

KÜMMERLEIN Code of Conduct

August 2023



Ladies and Gentlemen!
Dear Colleagues!

At Kümmerlein, we combine excellent consulting, economic thinking, commitment and innovative spirit with personal integrity. On this basis, we face the great challenges of our time. And master them together.

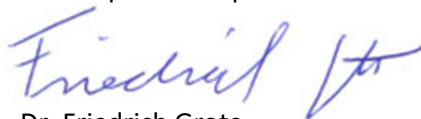
The defining challenge of our time is **sustainability**. With regard to the natural foundations of life, so that they can continue to provide a fulfilling life for future generations. And with regard to people themselves: Our actions have an impact on our fellow human beings. We also have a responsibility to them.

In order to live up to this responsibility, we strive to act at all times not only lawfully, but with integrity, foresight and prudence. We do not follow every trend and think in the long term. For our clients. And for us. That's why it was easy for us to put these principles down in a code of conduct by which we want to be measured.

It sets out what we believe in and what we want to act upon. In dialogue with you. Let us continue on this path together...

Essen, August 2023

for the partnership



Dr. Friedrich Grote
Rechtsanwalt & Notar



Dr. Elke van Arnheim
Rechtsanwältin & Notarin

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This Code applies to the interactions of all members of the firm with each other...

About this Code

Kümmerlein, Simon & Partner Rechtsanwälte mbB ("**Kümmerlein**" or "**firm**") and all its partners[■], attorneys, notaries and employees not only strive to act in accordance with the law at all times in the performance of their professional activities, but also to act responsibly and with integrity in their daily work. This Code of Conduct serves as a guideline to which we align our behaviour.

Within the scope of our professional activities as lawyers and notaries, we are subject to the strict rules of the statutory professional law. These rules are a strong foundation to ensure our independence, confidentiality, loyalty, integrity and professionalism. At Kümmerlein, they also apply to those of us who are not admitted as lawyers or notaries.

However, we commit ourselves to even higher standards.

[■] Terms characterizing persons comprise all persons belonging to the respective group of persons, irrespective of the biological sex of such persons.

Being a signatory of the UN Global Compact, we are committed to human rights as laid down in particular in the Universal Declaration of Human Rights of the United Nations, the OECD Guidelines for International Enterprises and the core labour standards of the International Labour Organisation (ILO).

We stand firm against any form of corruption. We strive to protect the environment and our natural resources in all our activities. We use new technologies responsibly.

This Code of Conduct applies to the interactions of all members of the firm with each other. We also observe it towards our clients and business partners, towards courts, authorities, other professionals and other third parties. We expect our suppliers, contractors and service providers to observe this Code of Conduct in their own businesses as well.



**We are signatories of the UN
Global Compact...**

General Standards

Values and Principles

Respect and Performance

We pursue our goals together. That's why we support each other and strive for a working environment in which everyone can develop their individual skills and strengths to the best of their ability. That is why we treat each other with appreciation and respect. We set high quality and performance standards for ourselves. For us, this includes above all personal integrity, excellent professional skills, economic thinking, commitment and innovative spirit.

Diversity and Tolerance

Unlawful discrimination on the grounds of nationality or ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or belief, or other specially protected personal characteristics has no place in our firm. Nor do we tolerate any form of harassment or bullying within the firm's sphere of influence.

Each of us has unique skills and experience. We are convinced that this diversity is an advantage. Kümmerlein strives for diversity and promotes it wherever possible, also taking into account special individual needs.

We respect everyone's freedom to form and hold political, religious or ideological opinions within the framework of applicable law. In doing so, each of us is aware that the business environment requires neutrality and shows appropriate consideration for the political, religious or ideological views of colleagues, clients and other business partners.



Conflict of Interests

In the exercise of our profession, situations may arise in which personal interests come into conflict with those of the firm, clients or business partners. For example, when friends or family members are directly or indirectly affected by our actions.

Insofar as the professional law applicable to lawyers and notaries regulates such situations, it always takes precedence. In all other situations, too, we do not allow our personal interests to influence our business decisions. We are loyal to the firm, our clients and our business partners.

All Kümmerlein employees are obligated to immediately disclose any actual or potential conflicts of interest that arise in the course of their professional activities to a partner of Kümmerlein.

If partners of Kümmerlein are subject to an actual or potential conflict of interest in the course of their professional activities, they must disclose this immediately to the partnership.

Compliance

Anti-Corruption

Kümmerlein stands firmly against any form of corruption.

