

# Communication on progress



WIKBORG | REIN

OSLO | BERGEN | LONDON | SHANGHAI | SINGAPORE

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## Our sustainability journey has only just begun

**FOR NEARLY 100 YEARS**, Wikborg Rein has offered our services to clients all over the world. We have grown to become one of Norway's largest and leading law firms, and with this comes a huge responsibility. Although we are headquartered in Norway, our company also have offices in London, Singapore, and China, and it is of high importance to us to operate under the regulatory framework and rules of the bar associations in these countries in addition to the ethical guidelines and other internal regulations of Wikborg Rein.

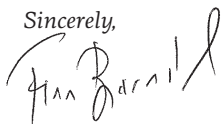
In recent years, sustainability has been placed higher up on the agenda for companies all over the world, and this also includes us. Commitment to sustainability is vital for our future success and to remain one of the top players in our business.

Recently, we have noticed a push from several of our stakeholders to demonstrate how our firm takes on this responsibility, and this is a motivation and something that we welcome.

Our sustainability work has over the years taken many forms, supporting people and organisations in need, for example with monetary support or through our pro bono legal support. In 2020, we became a signatory of the UN Global Compact (UNGC) – a voluntary initiative to implement sustainability principles and take steps to support UN goals. As a signatory of the UNGC, our company has committed to deliver on such sustainability principles. As part of this commitment, we will each year deliver a Communication on Progress (COP), demonstrating our progress and efforts in four core areas: Human rights, worker's rights, anti-corruption, and the environment.

The document that you are now reading, describes our principles and guidelines in each of these areas, as well as our actions to improve the integration of the Global Compact and its principles into our business strategy, culture, and daily operations. Being a sustainable company is about continuous work, thus, this document is not only describing the efforts made by us in the year that went by, but also states our long-term and short-term goals and ambitions. As Managing Partner, I am very proud to present to you our first COP and I look forward to sharing with you our progress in future reports. Our firm may be nearly 100 years old, but our sustainability journey has only just begun.

Sincerely,



Finn Bjørnstad  
Managing Partner, Wikborg Rein

Commitment to sustainability is vital for our future success and to remain one of the top players in our business.



Photo: Kari M. Sandvick



# Human rights

Wikborg Rein supports and respects the protection of internationally proclaimed human rights and do our utmost to ensure that we are in no way complicit in human rights abuses. Our company is both directly and indirectly exposed to ethical risks through our global business operations, and as lawyers, we have both the ability and responsibility to mitigate such risks.

## PRINCIPLE 1: SUPPORT AND RESPECT FOR HUMAN RIGHTS



***Wikborg Rein supports and respects the protection of internationally proclaimed human rights.***

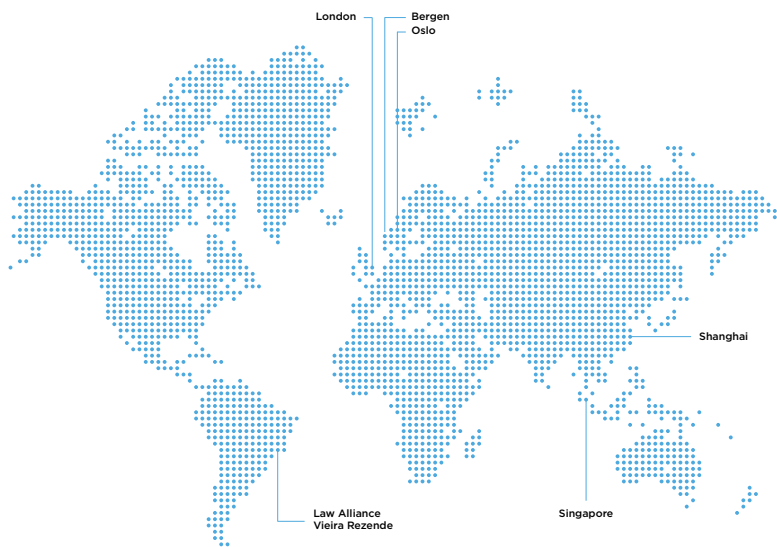
Wikborg Rein shall abide by laws and regulations regarding human rights in all countries where we are present. We work to integrate human rights into our operations, and our UN Global Compact membership is an expression of our commitment to this.

