



CODE OF CONDUCT





PREAMBLE

- A. With this Code of Conduct, Heuking Kühn Lüer Wojtek PartGmbH (“HEUKING”) establishes binding rules defining how we work and what we stand for. This Code of Conduct applies to all partners and employees, including interns and trainees, freelance staff, and – where applicable – our business partners and suppliers.
- B. Our firm assumes responsibility towards clients, business partners, service providers and employees. HEUKING is aware of this environmental, social and ethical responsibility. Our partnership regards it as a guiding principle of all entrepreneurial activity. We have therefore decided to set out in writing our fundamental ethical understanding and the principles by which our firm is guided.
- C. Our objective is to foster a firm culture characterised by integrity, respect, professional excellence, sustainability and responsible and fair interaction with one another. HEUKING complies with applicable laws and regulatory requirements in all jurisdictions in which we operate. In addition, we are guided by international standards, in particular the labour and social standards of the International Labour Organization (ILO) and the United Nations (UN) Global Compact.
- D. This Code of Conduct is supplemented by internal policies and guidelines, including various compliance policies as well as rules covering anti-corruption, data protection, IT security, protection of confidential information and dawn raids, as well as copyright and social media.
- E. In case of any questions or potential conflicts, you may contact HEUKING’s Director of Risk & Compliance, Ms Shiye Luo-Forst, at any time. She can be reached as follows:

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1. PRINCIPLES OF CONDUCT

1.1 General

HEUKING expects all persons within the scope of application of this Code to always conduct themselves in accordance with the principles set out herein. Breaches of statutory provisions, internal policies or this Code of Conduct may have serious consequences both for the individual concerned and for HEUKING. Deliberate misconduct will not be tolerated.

Our cooperation, both within the firm and with clients, business partners and suppliers, is based on appreciation, integrity and reliability.

1.2 Working Environment

1.2.1 Respect for Human and Labour Rights

Respect for human dignity and the fundamental rights enshrined in the German Basic Law is self-evident for us as a commercial law firm providing legal and tax advice. Any activity must be carried out voluntarily. HEUKING does not tolerate any violation of human rights and rejects all forms of forced labour and child labour. The employment of minors takes place exclusively within the framework of applicable laws, for example as part of work experience placements for school students and primarily serves educational purposes. HEUKING attaches great importance to ensuring that our employees are compensated fairly and appropriately for their work and that remuneration is significantly above subsistence level and in line with market standards.

1.2.2 Equal Treatment, Diversity, and Inclusion

We expressly affirm diversity and equal treatment. As an employer, it is our fundamental principle to treat all employees equally, respectfully, fairly and with appreciation. In accordance with the German General Equal Treatment Act, we provide a working environment that is free from any form of discrimination, harassment or disadvantage. Discrimination on the grounds of gender, nationality, skin colour, origin, religion or belief, age, sexual identity, disability or social background will not be tolerated at HEUKING. All employees are treated fairly and respectfully. Harassment and bullying have no place in our firm. We actively promote an inclusive working environment and value the diverse perspectives and experiences within our teams.

1.2.3 Occupational Health and Safety

The safety and health of our employees is a key concern and an essential component of our responsibilities as an employer. We ensure that our working environment complies with statutory occupational safety requirements and promote prudent, forward looking and safety conscious conduct. Risks are assessed regularly and measures to prevent health hazards are implemented on an ongoing basis.

1.2.4 Environmental Responsibility and Environmental Protection

HEUKING is committed to the responsible and, as far as possible, resource conserving use of natural resources. Environmental and climate protection are of central importance to us. We undertake to comply with all applicable environmental, health and safety laws and to minimise the adverse environmental impact of our business activities as far as possible. Our objective is to conserve raw and operating materials, minimise water and energy consumption, reduce emissions, prevent waste and promote sustainable procurement processes. Through comprehensive sustainability management, we ensure that our operational activities remain within planetary boundaries, and we also expect our suppliers and service providers to adhere to comparable environmental standards.

1.3 Business Relationships

1.3.1 Fair and Lawful Competition

HEUKING is committed to fair competition and seeks to succeed in the market through high standards of quality in our work and services. We comply with all laws designed to protect and promote competition, in particular applicable competition and antitrust law. Price fixing or other arrangements with competitors that allocate sales markets or clients among themselves or otherwise unlawfully restrict free and open competition are strictly prohibited.

