



CSR Report 2021



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Gorrissen Federspiel | CSR Report 2021

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Surge in sustainability

Today there are increasing requirements and expectations of businesses to be CSR conscious and to run their organisations in a sustainable manner.

We feel this clearly from our clients, we feel it in the course of public debate and we feel it from our employees.

Our clients want to partner with organisations who match their own ethical standards, our employees want an employer who has clear values and a clear “purpose”, and society wants companies that take responsibility and are active in pushing for sustainable development.

As an industry player and legal adviser to businesses undergoing their own sustainable transformation, we have seen how CSR has evolved from good intentions to factual requirements and documentable results. At the same time, developments are being driven by regulation, with several industry sectors subject to incoming legislation.

At Gorrissen Federspiel we strive to run our firm in a responsible and sustainable manner, and with an environment in which our employees thrive and develop and can bring their knowledge and experience to bear in the best ways possible including through pro bono work. At the same time, we seek to minimise our carbon footprint associated with the running of our business operations.

The Ten Principles of the UN Global Compact, in combination with selected UN Sustainable Development Goals (SDGs), form the foundation of our CSR work. We have taken an active stance on social responsibility and sustainability since 2018, when we joined the Global Compact, and we remain committed to the agenda.

Not just because it is a requirement, but because it is the right thing to do.

Martin André Dittmer
Managing Partner

Our CSR work

With the UN Global Compact as our guide, in recent years we have focused on professionalising our CSR-related work. Today sustainability and CSR are an integral part of our management and business activities.

CSR Report

Since 2018 we have published a separate CSR report that provides an overview of activities and progress in areas relating to human rights, labour, environment and anti-corruption.

When Gorrissen Federspiel joined the UN Global Compact in 2018, we agreed to adopting a more systematic and strategic approach to CSR. We wanted to take an active stance, and we still do.

Since then we have been working to incorporate the UN Global Compact's Ten Principles of human rights, labour, environment and anti-corruption into both our strategy and daily operations.

This has involved the launch and implementation of a wide range of initiatives and projects that support our CSR work and our desire to run the firm in a sustainable and responsible way.

ensuring that our employees have the best environment in which to thrive and develop and that our knowledge is put to use through, for example, participation in networks and organisations, events and pro bono projects. We are also working to reduce the environmental footprint we leave in the course of running our business.

As a provider of highly specialised legal advice on strategic compliance and CSR, Gorrissen Federspiel has a special role to play in safeguarding and protecting human rights. We want to use our position in the Danish business community and our legal expertise to support companies and organisations working to ensure that human rights are not violated. As a guideline for our pro bono projects, we have chosen to focus our efforts on the rule of law and the development and education of children and young people in Denmark and abroad. We have done this so as to make the best possible contribution based on our competencies. We often assist organisations and initiatives that may otherwise have difficulty getting the necessary legal assistance. We also support a number of projects financially. We have done so throughout 2021, during which time new initiatives were added.

New initiatives in 2021

The UN Global Compact provides the foundation for our CSR work, complemented by the UN's 17 Sustainable Development Goals from which we have selected seven to act as focus areas around which we can take action.

When we talk about CSR and running our firm in a responsible and sustainable way, we focus primarily on

CSR Committee

The CSR Committee works to ensure that as a firm we comply with applicable rules, standards and best practices in the area of CSR.

Camilla C. Collet
Partner, Chair of the
CSR Committee

Martin André Dittmer
Managing Partner

Sara Jursic
Head of HR

Our focus

The world's most comprehensive sustainability initiative, the UN Global Compact, provides the foundation and guiding principles for Gorrissen Federspiel's corporate responsibility work. Since joining the initiative in 2018 we have enhanced our efforts through a focus on seven of the UN's 17 SDGs.

Human rights



Labour



Environment



Anti-corruption



The UN Global Sustainable Development Goals (SDGs)

The UN Sustainable Development Goals came into force on 1 January 2016 and up until 2030 they will set the agenda for international sustainable development efforts.

The SDGs comprise 17 specific goals and 169 targets. At Gorrissen Federspiel we have placed particular focus on seven SDGs that represent areas where we can make a difference. In combination with the Global Compact, these serve as the foundation for how we prioritise our CSR and sustainability efforts.

The UN Global Compact

The mission of the Global Compact is to create a better world through a global movement of responsible companies. It is the world's widest reaching corporate sustainability initiative.

The reference point is 10 fundamental principles based on international conventions and covering the areas of human rights, labour, environment and anti-corruption.

As a company, you commit to comply with the Ten Principles by incorporating them into your organisation's strategies, policies and procedures. Gorrissen Federspiel joined the UN Global Compact in 2018.

Our approach to CSR reporting

When we joined the UN Global Compact in 2018 we committed to report annually on our efforts, progress and anticipated developments. Our first CSR report covered the 2018 calendar year.

In this report we have grouped our updates around the four themes that make up the UN Global Compact: human rights, labour, environment and anti-corruption.

For each theme, we will address our ambitions, objectives and progress and make clear how the SDGs are integrated and reflected in each of our initiatives.