Our company operates according to national and international laws and regulations on human rights, including (but not limited to) the Human Rights Act, the Modern Slavery Act, ILO conventions and OECD guidelines for multinational enterprises. Wikborg Rein and its employees in Norway and Shanghai abide by the Norwegian

Bar Association's guidelines and the Norwegian Code of Conduct for lawyers, where lawyers' relationship to human rights is specifically outlined. In the UK and Singapore, our lawyers operate according to the Solicitors Regulation Authority's (SRA) principles, which states its support for the 1998 Human Rights Act.

Our contribution to the support and respect for human rights are also through the advice and counselling we give to our clients on a day-to-day basis. Additionally, Wikborg Rein contributes to the general understanding of human rights from a legal perspective through our participation in the public debate and through hosting seminars and webinars for employees, clients, students, and the general public.

Our company also supports persons in need and companies (such as start-ups) with legal advice free of charge or at a discounted rate. In 2020, our lawyers spent more than 2000 hours on such projects.



1923

Established

333

Employees

## PRINCIPLE 2: HUMAN RIGHTS ABUSES

**Wikborg Rein shall not be complicit in human rights abuses.**

Wikborg Rein has offices in Norway, the UK, Singapore, and China and works for clients all over the world, which means that our business could potentially be exposed to unethical business practices, including human rights abuses. We are continuously assessing our operations for risks, and new clients are evaluated before contracts are entered into through Wikborg Rein's own Client Intake programme.

As an international law firm, our company gives legal advice to clients operating in several types of industries. However, we do not work for clients operating in the pornography, drug or tobacco industries.

Our Managing Partner together with the Finance Department (Case Controllers) and our Risk and Quality Partner bears the ultimate responsibility for ensuring that our company does not violate human rights or in any other way take part in unethical business practices. Partners are also responsible for evaluating new clients before signing contracts.

All of Wikborg Rein's employees have been onboarded to the company's ethical guidelines that is our governing document outlining Wikborg Rein's values and principles, and which applies to everyone working for Wikborg Rein at our offices in Norway (Oslo and Bergen), London, Singapore and Shanghai. The ethical guidelines also provide a regulatory and legal framework for employees to operate within, and further outlines the expectations the firm has for employees and stakeholders, extending beyond general compliance. Human rights are not mentioned specifically in our ethical guidelines today, but we will work to integrate this in 2022.


The company has not yet included a clause on human rights specifically in our Standard Terms and Conditions with clients, but is planning to do so and is also looking to develop its own Supplier Code of Conduct.

The company has not identified any human rights breaches relating to our business operations in 2020. •

### OUR GOALS AND TARGETS ON HUMAN RIGHTS SET FOR 2022:

- Deliver our first Communication on Progress as UN Global Compact signatory
- Update our ethical guidelines with increased focus on human rights
- Make sure that all employees have read and understood their responsibility with regards to human rights, including reporting irregularities, misconduct or breaches
- Make sure that human rights are mentioned in contracts with clients and suppliers and develop a Suppliers Code of Conduct
- Continue to provide advice and share knowledge on human rights from a legal perspective with clients and the general public

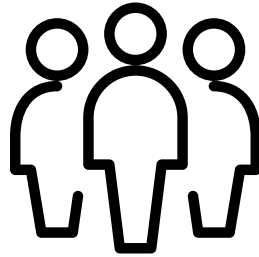




We are all equally human and we must therefore strive to ensure that we are all able to enjoy the same human rights and freedoms. Everyone deserves to be treated with dignity and respect.

