

# Code of Business Conduct

June 2024

## Preface

Dear Readers,

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

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 labour 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 people and the human rights enshrined in the German Basic Law is a matter of course for us as a law and tax consultancy firm. Every job must be carried out based on free choice and also includes the possibility of dismissal. If minors are employed at HEUKING, this is done exclusively within the framework permitted by German labour law and primarily with the aim of giving school pupils an insight into the day-to-day work of a commercial law firm. In particular, any form of unequal treatment, harassment, or abuse as well as inhumane treatment and practices that do not comply with human rights regulations will not be tolerated.

### 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 in the working environment and associated avoidance of health hazards are of great importance to us in fulfilling our responsibility as an employer.

### Social Engagement

As a law firm, we have a responsibility toward society. We do define our success not only by the quality of our advice to our clients, but also by our contribution to the well-being of our community. Therefore, we are actively involved in charitable projects - primarily through monetary and material donations – and thus assume social responsibility. HEUKING has the goal to make a positive contribution and bring about lasting change in our society. 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 our principle to treat all our employees equally, respectfully, fairly, and appreciatively. In accordance with the German Equal Treatment Act (AGG), we enable a working environment that is free from any kind of discrimination, harassment, or disadvantage. With various diversity measures, we ensure that there are no negative effects for employees due to their ethnic-cultural background, different mental and physical abilities, gender, religious affiliation, age, sexual orientation, social background, or gender identity. We value and promote diversity and inclusion in our law firm and are actively committed to respectful cooperation.

### **■ 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 have an impact on the environment and therefore take responsibility for sustainable development. Our aim is to achieve continuous improvements in order to conserve resources minimise environmental impact and ensure the health and safety of our employees, clients, and society in general.

### **■ Environmental Management**

By implementing a holistic sustainability management<sup>1</sup> system, we aim to ensure that our firm's operational environmental impact remains within planetary boundaries<sup>2</sup>.

### **■ Reducing Emissions, Resource use and Waste**

We are actively committed to the responsible use of natural resources and the protection of the environment<sup>3</sup>. Our measures include the reduction of emissions, the efficient use of energy and water, the avoidance of waste, and the promotion of sustainable procurement as well as the efficient use of natural resources.

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<sup>1</sup> Read more in our Corporate Social Responsibility Report.

<sup>2</sup> 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.

<sup>3</sup> Read more in our Greenhouse Gas Accounting Report.

## Governance Standards

### **Compliance with Laws and Regulatory Requirements**

HEUKING acts strictly in accordance with all applicable legal and regulatory requirements. As a law and tax advisory firm, it is a matter of course for us to act in compliance with the law and with integrity and we regard this as the basis of our activities. All professionals and employees of our firm are obliged to keep abreast of current legal developments and to undergo further training in order to ensure that all actions and decisions are taken within the framework of the applicable laws and internal guidelines.

### **Money Laundry 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 the effective control and prevention of money laundering risks and help us to identify potential risks at an early stage and take appropriate measures.

### **Anti-corruption**

HEUKING has established guidelines to provide employees with the right framework for correct behaviour when dealing with (potential) clients, authorities, cooperation partners and service providers.

Our aim is to impress our clients with the quality of our work. Conversely, we also apply this standard when selecting our contractual partners from whom we procure goods and services. The selection process and the relevant criteria are transparent and comprehensible for all parties involved. When dealing with clients and authorities, it goes without saying that we refrain from any behaviour that could give rise to suspicion of unfair conduct.

### **■ 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 behaviour. Integrity is fundamental to us and characterises all our business activities. With the help of our internal whistleblowing 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 make every effort to avoid potential conflicts of interest and have established measures to identify and avoid conflict situations. Our priority is to provide our clients with objective and fair advice and to represent their interests in the best possible way with excellent legal expertise. We emphasise transparency and openness to ensure that our decisions are free from influences that could compromise our independence and impartiality.

## Contact Persons



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