

# + CODE OF CONDUCT

Status: April 26, 2021

## OUR VALUES AT A GLANCE

- + Tolerance, acceptance and mutual respect are the basis of our cooperation.
- + We are responsible in our dealings with each other and with our clients.
- + We always strive for the highest level of professional excellence and continuously educate ourselves.
- + We allow our employees to combine their professional and family lives in the best possible way.
- + We care deeply about the health and well-being of our employees.
- + We conserve our resources and actively promote environmental protection and sustainability.
- + We have always attached great importance to social and cultural commitment.

## 1. Our corporate culture

### 1.1 Core values

POELLATH is a community of diverse personalities and talents. We are united by our passion for our work, pursuit of professional excellence, humanity and expertise in legal and tax advisory. WE are a team and we support each other by sharing our knowledge and experience. The combination of team spirit and personal freedom makes us strong and the tolerance and acceptance among our employees are part of our identity.

WE behave with integrity and professionalism and treat each other with respect and fairness. WE treat each other in an unbiased and friendly manner and have confidence in the competence and responsible actions of everyone within the POELLATH team. WE deal with each other as politely and openly as we ourselves would like to be dealt with.

The tasks our clients entrust us with oblige everyone at POELLATH to adhere to the highest ethical and professional standards. In so doing, we demand that our advice is of the highest quality. These standards apply to all employees, regardless of their respective areas of responsibility within the firm.

### 1.2 Compliance

Compliance with legal requirements and professional ethical standards is a self-evident and fundamental prerequisite for our advisory services.

WE avoid situations in which conflicts of interest could arise and deal transparently with potential conflicts of interest vis-à-vis our clientele.

All POELLATH professionals maintain their independence as advisors. POELLATH is independent and not part of a law firm association or network.

Acceptance of any mandate requires conclusion of a POELLATH mandate agreement with conflict and know-your-client checks; we meet all money laundering requirements.

Data protection is considered and observed in all our practice areas. Our clients, the partnership and all employees can expect special protection and careful handling of the personal data entrusted to us.

## **1.3 Tolerance and diversity**

Equal values and diversity are not a contradiction. Respect and tolerance are expected from the entire POELLATH team as the basis of our successful cooperation. WE protect the personal integrity of all employees at POELLATH.

Our dealings with each other reflect who we are and what we stand for. Diversity is important to us. This includes an open, supportive and positive environment and respectful treatment of each other. WE do not tolerate bullying or sexual harassment or other derogatory behavior toward each other. We see differences in origin, ethnicity, religion, sexual orientation, gender identity and many other individual differences as enrichments. At POELLATH, there is no room for hate and discrimination.

This identity also includes ensuring equal conditions and development opportunities at POELLATH. WE actively and equally promote the professional and personal development of all our employees - explicitly with no gender-specific distinctions. All advisors have equal access to training, support and resources. Any personnel decisions are made solely on the basis of professional and personal qualifications.

We have made it our mission to promote diversity in all areas and at all levels of the firm and to address deficits, particularly in gender parity.

In case of violations, POELLATH has established the institution of the partnership of trust. In each POELLATH location, persons in positions of trust have been appointed to whom every employee can turn. It is our top priority to protect the persons concerned.

## **2. Our responsibility...**

### **2.1 in dealing with each other**

WE at POELLATH maintain an open atmosphere at all levels, in which everyone can approach colleagues, superiors, persons in positions of trust or the board with critical or sensitive questions without hesitation and confide in them. WE encourage each other to take responsibility and provide each other with the necessary support. Everyone should give constructive feedback at all times and receive feedback in return on a regular basis. An active open-door policy is part of POELLATH's corporate culture.

WE always see mistakes as an opportunity and an obligation to learn both professionally and personally and to constantly improve. WE discuss relevant mistakes openly with our colleagues in order to continuously optimize the cooperation at POELLATH and the advisory services for our clients at all times.

WE all help shape POELLATH. The opinions and participation of our employees in the continuous improvement of our common work environment are important to us. Regular meetings of the professionals and the administrative teams at all locations provide space for joint exchange, suggestions and discussions of new projects and ideas.

#### Education and training:

Continuous education and training are the prerequisite for providing the best possible advice. POELLATH supports all employees in their continuing education and training plans, regardless of their function.

Specialized continuing education and training opportunities, participation in postgraduate programs or internships and secondments in other law firms or companies also serve this goal. Extensive non-professional training opportunities and the POELLATH mentoring program ensure the continuous development of our personalities.

POELLATH promotes activities in teaching and research and supports the publication projects of our advisors.

#### Family:

Our focus is on providing the best possible services for our clients. In order to do this, it is necessary for our employees to maintain a healthy balance between their professional and private lives. In our firm, WE allow our employees to combine their professional and family lives in the best possible way. Regardless of gender, we support a family-friendly work environment through a variety of measures and offers.

This includes flexible working hours and part-time models, sabbaticals, the offer of individualized home office solutions with the necessary technical equipment, and flexible parenting and childcare hours. In addition, we cooperate with a family service that, among other things, provides support in arranging (child) care and hiring household staff and also offers short-term solutions for spontaneous care shortages.

## 2.2 towards our clientele

Our clients' trust is our most valuable asset. Therefore, their concerns are the absolute priority. Everyone on the POELLATH team represents our firm. Friendliness, courtesy and professionalism are our hallmarks.

POELLATH stands for high-end advice on transactions and asset management. In order to guarantee excellent advice, the best-practice principle applies. WE deliberately only take on mandates on which the specialization of our advisors allows us to provide the highest possible quality of work.

WE are competitive, but we remain fair.

POELLATH charges an appropriate fee for its services according to the specifications of the POELLATH client agreement. Our clients have the right to transparent proof of our services.

Should a client ever be dissatisfied with our advice, support or even the services for which we have charged, we will endeavor to remedy the situation quickly and effectively. WE always communicate clearly, understandably and appropriately with our counterparts. WE address all essential issues openly, even if they may be unpleasant.

Our international network offers the best possible support for our clients' global business. WE maintain our long-standing professional contacts and coordinate cooperation with leading foreign colleagues in cross-border mandates.

## 2.3 vis-à-vis the company

As a successful law firm, we have a social obligation. POELLATH stands not only for expertise, but also for humanity and social commitment. Corporate social responsibility is part of our corporate culture. For us, economic success also includes a mandate for charitable commitment. WE support diversity, curiosity and sustainability in a colorful bouquet of topics, interests, ideas and projects.

WE want to preserve and protect our environment. By continuously reviewing and improving internal processes and raising awareness of this concern among all employees, we are making our contribution to an ecologically sustainable future.

POELLATH supports environmental protection. For this purpose, we have developed guidelines.

Social and cultural commitment has played a central role at POELLATH since its founding. WE at POELLATH also use our expertise for pro bono advisory. POELLATH encourages its advisors to engage in pro bono activities even beyond the firm's mutual commitment.

### **3. Voluntary commitment and enforcement of the Code of Conduct**

In order to live up to our standards and core values, this Code of Conduct serves as the basis for our actions in our day-to-day professional lives at POELLATH.

Violations of this Code of Conduct will not be tolerated and may result in penalties in individual cases.