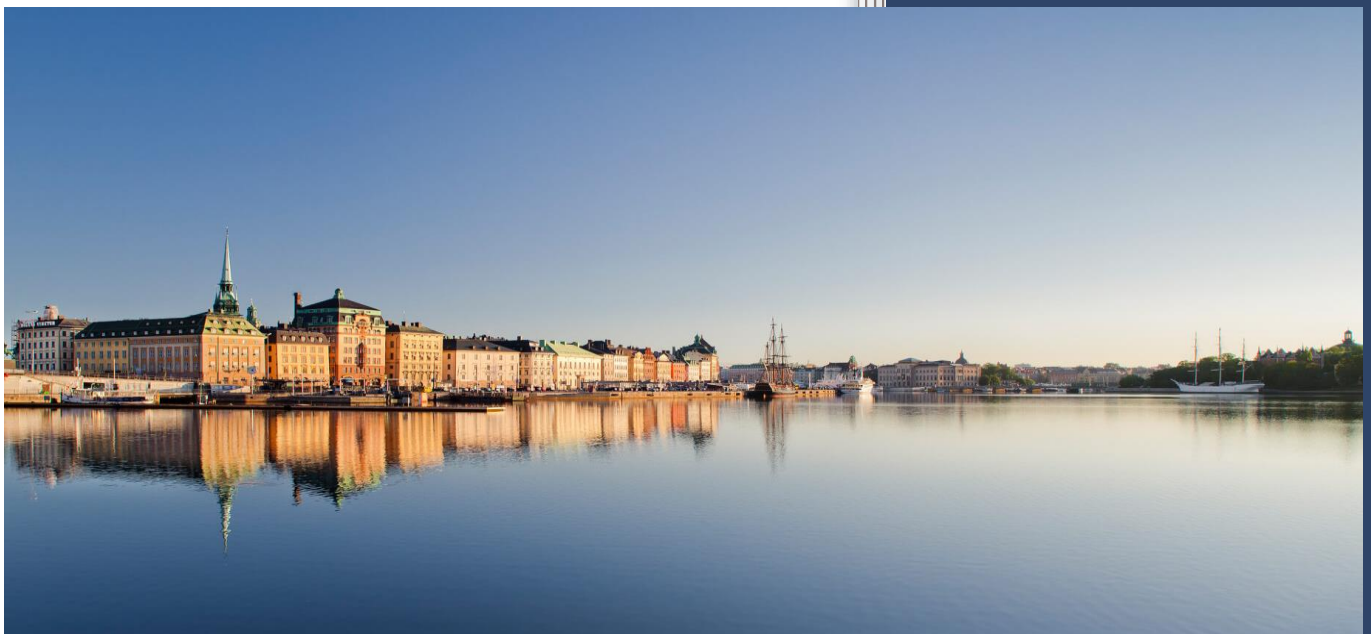




# 2021

## UN Global Compact Communication on Progress



HAMMARSKIÖLD

## INTRODUCTION

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*The Swedish law firm Hammarskiöld is pleased to confirm that we are once again giving our support to the UN Global Compact and to the ten principles in labor law, environment, anti-corruption and human rights. We at Hammarskiöld strive to conduct our business according to the highest ethical standards and provide legal advice in accordance with ethical principles. For us, it is a basic principle to follow the UN Global Compact and is consistent in all our daily firm activities.*

*We are pleased to integrate these ten Global Compact principles in 2021 and in this annual communication; we will describe our progress through last year and our future actions. We will describe how we use these measures in our daily operations, corporate culture and business strategies. This information will be shared to both our employees and customers. The information will also be available on our regular communication channels*

*Yours sincerely,*

Advokatfirman  
HAMMARSKIÖLD



Mattias Anjou  
Managing Partner



Claes Langenius  
Partner

HAMMARSKIÖLD

## CSR AND HUMAN RIGHTS AT HAMMARSKIÖLD

**Corporate Social Responsibility (CSR), also referred to as Corporate Citizenship, is about creating long-term sustainability, not only for us at Hammarskiöld, but also for the community in which we operate.**

CSR is important within Hammarskiöld's day-to-day operations, where ethics and long-term sustainability, together with quality and integrity, are fundamental principles that guide us in everything we do. As lawyers, we have a special responsibility, as well as a special opportunity, to stand up for the most fundamental and basic principles in society – such as human rights, the rule of law, and sound business ethics.