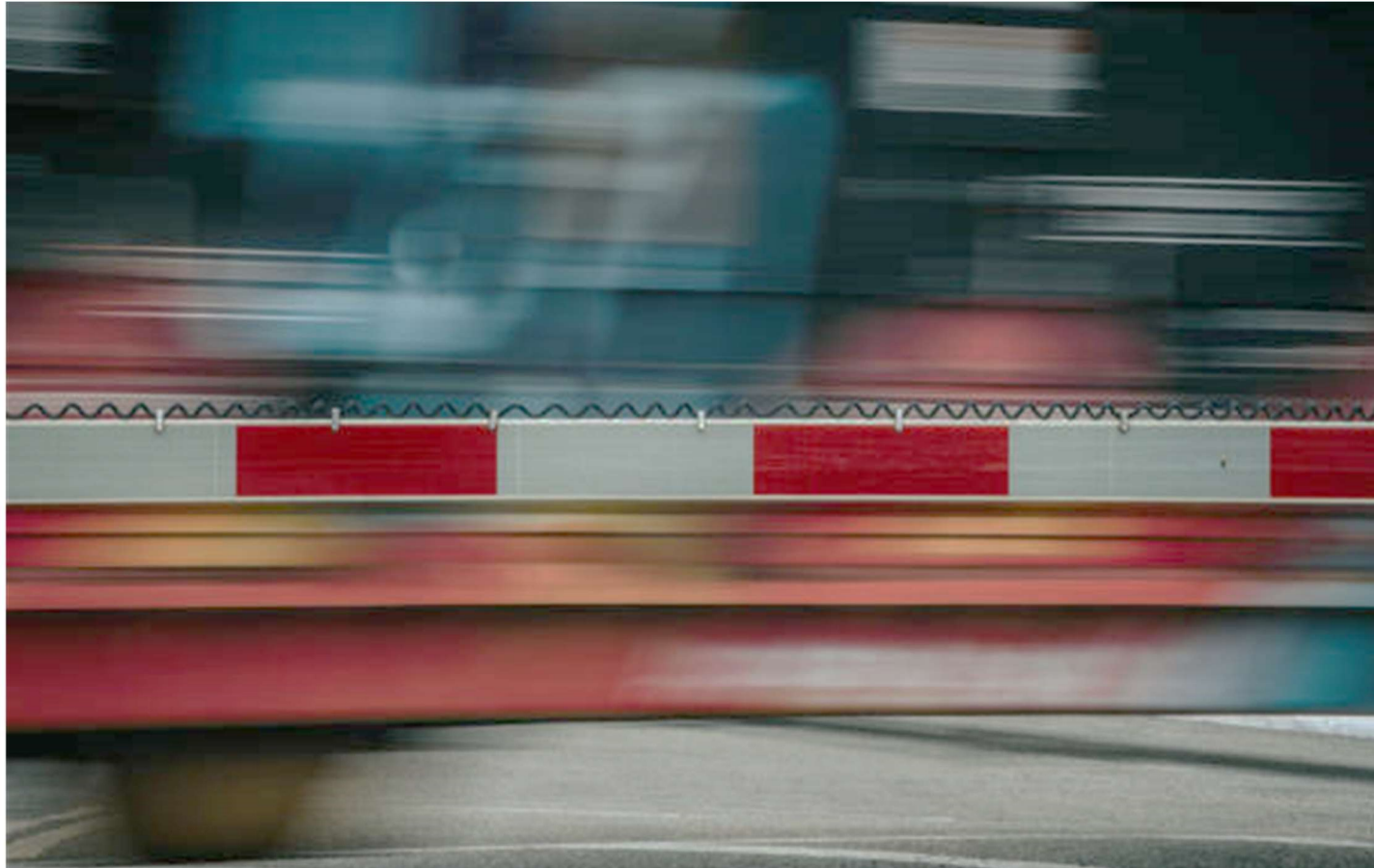
We do not pay bribes, kickbacks or acceleration payments to judges, civil servants or other public officials, clients or business partners, nor do we grant or offer them any other improper benefits. We also do not accept such benefits.

We ensure that gifts, hospitality or other benefits customary in the ordinary course of business are always appropriate to the occasion and in compliance with applicable law. We generally do not offer such benefits to judges, civil servants or other public officials and we generally do not accept such benefits from them.

Sponsorships or donations require the prior approval of the firm. They, too, must always be appropriate and in accordance with applicable law.



**Kümmerlein stands firmly
against any form of corruption.**



Anti-Money Laundering and Tax Compliance

As lawyers and notaries, we are subject to strict legal regulations on preventing and combating money laundering and tax evasion. Insofar as these regulations are applicable, they always take precedence.

Irrespective of this, we do not participate directly or indirectly in money laundering or tax evasion, neither in Germany nor abroad. We ensure that we always provide proper accounting for our services in accordance with the applicable laws. We will also ensure that we do not make or receive unusual payments or otherwise engage in unusual payments.

Each partner and each employee of Kümmerlein will immediately report to the anti-money laundering officer appointed by the firm any suspicion of money laundering or tax evasion that arises in the course of our professional routine.

Export Control and Sanctions

Our clients and business partners are often globally active companies and this may also have an impact on our business.

Cross-border business relationships – especially outside the European Union – may be subject to special trade regulations. In addition, some countries and individuals are subject to sanctions imposed by the United Nations, the European Union, the United States of America and other countries in order to combat terrorism or violations of international law. The European Commission provides an up-to-date overview of the sanction rules applicable in the European Union at any given time at www.sanctionsmap.eu.