**Ina Lutchmiah, Partner, Singapore**





# Workers' rights

Our employees and the competence that they possess are our firm's most important asset. Wikborg Rein upholds the freedom of association and the effective recognition of the right to collective bargaining for all our employees. The company strongly distances itself from all forms of forced and compulsory labour, including child labour. We do not tolerate any form of discrimination with respect to employment and occupation.

## PRINCIPLE 3: FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING



***Wikborg Rein and the company's employees shall at all times comply with applicable rules and regulations on working environment and support employees' membership and involvement in unions and associations.***

Wikborg Rein's employees are the company's most important assets and employees have a high impact on the company's operation and business success. Our company can directly impact the working environment through active dialogue with employees, employee representatives and/or unions, and through our policies and agreements.

Wikborg Rein operates according to the Norwegian Working Environment Act, which states that employees should have freedom of association and the right to collective bargaining agreements. Our Norwegian lawyers are members of the Norwegian Bar Association, which is the professional body and interest group for lawyers (advokater) and associ-

ates (advokatfullmektiger) in Norway. Together with its members and elected officers, the Bar Association endeavours to ensure that Norwegian lawyers meet high professional and ethical standards. Several of our employees are also actively participating in the Bar Association's day-to-day work. Our lawyers in the UK and Singapore are members of the SRA.

Employees are not subjected to collective bargaining agreements; however, the company is currently reviewing whether this should be applied to associates. The company has established a Working Environment Committee (WEC) in line with the Norwegian Working Environment Act, which today consists of representatives from business support, lawyers and management. The WEC has regular meetings where all types of issues related to the work environment are discussed. Additionally, the lawyers have their own interest body (Fullmektig-styret), which works with lawyer-specific issues such as promotion, salary, etc. Business support has their own employee representatives who work with issues related to their working conditions.

Wikborg Rein's remuneration policies are outlined in the company's Employee Handbook.

23

nationalities


3.5%

absence due to illness

40%

goal of both genders represented  
in partner appointments

#### PRINCIPLE 4 AND 5: FORCED OR COMPULSORY LABOUR, CHILD LABOUR


 ***Wikborg Rein strongly distances itself from any form of forced or compulsory labour.***

Wikborg Rein strongly distances itself from any form of forced or compulsory labour and/or child labour. As with human rights, the company evaluates both suppliers and clients on issues relating to forced and compulsory labour before entering into agreements, and the company regularly conducts risk assessments of existing client relationships.

All our employees have signed employment contracts and related documents, which clearly state their responsibilities and rights. Furthermore, the company's Employee Handbook contains information on employee benefits, data protection, the WEC, working hours, compensation, occupational health services, insurance, career development, resignation, absence, whistle blowing, our values and more.

Each employee's salary is based on position and responsibilities. Although the company's employees are not covered by collective bargaining agreements as of today, the firm aims to offer a competitive salary.

#### PRINCIPLE 6: NON-DISCRIMINATION AND MUTUAL RESPECT

 ***Wikborg Rein prohibits discrimination in any form, whether it is based on gender, age, political views, religious beliefs, sexual orientation and/or disabilities.***

Wikborg Rein has a zero tolerance policy for harassment, and any cases of harassment should be reported to HR, the relevant team leader or handled according to our internal guidelines.

Our firm embraces our employees' uniqueness, and at present, our employees represent 23 nationalities across our five international offices.

The Norwegian Equality and Anti-Discrimination Act sets forth requirements for businesses to uphold with regard to equality and non-discrimination, and these requirements must be complied with by everyone working for Wikborg Rein and by all of our offices. Additionally, the company's anti-discrimination policy includes information about discrimination, equality, bullying, harassment, and sexual harassment specifically.