As a firm we have agreed to support and respect internationally recognized human rights, as part of our commitment to the UN Global Compact, to all of our clients and employees, and to the local and international community. In addition, Hammarskiöld fully expects all of its suppliers and cooperative partners to comply with the applicable laws in the countries in which they operate.

Being a law firm, Hammarskiöld and its employees operate under the strict ethical rules of the Swedish Bar Association. These rules mandate that Swedish lawyers shall fulfil their duties of loyalty to the client, by observing professional independence and confidentiality – safeguarding, among other things, that we as a firm will not allow ourselves to be affected by improper influences or conflicts of interest.

Hammarskiöld strives to lead the way in business ethics amongst its peers. Serving as a beacon for the legal community, Hammarskiöld adopted its own internal business ethics policy with even stricter rules than those mandated by the Bar Association. Among other rules, the policy contains:

- i) A special screening and acceptance procedure for admitting new clients;
- ii) A procedure for accepting new matters from existing clients;
- iii) Additional requirements regarding an employee's independence and integrity;
- iv) Restrictions on an employee's engagement in other businesses or participation in financial investments;
- v) Strict guidelines prohibiting insider trading; and
- vi) Strict guidelines prohibiting money laundering.

The unique screening and acceptance procedure that Hammarskiöld has adopted also works as a checkpoint, to assure that the law firm does not accept clients that do not respect basic human rights and that the law firm does not accept assignments that would be contrary to Hammarskiöld's ethical standards or would make the law firm complicit in human rights abuse.



## Present situation

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In addition to our daily operation, we are proud to be part of a number of projects, which we support legally, financially, and with our personal effort and time.



### Promoting Human Rights and Sustainable Business Models

In 2013 Hammarskiöld joined **the United Nations Global Compact**. Hammarskiöld's Managing Partner at that time, Claes Langenius, participated in the *UN Global Compact Leaders Summit 2013: Architects of a Better World* that gathered over 1,000 participants, bringing new energy and direction to the Global Compact's work.

We include questions regarding human rights and social responsibility in our checklist questionnaire that we use in the dialogue with all of our suppliers. This is intended as a tool that can provide us with information in order to analyze if we need to take additional measures during the procurement process to address potential human rights risks within our supply chain. So far this tool has been helpful and has increased our awareness, but it has also shown that many times there are significant challenges for a small company to get sufficient and useful information to assess its supply chain risks.

### Health

Another important and fundamental factor in CSR is health. Without good health everything else becomes irrelevant. We promote a healthy work-life balance and offer our employees everything from regular health check-ups to a variety of sporting activities.



### “Blodomloppet”

The aim is a healthier Sweden where there should never be a shortage of blood. All participants have the opportunity to donate blood before the race start and money raised goes towards the organizers youth network and to promote the importance of blood donations. The yearly run “Blodomloppet” was postponed for 2020 due to the Covid-19 pandemic.

### Integration of Refugees into Swedish Society

Hammarskiöld financially supports a non-profit student organization in Stockholm called **Asylrättstuderterna**. Hammarskiöld is also assisting the board members pro bono by giving general advice and acting as a discussion partner. The organization is founded by and has its members among law students in Stockholm. The aim of the organization is primarily to offer its members education focused on relevant law in relation to immigration, e.g. the right to asylum. The members' voluntary work is focused on giving legal advice to refugees arriving to Stockholm meeting their immediate needs in this respect.