Total number of employees

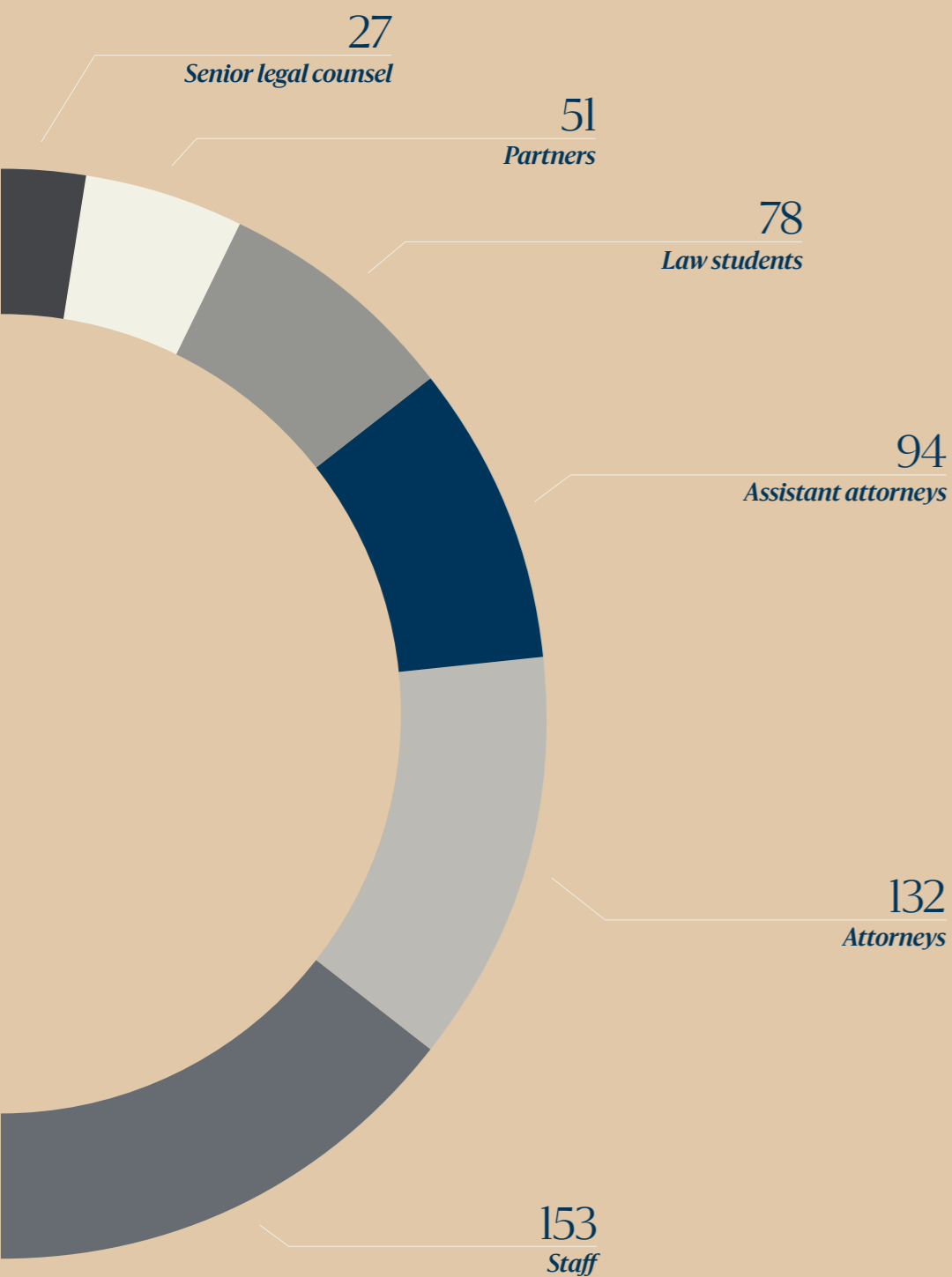
535*

Employees in Copenhagen

407

Employees in Aarhus

128



* Number of employees by the end of 2021

Gender distribution



General facts

Total average age	36
Seconded to a client	23
Admitted to the Danish Bar	19
Law students who have been on educational leave abroad	11
Seconded to an international law firm	1

Human rights



Human rights

When it comes to human rights, we are committed to the principles of the UN Global Compact:

Principle 1:
Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2:
Make sure that they are not complicit in human rights abuses.

Our ambitions

At Gorrissen Federspiel we want all employees, clients and business partners to feel that they are working in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory behaviour and harassment.

As a provider of highly specialised legal advice regarding strategic compliance and CSR, Gorrissen Federspiel plays a distinct role in safeguarding and protecting human rights. Our advice also extends to employee conditions at our international business partners, including issues such as freedom of association and the prohibition of forced labour and child labour.

We also want to use our legal skills and our position within Danish business to support companies and organisations that work to prevent violation of human rights. As a guideline for our pro bono projects, we have chosen to focus our efforts on the rule of law as well as the education and development of young people in Denmark and abroad. We have done this so as to utilise our specific skills and competencies in the most effective way possible.

The importance of focusing on human rights

It is not everywhere in the world where human rights are embedded as a matter of course, and as a social actor with law as the cornerstone of our business we are continually conscious that we have a responsibility to protect and uphold human rights.

We see no significant human rights risks in relation to either our business activities or relationships. We do, however, expect our clients, business partners and suppliers to comply with all applicable conventions in this area, and we are continually aware of our responsibility for strong ethical conduct when selecting business partners and suppliers and entering into client relationships.

As an employer we focus on diversity and inclusion (D&I). All employees should feel that they are treated with respect and have equal opportunities to succeed in their jobs. Today our employees expect more from their workplace, including in relation to CSR. It is imperative for us to be an inclusive workplace to ensure that we continue attracting and retaining the best talent in the sector.