**Equality**  
Check



**CEO**  
**COMMITMENT**

BY MAK x ODA

Corporate law firms have for a long time been criticised for having a conservative industry culture when it comes to gender balance in partnerships, salary and career development for employees with small children, and that the culture has not sufficiently managed to reflect the diversity that is expected. Wikborg Rein has a good gender balance at most levels, but a better gender balance at partner level is a focus area for us. Our goal is that at least 40% of both genders are represented in partner appointments over a rolling five-year period.

Wikborg Rein believes that a more equal distribution of parental leave between the parents is an important contribution to ensuring equal opportunities for development in general, and career development, regardless of gender. In our equality policy we encourage everyone at Wikborg Rein to take at least their part of the maternity leave. The company will encourage and facilitate for such an equal distribution of leave as the individual family wishes for.


Our company also takes part in external initiatives to promote gender equality, such as Equality Check, the Oda Network and CEO Commitment. In 2020, women lawyers' salary as a percentage of male lawyer's salary amounted to 104%, and at the administrative level amounted to 87%.

Our company culture can be described as 'down-to-earth', and our aim is to ensure a working environment where everyone can thrive and succeed. The company conducts annual talks with employees focusing on career development and wellbeing, and employee surveys are carried out regularly. We conducted two short surveys during the Covid-19 pandemic to ensure that our employees were well. In the survey, we asked about the home office situation, physical and mental health and follow-up from management. We are currently planning a larger employee survey before the end of 2021.

In 2020, absence due to illness was 3.5 %, which is well below the national average, and our goal is to keep the absence due to illness rate below 4% going forward. •

#### OUR GOALS AND TARGETS ON WORKERS' RIGHTS SET FOR 2022:

- Update our ethical guidelines to contain information on forced or compulsory labour as well as child labour, and include this in contracts with clients and suppliers
- Continue to promote equality and inclusion throughout the company, and increase our communication on policies concerning discrimination and harassment both internally and externally
- Continue to work with gender balance in general and the long-term goal of increasing the number of female partners
- Keep the absence due to illness below 4%

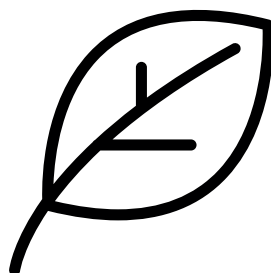
A portrait of Heidi Skuterud, a woman with shoulder-length brown hair and blue eyes, smiling. She is wearing a dark blazer over a brown top. Her arms are crossed, and her hands are visible with dark red nail polish. The background is a plain, light-colored wall.

In a workplace and in society in general, it is important that everyone feels safe and valued.

I hope that we in Wikborg Rein can lead by example and together create a culture that includes a safe and good community where everyone feels welcome and included.

**Heidi Skuterud, Director of People & Culture**





# Environment

Wikborg Rein supports a precautionary approach to environmental challenges and undertakes initiatives to promote greater environmental responsibility. Our company encourages the development and diffusion of environmentally-friendly technologies and has in recent years increased our focus on implementing technologically-driven solutions throughout the firm.