### Activities for Critically ill Children

Hammariskiöld is also committed to supporting critically ill children. Our Partner Carl-Johan Pousette is a part of a fundraising project, Team Rynkeby, which is a Nordic charity cycling team cycling to Paris every summer to raise money for seriously ill children. In 2019 Hammariskiöld was a Gold sponsor of Team Rynkeby GM Stockholm and had a rider on the team. Team Rynkeby comprises 2,100 cyclists and 550 volunteers, divided into 57 local teams in Denmark, Sweden, Finland, Norway, the Faroe Islands, Iceland, Germany and Switzerland, plus one international team of participants from several European countries. For almost a whole year participants must not only prepare themselves for the 1,300 kilometre trip to Paris but they are also obliged to do what they can to raise money for children with critical illnesses. The fundraising has resulted in that over the years Team Rynkeby has been able to donate a total amount corresponding to SEK 566,432,931 (approx. EUR 53,811,128) to support this particular group of children. 2020 due to the Covid-19 pandemic.

Another bright example includes helping establish the charitable foundation **MinStoraDag** (My Big Day). Hammariskiöld prepared all of the legal work necessary to create the foundation, pro bono. The mission of MinStoraDag is to grant wishes to children with serious illnesses and diagnosis. The foundation's work is unique as each child is actively involved in planning his or her own wish.

MinStoraDag works with all of the university hospitals in Sweden. The primary physicians refer the children and their wishes to the foundation, which in turn makes their wishes come true. Since August 2000, MinStoraDag has helped thousands of children fulfill their dreams and wishes. The foundation is based on an initiative taken by Claire Rosvall and its patron is Her Royal Highness Princess Madeleine of Sweden. Hammariskiöld's Senior Partner Peder Hammariskiöld is one of the founders of the MinStoraDag foundation.



### MusikBojen

Another manner in which we express our commitment to support our society is by assisting the newly founded charity foundation **MusikBojen**. Hammariskiöld has carried out all the legal work pro bono, including, among other things, work relating to creation of the foundation. MusikBojen's mission is to promote and provide access to music therapy and music activities primarily to children and youth, in which music is used to address physical, emotional, cognitive, and social needs of individuals.

The foundation is based on an initiative taken by Claire Rosvall, who was also the initiator of MinStoraDag. Hammariskiöld's Senior Partner Peder Hammariskiöld is one of the founders of the MusikBojen foundation and the current ambassadors of MusikBojen are famous Swedish artists Ann Sofie von Otter, Loa Falkman, Martin Stenmark, Nikki Amiri and music producer Martin Sandberg ("Max Martin").

# HAMMARSKIÖLD

### **Ambitious Africa**

Ambitious Africa is a novel initiative from the Nordics that is on a mission to enable young people from Africa and the Nordics to collaboratively reach the SDG30s (Sustainable Development Goals). The organization initiates and facilitates social impact projects within entrepreneurship, education and entertainment. The not for profit movement was started in April 2020 and has established teams in 25 countries, held 100+ online events, engaged 300 volunteers and launched 40 projects; all of this with no funding. undeniable impact. Hammarskiöld supports Ambitious Africa with pro-bono legal advice in Sweden since 2020.

# **Ambitious Africa**

## **Going forward**

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Hammarskiöld works continuously to safeguard that the firm's high standards regarding ethics and respect for basic principles in society are upheld. This work includes obligatory education on the firm's core values and internal policies for all new employees, special sessions for young lawyers on Hammarskiöld's and the Swedish Bar Association's ethical rules and proper conduct, as well as biannual conferences for all employees where the firm's ethical rules are studied and discussed.



## EMPLOYMENT AT HAMMARSKIÖLD

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### Labor Principles

Hammar skiöld's company handbook covers a range of policies concerning employee rights, compensation, and responsibilities. We continuously assess labor related risks. We will continue to revise our employee handbook as needed and incorporate the Global Compact in this work.

