



UN GLOBAL COMPACT - COMMUNICATION ON PROGRESS

I am pleased to confirm that Advokatfirmaet Wiersholm AS reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours,
For Advokatfirmaet Wiersholm AS

Morten Goller
Managing Partner

HOW WE DELIVER RESPONSIBLE BUSINESS

Two of our most important values in Wiersholm are integrity and professionalism. The way we practice and operate our business tells us who we are and what we stand for. We will not only provide our clients with the best service and quality, we will also show responsibility in how we run our business and accountability in our contribution to the society.

The UN's goal for responsible business is high on the agenda of businesses, governments and organizations globally as well as nationally, and is based on broad recognition that responsible and sustainable business activity is the key to long-term growth and profitability for both society and the individual.

As one of the leading law firms in Norway, Wiersholm have both the opportunity and responsibility to be a driving force for responsible and sustainable business.

The fact that we operate our business in accordance with national and international standards for law firms is natural. We comply with laws and regulations, work against money laundering, corruption and human rights violations in our own business, work actively for increased diversity and strive for sustainable operation and make demands for our suppliers.

In addition, we actively contribute to the society by sharing our knowledge and expertise - through teaching within our areas of expertise, through pro bono work in collaboration with organizations that contribute to the disadvantaged being given access to legal aid, and by working actively to ensure that our clients will succeed in achieving the goals for responsible business activity.

ETHICS, COMPLIANCE AND ANTI-CORRUPTION

The basic principle of a responsible and sustainable law firm is that we in our own business comply with the requirements and rules that apply to our type of business activity. For us, this is not enough: Ethics is an essential part of our profession and the spine of our law firm. In everything we do, Wiersholm must maintain a high ethical standard.

To fulfil these ambitions, Wiersholm implemented new ethical guidelines in 2018, strengthening the focus on ethics in the business. Ethics and dilemma training is an integral part of Wiersholm's introductory programs and the annual seminars, "fagdager", for all employees. All lawyers are in addition obliged to comply with the ethical guidelines from the Norwegian Bar Association and to comply with the Bar Association's requirements for regular training in ethics.

Wiersholm's own ethics committee shall be sparring partner where dilemmas arise in ongoing cases, and shall advise management on ethical issues related to the business management. During 2018, the mandate for the ethics committee was extended and strengthened and the ambition is that the committee shall be more dedicated and proactive in its work, to contribute to deepen the ethics expertise and awareness in Wiersholm, and contribute to good ethical judgments. Going forward, Wiersholm will ensure full implementation of the new mandate.

In Wiersholm we have strict routines related to AML, anti-corruption, conflict check, labour rights and Data Privacy, and we have systems for follow-up and internal control. Internal compliance within these areas are essential for a law firm as a profiled external adviser within these areas. To secure compliance and sufficient internal control, Wiersholm hired a dedicated Compliance & CSR Officer who is responsible for the internal Compliance program and internal CSR assignments.

Wiersholm has a zero-tolerance for corruption, and aims to work against corruption in everything we do, such as extortion and bribery. Wiersholm's internal framework include guidelines on how all employees should interact in situations where there is a risk of corruption.

Actions performed:

- New ethical guidelines
- Strengthened mandate for the ethics committee
- Strengthened internal training in ethics
- Hiring a dedicated Compliance/CSR-responsible

Plans going forward:

- Implement the strengthened mandate for the ethics committee
- Continue internal training in ethics
- Continue to focus on internal compliance and follow up
- Further improve the internal anti-corruption framework

HUMAN RIGHTS

As lawyers, we have a special responsibility to respect and contribute to the respect of human rights in our own business and in our advice. Our lawyers and employees shall respect human rights in accordance with the UN's guiding principles and the Bar Association's recommendation. We work actively to integrate human rights into our practice and business. Our membership of the UN Global Compact is an expression of this, and helps us continually uncover risks in our business.

We have also committed ourselves to be an active partner for our clients in their efforts to ensure respect for human rights. This is explicitly stated in our terms of business. If the client decides not to follow our advice related to human rights, and it is clear to us that the assignment may lead to violations of human rights, we should consider withdrawing from the assignment.

Respect for human rights is implemented in our ethical guidelines, and during autumn 2018 all lawyers were trained in assessing risks of violations of human rights in assignments. Wiersholm is working on implementing a separate policy for assessment of human rights risks, and a system will be implemented to document the assessments (as part of the ordinary case handling system).

For Wiersholm it is important to have focus on the respect of human rights in all parts of the business. Therefore, we have implemented respect for human rights as a part of the agreements with all suppliers, in a separate supplier policy, where the suppliers must confirm their compliance with the human rights principles. If the suppliers cannot confirm their compliance according to our supplier policy, we will consider what measures should be taken in relation to the supplier.