## PRINCIPLE 7: PRECAUTIONARY APPROACH TO ENVIRONMENTAL CHALLENGES



***Wikborg Rein shall take a precautionary approach to environmental challenges***

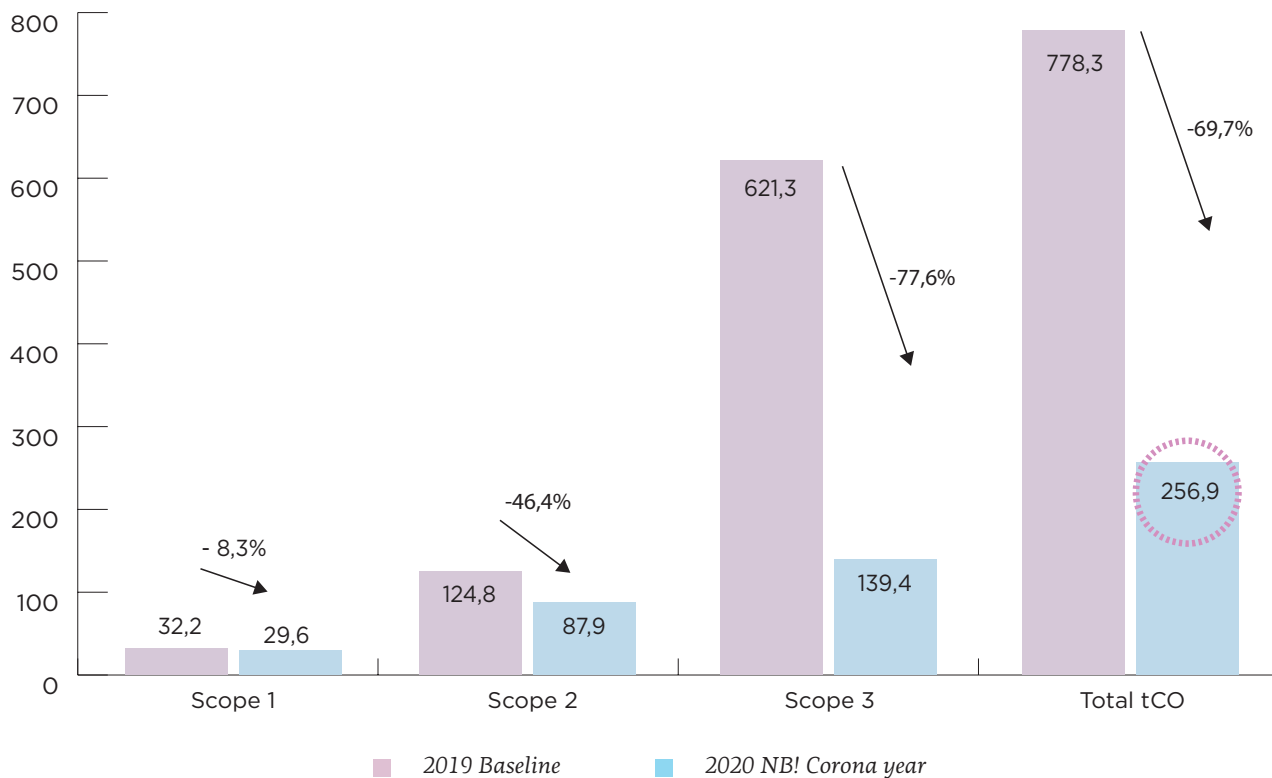
In recent years, the focus on climate and the environment has received increased attention, and our company also experiences increased attention on this topic among our stakeholder groups. Although Wikborg Rein does not itself own any of the buildings which hosts our offices, our company has an indirect impact through energy use for heating/cooling of the premises used by us (scope 2). As an international law firm with offices and clients in many different locations around the world, our lawyers sometimes have to travel by plane and/or car, and this is where our business' main impact lies today (scope 3).

Although our impact on the environment can be considered as limited, it is nevertheless important to have full