The written company policies stating employee rights and responsibilities include:

- Anti-drug policy
- Anti-harassment policy
- Confidentiality policy
- Corona policy and guidelines
- Crisis plan
- Environmental policy
- Ethics policy
- Equality and diversity policy
- Guidelines prohibiting insider trading
- Guidelines prohibiting money laundering
- Integrity policy
- IT and security policy
- Legal opinion policy
- Pension policy
- Personal data policy
- Policy on parental leave compensation for lawyers
- Purchasing policy
- Quality policy
- Safety policy
- Work environment policy



HAMMARSKIÖLD

## EMPLOYEE SATISFACTION AND DEVELOPMENT

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In Sweden Hammarskiöld is one of the leading law firms. We strive to have the most committed, motivated and competent employees. Our main goal is to have employees that wants to improving and developing our business. In every recruitment, we do, we aim for long-term relationships. We always try to developing new employees in all ways so everyone can reach their full potential.

Since its founding, Hammarskiöld and Co has invested heavily in Know How and our Know-How database. The Know-How work is conducted primarily within our competence groups. It develops our employees' ability to adapt to new conditions and increases the quality of our work product.

Hammarskiöld believes that employees who are engaged and motivated feel happy and do a better job at work. Good employee morale promotes excellent treatment and service for our clients. In the Partnership Agreement, one of the firm's most basic principles is *"To have fun at work."* We therefore believe in engaging our employees in activities inside and outside office hours to promote a well-functioning team spirit and friendship within the firm. We continuously arrange different social activities and participate in common sporting events or competitions.



Hammarskiöld is further convinced that:

- Personal development is important;
- A heterogeneous group performs better over time than a homogeneous group;
- Equality in the workplace leads to a positive work environment which promotes business;
- Balance between work and family life contributes to better performance;
- Any form of harassment is completely unacceptable, degenerates the working atmosphere, and also contributes to increased absences; and
- A good working environment is characterized by security, diversity, and social responsibility.

Most importantly, however, is how we treat each other and our clients. All employees are encouraged to ask colleagues for help and advice if needed and to freely speak their minds without regard to age differences or titles. This promotes quality and comfort. We always strive to maintain a positive tone and manner with each other as well as with our clients and opposing parties.

Each associate has a designated partner acting as a mentor and they meet on a regular basis to discuss the associate's professional and personal development. For each new associate, a "buddy" associate is appointed to help introducing the new employee to the firm and his/her new colleagues.

# HAMMARSKIÖLD



## Present situation

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In order to maintain our high standard of being one of the leading business law firms in Sweden, we monitor and evaluate performance through many different channels. Our associates maintain their own representative council which meets monthly with our partners in order to present their point of view on various issues regarding the employees' working situation. Moreover, there are scheduled group lunches for all associates every two weeks and once a month all the firm's lawyers have a joint lunch.

We have a development plan for each associate, which includes follow-up meetings twice a year, lunches and reviews to support the individual associate's development. We make plans with measurable goals giving employees the opportunity to fully develop their potential. We also give additional support in the areas of education, special coaching, and experience in particular subject areas and business development.

Every associate has a generous education budget for continuing external education in Sweden and abroad. We also send employees on short or long term secondments both to Swedish companies and to leading law firms abroad. Several of our senior associates and partners have experience from leading business law firms in Europe, the U.S., and Australia.

Our administrative and support staff is offered introduction training and ongoing training in English. Specific/individual courses are discussed, documented, and followed-up on during the yearly Performance Management Cycle, ensuring that all support staff receives training to meet the requirements of their role within the firm. The support staff has a development plan with measurable goals and follow-up meetings once a year, to reach their full potential in necessary areas.

We have also taken steps to promote the health and general well-being of our employees and to prevent workplace injuries. In addition to an in-house work-out facility, all employees are entitled to an annual health benefit, complementary health check-ups according to scheme, ergonomic workplace adaptations, and other benefits.

Hammariskiöld has a student step program. The idea is to create ways for talented law students to become involved in the work at Hammariskiöld at an early stage and gradually introduce them to more challenging tasks.

