

The image features a large, stylized letter 'M' shape in the background. The 'M' is composed of two dark, curved shapes that meet at the top and bottom, creating a central vertical opening. This opening reveals a scenic view of a lake with a forested shoreline. The water is calm and reflects the sky and the trees. The sky is a clear, light blue. The overall composition is clean and professional.

# Code of Conduct for Employees

MANNHEIMER  
SWARTLING

## A word from the Board of Directors

Mannheimer Swartling provides high-quality advice on business law in Sweden and around the world. Our clients include prominent Swedish and multinational enterprises and organisations. We always strive to provide our clients with the best possible counsel. To do so, it is essential that we conduct our own business in a manner at once responsible and sustainable.

The firm's core values – *quality, business focus and team spirit* – govern both our approach within the firm and our relations with clients and the world around us.

Our Code of Conduct clearly sets out the firm's values and summarises the expectations we have of our employees. Gender equality and diversity, working conditions, environment, business ethics, anti-corruption and insider regulations are some of the issues to which we have adopted a result-oriented and systematic approach for many years. The Code of

Conduct summarises the firm's governing documents in each of these areas. More detailed information on each area may be found in the relevant governing document.

We urge all employees of the firm to read the Code of Conduct carefully and abide by it in their day-to-day work.

**BOARD OF DIRECTORS**  
Stockholm 11 March 2021

“We conduct our own business in a manner at once responsible and sustainable.”

The Code of Conduct sets out the principles governing Mannheimer Swartling in its role as an employer. It also clarifies our employees' role in relation to each other, and the firm's and the employees' role in relation to clients, suppliers, business partners and the wider community. We must always act in a way that is responsible and sustainable.



# Mannheimer Swartling's Code of Conduct

## ABOUT THE CODE OF CONDUCT

The Code of Conduct has been adopted by Mannheimer Swartling's Board of Directors, and is reviewed annually. It covers all employees of the firm – partners, associates and support staff. The Code of Conduct also applies to agency staff.

Each employee is responsible for complying with the Code of Conduct. Partners and heads of support departments are responsible for ensuring that other employees understand the Code of Conduct, can receive advice about the Code, and act in accordance with it. The responsibility borne by all partners and heads of support departments includes ensuring that employees receive regular training on the contents of the Code of Conduct, as well as its relevance in day-to-day operations at the firm.

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to clients, suppliers, business partners and the wider community. We must always act in a way that is responsible and sustainable.

The Code of Conduct provides guidance on the laws and regulations that the firm and its employees must abide by. It also addresses matters where the firm – internally and in relation to others – goes further than its statutory obligations.

The Code of Conduct is not exhaustive; it is intended to serve as a navigation aid, helping the firm's employees to understand the governing documents applying to our operations. The different sections of the Code of Conduct make reference to other relevant governing documents in force at the firm. More detailed information may be found in those documents.

The firm also has a *Code of Conduct for Suppliers*. That code governs all business relationships between Mannheimer Swartling and our suppliers, and defines the firm's expectations of the operations and behaviour of our suppliers.





**THE FIRM'S CORE VALUES**

The firm has three core values – quality, business focus and team spirit – which permeate our culture, govern our day-to-day operations, and form an integral part of our business model – “Pure Lockstep”. The model promotes knowledge sharing and collaboration between colleagues, practice groups and offices. It is our primary

means of guaranteeing each client the best possible advice, and of ensuring the best possible working environment for our people. Pure Lockstep means that the firm’s operating profit is shared equally between the partners of the firm, and that the remuneration paid to associates is based solely on experience.

Read more about our core values on the next page



**QUALITY**

We strive to achieve the highest quality in everything we do.

**BUSINESS FOCUS**

Within the scope of each engagement we consider the business challenges and opportunities facing our clients, and take them into account when shaping the advice we give.

**TEAM SPIRIT**

We help each other and gladly share knowledge and experience for the benefit of the whole firm, and ultimately also every client.

# Core values

# Our priority areas

## HUMAN RIGHTS

We respect human rights, and must be aware of how our business impacts human rights.

We respect internationally recognised human rights, including those laid down in the UN General Declaration of Human Rights and UN international conventions on civil and political rights, and on economic, social and cultural rights. Throughout our operations we take active steps to implement the UN guiding principles on business and human rights. Other central instruments are the OECD Guidelines for Multinational Enterprises, Swedish Bar Association guidelines and recommendations, the IBA Practical Guide on Business and Human Rights for Business Lawyers and other guidance for the legal sector.

The firm's approach to human rights is encapsulated in the following principle:

### Respect for human rights

We respect human rights. We are committed to ensuring that our business does not cause or contribute to disregard for human rights. Our operations are based on values founded on respect for human rights.

## WORKING CONDITIONS – PHYSICAL AND PSYCHOSOCIAL WORK ENVIRONMENT

As a knowledge company, Mannheimer Swartling is dependent on its people and the expertise they possess. Each employee's commitment, skill and experience are absolutely crucial factors for the success of our counsel – today and to ensure we remain relevant in the future. Our aim is to be a modern workplace that attracts and retains the most talented people.

The firm's approach to the physical and psychosocial work environment is encapsulated in the following principles:

### A workplace where respect is paramount

We act in all situations as good ambassadors for Mannheimer Swartling and in line with the firm's core values. We show respect in our meetings with others.

### Zero tolerance of discrimination

We do not accept any form of discrimination based on gender, identity or expression, ethnicity, religion or other beliefs, functional variation, sexual preferences or age. We strive to achieve equal treatment and to increase diversity and gender equality.

The firm has a *Gender Equality and Diversity Plan* in which these issues are addressed in detail.