Objectives for 2021

Our objective was to continue our work to help safeguard the rule of law in Denmark and to continue to focus our efforts on the education and development of children and young people in Denmark and abroad. It was also our objective to draft a detailed D&I policy.

Progress in 2021 and expectations of continued development

Throughout the course of 2021 we continued our support for organisations and our involvement in pro bono projects focused on the rule of law as well as children and young people in Denmark.

As in previous years we continued to assist in the preparation of consultation responses to legislative bills under the auspices of the Association of Danish Law Firms and the Danish Bar and Law Society. We also continued our involvement in a number of initiatives from previous years.

In 2021 we once again hosted a bootcamp organised by non-profit organisation Project Access, which helps Danish high school students apply to the university of their dreams. 28 Danish students took part in the Bootcamp, which ran over the course of a weekend.

Our support in 2021 for the Human Practice Foundation consisted of a financial contribution to support the Indre Styrke (Inner Strength) project, which will be rolled out to include an even greater number of school pupils in Denmark who are unsettled and have difficulty school. We also helped to put in place the legal framework of an agreement between 1000 Nepalese coffee farmers and Hagen Espresso Bars that will affect the livelihoods of 3,500 Nepalese families.

We also supported a number of organisations through donations, as well as continuing our ongoing commitments to, among other initiatives, the Forældre Fonden (the 'Parent Foundation') and Mission Afrika.

In 2021 Gorrissen Federspiel launched a detailed D&I policy which formally set out existing practices. Through the policy we are committed to creating a working culture in which everyone is treated with respect and dignity.

2021 was also the year in which Gorrissen Federspiel established the firm's first D&I committee, with employees from across the organisation. The committee meets three to four times a year to discuss diversity-related issues such as recruitment, equal opportunities, quotas and role models.

Aims for 2022

We will continue to focus attention on pro bono work within our two focus areas, namely the rule of law and education and development of children and young people in Denmark and abroad.

In the context of our new D&I committee, we will continue to work on strengthening the firm in all areas of diversity and inclusion. It is also our ambition to assess the need for specific actions to support LGBTQIA+ rights and inclusion.

SDGs



Objective attained



Fully

Agreement benefits 1000 coffee farmers in Nepal

Since 2016 Gorrissen Federspiel has supported the Human Practice Foundation's activities in Nepal, among other places. In 2021 we assisted with drawing up an agreement entered into between 1000 coffee farmers and Hagen Espresso Bars.



The partnership between Gorrissen Federspiel and charitable organisation Human Practice Foundation (HPF) dates back to 2016, at which point we contributed towards the rebuilding of the Bhagawati Secondary School in the Nepalese mountain village of Dumkot. Since then we have continued our commitment to the HPF in the form of financial support and pro bono legal services.

In 2021 we helped to formalise an agreement between 1000 Nepalese farmers from Taplejung and Hagen Espresso Bars, which operates several London-based coffee bars serving high-quality coffee and selling coffee beans.

Profits from the sale of the Nepalese beans go directly back to the farmers, and the HPF charity model helps to provide a livelihood for 3,500 families.

Mikkel Fritsch, a partner at Gorrissen Federspiel, assisted with putting in place the legal framework of the agreement.

"We are incredibly pleased to have been able to contribute to HPF's development by offering ongoing legal pro bono services to the foundation," says Mikkel Fritsch.

"We are incredibly pleased to have been able to contribute to HPF's development by offering ongoing legal pro bono services to the foundation."

Better opportunities for children's education

For a number of years HPF has been involved in various agricultural projects that aim to create sustainable sources of income for the local population, including this coffee project. More than 750 coffee farmers have been trained, and nearly 150,000 coffee plants have been planted. The project is having a major impact in creating change for future generations. Children from poor households are often required to work and take care of domestic duties during the day. When the parents have a source of income, for instance through coffee production, the children's chances of obtaining a high quality education are increased.

Progress in school

In 2018, with support from among others Gorrissen Federspiel, the doors opened to the Bhagawati Secondary School in the mountain village of Dumkot. In addition to containing eight new classrooms, a library, a computer room and a kitchen, the school is also earthquake-proof.

Like so many other schools in 2021 the challenges of Covid-19 meant the school was faced with lockdown and closures. Under such circumstances, and in order for pupils to continue learning, the school experimented with alternative teaching methods, such as through learning apps on mobile phones, radio broadcasts and teaching materials to support self-learning. A report issued by the school shows that there has been great progress. Among other findings, the average learning rate in English has increased by 12.8%, the drop-out rate has fallen by 47.35% and there has been a 7.2% increase in the enrolment rate.

"In Denmark we take it for granted that children go to school and get an education. In some countries, however, schooling is far from a matter of course. It is a proven fact that schooling is one of the best ways to fight poverty and give children a brighter future. We are therefore very happy to support HPF and the organisation's important efforts to ensure that more children get better school education," says Managing Partner Martin André Dittmer.

Inner Strength for more schoolchildren

The importance of focusing on children's well-being has not diminished by the Covid-19 pandemic. In 2021 we once again supported the Indre Styrke (Inner Strength) project, whose goal is to strengthen the well-being of Danish primary school pupils.

The project started as a pilot back in 2019 at Humlebæk School, but since then has taken off and been introduced to more pupils including in the cities of Fredensborg and Aarhus.

With support from Gorrissen Federspiel, among others, the project is now ready to enter the next phase, which will be an actual model school. At the school Indre Styrke will become an integral part of the pupils' schooling, whereas previously the project was reserved for selected pupils.

