



Code of Conduct for Suppliers

MANNHEIMER
SWARTLING

Managing Partner's report

Mannheimer Swartling is the leading corporate law firm in the Nordic region, and operates in a number of jurisdictions. It therefore falls to us to ensure that we provide our clients with the best possible advice, whilst also running our own business in a responsible and sustainable manner.

We are proud of our strong corporate culture and the core values we have long espoused – quality, business focus and team spirit. In 2016 we summarised our expectations for the business in a code of conduct covering all people working at the firm.

To ensure that the expectations we have of our own operations are also met by our suppliers, we have defined

our expectations in this Code of Conduct for Suppliers (“the Suppliers’ Code”), which covers the same four areas as our own code of conduct: Human Rights, Labour Standards, Environment, Business Ethics and Anti-Corruption.

JAN DERNESTAM Managing Partner

”We strive to
build long-term
and stable
relationships.”

The Suppliers' Code applies to all business relationships between Mannheimer Swartling and our suppliers, and defines our expectations of the business operations and behaviour of our suppliers.

The relationship with our suppliers

LONG-TERM RELATIONSHIPS

Mannheimer Swartling strives to build long-term and stable relationships with strategic suppliers, in cooperation with whom we systematically develop products and services.

The Suppliers' Code applies to all business relationships between Mannheimer Swartling and our suppliers, and defines our expectations of the business operations and behaviour of our suppliers. Mannheimer Swartling expects all suppliers to conduct their business in a responsible and sustainable manner.

Suppliers of Mannheimer Swartling must comply with all laws and regulations governing their operations. Mannheimer Swartling expects suppliers and their subcontractors to abide by the expectations set out in the Suppliers' Code, even where they set a higher standard than that provided by law.

The Suppliers' Code

PURPOSE OF THE SUPPLIERS' CODE

The purpose of the Suppliers' Code is to create a dialogue and partnership with our suppliers to ensure they abide by a number of specified instruments based on the principles enshrined in the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. These international instruments have served as an inspiration, in terms both of structure and design.

OTHER DOCUMENTATION

In addition to the Suppliers' Code, Mannheimer Swartling uses a questionnaire that is sent to all suppliers before a contract is signed. The questionnaire follows the same format as the Suppliers' Code. The Suppliers' Code, the questionnaire, a non-disclosure agreement and also, where applicable, a personal data assistant agreement, all constitute appendices to the contract between Mannheimer Swartling and the supplier.

Focus areas

HUMAN RIGHTS

Respect for internationally recognised human rights

The supplier respects internationally recognised human rights and undertakes in its business operations not to cause, or be complicit in, human rights abuses.

LABOUR STANDARDS

A secure and safe working environment

The supplier guarantees a secure and safe working environment for its employees.

Zero tolerance of discrimination

The supplier guarantees a working environment free from discrimination and harassment on grounds of gender, transgender identity or expression, ethnicity, religion or other beliefs, mental or physical disability, sexual orientation or age.

Freedom of association and collective negotiations

The supplier ensures that the freedom of association is safeguarded and recognises its employees' right to collective negotiations.

Zero tolerance of child labour and forced labour

The supplier opposes the use of any form of child labour, forced labour or other forms of involuntary work.



ENVIRONMENT

Systematic environmental responsibility

The supplier adopts a systematic approach to its environmental responsibility and has good knowledge of the environmental impacts caused by its operations. The supplier meets all relevant environmental standards in its production and products.

Life-cycle analysis

The supplier has knowledge of the environmental impacts of its products or services from a life-cycle viewpoint.

BUSINESS ETHICS AND ANTI-CORRUPTION

Zero tolerance of corruption

The supplier has zero tolerance of all forms of corruption, including extortion and the giving and receiving of bribes.

Avoidance of conflicts of interest

The supplier undertakes to inform Mannheimer Swartling if, in conjunction with a purchase, there is some form of personal relationship (family relationship, personal friendship, etc.) between the person responsible for the purchase at Mannheimer Swartling and representatives of the supplier involved in the purchasing process.

Money laundering and financing of terrorism

The supplier works to prevent its own business from being used for money laundering or financing of terrorism by

having established procedures for gaining proper knowledge of its partners and suppliers, and knowledge and understanding of the purpose of a given business relationship.

Information security and IT security

The supplier manages all information received from Mannheimer Swartling in a secure manner and in accordance with any non-disclosure agreements it has entered into, as well as applicable market abuse legislation. The information is never disclosed to unauthorised persons. The contents of offers, fee quotes and agreements are to be regarded as confidential.

Processing of personal data

The supplier must process personal data in accordance with the data protection legislation applying to the processing. In all processing of personal data, the supplier will consider and respect the right of the registered person to privacy. Particular care must always be exercised if the processing involves transfer of the personal data to third countries or if the processing involving specific categories of personal data.¹

The supplier must take appropriate technical and organisational measures to ensure that the security level for processing meets the relevant legal requirements. The supplier must immediately notify Mannheimer Swartling if a personal data incident occurs involving personal data that Mannheimer Swartling has shared with the supplier.

1. Personal data revealing race or ethnic origin, political views, religious or philosophical conviction or membership of a trade union, and processing of genetic data, biometric data in order to unequivocally identify a private individual, information about health or information about the sexual habits or sexual orientation of a private individual.



Implementation of Code of Conduct

All suppliers are expected to abide by the Suppliers' Code, and to ensure that their sub-contractors also do so.

If the supplier discovers that it is not abiding by the Supplier's Code, it must inform Mannheimer Swartling of this. The supplier must then be given the opportunity to take necessary remedial action. If, in spite of this, the supplier does not succeed in abiding by the Suppliers' Code, Mannheimer Swartling is entitled to take action against the supplier, including the right to cancel the contract of supply.

If the supplier discovers that a sub-contractor is

breaching the provisions of the Suppliers' Code, the supplier undertakes to (i) inform Mannheimer Swartling; (ii) ensure that action is taken to rectify the situation; and (iii) ascertain that this has been done. If shortcomings persist after they have been pointed out, the supplier must be replaced.

If you have any questions regarding this Code of Conduct for Suppliers, please contact Compliance and Risk C&R@msa.se.



 **MANNHEIMER SWARTLING**

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