

Code of Conduct

of the

Kapp Hebein Partner GmbH

Preamble

The Kapp Hebein Partner GmbH (abbr. KHPartner) is a strategy and communications consulting company, which supports businesses, organizations and public figures concerning issues of positioning, reputation and for exceptional media challenges and crises.

In carrying out these tasks, KHPartner and the staff of Kapp Hebein Partner GmbH will be guided by the basic principles of ethics and morality.

I. Scope

1. This Code of Conduct is based on the following international codes of conduct: Code d'Athènes, Code de Lisbonne and the U.S. Code for Financial PR. These form the ethical and moral basis for the actions and behaviour towards our contractual partners, especially customers, competitors and authorities in connection with the exercise of our communication and consultation activities.
2. This Code of Conduct applies to all employees and representatives of Kapp Hebein Partner GmbH.

II. Overview of the Principles

The manner in which we perform our strategy and communications consulting is characterized by the following principles:

- Principle of Social Responsibility
- Principle of Legality and Morality
- Principle of Fair Action
- Principle of Integrity, Honesty, and Transparency
- Principle of Confidentiality and Secrecy
- Principle of Equal Treatment and Non-discrimination



III. Principle of Social Responsibility

In the execution of their duties, the employees and representatives of Kapp Hebein Partner GmbH undertake to respect the rights, interests and dignity of third parties.

IV. Principle of Legality and Morality

While carrying out their duties, the employees and representatives of Kapp Hebein Partner GmbH comply fully with the applicable laws, and in particular to the anti-corruption legislation, and do their utmost to prevent any illegal, immoral and unethical business practices.

V. Principle of Fair Action

In pursuing their interests, the employees and representatives of Kapp Hebein Partner GmbH will not exercise any unfair, irrelevant, inappropriate or unlawful influence on third parties, either through direct or indirect financial or economic assistance or other material incentives.

VI. Principle of Integrity, Honesty, and Transparency

1. Contract partners, customers, competitors, employees and other third parties are always treated with respect and dignity.
2. The employees and representatives of Kapp Hebein Partner GmbH are committed to deal honestly towards their clients and observe the principle of transparency and disclosure. Any form of trying to mislead is to be avoided.

VII. Principle of Confidentiality and Secrecy

1. The employees and representatives of Kapp Hebein Partner GmbH undertake to treat all information and data received from contractual partners in a confidential manner.
2. Confidentially obtained data, documents, information, business affairs and transactions, and in particular all operating and business secrets, will be handled absolutely confidentially and kept secret.
3. The employees and representatives of Kapp Hebein Partner GmbH will only with prior expressed consent, provide any of their knowledge or skill sets to any company which is in competition with any of our contract partners / clients or establish such a competing company themselves.

VIII. Principle of Equal Treatment and Non-discrimination

In connection with the exercise of their activities, the employees and representatives of Kapp Hebein Partner GmbH undertake to refrain from any form of discrimination on the basis of race, sex, religion, age, or disability.

IX. Final Provision

Any order, which is inconsistent with the principles set forth herein, will not be accepted.