Part of a positive community

The goal of the Indre Styrke project is to strengthen school pupils' well-being, social skills and ability to be part of a community, as well as to train teachers in relationship skills.

The pilot project at Humlebæk School was developed in collaboration with Børns Livskundskab (Children's Life Skills) and the Municipality of Fredensborg. Past experience has shown that children who have participated in an Inner Strength programme have improved self-esteem, a more positive self-image and a sense of belonging to a positive community.

"Over the last two years the well-being of schoolchildren has been under pressure. Lockdowns and closures have kept many children away from their social circles, with many experiencing loneliness and showing signs of falling behind. That's why a project like the Inner Strength project has become even more relevant," says Martin André Dittmer, Managing Partner at Gorrissen Federspiel.

Equal opportunities for education

Martin André Dittmer notes that the education and development of children and young people is a key aspect of Gorrissen Federspiel's CSR initiatives.

"We believe that all children deserve equal opportunities for education and development. This creates the best foundation for their future. No child should be left behind at school. That's why Inner Strength is an important project to support, because it takes a holistic approach to helping children find the inner strength that they all have within them," he adds.

To be rolled out to all year groups

The plan is for Humlebæk Skole, over a three-year period, to become a model for Inner Strength. The school will serve as the standard for the next set of schools, in which the approach will be implemented throughout all year groups.

Seventh- and eighth-grade students from Humlebæk School have already participated successfully in the project. At the model school the programme will be extended to pupils across all year groups, with professional staff, school management and parents all involved in the process.

Pupils at the model school will participate in three development programmes, each lasting three months: in first grade (primary school), fourth grade (intermediate school) and seventh grade (secondary school). The programmes form part of the curriculum, with the pupils – especially vulnerable ones – having the option to take an optional Inner Strength elective.

The Indre Styrke project is aligned to SDG 4, concerning quality education.



Chamber concert for dialogue and tolerance

In 2021 the auditorium at Axel Towers hosted its first chamber concert. The occasion was a charity concert in memory of the late Bent Melchior.



Out of a desire to remember former Chief Rabbi Bent Melchior and his legacy, the auditorium at Axel Towers hosted a chamber concert by the Kleio Quartet, who performed the works of Max Bruch, Franz Joseph Haydn, Leoš Janáček and Ludwig van Beethoven for a large audience.

It was the first time that a concert had been held in the auditorium. Sponsored by Oscar and Margaret Lewisohn, it also provided an opportunity to draw attention to the Bridge Builders Association, which was established in 2019 by Bent Melchior and Özlem Cekic and is known for its “Centre for Dialogue Coffee” whose aim is to strengthen dialogue and democratic conversation.

“Our democracy should not be taken for granted. Democracy is our common right and opportunity, and we take care of it by participating, using our voice and engaging in dialogue. Because dialogue enlightens us, represents us and unites us across all the things that divide us. That’s why we need to keep the democratic conversation going and open to all, because democracy flourishes when we make room for a diverse range of voices, different perspectives and disagreements,” the Association explains about its purpose on its website.

Constructive disagreement

In her speech at the concert, Özlem Cekic said that it was Bent Melchior’s hope that he would be remembered as a person who had made an effort – an effort to make the world a better place.

“It’s my hope that we can continue his work in the Bridge Builders Association. We try to do what we can to get different groups of people together. Everything starts and ends with children. That’s why it is our aim to educate children to be tolerant human beings,” she said in her speech.

She also emphasised the importance of engaging in dialogue with people you don’t really want to talk to. And that is the reason why the Bridge Builders Association is also about being able to disagree – but in a constructive manner.

“Because peace, as Bent said, cannot be created with friends. You have to talk to those people you consider to be your enemies,” she added.

Today, the Bridge Builders Association has around 7,500 members. Bent Melchior’s goal was to have 10,000 members.

Our support

Gorrissen Federspiel supports a number of organisations and social causes, including through financial contributions and pro bono work. We often help organisations and initiatives that would otherwise struggle to get the necessary legal assistance, and we support causes that fall within our areas of focus. We offer ongoing support to several initiatives with which we have long-standing relations.

Here is an overview of some of the initiatives we support:





Labour

Labour

When it comes to labour, we are committed to the principles of the UN Global Compact:

Principle 3:
Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4:
The elimination of all forms of forced and compulsory labour;

Principle 5:
The effective abolition of child labour; and

Principle 6:
The elimination of discrimination in respect of employment and occupation.

Our ambitions

At Gorrissen Federspiel we see ourselves as having an open working culture, where everyone should feel accepted, valued and respected. It is our policy to treat everyone equally and to not discriminate on the basis of social background, culture, gender, ethnicity, religion, age, skin colour or sexual orientation.

Over recent years we have worked hard to ensure we create a diverse workplace with equal opportunities for all talent. We have done this through both internal and external initiatives.

As one of Denmark's leading law firms, we must actively promote conditions that create gender diversity in management positions and boardrooms – an area in which we as an industry face a common challenge.

We believe that inclusion and diversity are key to our continued success. That's why we remain committed to working towards this goal. And we will continue to do so with determined effort. It's an area in which we are continuing to become wiser, as we share experiences with the leadership teams of other Danish companies from who we both learn and draw inspiration.

The importance of focusing on labour

Throughout 2021 we saw the competition for talent continue to intensify. As a knowledge-based business it is imperative that we attract and retain the best lawyers in the market, so that we can continue to provide specialist advice of the highest standard.