### Responsible leadership and employee involvement

As leaders and employees we set a good example, and act on the basis of the firm's core values. We encourage employee involvement – a key element of the firm's culture and Pure Lockstep model.

### A safe and secure work environment

We work continuously to ensure the firm has a good physical work environment. To promote the psychosocial work environment we have regular training sessions on stress management, and we encourage and contribute to health care and wellness. We attach importance to social activities and gatherings at which employees are able to establish and maintain good relations with each other.

The firm has a *Work Environment Policy* in which these issues are addressed in detail.



“We continuously analyse our climate footprint.”

The purpose of the firm’s policy on environment and climate is to minimise our negative impact, thereby contributing to lasting and sustainable societal development.

#### ENVIRONMENT

The firm’s environmental performance is an important issue, even though we are a company providing services, with a limited direct impact on the environment. The purpose of the firm’s policy on environment and climate is to minimise our negative impact, thereby contributing to lasting and sustainable societal development. The firm reports its greenhouse gas emissions in line with the Greenhouse Gas Protocol, Corporate Standard. We continuously analyse our climate footprint, and use the results as a basis for focusing our efforts to reduce that footprint.

The firm has also received ISO 14001 certification. The purpose of our environmental management system is to continuously reduce our environmental impact by taking effective action in a number of areas we have identified for improvement.

In outline, our approach to environmental issues is based on the following principles:

#### Transport and travel

We always choose the most environmentally friendly mode of transport for deliveries to and from our offices. We are responsible for ensuring that our own business journeys take place in an environmentally friendly, efficient and economically defensible and safe way.

The firm has a *Meeting and Travel Policy* in which these issues are addressed in detail.

#### Purchasing of goods and services

We have a positive impact by making our purchases consciously and by as far as possible choosing products and services that have less environmental impact. We consider relevant environmental standards, and take the life-cycle perspective into account in procurement and purchasing.

These issues are among those addressed in detail in the firm’s *Code of Conduct for Suppliers*.

#### Knowledge about the environment and climate

We continuously inform, educate and inspire our employees in relation to environmental and climate issues to increase awareness, engagement and knowledge about the impact we have on the environment and climate. We arrange recurring in-house events focusing on the environment and conduct regular activities to raise awareness.

The firm has an *Environmental Policy* in which these issues are addressed in detail.

#### BUSINESS ETHICS, ANTI-CORRUPTION, ANTI-MONEY LAUNDERING AND REGULATORY COMPLIANCE

A crucial part of our business is to monitor and systematically manage risks within our advisory services relating to money laundering, terrorism financing, ethics of legal practice, sanctions legislation, insider trading and anti-corruption. We constantly weigh ethical considerations to ensure we act in line with



the firm's values. A qualified team of around fifteen people check to ensure that our employees meet the firm's standards of responsible and ethical behaviour when accepting new engagements and clients.

Good business ethics and our employees' compliance with relevant laws, regulations and internal policies are fundamental in all the firm's operational areas.

The principles forming the basis for our approach include the following:

#### Zero tolerance of corruption

We abide by the anti-corruption legislation, as well as other relevant regulations and guidelines we are bound to consider. We are particularly aware of the risks typically associated with our industry and business, and as a law firm we must not cause, aid or by our business cause or contribute to corruption.

The firm has an *Anti-Corruption Policy* in which these issues are addressed in detail.

#### Avoidance of conflicts of interest

We take conscious and active steps to avoid conflicts of interest in accordance with the Swedish Bar Association Code of Conduct and other current regulations. We understand and recognise the importance of reviewing all parties in a new matter in line with the firm's internal procedures.

The firm has a *Policy for Management of Conflicts of Interest and Decisions before Accepting New Engagements*, in which these issues are addressed in detail.

#### Money laundering and terrorism financing

We take active steps to prevent the firm and its engagements being used for money laundering or terrorism financing.

The firm has a *Policy under the Anti-Money Laundering and Terrorism Financing Act (2017:630)*, in which these issues are addressed in detail.

#### Information security, IT security, duty of confidentiality and personal privacy under data protection legislation

We uphold our duty of confidentiality and discretion as regards information to which we have access in our operations, and report any identified risks of information loss to the relevant partner, head of support department or the Compliance and Risk department. We uphold our duty of confidentiality, information security, IT security and respect for personal privacy under the data protection legislation.

The firm has an *Information Security Policy, an IT Security Policy and a Protection of Privacy Policy*, in which these issues are addressed in detail.

#### Insider regulations

We always respect applicable laws and our internal regulations governing insider trading. Among other things, our internal regulations prohibit our employees from acquiring listed financial instruments (e.g. shares).

The firm has an *Insider Trading Policy*, in which these issues are addressed in detail.







# Reporting breaches

All employees are urged to report any breaches of the Code of Conduct or of any of the firm's policies to the relevant partner or head of support department.

Information on how this is done, and how a matter is dealt with is set out in the Work Environment Policy, and the Gender Equality and Diversity Plan. If an employee suspects that a partner or head of support department has committed a serious breach of this Code of Conduct, the *Bar Association Code of Conduct*, the firm's *Insider Trading Policy*, *Information Security Policy*, *Protection of Privacy Policy*, *Anti-Corruption Po-*

*licy* or our *Policy under the Anti-Money Laundering and Terrorism Financing Act (2017:630)*, those suspicions can be reported under the firm's whistleblowing system.

The system can also be used to report suspicions that a partner or head of support department has committed serious financial irregularities or serious irregularities involving the life and health of individuals. The system is described in detail in the firm's *Whistleblowing Policy*.

Any employee can report their suspicions anonymously. Reports are dealt with expeditiously by a specially appointed whistleblowing team.





**MANNHEIMER SWARTLING**

[www.mannheimerswartling.se](http://www.mannheimerswartling.se)