Actions performed:

- New guidelines for Human Rights liability in our terms of business
- Training of all lawyers in Human Rights dilemmas in our own business
- Oslo Compliance Forum with focus on Human Rights

Plans going forward:

- Implement Human Rights policy, and risk assessment of Human Rights for all clients and assignments
- Seminars with focus on Human Rights, breakfast seminars

DIVERSITY

It is a strength and a competitive advantage that we are different. We value our colleagues' differences and different advantages, their inequality in background, gender, ethnicity, sexual orientation, age and not least different skills and competencies.

At Wiersholm, diversity is about building up a workforce that is as diverse as our client base - and about using this diversity to drive our business forward. We consider diversity among our employees as one of our most important resources. The unique experience that each employee brings to the firm allows us to provide better service to our clients.

We are actively seeking talents in new arenas. Among other things, Wiersholm collaborates with Mino.jur, a student-driven organization for minorities at the legal faculty in Oslo and Bergen. The organisation aims to create networks and contacts among minorities, and contribute to their professional development. We hope that the initiative will draw more legal talents with minority background to our company.

Our focus on diversity is not only on employment, but as long as the employment relationship lasts. We focus broadly, through various programs, on recruiting and promoting female employees. We have special measures aimed at female employees who return from parental leave.

- We have recently launched a joint seminar together with two of the other leading law firms in Norway to discuss strategies to increase the number of female partners.
- In August 2018, we participated in the #itshertreat campaign, organized by the ideal organization #shesgotit, which deals with subconscious discrimination and gender stereotypes. We will always support and encourage those who work to create a better future

Key figures:

55 % of our employees are women, and 56% of the employed lawyers are women.

40 % of partner promotions in the last three years were female. We currently have seven female partners, six of whom were recruited internally - 17% of a total 42 partners.

12 Our lawyers come from 12 different countries and speak 15 different languages. We have lawyers with a license in the USA, UK, Germany, Denmark and Sweden.

18 of our 30 latest promotions are women.

Actions performed:

- A separate diversity committee is responsible for following up employees before, during and after parental leave, to work against pipeline leakage and to facilitate flexible career paths.
- Wiersholm has initiated a collaboration with Norway's three largest law firms on efforts to increase the number of female partners, and is engaged in the Norwegian Bar Association's women's committee.
- We support and collaborate with MinoJur to recruit and retain more employees with minority backgrounds

Plans going forward:

- Continue focus on follow up on employees on parental leave
- Continue to support and collaborate with MinoJur to recruit and retain more employees with minority backgrounds
- Increase female representation in the partnership

LABOUR AND WORKING ENVIRONMENT

In 2018, Wiersholm was named the most attractive employer among the law students in TNS Sifo Prospera's employer branding survey. It is important to attract the good candidates to maintain the quality of the counselling we provide, but it is also important to keep all the good employees we have. It is therefore important to have a good working environment for the employees, and Wiersholm has high focus on ensuring that the employees are satisfied at work and facilitate adapted working conditions if needed.

Wiersholm work actively to engage the employees, and there are many social initiatives to promote a good working environment. Wiersholm has its own social committee, which is responsible for arranging different social activities, such as spring party, summer party, autumn party, Christmas party, after works, Christmas party for the employee's children and company trips for all employees. There are also focus on promoting physical activities for the employees, and Wiersholm sponsor participation in Holmenkollstafetten and Oslo Marathon, and football teams for men and women.

All new employees will have a dedicated sponsor who will follow up both socially and career-wise. Wiersholm also has a mentoring scheme for more experienced employees.

Wiersholm support the freedom of association, and have an active group in Bedriftsgruppen, representing the employees. It is entered into a separate collective agreement for the associates, to secure the needs that lie in their working conditions.

Wiersholm runs a type of business where forced labour and child labour are not relevant, but is aware of the fact that some of our clients may be involved in this type of work directly or indirectly. Wiersholm focuses on this as part of the risk assessment related to human rights violations in connection with the assignments we undertake. This is also part of the supplier policy that is implemented. In this way, Wiersholm can assist to put this on the agenda and focus on safe and good working conditions for all groups.

It is important to have a well-functioning HSE-program, and Wiersholm has routines and guidelines that are adapted to the risks in the business. There have been no HSE related incidents during 2018 that have required any actions to be taken, and Wiersholm will continue to strengthen the HSE-work in the future. Among other, it will be considered to introduce employee satisfaction surveys in the business in order to gain a better understanding of how the employees experience their workday and what improvements that could be implemented.

Actions performed:

- Implemented a supplier policy focusing, among other things, on compliance with the UN principles for Human Rights and general labour rights
- Arranged get-togethers for the employees
- Promoted physical activity for all employees, and sponsored participation in Holmenkollstafetten and Oslo Marathon, and football teams for both men and women

Plans going forward:

- Continue to focus on compliance with relevant labour rights
- Continuous implementation of the supplier policy, and follow up on the suppliers
- Continue to promote a good working environment by arranging social events for all employees, and support physical activity

ENVIRONMENT

We work actively to manage and reduce the negative environmental consequences of our business, and have implemented a number of environmental management measures. Our work to make the business more environmentally friendly and sustainable focuses on environmental awareness in our purchasing, waste reduction and waste sorting, and general reduction of our energy consumption. We have implemented environmental management systems through Eco-Lighthouse Certification, and will organize our operations so that it is exercised with the least possible negative impact on the environment. Environmental considerations should be an integral part of the assessment in all purchases and in the choice of suppliers. We have implemented sustainability requirements for our suppliers, and Wiersholm was Eco-Lighthouse certified in December 2018.