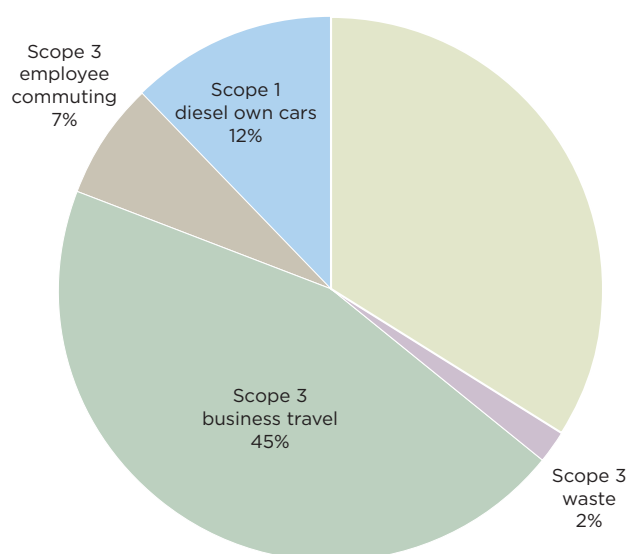
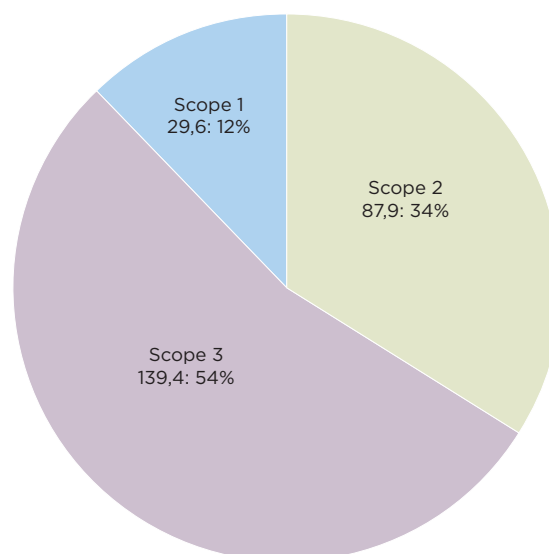
overview of our environmental footprint in order to mitigate climate risks and improve our environmental efforts. With assistance from Cemacys, our company has in 2021 started climate accounting on scope 1, 2 and 3, and this work will continue in 2022. In 2020, our total emissions were 256.9 tonnes CO<sub>2</sub>, however, this number is considerably lower than our base year (2019) due to limited travel activity during the Covid-19 pandemic.

In 2020, the company established an environmental policy which is yet to be shared with employees and business partners. The overall objective with establishing the environmental policy is to make sure that environmental efforts are integrated into everything we do and to raise awareness to improve environmental performance. The company also aims to implement green measures into our daily operations, for instance through waste separation, sourcing and choosing suppliers that offer environmentally-friendly options, recycle and reduce. In 2020, waste stemming from our company's activities amounted to 5.9 tonnes CO<sub>2</sub> equivalents.

## WIKBORG REIN\* GREEN HOUSE GAS EMISSION IN TCO2E\*\*



## GREEN HOUSE GAS EMISSION 2020 - WIKBORG REIN

Emission tCO<sub>2</sub>e 2020Emission tCO<sub>2</sub>e 2020 - total 256,9



## PRINCIPLE 8: INITIATIVES TO PROMOTE ENVIRONMENTAL RESPONSIBILITY



***Wikborg Rein will continue to take part in initiatives that promote environmental responsibility***

As part of our environmental strategy, our company has obtained the Eco-Lighthouse certification, which is Norway's most widely-used environmental management system. The Eco-Lighthouse Foundation is certified per the ISO-9001:2015 standard and integrates environmental management and internal and external environmental measures into the Norwegian Regulations relating to Systematic Health, Environmental and Safety Activities in Enterprises (Internal Control Regulations).

In 2017, our office in Oslo, Norway (Wikborg Rein's headquarters) moved to a new and modern building, which is BREEAM-NOR certified. This is the Norwegian equivalent of Europe's certification for sustainable buildings.

- Digital templates and document automation
- AI tool (to review contracts with clients and structure large amounts of documentation)
- eDiscovery tools (typically used for major investigations and in competition cases)
- Digital proofreading
- Digital project management (digital project plan, timeline and project reporting)

These tools provide better communication flow, flexible processes and efficient implementation of projects, which benefits both our firm and clients through increased efficiency and quality. All our clients have the opportunity to work with our lawyers through these digital solutions and thereby increase their own digital expertise.