Within the scope of our professional activities, each of us shall ensure that no prohibited transactions are conducted with sanctioned persons or states and that other trade regulations are complied with.

Fair Competition

We are committed to fair competition in which performance determines success.

We reject unlawful restrictions on competition, market abuse and unfair competition.

We do not participate in such practices – for example, price fixing, market sharing or the manipulation of contract awards – neither directly nor indirectly and neither in Germany nor abroad.

We do not disclose internal company information to competitors or potential competitors. This also applies to former colleagues and outside of a specific business relationship, for example at private events.



We are committed to fair competition in which performance determines success.



The firm is committed to human rights...

Health & Safety at Work and Human Rights

Health & Safety at Work

The health and safety of all attorneys, notaries public and employees of the firm is of the utmost importance to Kümmerlein. The firm complies with all applicable workplace health and safety regulations.

If any of us become aware of potential health or safety hazards in connection with our work for Kümmerlein, we will immediately report this to the firm's safety officer.

Human Rights

The firm is committed to human rights as laid down in particular in the Universal Declaration of Human Rights of the United Nations, the OECD Guidelines for International Enterprises and the core labour standards of the International Labour Organisation (ILO).

In particular, the following practices are **incompatible** with the values and principles of the firm:

- Any form of slavery, servitude or forced labour.
- Any form of child labour.
- Any form of human trafficking.
- Any form of eviction or unlawful forced removal.
- Any form of torture or unlawful violence.

The firm respects the labour laws applicable to its employees. In particular, all employees have the right to join, form or represent trade unions, the right to strike and the right to collective bargaining within the framework of the applicable regulations. The firm respects the right of all employees to negotiate individual terms and conditions of employment. All employees receive the employment documents to which they are entitled in a timely manner.

Kümmerlein remunerates the employees in accordance with the agreements made and respects the applicable rules on working hours and

time recording, on the remuneration of working hours as well as on the entitlement to recreational leave and the statutory minimum wage. Each employee shall receive the agreed appropriate wage at the agreed time.

If there is a suspicion that human rights are disregarded in connection with work for Kümmerlein, the HR Committee – which performs the function of human rights officer in our firm – is available as a point of contact.

Preservation of Natural Resources

We view the preservation of natural resources for future generations as one of the great challenges of our time. We therefore strive to make all our business processes sustainable. We ensure that our business activities do not destroy or deprive people or other living creatures of their natural resources, in particular through prohibited soil alterations, water or air pollution, other emissions or the deprivation of land, forests or waters.

Kümmerlein shall otherwise comply with all applicable environmental laws and regulations, including the so-called Minamata Convention of October 10, 2013, the so-called Stockholm Convention of May 23, 2001 and the so-called Basel Convention of March 22, 1989, as amended from time to time, and the implementing regulations issued thereunder from time to time.

We are constantly working to make our business processes even more sustainable. Everyone who works at, for and with Kümmerlein is therefore encouraged to contribute ideas and suggestions for improving the sustainability of our business processes.



We strive to make all our business processes sustainable...

Data Protection & IT Security

Due to the nature of our work, we bear special responsibility for the information provided to us. Therefore, we are subject to the particularly strict statutory confidentiality obligations for attorneys and notaries. Insofar as these are applicable, they always take precedence.

In other respects, too, the protection of personal data, business and trade secrets and the security of IT systems are of paramount importance for Kümmerlein. Each of us is obligated to comply at all times with the applicable provisions of data protection law, the protection of trade and business secrets and the protection of our IT systems. The firm sets out details in separate confidentiality, data protection and IT security guidelines.

We use new technologies responsibly, constantly weighing the associated risks. The firm's IT Committee is available as a point of contact for questions in this regard.

Work Equipment

We use work equipment only for the intended purpose and in the intended manner. Each member of the firm is obliged to protect entrusted work equipment from theft and unauthorized use by third parties.

Upon leaving the company, each person must return the work equipment entrusted to him or her to Kümmerlein in full and without being asked to do so.

Application of this Code

This Code of Conduct is binding for Kümmerlein, its partners, lawyers, notaries and all its other employees.

We expect our suppliers, contractors and service providers to observe this Code of Conduct in their own businesses as well.

If someone suspects a violation of this Code of Conduct, he or she may report this to the firm – anonymously if necessary. Details on the available reporting channels are published on our website (www.kuemmerlein.de). Kümmerlein will investigate every report and protect the identity of the whistleblower and the rights of the other parties involved.



We do not tolerate violations of this Code of Conduct.

We do not tolerate violations of this Code of Conduct. In the event of an identified violation of this Code of Conduct, the firm will take all necessary and reasonable steps to end the violation and prevent further future violations.

This Code of Conduct was originally prepared in German. This English version of the Code of Conduct has been prepared only for convenience. **In case of a contradiction between the German and the English version of this Code of Conduct, the German version takes precedence.**



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