

PROCOPE & HORNBERG ATTORNEYS LTD

VALUE CHAIN GUIDELINES / CODE OF CONDUCT

APPLICABLE FROM 10/2022

1. INTRODUCTION

Corporate Responsibility Values

Procopé & Hornborg Attorneys Ltd (individually and jointly “Procopé & Hornborg”, “we”, “us” or “our”) is committed to providing legal services in accordance with the highest ethical and legal standards.

Environmental, social, and economic considerations are central to our decision-making when selecting suppliers. We purchase responsibly, sustainably, and environmentally friendly produced products. We also expect our suppliers and other business partners to respect social values and human rights in their operations.

Purpose of the Code of Conduct

The purpose of this Code of Conduct (the Code) is to define the basic legal, ethical, employee, and environmental related standards placed on our suppliers. Our suppliers shall comply with the principles prescribed in this Code in all their business activities and in relation to their employees and authorities.

Value Chain

Our suppliers have an important role in the responsibility effort. In addition to their own activities, the suppliers shall also ensure that

their own suppliers, subcontractors, consultants, and business partners participating in the delivery of products or services to us comply with the principles of this Code.

2. BUSINESS CONDUCT

Compliance with Laws

The supplier shall comply with all laws and regulations applicable to its business operations. The supplier is expected to have adequate compliance policies in place and undertake necessary training for its personnel as to the content of applicable laws.

Conflict of Interest

The supplier shall avoid any situation in which a conflict of interest arises or may arise between the supplier and us. The supplier shall immediately disclose us all conflicts of interest relating to its activities as our supplier. This includes informing us of situations where our employee or his/her family member holds a material financial interest, holds a managerial position, or works for the supplier.

Anti-corruption

The supplier shall have zero tolerance towards bribery, extortion, and any other

forms of corruption in all business relationships.

The supplier shall establish and maintain policies and procedures to ensure that its representatives do not accept or offer any payments, personal benefits, gifts, or other commitments that deviate from normal hospitality.

Grey Economy

The supplier shall comply with all applicable laws and regulations relating to anti-money laundering, taxation, contractor's obligations and liability when work is contracted out, as well as other legislation combating grey economy. The supplier must duly take care of any payment and related obligation towards its employee, suppliers, and authorities, especially tax authorities.

Trade Sanctions

The supplier shall comply with all applicable laws and regulations on export control and export restrictions.

Competition Law

The supplier shall compete fairly and in accordance with applicable competition laws and regulations. These laws prohibit such formal or informal understandings, agreements, or arrangements among companies that unfairly restrict competition.

Privacy

The supplier shall handle personal data appropriately in compliance with applicable laws and regulations. The supplier undertakes to safeguard high level security of our information and not to disclose or use

our confidential information without a permission from us.

3. SOCIAL RESPONSIBILITY

Respect of Human Rights

The supplier is expected to support and respect internationally proclaimed human rights, for example those set out in the International Bill of Human Rights.

The supplier shall respect the rights and privacy of each individual and treat everyone with dignity and respect. The supplier shall implement mitigation actions and provide corrective measures in the event of human right violations.

Health, Safety, and Well-being

The supplier shall provide its employees with safe, healthy, and secure working environment in compliance with all laws and regulations applicable to its operations.

The supplier shall ensure that its employees are provided with appropriate health and safety information, training, and equipment.

We encourage our suppliers to adopt a proactive approach to occupational health and well-being and to discuss matters related to health, well-being, and coping at work with its personnel.

Terms of Employment

The supplier shall clearly define its employees' terms of employment. The supplier shall ensure that the compensation paid to the employees complies with all applicable wage laws, possible collective agreements, or industry standards, whichever is higher, and shall always compensate employees fairly.

The working hours and holidays shall comply with applicable national laws. Sick leaves and parental leaves must be respected.

Fair treatment, Non-discrimination, and Harassment

Suppliers must treat everyone fairly. Any discrimination based on gender, ethnic or social origin, religion, political or any other opinion, marital status, pregnancy, or any other similar distinction not inherent to the requirements of the work is prohibited.

The supplier shall ensure that no worker is subjected to any physical, sexual, or verbal abuse, or other unlawful harassment.

Freedom of Association

The supplier shall recognize and respect its employees' right to organize freely and bargain collectively.

Forced Labor

The supplier shall refuse to make anyone work against his or her will. The suppliers shall not use under any circumstances forced or compulsory labor. The supplier shall not make employees work under a threat of penalty or mental or physical coercion.

Child Labor and Young Workers

The supplier shall not employ under any circumstances children who are under the legal minimum age for the employment.

The suppliers shall protect workers under the age of 18 from work which, by its nature or the circumstances in which it is carried out, is likely to endanger their health, safety, or morals.

4. ECOLOGICAL RESPONSIBILITY

Environmental Protection

The supplier shall make all reasonable efforts to protect the environment, combat climate change and take biodiversity into account. We encourage the suppliers to have a clear plan and a target on carbon neutrality.

Proactive Approach and Initiatives

The supplier shall comply with all applicable environmental laws and regulations and obtain, maintain, and comply with all environmental permits, licenses, and registrations necessary for its operations.

The supplier shall support a proactive and precautionary approach to environmental challenges and undertake initiatives to promote greater environmental responsibility.

Environmental Impact and Adoption of Measures

We are committed to minimizing the environmental footprint of our business operations and expect our suppliers to share our sustainability commitment.

The supplier shall make a reasonable effort to identify environmental impact and footprint of its operations and to undertake necessary mitigation measures. The supplier is expected to monitor, control, minimize, and appropriately treat emissions and pollutants and other waste generated from its operations.

The supplier shall strive to implement appropriate and adequate greenhouse gas reduction measures such as improving

energy efficiency, using renewable energy, as well as eliminating, reducing, and recycling waste.

5. MONITORING AND REPORTING

Monitoring

The supplier shall monitor its compliance with the Code. The supplier shall notify us without undue delay if it becomes aware of any infringement of the requirements of the Code.

Breach of Code

If we reasonably consider that the supplier has materially breached the Code, the supplier must remedy the situation as soon as possible. If the situation is not remedied within the time agreed together with us, we have the right to terminate the contract and cancel or suspend the work.