Furthermore, we believe that digitisation and innovation are about more than implementing new systems – it is about cultural change. Although our IT department has the overall responsibility for this area in Wikborg Rein, we understand the importance of collaborating and working with our lawyers when introducing new technology. •

## PRINCIPLE 9: ENCOURAGING THE DEVELOPMENT AND DIFFUSION OF ENVIRONMENTALLY-FRIENDLY TECHNOLOGIES



***Wikborg Rein encourages the development and diffusion of environmentally-friendly technologies***

Making use of environmentally-friendly technologies is vital if we are to achieve the Paris Agreement's goal of reducing climate emissions and limit global warming to 1.5 degrees Celsius before 2030. In recent years, Wikborg Rein has enhanced our efforts when it comes to implementing innovative solutions, using phone and video technologies such as Skype for Business and Teams to help reduce employee business travel whenever possible. Digital solutions are also used when evaluating and onboarding new clients and to ensure compliance with regulations such as the Money Laundering Act and the General Data Protection Regulation.

However, in an increasingly digitalised business sector, it is often not enough to just implement digital solutions, we sometimes have to develop and deliver them ourselves. Mapping areas of improvement when it comes to our working processes has been a priority area, and our firm has developed several smart and sustainable solutions that we now offer our clients such as:

- Client Portal
- Digital onboarding solutions for clients (together with PSA Consulting)
- WR Collab

### OUR GOALS AND TARGETS ON ENVIRONMENT SET FOR 2022:

- Reporting processes to uphold our Eco-Lighthouse certification
- Reorganisation of our print and service centre is implemented and will gain 100% effect in 2022
- Reduce our total emissions with at least 10% compared to the 2019 level
- Reduce air travel and hotel with at least 10%
- Reduce waste with at least 5%
- Further develop and implement digital solutions that can contribute to more sustainable and environmentally-friendly operations at all levels

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Wikborg Rein is proud to partner and fully support the United Nations Decade of Ocean Science for Sustainable Development in the project: The One Ocean Expedition. The purpose and importance of the One Ocean Expedition is to share knowledge and to reinforce and create attention regarding the crucial role of the ocean for a sustainable development in a global perspective. The expedition will be carried out with the 116 year old school and science ship the Statsraad Lehmkuhl. Its voyage began from Arendal in Norway during Arendalsuka in August 2021 and will circumnavigate for 19 months via 36 harbours, including Singapore and Shanghai, arriving in Bergen in May 2023.



United Nations  
Educational, Scientific and  
Cultural Organization

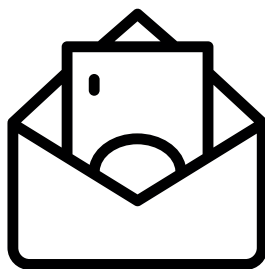
Intergovernmental  
Oceanographic  
Commission

2021 United Nations Decade  
of Ocean Science  
for Sustainable Development  
2030

## Our partner- and sponsorships

Since our company was established almost 100 years ago, Wikborg Rein has supported voluntary organisations and NGOs promoting human rights including Amnesty International, the Norwegian Refugee Council, the Church City Mission, the Norwegian Cancer Society, the Norwegian

Helsinki Committee and NRK's Telethon – the largest information campaign and fundraising event in Norway. In total, this support amounted to NOK 299,000 in 2020. In addition to this, we have a partnership with One Ocean Expedition. This support amounted to NOK 333,000 the same year.



# Anti-corruption

**It is the lawyer's duty to promote justice and prevent injustice. Thus, ensuring good corporate governance and ethical behaviour throughout Wikborg Rein's value chain is not only our moral obligation, but is also established in the ethical rules and legal framework that apply to our work.**

## PRINCIPLE 10: CORRUPTION PREVENTION



***Wikborg Rein works to prevent corruption in any form, including extortion and bribery.***

Our company has a zero tolerance for corruption and aims to promote transparency and integrity in everything that we do. It is our principal objective that Wikborg Rein's lawyers and other co-workers keep a high ethical standard, both when performing their profession and in their conduct in other respects.