1.3.2 Integrity and Anti-Corruption

Our priority is to uphold high ethical standards and to consistently reject fraud, corruption and unethical conduct. Integrity is fundamental to us and shapes all our business activities. In dealings with clients, suppliers, service providers and authorities, domestically and abroad, no advantages of value may be granted to business partners or public officials for the purpose of improper preferential treatment. Likewise, such advantages may not be accepted from business partners. These principles apply without exception, even if compliance in an individual case means that a transaction does not materialise. Decisions are based exclusively on objective criteria, quality and integrity. We rely on the quality of our work to convince and expect the same conduct from our contractual partners.

1.3.3 Anti-Money Laundering

HEUKING complies with all statutory obligations relating to the prevention of money laundering and has established a comprehensive risk management system to ensure that business relationships are not used for money laundering purposes. This system is based on three key pillars. First, a uniform client acceptance process including sanctions screening, anti-money laundering checks and conflicts of interest reviews. Second, regular monitoring of ongoing mandates and files, particularly for indicators relevant to money laundering. Third, a dedicated, needs based training concept for professionals and employees. Each employee shares responsibility for ensuring that third parties are not given any opportunity to misuse business relationships with HEUKING for money laundering purposes.

1.4 Informationen

1.4.1 Confidentiality and Secrecy

HEUKING safeguards and protects trade and business secrets as well as all confidential information entrusted to us in the course of our activities. We implement all necessary organisational and technical measures to protect our IT systems against unauthorised access. Third parties are neither granted unsupervised physical access to our premises nor uncontrolled electronic access to our data. The obligation to maintain confidentiality continues beyond the end of any employment relationship. We ensure that information connected with HEUKING's activities is always protected against loss, unauthorised disclosure or misuse.

1.4.2 Data Protection

Data relating to natural persons is a valuable asset. The protection of personal data, especially data relating to our employees, clients, suppliers and service providers, is therefore of the highest priority for HEUKING. We respect the associated need for data sovereignty and privacy and collect, process and use personal data only where legally permitted or where the data subject has given explicit consent. Personal data is always stored securely and protected against unauthorised access. Data breaches must be reported immediately so that appropriate measures to safeguard and restore data protection can be initiated without delay.



1.5 Conflicts of Interest

It is a fundamental principle for us to commit to independent conduct, as this is part of our Firm's DNA. We make every effort to identify and avoid potential conflicts of interest and have established measures to detect and prevent such situations. Our priority is to provide clients with objective and fair advice and to represent their interests to the highest standard through excellent legal expertise. We place great value on transparency and openness to ensure that our decisions are free from influences that could compromise our independence and impartiality.

This also includes our activities in the context of lobbying and work within associations. HEUKING always complies with statutory requirements governing permissible interest representation and does not exert undue influence on legislation or political decision-making processes. In our work within business associations, we strictly ensure impeccable conduct regarding competition law requirements

2. CONSEQUENCES OF MISCONDUCT

HEUKING does not tolerate any breaches of this Code of Conduct. All employees must be aware that breaches of duty may not only result in personal consequences but may also have serious implications for the firm. Misconduct and any potential violations are investigated and pursued consistently, without exception and without regard to the position of the individual concerned, within the framework of applicable laws, and where required sanctioned accordingly.

This Code of Conduct is binding for all employees. Failure to comply with the rules of conduct set out herein may result in serious civil, criminal or employment law consequences, up to and including termination of employment. HEUKING expects all employees to always align their conduct with the principles of this Code of Conduct, the supplementary internal policies and the firm's ethical standards. The purpose of these rules is not only to sanction violations but also to prevent future misconduct through prevention, awareness raising and a lived culture of compliance.

3. CONTACT AND WHISTLEBLOWING SYSTEM

HEUKING encourages all employees to report without delay any actual or suspected violations of this Code of Conduct, the firm's compliance framework or other relevant provisions. The central point of contact for this purpose is HEUKING's Director of Risk and Compliance, Ms Shiye Luo-Forst.

In addition, HEUKING provides the option to submit reports anonymously via the internal whistleblowing system, [WhistleFox](#).

For general questions regarding the Code of Conduct, the Compliance Management System (CMS), or supplementary policies and guidelines, employees may also contact the Director of Risk and Compliance at any time.

4. FINAL PROVISIONS, EFFECTIVE DATE AND REVIEW

This Code of Conduct enters into force on 1 January 2026 and applies to all persons referred to in the Preamble under section A, irrespective of the type of employment relationship. Supplementary sub policies and guidelines form an integral part of this Code and must be observed accordingly.

Any amendments will be communicated to all relevant persons in an appropriate manner.

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Note on gender inclusive language

Unless explicitly indicated otherwise, all personal designations used in this Code of Conduct are intended to refer to persons of all genders and include all individuals equally.