Part of our strategy is to be the best workplace in the legal sector, a goal we work to achieve by continually developing as a modern firm. We recognise that the generations entering the workforce today hold high expectations for their employers in terms of what they want from their career and their place of work. We have high expectations of our employees, but they also place high demands on us as a workplace.

In recent years we have sharpened our focus on diversity, inclusion and well-being, and we will continue to do so. Not only because it could weaken our business in the long run if we are no longer able to attract and retain talented employees, but also because it is the right thing to do.

As a responsible workplace it is important to us that all our employees have a stable and sustainable working life throughout their careers at Gorrissen Federspiel.

Objectives for 2021

Our objective for the year was to promote diversity and inclusivity in the legal profession. We aimed to achieve this goal through our involvement in The Diversity Council and a number of other initiatives that are centred on diversity. We also wished to finalise the drafting of a detailed D&I policy.

We wanted to remain focused on employee development, including through new training initiatives. In addition, we wanted to continuously assess employee satisfaction based on parameters such as the work environment, management, employment terms and their current well-being.

Progress in 2021 and expectations of continued development

We are continually building on ongoing D&I initiatives, and we continued to do so in 2021.

First and foremost, we drafted a written D&I policy that brings together existing practices and commits us to providing a working environment where everyone is treated with respect and dignity.

We once again conducted an employee well-being survey, which among other things focused on employee supervision, working conditions, job content and development as well as, for the first time, questions relating to diversity and inclusion. We also conducted a supplementary survey focusing on mental health and well-being. Against this backdrop, Managing Partner Martin André Dittmer set up a well-being committee with the aim of establishing the optimal operating framework for individuals to perform their roles.

In the autumn we set up our first D&I committee. Committee members meet three to four times a year to discuss diversity and issues such as recruitment, equal opportunities, quotas and role models. The committee consists of employees from across Gorrissen Federspiel, and their input is reported to the board of directors.

A further initiative came into being when we launched an internal training programme around the issue of unconscious bias, with a focus on how unconscious bias can be problematic for decision making as well as inclusivity more generally. The HR team, the board of directors and the D&I committee, plus several of our Managing and Practice Area Counsel as well as partners, participated in the training programme, which we expect to continue in the future when it is rolled out to the entire group of partners.

In our efforts to retain employees following parental leave, in 2021 we introduced a retention bonus corresponding to the pension contribution that Gorrissen Federspiel would have paid if the employee had received salary during the period of leave. We have chosen to do this to ensure that our employees do not experience a pension shortfall due to their parental leave. We want our people to develop throughout their careers. In 2021 we sent off the first cohort of participants on our tailor-made GF Academy – a programme targeted at lawyers who have taken on new roles with increased management and professional responsibilities. In the course of the programme, participants acquire tools and skills to assist them in their new roles. We focus on employee development at all levels, and believe that lifelong learning is the key to retaining employees throughout their careers.

Aims for 2022

We will continue to focus on diversity and inclusion as well as measures to improve mental well-being, and we will expand our unconscious bias training programme. We will continue to support the Association of Danish Law Firms with their three-year research project and Business PhD programme, which will examine the gender imbalance within senior management in the legal profession.

SDGs



Objective attained



Fully

Tighter competition for talent

Talented lawyers were in high demand in 2021 – something that we also felt at Gorrissen Federspiel. But despite the competitive market we were successful in both retaining and in recruiting new employees. For the first time our firm has more than 300 lawyers.

The well-being survey is an important measure

It takes time to develop the knowledge base and talent pool upon which our firm is built. That's why it is essential that we manage to retain our employees, so that there is a deep portfolio of skills at all levels.

Every year we conduct a well-being survey among our employees. The survey provides us with an overall picture of how our employees perceive the firm as a workplace and identifies areas where extra attention is required.

The well-being survey is one of several tools that we use to gauge employee satisfaction and well-being.

We also work actively to understand each employee's life and career situation, and endeavour to provide the flexibility required to meet their individual needs.

Increasing our numbers in 2021

To retain our talent – including at senior management level – we are actively committed to having an open and inclusive work culture, where everyone feels valued and respected and with equal opportunities to fulfil their potential in the direction they desire. We want to bring all talent into play, as it would be such a wasted opportunity if certain groups of employees took their talent elsewhere because they could not envisage a fulfilling career at Gorrissen Federspiel.

Even though the most talented employees are in great demand, in 2021 Gorrissen Federspiel was successful in both retaining employees and attracting new ones. In the last year we took on 67 lawyers and 140 employees in total. In September 2021 alone we welcomed 38 new employees.

This means that in 2021 the number of lawyers exceeded 300 for the first time. Gorrissen Federspiel ended the year with a total of 535 employees.

With high activity levels across the sector, in 2021 there was heightened competition for talent.

Our people are our most important asset. Part of our strategy is about being the best place to work, with the most talented and most committed people. This requires close attention to well-being, inclusion and development.

In a market where we compete not only with other law firms, but also with in-house legal departments, the courts of law and government departments, it is not a given that our employees will stay with us – not least if they believe that their vision of a rewarding and exciting working life can be better fulfilled elsewhere. This puts pressure on us as a workplace.



Equal opportunity for success

We see ourselves as an open working community, where everyone must have an equal opportunity to succeed and to advance. In 2021 we have placed extra focus on inclusion and diversity and, in particular, unconscious bias.

At Gorrissen Federspiel we want to reflect the society we are part of. This means that we work actively to have a diverse workforce in which everyone has equal opportunities and rights. We believe that this is the key to our continued success.