For 2019, we will keep focus on reducing waste, and will have special focus on reducing organic waste in cooperation with our canteen. There will also be a continued focus on reducing print and travel in an environmental way, if possible.

Actions performed:

- Eco-Lighthouse Certification in December 2018
- Membership of the UN Global Compact
- Implemented supplier policy with environmental focus
- Implemented several environmental actions, e.g. waste reduction and waste sorting, and reduction of energy consumption

Plans going forward:

- Continue to implement relevant environmental actions
- Increase focus on environmental issues internally, e.g. organize an environmental-day/week
- Assess possibility for more environmental traveling, e.g. use of electrical bicycles
- Continuous implementation of the supplier policy, and follow up on the suppliers

SOCIAL RESPONSIBILITY

As leading lawyers in our areas, our knowledge and experience is our most important value and the most valuable and sustainable contribution we can make. Each year, we provide several FTEs to help create value for others who cannot be measured in money in the following ways:

Teaching

Wiersholm contributes to developing tomorrow's lawyers and leaders through guidance and teaching in legal subjects at universities and colleges, including the University of Oslo and BI Norwegian Business School. Wiersholm contributes to raising competence among today's managers and lawyers by arranging seminars and courses within our disciplines. In addition, we organize the Oslo Compliance Forum and the Oslo Privacy Conference annually, which have become some of the industry's most important arenas for sharing knowledge and experience within two of our most important areas for responsible business.

Wiersholm also has comprehensive trainee-programs, arrangements for scholarships and Summer School for students that are potential future employees.

Actions performed:

- Oslo Compliance Forum
- Oslo Privacy Forum
- Running trainee-program
- Several breakfast and lunch seminars with themes of interest
- Summer School for students

Plans going forward:

- Oslo Compliance Forum 2020
- Oslo Privacy Forum 2019
- Continue with trainee-program
- Several breakfast and lunch seminars with themes of interest
- Summer School for students

External positions and board participation

Wiersholm's lawyers have a long tradition of social engagement. We contribute to legal and social development through, among other things, positions in the Norwegian Bar Association's law committee, the Bar Association's human rights committee and the Bar Association's women's committee. Wiersholm's lawyers are engaged in a number of charitable organizations and through this contribute with their expertise and knowledge.

Probono

Wiersholm's social contribution in the form of pro bono assignments is a significant and integrated part of our business.

Wiersholm has established cooperation with NOAS and conducts 8-10 litigation cases every year concerning asylum seekers who are in danger of being sent out of the country. Two FTEs are made available for this work annually.

In addition we contribute to legal assistance and charity work outside our core business, e.g. through our cooperation agreement with Redd Barna, which was entered into in December 2018. Our cooperation will include pro bono counseling, professional contributions at Redd Barna's events, involvement in specific Redd Barna projects, collaboration on a common trainee program and financial support.

Wiersholm is excited to be the main partner for HumAk 2020. HumAk is short for Jusstudentene's Humanitarian Action, and it is 30 years since Humak was arranged for the first time. The commitment on the law is great. The idea behind HumAk was to direct some of this commitment to a bigger cause, namely to help those who need it most. HumAk is today the only association for humanitarian law. Every other year, a fundraising campaign is held for a specific purpose. It all ends with a late summer festival where the students celebrate their social corporate commitment. The collaboration means, among other things, that we will hold lectures in the HumAk week and at several events related to the action. We will also be part of selecting the charitable purpose for the action.

Actions performed:

- Breakfast-seminars and financial support to TV-aksjonen/Kirkens Bymisjon
- Strengthened probono-strategy
- Entered into a cooperation agreement with Redd Barna
- Performed several probono-cases for NOAS

Plans going forward:

- Probono work in cooperation with Redd Barna
- Professional contributions at Redd Barna's events
- Involvement in specific Redd Barna projects
- Collaboration with Redd Barna on a common trainee program.
- Continue with probono-cases for NOAS
- Plan for HumAk 2020

Responsible advice

Wiersholm is leading in compliance, anti-corruption and sustainable advice. We take the initiative to discuss with our clients how they can achieve accountability in their own business, through, among other things, the prevention of corruption, money laundering and human rights violations in their own business.

Actions performed:

- Internal Compliance training for all employees with focus on ethics and human rights

Plans going forward:

- Implementing new AML-routine and KYC-system
- Follow-up Compliance training for all employees

ACHIEVEMENTS

Our work on corporate social responsibility is important for Wiersholm to continue to be:

- A company clients are proud to work with
- A company our employees are proud to work in
- A company that is valued by the society around us