Wikborg Rein operates according to national and international laws and regulations concerning ethics and anti-corruption, which is reflected in various regulations applicable to our activities. The overriding guidelines are set out in the ethical rules of the Norwegian Bar Association, and these guidelines are also made part of Norwegian legislation on lawyers and are based on international standards, in particular CCBE's (Council of Bars & Law Societies of Europe) code of conduct for European lawyers. To ensure that all our lawyers live by

those standards, we have introduced internal regulations specifying and sometimes expanding on our obligations under the general framework.

Our ethical guidelines include our anti-corruption policy, rules for trade in securities, conflicts of interest, handling of inside information etc. The ethical guidelines are based on the Norwegian Bar Association's Code of Conduct for Lawyers, however, in some areas our own set of rules is stricter than the Norwegian Bar Association's Code or applicable legislation. The firm and all the lawyers are also subject to the ongoing monitoring and possible impositions by the Norwegian Supervisory Council for Legal Practice.

As lawyers we have strict obligations under the Norwegian Money Laundering Act. We have put in place extensive regulations securing that we take all measures needed to avoid any money laundering. To achieve that, we have established a digital client intake system securing all information needed and we have also formed an extensive group of highly-trained staff working solely with such issues.

Our company has a zero tolerance for corruption and aims to promote transparency and integrity in everything that we do.

When accepting new clients, Wikborg Rein has an approval process involving various levels. In addition to business considerations, the responsible persons in Wikborg Rein will consider ethical and reputational issues relating to the client and the anticipated services. As part of our Client Intake process, Wikborg Rein conducts evaluations and/or risk assessments before entering assignments with clients and contracts with suppliers, which primarily involve gathering information directly from the client, through web-based searches, or in databases and the like. In some cases, it may be decided to gather additional information, typically when entering contracts with clients or in countries where the risk of corruption is perceived to be higher (ref. the Transparency International Index).

A core value for lawyers is to maintain independence and secure that our advice always comes across as totally unaffected by any conflicting interests. Therefore, we have extensive systems to avoid that any conflict of interest should occur in our relationship with clients. There is one partner especially dedicated to handling potential conflict situations. Moreover, we have taken steps to ensure that our employees are not affected by other interests in their work for our clients. We have internal rules restricting employees from trading in securities, which go beyond what is required under the general rules of the Bar Association. In relation with our M&A activities, we have internal systems established to avoid any risk of insider trading.

Our Board of Directors bears the ultimate responsibility for the firm's compliance with all ethical rules and the anti-corruption work in Wikborg Rein. The company has also appointed a Risk & Quality Partner who oversees ethical issues, revises internal regulations and is ultimately responsible for the firm's compliance with the Money Laundering Act. In terms of the ethical rules set out in law, the partner on every matter is ultimately responsible.

Wikborg Rein's employees are expected to comply with applicable laws and regulations at all times and receive

information about the company's ethical guidelines and anti-corruption policy upon hiring. All our lawyers that are members of the Norwegian Bar Association complete mandatory ethics training. To ensure that our ethical guidelines are understood and complied with, our employees and partners undergo ethical training on a regular basis and a two-hour introductory ethics course is held each calendar year for new associates.


The company has not established an external whistleblowing channel as of today but is planning to do so in 2022.

There were no confirmed incidents of corruption in the reporting period. •

#### OUR GOALS AND TARGETS ON ANTI-CORRUPTION SET FOR 2022:

- Update / review the company's ethical guidelines
- Organise regular e-learning in the company's ethical guidelines for all employees
- Establish an external whistleblowing channel where employees can report irregularities



A portrait of Jan L. Backer, a middle-aged man with grey hair and glasses, wearing a dark blue suit, white shirt, and a red patterned tie. He is standing in front of a modern building with large glass windows. The background is slightly blurred, showing the interior of the building through the glass.

Maintaining a culture  
based on transparency  
and ethical consciousness  
will create values for our  
clients and for society.

**Jan L. Backer, Risk & Quality Partner**

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WR.NO