Through both internal and external initiatives, we are working to not only make Gorrissen Federspiel an inclusive place to work but also to address some of the wider challenges we face in the legal profession, particularly when it comes to gender diversity in senior management.

As a new initiative in 2021 we started in-house training on unconscious bias. Among other things, this should make us aware of any unintended patterns, decisions and actions in relation to diversity and inclusion.

“We want to increase our awareness of unconscious bias in relation to how we judge other people and by having tools to

identify, talk about and reduce bias in everyday life,” says Head of HR, Sara Jursic.

Bringing all talents into play

To-date, HR, the board of directors and a cross-departmental group including several of our Managing Counsel and Practice Area Counsel have received training. The intention is that the unconscious bias training will continue in 2022 including with, among others, the partner group.

For Sara Jursic, gender diversity is about bringing all skills and competencies into play and using the entire talent pool. At the same time it is also important that young female lawyers have role models to look up to, so that they can see that gender is not a limitation to their career.

Together with Managing Partner Martin André Dittmer, she is part of the Diversity Council’s network for CEOs and HR Directors. Both of them meet with

representatives from some of the largest companies in Danish industry, to gain inspiration, share experiences and discuss the barriers that can lead to a lack of retention of female talent and so prevention of women from entering senior management positions.

“Diversity in senior management is not just a challenge in the legal profession. It’s therefore very valuable for us to be part of networks that bring the business community together across sectors, where experiences and good practice can be exchanged so that we don’t all have to reinvent the wheel,” says Sara Jursic.

Diversity is more than gender

Although gender is often on the agenda when talking about diversity, she points out that Gorrissen Federspiel focuses on diversity in a broader sense and not only in relation to gender.

That’s why we have foreign lawyers from Australia, Austria, Belgium, France, the UK and the US, for example, and we are continually looking to provide clients with further value by complementing our legal advice with other competencies. One example is our specialist economic analysis team, which has grown considerably since it was set up in 2016.

Another example is the recruitment of a special adviser with a background in agriculture, and the engagement of former Prime Minister Lars Løkke Rasmussen as a senior adviser focusing on cases with a political, regulatory or diplomatic angle.

“When we talk about diversity and the composition of our workforce, it applies to all aspects. Society and our clients are diverse. That’s why we have to be too,” says Sara Jursic.

She points out that the days are gone when all lawyers were cast from the same mould, which is only to the benefit to clients.

“If we were all the same, there would be a risk of an overly one-sided perspective. Having a diverse and inclusive workforce allows us to see our clients’ challenges and opportunities in a more nuanced way, bringing greater value to our advice,” she says.

Diversity actions 2021

New diversity and inclusion policy

In 2021 we drew up a written diversity and inclusion policy. The policy sets out existing practices and commits us to ensuring a working environment where everyone is treated with respect and dignity. We want all employees, clients and other business partners to feel that they are working in a professional environment that promotes equal employment opportunities and prohibits discriminatory behaviour and harassment.

Gorrissen Federspiel's diversity and inclusion committee

In the autumn we set up our first diversity and inclusion committee. We want to be an inclusive workplace that promotes diversity. We therefore want to obtain input from our employees as to how to make it clear in everyday life that diversity is a priority. The committee meets three to four times a year to discuss diversity and issues such as recruitment, equal opportunities, quotas and role models. The committee consists of employees across Gorrissen Federspiel, and input is reported to management.

Anthropological project on gender diversity

On 1 February anthropologist Pernille Slots Lysgaard began a three-year research project and business PhD that aims to investigate the gender imbalance in senior management in the legal profession. During the project Pernille Slots Lysgaard will make observations in several law firms and interview partners, employees and former employees who have left the profession. Gorrissen Federspiel supports the project.

Training in diversity & inclusion and unconscious bias

We have launched an internal training programme that will, among other things, make us more aware of unconscious bias and why bias is a problem in decision-making and for inclusion more generally. Exercises with an external trainer will raise awareness of everyday bias and implement an inclusive and constructive language to address bias, diversity and inclusion. HR, the board of directors, members of the D&I committee and most Managing Counsel and Practice Area Counsel have participated in this training.

Retention bonus for employees on parental leave

As part of our efforts to retain our employees after parental leave, we have introduced a retention bonus equal to the pension contribution Gorrissen Federspiel would have paid if the employee had received salary during the period of leave. The bonus is paid directly into employees' pension savings to ensure that there is no pension shortfall due to parental leave.

Well-being survey with extended questionnaire

In 2021 the annual well-being survey was expanded to include questions regarding diversity and inclusion. The results of the survey showed that the overall experience is that people at Gorrissen Federspiel are treated fairly and with respect and that there are equal opportunities for everyone. Furthermore, people feel secure and able to share their honest opinions and feel that their opinions are respected.

Womenomics Nordic Business Conference

In 2021 we co-sponsored Above & Beyond Group's Womenomics Nordic Business Conference, which due to circumstances was held virtually. It brought together 500 business leaders from Denmark and abroad as well as politicians and experts to debate the impact of women on the global economy as consumers, leaders and innovators. The conference is the largest of its kind in the Nordic region, and the opening speech was given by HRH The Crown Princess.

The Danish Chamber of Commerce

The Advisory Committee of the Danish Chamber of Commerce has set up a working group focusing on diversity and social responsibility. Among other things, the group will focus on increasing diversity in the professional advisory sector with an initial focus on gender diversity. We are part of the working group that aims to suggest ways to increase gender equality in the industry. The working group's work is research- and evidence-based in collaboration with knowledge institutions.