As a step towards making Hammariskiöld an even more attractive workplace, we now have a work survey for all employees that takes place once every other year. The survey aims to capture the employees' opinions and allow them to participate and influence the business. The result is now being used as additional ground for the work environment management and to work on improvements.

## Going forward

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- Based on feedback from our employees and discussions with dedicated co-workers, working with gender equality, we are working to further improve Hammariskiöld and evaluating how we best can develop and retain talents in the future.

## EQUALITY IN THE WORK PLACE

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In recent decades, Europe has come a long way in achieving equality between women and men, with the Northern European countries serving as models in this work. However, much work remains to be done. We strive to achieve equal opportunities for both genders, and are aware of the challenges faced by employees wishing to become partners.

We recruit more women than men from universities, but we still have fewer women becoming partners. It is crucial for the firm's long-term success to retain the most competent employees, male or female. Therefore, the firm works with a number of measures to encourage our associates to focus on the partnership track. These include external mentoring, membership in different networks, and promoting a leadership program for senior associates on parental leave.



In 2017 partner Sandra Kaznova became the first woman appointed Managing Partner at Hammarskiöld. Sandra is also a board member of SWAN (Swedish Women in Arbitration Network) which is a professional network, supported by the Stockholm Chamber of Commerce (SCC), aiming to promote women in arbitration. During 2018 Hammarskiöld employed Malin Albert as Partner.

We are committed to being a respectful workplace. By working together as a team, we can provide our clients with the best services. We have zero tolerance for sexual harassments and other inappropriate behaviors. This message has been clearly communicated within the organization. We also encourage a speak-up culture.

### Present situation

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- Women and men are treated equally at all levels at Hammarskiöld.
- Our long-term strategy is that women and men shall succeed at Hammarskiöld in the same way and that gender, background, or other irrelevant factors shall not be an impediment to any individual employee's development.
- We provide individual mentoring for all of our associates.
- We conduct a yearly compensation survey to ensure comparable pay for comparable work. There is no pay gap between women and men at Hammarskiöld at the same level of experience. To our knowledge, there is no harassment of any kind at Hammarskiöld. In our weekly partners meetings we continuously follow up how work is allocated to the associate lawyers, in order to ensure that they get the best possible development of their careers and equal opportunities
- We want our lawyers to be able to combine work and family life. Working conditions, performance appraisals, career opportunities and wage increases should be equally favorable for lawyers who are parents as for those who do not have children.

- In 2018 we rewrote our Parental leave policy. The purpose of this policy is to secure this opportunity and promote the lawyers' career development alongside parenting. Another purpose of this policy is to provide guidance and guidelines to employees on what applies at parental leave. We encourage all our employees to take parental leave and we provide generous parental leave compensation for our lawyers. Many of our associates and partners with children have taken parental leave, both men and women.

*Statistics as per January 1, 2021 (last year's figures in parenthesis)*

<b>Law Section</b>	<b>Total</b>		<b>Women</b>		<b>Men</b>	
Partners	13	(13)	15%	(15%)	85%	(85%)
Senior Associates	7	(5)	100%	(100%)	0%	(0%)
Associates	11	(10)	27%	(20%)	73%	(80%)
Trainees	1	(1)	100%	(100%)	0%	(0%)
<b>Total</b>	<b>32</b>	<b>(29)</b>	<b>41%</b>	<b>(34%)</b>	<b>59%</b>	<b>(66%)</b>

<b>Administrative Section</b>	<b>Total</b>		<b>Women</b>		<b>Men</b>	
Managers	3	(3)	67%	(67%)	33%	(33%)
Staff	8	(7)	100%	(100%)	0%	(0%)
Extras	5	(5)	80%	(80%)	20%	(20%)
<b>Total</b>	<b>14</b>	<b>(15)</b>	<b>85%</b>	<b>(87%)</b>	<b>15%</b>	<b>(13%)</b>

<b>All employees</b>	<b>46</b>	<b>(44)</b>	<b>X%</b>	<b>(52%)</b>	<b>X%</b>	<b>(48%)</b>
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## Going forward

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- We will continue evaluating the information from “Level the playing field” and adapt the knowledge to our operations.
- Continue encouraging reporting of sexual harassments or inappropriate behaviour of any sort.
- Support all employees, both men and women to take out parental leave.
- Strive for an equality recruitment by following the FAIR- model. This is a model for fair and competence-based recruitment that ensures an inclusive approach and a structured process.

