

A partnership built on trust

Berlin Hyp

Lobbying Guideline

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Berlin Hyp believes it is legitimate that companies and business associations should establish and maintain contact with the politicians, government officials and civil servants who are responsible for protecting the interests of the public. Such contact makes it possible to exchange information and compare differing views and situational assessments. Thus it serves to improve understanding on all sides and promote the formulation of policies that are designed to safeguard the public interest in a democracy.

Berlin Hyp has, however, decided not to exert any direct influence on the political decision-making process and to instead focus strongly and exclusively on the formation of opinion in the public realm. Berlin Hyp also does not commission any third parties to establish contact with politicians, government officials, etc. on its behalf or to take steps to influence public opinion. Should Berlin Hyp decide to commission third parties for lobbying purposes, such parties shall be contractually obligated to comply with the principles described below.

Berlin Hyp is a member of several intersectoral associations. Although these associations are involved in activities designed to contribute to the formation of political and public opinion, such activities are conducted within the framework of the publicly accessible charters, by-laws, etc. of these associations and the decisions made by the governing body or executive committee of the association in question. Berlin Hyp has disclosed its memberships in banking industry associations within the framework of its sustainability reporting activities.

Berlin Hyp uses the following two documents as points of reference with regard to its involvement in political decision-making processes and the formation of opinion in the public realm:

- The Code of Conduct of the German Association of Political Consultants

- The German Public Relations Council Guideline for Cultivation of Contacts in the Political Arena

On the basis of the provisions contained in these documents, Berlin Hyp has committed itself to complying with the following principles:

- Integrity, adherence to democratic rules and procedures, and respect for the basic democratic order underlie all opinions expressed by employees of Berlin Hyp.
- When conducting activities designed to communicate or assert its interests, Berlin Hyp does not exert any inappropriate or illegal influence on any individual or entity – in particular through direct or indirect financial incentives.
- Berlin Hyp will not obtain information using dishonest or illegal means. Berlin Hyp will not knowingly disseminate false information.
- Members of staff of Berlin Hyp who participate in public discussions that relate to the business objectives and/or business activities of Berlin Hyp are required to identify themselves as Berlin Hyp employees. This especially applies to statements employees may make online via forums, blogs, etc.
- Berlin Hyp will not take any action that could create a conflict for a political decision maker with regard to their public or professional obligations. In particular, Berlin Hyp will not attempt to persuade individuals or entities to accept any type of benefit and will also refrain from utilising any form of coercion. Berlin Hyp and its employees are prohibited from making donations or any other payments to politicians, political parties, party-affiliated foundations, government officials or civil servants (see internal guideline Compliance, 11. Donations and Sponsorship).

The Corporate Strategy Division is responsible for ensuring that these principles are known and complied with throughout the company.

Berlin Hyp is clearly committed to compliance with this guideline.

A handwritten signature in blue ink, appearing to read 'Sascha Klaus', written in a cursive style.

Sascha Klaus

Chair of the Board of Management of Berlin Hyp AG

A note on the use of the masculine form of persons: For reasons of better readability, the simultaneous use of the language forms masculine, feminine and diverse (m/f/d) is dispensed with. All references to persons apply equally to all genders.