

Policies

Policies are an essential mechanism for establishing adequate organisational structures and for governance within the LLB Group. Our policies set out the principles and rules that apply to the LLB Group's employees, executive bodies and business activities. The policies undergo regular review and need to be approved by Group Executive Management and/or the Group Board of Directors.

The guidelines for our daily work

Code of Conduct/Rules of Conduct

Our regional roots mean we are always close to our clients; we therefore have high standards when it comes to responsibility. These need to be met by the company as a whole and by each individual. The Code of Conduct sets out these mandatory standards, reflecting our values and describing what we expect from the Board of Directors, Group Executive Management, managers and employees. It shows how we deal with possible issues or difficult situations that affect our business practices or internal togetherness. We expect our executive bodies and employees to comply with the applicable laws, regulations and directives as well as professional standards and our Rules of Conduct, which state transactions involving financial instruments that are permissible for employees and executive bodies as well as defining general principles in respect of employee transactions. Clear regulations are also stipulated for the overseeing of business relationships of employees and executive bodies as well as for acceptance of inducements, secondary employment and general handling of any conflicts of interest.

The LLB Group is represented in many countries, whose laws, regulations and rules of conduct are as diverse as their histories, languages and cultures. Nonetheless, our own Code of Conduct supports us in implementing our company's defined values Group-wide in our target markets, thereby consolidating the trust of our clients, investors and partners.

Privacy and security

We handle client data, the data of employees and business partners, and internal company data with the utmost care. In keeping with the applicable statutory requirements, we ensure the maximum level of confidentiality when recording, processing and storing data.

The following principles apply, among others:

- laws, regulations and internal provisions for the protection of information and data must be adhered to;
- all employees know the relevant requirements with regard to secure information processing and apply them appropriately;
- adherence to the need-to-know principle;
- information security and cybersecurity must be implemented by design.
- These requirements also apply to service providers and their employees.

In compliance with the applicable statutory regulations, we only process personal data if this is required for the purpose of setting up and conducting the business relationship, meeting applicable statutory or contractual requirements, providing services, or executing orders.

Discrimination; freedom of thought, belief and religion

We offer a corporate culture based on partnership and characterised by respect, professionalism and openness. We respect the dignity, personality and privacy of each individual colleague and accept different opinions.

All employees receive equal employment opportunities and promotion prospects, irrespective of their gender, age, religion, nationality, ethnic background, sexual orientation or physical abilities.

Handling of client complaints

Aligning our services to client needs in the best way possible is important to us. If a client complains about a service provided by the LLB Group, we investigate this complaint thoroughly and promptly, consulting with our competent, independent specialist units for clarification if the nature of the complaint requires this.

Policies for preventing financial crime

The employees of the LLB Group are required to comply with all statutory, regulatory and internal requirements as well as to observe standards and rules of professional conduct customary in the market. Responsibility for organising and ensuring Group-wide compliance lies with the Board of Directors, which has issued a Group regulation entitled 'Group compliance management' to this end. Group Executive Management is responsible for the implementation of and adherence to the compliance regulations.

In view of our corporate value 'integrity', it must be ensured that all business conduct is impeccable and in conformity with the rules. This particularly applies to the acceptance and giving of gifts as well as to invitations and events. All financial or non-financial benefits and favours, such as restaurant meals, hospitality packages, event invitations, presents, etc. are subject to particularly rigorous scrutiny.

Money Laundering Policy

The LLB Group is committed to fighting money laundering, corruption, organised crime and terrorist financing through the exercise and enforcement of due diligence obligations on the basis of applicable laws, national and international standards, and internal directives. The LLB Group consistently complies with regulations in regard to due diligence and sanctions and monitors its business relationships within the scope of risk-appropriate control and monitoring processes. The objective is to prevent the LLB Group, its executive bodies or its employees from being misused for criminal purposes, in particular for money laundering and its predicate offences, organised crime, terrorist financing or evasion of sanctions, and to prevent the relevant legal requirements from being violated.

The LLB Group employs policies and training courses to ensure that its employees receive ongoing training in respect of new regulations, are fully aware of possible indications of money laundering, and know and comply with the requirements of the particular destination country in the case of cross-border activities.

Insider Trading Policy/Regulations

We expect our executive bodies and employees to comply with the applicable laws, regulations and directives as well as professional standards and our Rules of Conduct, which state rules of conduct for all employees throughout the LLB Group in respect of dealing with conflicts of interest while providing financial services of any kind.

The Rules of Conduct also specify the generally applicable principles in respect of employee transactions, overseeing business relationships of employees and executive bodies, and handling confidential information.

In the case of confidential information – regarding LLB Group securities, for example – appropriate internal measures are implemented to ensure that the confidentiality of this information is maintained until publication. This is ensured by limiting and safeguarding access to the information and by maintaining an insider list, for example.

The Rules of Conduct are reviewed on an annual basis and approved by Group Executive Management. The employees receive regular training in respect of the regulations. Second Line continually monitors compliance with these regulations, in some cases with system support. Second Line compiles a report on its monitoring and control activities for Group Executive Management and the Group Board of Directors at least once a year.

Policies in the working environment

Whistleblower Protection Policy

Employees who have information about impermissible conduct of other employees can contact the ombudsman (internal reporting office) to report the information verbally or in writing; this can also be anonymous if the whistleblower does not wish to reveal their identity.

The ombudsman will treat information about the identity of the whistleblower and any third parties in strict confidence.

After receiving a report, the ombudsman investigates the facts of the case and assesses whether statutes or policies may have been violated, actions may have been taken in bad faith or conduct may have occurred that is contra bonos mores.

Labour Policy/Supplier Code

We are committed to leaving future generations with as intact an environment as possible, as well as stable social conditions, and therefore strive to take account of ethical and ecological aspects in our business activities.

When selecting our suppliers and business partners, we ensure that they act in accordance with the applicable statutory requirements and comply with the relevant business standards. In this case, we take account of aspects such as fair trade, the protection of human rights, the prevention of child labour and modern slavery, and ecologically responsible conduct, etc.