Gender diversity at Gorrissen Federspiel

The gender distribution among the lawyers at Gorrissen Federspiel has a slight predominance of women. As at 31 December 2021 the proportion of female lawyers (excluding partners) was 51%. This represents a slight decrease from 2020, when the proportion was 54%. The percentage of female lawyers in the Danish legal sector as a whole in 2019 was 39% (source: The Legal Sector in Numbers 2020, The Association of Danish Law Firms).

At Gorrissen Federspiel we want a diverse workforce and we have a broad desire for greater diversity, which extends to the rest of the firm's management – the partners. At the end of 2021 16% of partners were women, which is a slight fall from the previous year when the proportion was 18%. This should be seen in light of the fact that during 2021 we had to say goodbye to a female partner who wanted to pursue a career outside Gorrissen Federspiel.

A survey conducted by AdvokatWatch in September 2020 shows that the distribution among the profession's 10 largest law firms averages 15.5%.

In our top management body, the board of directors, we continue to have one female member, which represents 17% of the board. We have set a target for our board to be composed of at least two women by the end of 2022, which corresponds to 33% with the current number of board members. We have had one change in the board of directors during 2021, as we had a new head of our Aarhus office, Kenneth Kvistgaard-Aaholm. He replaced his predecessor on the board of directors, and in this context we found no reason for further changes.

At Gorrissen Federspiel we continue to focus on diversity and retention. We want to ensure that the talent of the future have role models to look up to, and that all skills and competencies come into play. We acknowledge that the composition of senior management does not fully represent a diverse workforce.

That is why for several years we have been working consciously to build a diverse pipeline of talent among our younger employees, in order to create an even more equal representation of candidates for senior roles and management positions. This will also lay the foundations for a diverse partner base. In 2020 we also introduced two new career steps: Managing Counsel and Practice Area Counsel. Both can be final positions or a step towards becoming a partner. Today the proportion of female lawyers in these two groups is higher than in the rest of the management, which should also help to promote greater diversity in the appointment of new partners. For the whole of Gorrissen Federspiel the proportion of female employees is 56%.

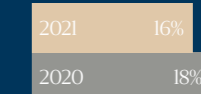
Female lawyers (excluding partners)



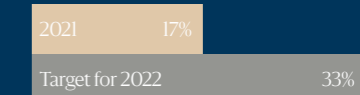
Female senior lawyers



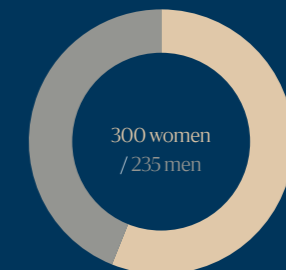
Female partners



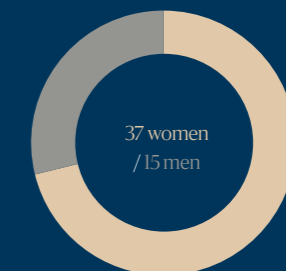
Women on the board of directors



Gender distribution



Maternity leave



Environment



Environment

When it comes to the environment, we are committed to the principles of the UN Global Compact:

Principle 7:
Businesses should support a precautionary approach to environmental challenges;

Principle 8:
Undertake initiatives to promote greater environmental responsibility; and

Principle 9:
Encourage the development and diffusion of environmentally friendly technologies.

Our ambitions

As an organisation we care a lot about the community we are part of and the world that we live in. We want to run our business with the smallest possible carbon footprint, which requires continual development in a more sustainable direction.

As a business and workplace we are very conscious of our responsibility in terms of reducing our CO₂ emissions and taking care of the environment. We do this by taking into consideration sustainability wherever we are able to make a difference. This may be internally in terms of the running and maintenance of our two office buildings, as a legal adviser to companies going through a sustainable transformation, through pro bono work related to the environment and climate, and by sharing our knowledge of environmental and climate legislation through conferences, discussion forums and industry debate.

Both our employees and our clients have an expectation that we conduct ourselves in a responsible and sustainable manner, and that we maintain focus and awareness of how to run our business with a minimal impact on the environment.

Even though our business model does not involve significant environmental risks, this does not mean that we do not want to take responsibility. We are ambitious and we are constantly working to optimise and find alternative solutions to ensure we run a climate-friendly business.

The importance of focusing on the environment

Focusing on sustainability and responsible business stretches beyond us as a firm. As a responsible business, we have a responsibility to run our firm in an ethical and responsible manner so that we do not have a negative impact on the climate.

This means that we are constantly working to find new and more climate-friendly approaches and solutions and looking to use eco-conscious suppliers with an environmental agenda that, as far as possible, helps to limit our climate footprint.

As a legal services provider, our primary activities do not directly affect the environment. Likewise, climate change does not affect our business. However we want to make a difference where we can. We do this through our choice of suppliers and in the day-to-day running and maintenance of our two offices.

Objectives for 2021

We aimed to identify the most environmentally friendly alternatives and the most sustainable approaches across all areas of the organisation where we were able to make an impact. This included a continued focus on organic products and sustainability in our kitchens, an ambition for more meat-free days and using sustainable suppliers from the local area.

We were anticipating a cultural shift towards more paperless work procedures and thus a reduction in our print consumption. We were also planning to replace more office supplies and corporate merchandise with more environmentally friendly solutions and reusable materials.