## DIVERSITY

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Hammar skiöld only hires lawyers and administrative staff with the best qualifications, regardless of gender, ethnic origin, age, religion, functional disability, and sexual orientation. We strive to meet the needs of our clients and our employees must reflect the market's demands. It is important for our brand to be an attractive workplace where people feel comfortable and able to develop. A group of people with different backgrounds and mixed genders will have better resources for innovation and higher quality solutions for our clients.

### Present situation

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- We have a diverse workforce regarding age, gender and background.
- Hammar skiöld supports foreign graduates entering the Swedish job market by providing concrete work experience through internships.

### Going forward

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- We will continue our strategy of recruiting associates with diverse mind-sets and a blend of mixed backgrounds, genders, and ethnic groups.
- Overlook the physical working conditions. We will bring our employees tools that are important for the work, such as computers, desks, protective equipment, lifting devices, etc., must be adapted to the physical conditions of women and men.
- Ensure that all employees have a good working environment even when they work from home regarding Covid 19 and after the pandemic.
- Our ambition is to have an atmosphere based on inclusive and open mind.



HAMMARSKIÖLD

## CARING FOR THE ENVIRONMENT

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At Hammarskiöld & Co, we actively strive to reduce our impact on the environment and take into account both humans, animals and nature. We try to be involved in creating a sustainable society that is adapted to a changing climate. For several reasons, we have therefore in recent years introduced more environmentally friendly methods in the business and there are several plans for a more long-term perspective.

As a company, we constantly try to work for a more climate-smart way of working and where the environmental impact is limited. At Hammarskiöld, we like to see things from a larger, global perspective, whatever we do with the idea of the environment. We engage our employees to create knowledge about and improve our environmental impact. When we engage employees, it is easier to achieve the goals in our workplace and in society in general.



### Present situation

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For Hammarskiöld, it is important to constantly improve what we can and by creating a special work ethic, we continue to implement environmental projects for the law firm. The group works on various projects where it is a matter of collecting information, which is then analyzed; it can be data of various kinds or other information. This is done in order to identify activities and services that can reduce our impact on the environment.

Hammarskiöld's environmental committee is constantly working to help the company become more environmentally adapted. All employees are encouraged to think twice before printing anything in paper form. Many times, it is just as well to have the material digitally. If we need to print on paper, all employees are encouraged to do this on double-sided printing, which means that we can save both money and think about the environment. When it comes to clients, many people today receive their invoices digitally or via e-mail. Internally, we have also started posting more information on the Intranet and the newsletter will be sent to all employees via E-mail.

Within the project, we identified four main groups to which our environmental efforts are focused.

- Energy
- Purchase
- Recycling
- Travels

### Energy

We are working to improve energy monitoring and reduce Hammarskiöld's impact on the environment, especially the use of heating, electricity, and water consumption. Our office is situated in an old 17<sup>th</sup> century listed building, which affects the kind of measures that can be taken. We are however continuously improving energy efficiency while steering towards renewable sources. Hammarskiöld has a close co-operation with our property owner regarding a climate project that aims to improve the interior climate in the premises by installing a ventilation system for supply of cool air. This increases the energy efficiency by contributing to easier heat recovery. At the end of 2017 our landlord got all building permits. In 2020, the



renovation of the two top floors, floor 3 and floor 4, began and are now completed. Renovation work on the remaining floors will continue in the upcoming years.

