

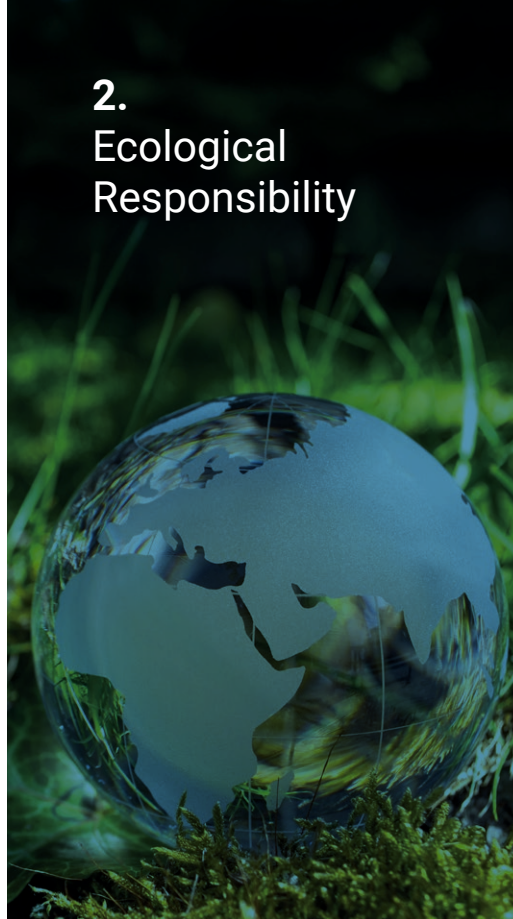
CODE OF ETHICS



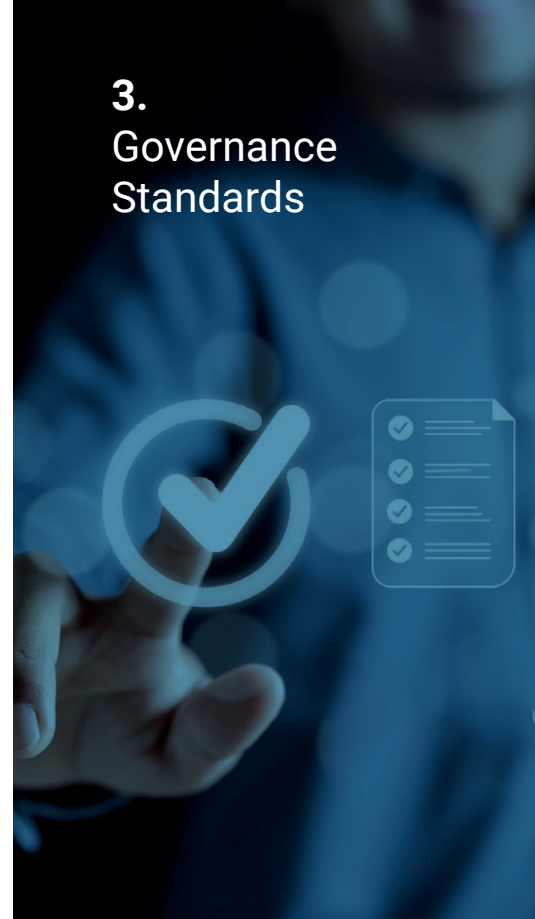
1. Social Responsibility



2. Ecological Responsibility



3. Governance Standards



Dear readers,

Our firm embraces a profound sense of responsibility – towards our clients, business partners, service providers, and employees. At HEUKING, we are deeply aware of our ecological, social, and ethical obligations, and our partnership considers this awareness a cornerstone of all entrepreneurial activities.

To strengthen trust in the integrity of our firm and to foster meaningful dialogue on ecological, social, and ethical matters, we have chosen to articulate our fundamental ethical values and guiding principles in writing. This initiative reflects our commitment to maintaining transparency and building strong, lasting relationships with our clients, service providers, and employees.

Our Code of Ethics draws upon internationally recognized standards, including the labor and social benchmarks of the International Labour Organization (ILO) and the principles of the United Nations (UN) Global Compact.

We are dedicated to ensuring that our partnership and all employees adhere to, uphold, and champion the principles outlined in this Code of Ethics. Our ultimate goal is to pave the way for future generations to thrive within a balanced framework of environmental, social, and economic responsibility.



Prof. Dr. Martin Reufels
Managing Partner



Dr. Philip Kempermann
Managing Partner

SOCIAL RESPONSIBILITY

Human rights

Respect for individuals and the human rights enshrined in the German Basic Law is fundamental to us as a law and tax advisory firm. Every activity must be carried out of one's own free will and includes the right to terminate. If minors are employed at HEUKING, this is done exclusively within the framework of the legal provisions of the German Labor Law. Any form of unequal treatment, harassment, abuse, or inhumane practices that violate human rights regulations will not be tolerated.

Occupational health and safety

We are committed to providing a safe and healthy working environment for all employees. Continual monitoring and assessment of potential risks in the workplace, along with proactive measures to avoid health hazards, are central to fulfilling our responsibility as an employer.

