements

As a legal and tax consulting firm, we, without doubt, act in compliance with the law and with integrity, and we consider this to be the basis of our business activities. All professionals and employees of our firm are obliged to keep abreast of current legal developments and to undergo further training to ensure that all actions and decisions are within the framework of applicable laws and internal guidelines.

Money Laundering Prevention

HEUKING has established a comprehensive risk management system to prevent money laundering based on three pillars:

- (1) Standardized mandate acceptance process incl. KYC check as well as check for conflicts of interest and sanction relevance of the mandate;
- (2) Regular monitoring of mandates and files, in particular for indications of relevance to money laundering;
- (3) A dedicated and needs-based training concept for professionals and employees.

These three pillars form a solid basis for effective control and prevention of money laundering risks by helping us identify these potential risks early on and thus enable us to take appropriate action.

Anti-corruption

The firm has established guidelines to set the framework for employees to behave correctly in their dealings with (potential) clients, authorities, cooperation partners, and service providers. Conversely, we apply this standard when selecting our contractual partners from whom we purchase goods and services. The selection process and the relevant criteria are transparent and comprehensible for all parties involved. In our dealings with clients and authorities, it goes without saying that we refrain from any conduct that could give rise to suspicions of unfair behavior.

■ Data Protection, Information Security and Confidentiality

The data of individuals and companies is a valuable asset. We respect the associated need for data sovereignty, protection of secrecy, and privacy. Therefore, we only use the data provided to us for the agreed purpose. We always ensure the confidentiality of all data and information entrusted to us and protect it from loss, unauthorized disclosure to third parties, or misuse.

■ Integrity and Honesty

Our firm is committed to acting with integrity and ethics toward our clients, employees, and the public. Our priority is to maintain high ethical standards. Thus, consistently reject fraud, corruption, and unethical behavior. Integrity is fundamental to us and shapes all our business activities. Through our internal whistleblower system, the firm has established clear rules and control mechanisms to ensure that we always meet the highest ethical standards.

■ Independence and impartiality

It goes without saying that we are committed to acting independently, as this is part of our firm's DNA. We try to avoid potential conflicts of interest and have established measures to identify and prevent conflict situations. Our priority is to provide our clients with objective and fair advice. We value transparency and openness to ensure that our decisions are free from influences that could compromise our independence and impartiality.

Contact Persons



Managing Partner
Dr. Johan Schneider
Managing Partner
Email: j.schneider@heuking.de
Tel: +49 (0)40 355 280-89



Risk & Compliance
Shiye Luo-Forst
Director of Compliance
Email: s.luo-forst@heuking.de
Tel: +49 (0)211 600 55-074



ESG & Sustainability
Zoe Abulzahab
Sustainability & Inclusion Manager
Email: z.abulzahab@heuking.de
Tel: +49 (0)40 355 280-345