In order to reduce our energy consumption we continuously review different types of sources of light used in our offices. The electric fittings at the office have been analyzed, with focus on the type of electric lightning used (halogen lamps, low energy, LED etc.). The project resulted in an action plan, cutting our energy consumption related to electric lightning by 70 per cent (corresponding to an annual reduction of CO<sub>2</sub> by 150 tons per year). We have been able to replace certain corridor lightning to LED and where we in the future need to invest in new fixtures – LED will be a natural choice. As a part of this project we invested in a new sign on our building with a modern low energy LED system.

During 2019 Hammarskiöld changed computers to a more environmentally sustainable model. The new laptops consume about 480 000 kWh less per year, than the old model. This corresponds to a reduction in carbon footprint of approximately 160 000 kgCO<sub>2</sub>e /year.

In 2019 we also implemented an even more virtualized server solution, which reduced our datacenter down to two hosts and thereby reduced the amount of electricity used. We also have a goal to eliminate the number of supplier invoices sent via regular post. We contact all suppliers in order to get them to send us their invoices via e-mail instead.

Hammerskiöld's IT department has worked systematically to reduce the number of individual appliances in the company's machine park. For example, we do not purchase individual desk printers, saving both energy and other consumables such as ink cartridges, as well as saving costs

### **Purchases**

We have adopted procurement policies to ensure that environmental aspects are considered when purchasing supplies and services for the law firm. Hammarskiöld also maintains an active discussion with our suppliers to improve transportation and delivery routines and avoid unnecessary transport.

Our administrative staff follows a checklist in order to consistently request environmentally preferable options from our suppliers. The checklist was designed to motivate and compel each person responsible for ordering supplies and services to consider preferable environmental options by requesting healthy and sustainable materials and environmentally friendly ways of production and means of transportation. The checklist also contains a number of questions to be posed to all of our suppliers, including a description of how the supplier address issues related to environment, CSR, and quality and to what extent the supplier is certified within these areas. To date, our IT department and office department have received this information from about 70 percent of our suppliers. The result serves as basis for a continued dialogue with our suppliers and, if so required, a decision to change to other more conscious suppliers.

We continuously look to reduce our environmental impact and for possibilities to change to more environmental friendly products. In that way we hope to increase our purchase of eco-labelled products.

### **Recycling**

We are working to improve recycling and waste disposal. All waste from the office except food waste is categorized and sent for recycling. The reduction of the number of delivery transports to the law firm (see further below) has also led to a significant reduction of the amount of packaging material that needs to be recycled, thereby reducing our total waste.

We aim to reduce our paper usage per project by increasing the amount of digital information send-outs and decreasing unnecessary copying/printing. The reduction of A4 papers has been close to 40 percent since we started measuring. The new printers that we bought in December 2018 also enable us to measure consumption of printing. The printers also have a default setting to always print black-and-white and on both sides, all to reduce the amount of paper when printing. Our focus is on optimizing paper recycling. We also strive to increase the share of digital invoices that are received as well as sent from the law firm.

## Travels and transportation

### *Business travel*

In 2020, our business did not require as much travel as within, the fact that Covid 19 has meant that we have received internet and digital solutions to a greater extent than before. Despite the fact that we have a large proportion of international customers and travel internationally, these have been reduced. Under the current circumstances, with Covid-19 preventing travelling and all sorts of IRL meetings in general, we have reduced business travelling to zero.



When staff from Hammarskiöld have traveled, we have chosen the most cost-effective resale means with the least possible impact on the environment. We assume that 2021 will also be a year of less travel for our employees and in the future, we will try to travel less and find digital or others ways to work.

### *Transportation to and from the office (supplies, couriers etc.)*

Transport to and from the office must, as far as possible, be environmentally efficient by increasing the use of vehicles powered by renewable energy. This applies to all couriers, deliveries and business trips. We have worked actively with suppliers to reduce the number of transports to Hammarskiöld and thereby reduce the environmental impact. During 2020, it has been possible to reduce the number of delivery transports to the office drastically as the office did not have as many visitors or employees on site.