Social commitment

As a law firm, we recognize our responsibility to society. Our success is measured not only by the quality of our client services but also by the positive impact we contribute to the community. We actively engage in charitable projects, primarily through financial support and donations in kind, taking on social responsibility in meaningful ways. Our goal is to make a positive impact and drive lasting change in society. We support and promote organizations and initiatives dedicated to social justice, education, environmental protection, and other critical social causes. Through these efforts, we aim to foster sustainable and inclusive development that enhances the well-being of society as a whole.

Diversity, inclusion and respect

At HEUKING, we are deeply committed to fostering an inclusive workplace where all employees are treated equally, respectfully, and with genuine appreciation. Guided by the principles of the German Equal Treatment Act, we maintain a work environment free from discrimination, harassment, or any form of disadvantage. Through a range of diversity initiatives, we actively ensure that no employee faces negative treatment based on their ethnic or cultural background, differing mental or physical abilities, gender, religious beliefs, age, sexual orientation, social background, or gender identity. We not only value diversity and inclusion but also actively promote a culture of mutual respect and collaboration.

Fair remuneration

At HEUKING, we prioritize fair and appropriate remuneration for our employees, ensuring compliance with all applicable legal standards. Our compensation practices align with industry norms and significantly exceed living wage levels.

ECOLOGICAL RESPONSIBILITY



Environmental protection

We strictly comply with all applicable environmental, health, and safety laws and standards. Acknowledging the impact of our actions on the environment, we take responsibility for sustainable development. Our goal is to continually improve to conserve resources, minimize environmental impact, and ensure the health and safety of our employees, clients, and society.

Environmental management

By implementing a holistic sustainability management system, we ensure that our firm's operational environmental impact remains within planetary boundaries.

Reduction of emissions, use of resources and waste

We are committed to the responsible use of natural resources and environmental protection. Our measures focus on reducing emissions, efficiently using energy and water, avoiding waste, promoting sustainable procurement, and ensuring the efficient use of natural resources.

¹ Read more in our Corporate Social Responsibility Report.

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

³ Read more in our Greenhouse Gas Performance Report.

GOVERNANCE STANDARDS

Compliance with laws and regulatory requirements

Our firm adheres strictly to all applicable legal and regulatory requirements. As a law and tax advisory firm, compliance with the law and acting with integrity are fundamental to our operations and form the foundation of our activities. All employees are required to stay informed about the latest legal developments and participate in ongoing training to ensure that all actions and decisions align with applicable laws and internal guidelines.

Money laundering prevention

HEUKING has implemented a comprehensive risk management system to prevent money laundering, built on three key pillars:

- 1) a standardized engagement acceptance process, including sanctions, anti-money money laundering checks, and conflict-of-interest assessments
- 2) an ongoing review of engagements and files, with particular attention to indicators of money laundering;
- 3) a dedicated and needs-based training program for professionals and employees.

These three pillars provide a robust foundation for effectively monitoring and mitigating money laundering risks, enabling us to identify potential threats early and take appropriate measures.

Combating corruption

The firm has established clear guidelines that provide employees with a binding framework for appropriate interactions with (potential) clients, authorities, cooperation partners, and service providers.

We strive to impress our clients through the quality of our work, and we apply the same high standards when selecting our contractual partners for goods and services. The selection process, along with its relevant criteria, is transparent and comprehensible to all parties involved. In all dealings with clients and authorities, we strictly avoid any behavior that could raise suspicions of unfair conduct.

Data protection, information security and confidentiality

Data pertaining to natural persons and companies is a valuable asset, and we are committed to safeguarding its confidentiality, sovereignty, and privacy. We use all data entrusted to us solely for its intended and agreed purpose. Ensuring the confidentiality of all data and information is paramount, and we protect it rigorously from loss, unauthorized disclosure, or misuse.

Integrity and honesty

Our firm is unwavering in its commitment to integrity and ethical behavior toward our employees, clients, and the public. Upholding high ethical standards is a core value, and we consistently reject fraud, corruption, and unethical conduct. Integrity underpins all our business activities, and our internal whistleblowing system provides clear rules and control mechanisms to ensure adherence to the highest ethical standards.

Independence and impartiality

Acting independently is a cornerstone of our firm's values and operations. We take proactive steps to avoid conflicts of interest, supported by established measures to identify and mitigate potential conflict situations. Our primary goal is to deliver objective, fair, and expert legal advice while representing our clients' interests to the highest standard. Transparency and openness guide our decision-making, ensuring it remains free from any undue influence that could compromise our independence or impartiality.

Legal Notice

Heuking Kühn Lüer Wojtek

Partnership of lawyers and tax advisors with limited professional liability under the German Partnership Act*

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Note on gender-neutral language:

We use gender-neutral language throughout this Code of Ethics. Unless otherwise specified, all personal designations are intended to be inclusive of all genders and all individuals.