## Going forward

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- We will continue implementing the environmental management system.
- We will continue the co-operation with our landlord to further improve energy efficiency.
- We will finalize the travel policy and set goals for reduction of the environmental impact.
- We will continue to have a close dialogue with the main suppliers, to search for new, environmental friendly and sustainable alternatives or work more digitally.
- We will continue our work on optimizing and reducing the number of delivery transports.

## ANTI-CORRUPTION

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For us at Hammarskiöld ethics, integrity, and excellence are core values that encompass everything we do. All employees of Hammarskiöld shall always act with integrity and maintain the highest ethical standards in order to provide our clients with the leading-quality advice and

counsel. Our business principles require that we always comply with the applicable laws and regulations. Hammarskiöld has a zero tolerance policy for corruption and bribery.

Hammarskiöld has an appointed ethics committee that oversees our employees' compliance within the areas of anti-corruption, insider trading, anti-money laundering requirements, and the rules and regulations of the Swedish Bar Association. The ethics committee is responsible for our internal policy relating to anti-corruption, insider trading, anti-money laundering, and conflicts of interest. The policy is continuously developed to further strengthen and secure Hammarskiöld's position as a high-quality law firm. The ethics committee also provides guidance and support to the organization regarding anti-corruption matters.

In order for us at Hammarskiöld to maintain our high ethical standards, all of our employees are given continuous mandatory education about anti-corruption, including instruction on what to do should they encounter or suspect it. Every other year we revisit the course material and instruct all of our employees to complete the mandatory online course on the prevention of money laundering. The anti-money laundering education tool has been developed by Hammarskiöld together with other selected major law firms in Stockholm and is now widely used by larger Swedish law firms.



Hammarskiöld's unique Client Acceptance Committee reviews and approves all new client admissions and requests, assuring that all new clients fulfill our ethical requirements and that they are compatible with Hammarskiöld's business model. We also have comprehensive IT and record keeping systems in order to identify any potential conflict of interest that could arise. These systems include processes for identifying and conducting due diligence on new clients in compliance with Swedish anti-corruption rules and regulations.

We at Hammarskiöld also provide legal advice and services within the field of compliance for our clients and their businesses. In addition to anti-corruption matters, Hammarskiöld has extensive experience in a broad range of issues, including corporate governance, risk management, competition law, market abuse, and other securities laws. We also advise our clients on the laws and regulations targeting the financial sector, the insurance sector, and many other industries. Our multi-practice Compliance and Investigations team is ideally suited to assist in preventing, detecting, and resolving potential violations of laws, regulations, and company policies in all industries. By providing this kind of legal advice to our clients, we aim to assure that our clients also maintain their ethical standards and prevent corruption.

## Present situation

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During 2020 all of Hammarskiöld's employees took and passed the online anti-money laundering course. In addition, all new employees must take and pass the course within their first two months of employment.

## Going forward

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We continue to see an increased awareness from our clients coupled with a strong demand for assistance in the areas of compliance and investigation – including anti-corruption and risk assessments, implementation of policies and programs, and related issues. Hammarskiöld will therefore continue to support and assist our clients in this field of work.

Hammarskiöld's internal education program on business ethics and anti-money laundering will continue in 2021.

## COVID 19 PANDEMIC

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The current Covid 19 pandemic has naturally had a big impact on Hammarskiöld as a firm and our employees. From the time Sweden got hit by the virus, Hammarskiöld took a strong position on the importance of following any and all rules and guidelines adopted by the Swedish authorities, in order to minimize the risk of any employees catching or spreading the virus at work or in connection therewith. As a general rule, our employees have been working remotely unless specific tasks have required office work. In addition, we have taken appropriate measures based on applicable guidelines at the office to create a Covid-19 secure environment.

## Going forward

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We continuously assess our internal Covid-19 guidelines in light of applicable rules and guidelines issued by the Swedish authorities.