Progress in 2021 and expectations of continued development

In 2021 we continued our journey towards having optimal and sustainable business operations. In our kitchens there was ongoing focus on organic products, sustainability, local suppliers and avoiding food waste. Our kitchen at Axel Towers retained its Organic Cuisine Silver Label.

Our coffee supplier in Copenhagen has introduced a new and sustainable return system, where organic coffee beans are now being delivered in larger cans that can be reused up to 100 times. We have signed up to an arrangement whereby for every kilo of coffee sold the supplier donates €1, of which €0.5 goes to the coffee farmers in Sumatra and €0.5 to an initiative to prevent the extinction of orangutans.

For several years we have focused on paperless work procedures, with the ambition of reducing our print consumption. We saw a big drop in 2020, which was partly due to lockdown and home working. It was therefore interesting to see what the 2021 level would be. We were pleased to see that print consumption was also lower, as our employees have continued the good habits of the previous year. We also continued to send used IT equipment to recycling.

We are also exploring the use of electronic signatures, which in 2022 could reduce both paper consumption as well as car, plane and train journeys.

In terms of corporate merchandise, we have made a number of switches to more sustainable products. This includes our umbrellas, tote bags and laptop bags, which are all now produced from reusable polyethylene terephthalate (PET). Boxes used for client gifts are also now made from recycled cardboard.

Aims for 2022

We will continue to focus on how we can replace existing solutions and products with new and more environmentally friendly alternatives. Actions and initiatives already underway will continue in 2022.

On the following pages you can read more about our efforts to minimise our climate footprint.

SDGs



Objective attained



Fully

A contract for cleaner oceans

In 2021 Gorrissen Federspiel entered into a pro bono partnership with The Ocean Cleanup, a Dutch organisation that uses new technology to remove plastic from the world's oceans.



When Dutch non-profit organisation The Ocean Cleanup requires legal assistance under Danish jurisdiction, Gorrissen Federspiel is ready to help. We entered into a pro bono partnership in 2021, in doing so becoming the Danish arm of a worldwide pro bono network.

The Ocean Cleanup was founded in 2013 by the then 18-year old Dutchman Boyan Slat. With the help of specialist technology, he set out to clean the world's oceans of the more than five trillion pieces of plastic that are floating around and prevent new items being added.

"This covered a topic that we haven't otherwise focused our attention on in terms of pro bono work, but which is clearly very important – namely, the environment. It enables us to assist an organisation whose mission it is to remove plastic from the oceans, so it's a modest way in which we are able to contribute," says Kenneth Kvistgaard-Aaholm, partner at Gorrissen Federspiel with responsibility for the agreement with The Ocean Cleanup.

Already in 2021 we have provided legal assistance to the organisation. This was in connection with an agreement between The Ocean Cleanup and a Danish company.

"On this specific matter we helped with various aspects of the agreement relating to Danish law. We think that it's a really good cause, and it's an ongoing partnership," says Kenneth Kvistgaard-Aaholm.



Clean offices and a clear conscience

In 2021 the Covid-19 pandemic meant changes to the cleaning procedures in Axel Towers. These changes embrace environmentally friendly cleaning.

All cleaning in Axel Towers is now done with eco-labelled cleaning products.

In 2021 Gorrissen Federspiel reviewed its cleaning procedures, with increased priority on the cleaning of surfaces due to the Covid-19 pandemic. It therefore became even more important to use products without hazardous chemicals, says Pernille Clemen, Head of Shared Service and Facilities. Not just for the sake of the environment, but also out of consideration for our cleaning staff and our employees who were experiencing more frequent cleaning while they were at work. At our office building in Aarhus, we are using eco-labelled detergents and place particular focus on using the correct dosage.

“Our offices are large and require very targeted cleaning. It’s important for us that this is done sustainably, which among other things includes using eco-labelled

detergents with minimum chemicals and avoiding over-use,” says Pernille Clemen.

A natural part of our business

In 2020 Pernille Clemen was involved in the process of selecting and appointing cleaning firm Anders Andersens Rengøring as our new provider of office and window polishing services. One of the key selection criteria was the provider’s approach to CSR and sustainability.

“It was crucial for us that environmental considerations and sound working conditions were a natural part of our future provider’s business. Fortunately, we found it,” says Pernille Clemen.

Digital work procedures reduce paper consumption

Although in 2021 we spent more time in our offices than in 2020, paper consumption continued to drop. Digital habits have become an integral part of matter management, resulting in both more efficient work procedures as well as benefits for the environment.

Since we implemented our new finance and matter management system in February 2020, with the aim of introducing more digitised processes and work flows, print consumption at our two offices has been decreasing.

Already in 2020 we saw a drastic decrease owing to the new system, but also owing to lockdowns and the level of home working which meant that fewer people were at the offices with access to printers.

We were therefore quite anxious to see the figures when Niels-Jørgen Will-Nielsen, Head of IT, generated the 2021 print report. He was hoping and expecting that the digital habits from 2020 would extend into 2021 and bring about a permanent change of habits.

“Many people have been used to having physical documents in front of them. A reduction in paper consumption is of course about having the right IT systems that support digital work flows, but it’s also about changing working habits. In the last year many people become more confident with digital documents and found that it’s possible to read, mark-up and add comments on screen,” says Niels-Jørgen Will-Nielsen.

Further fall in paper consumption

There is every indication that good habits have stuck. The overview report for print consumption shows that, despite an increased physical presence at our offices, useage has decreased further. In 2021 we printed 5,010,505 sheets of paper, down from 5,402,645 sheets in 2020. This corresponds to printing 1,074 fewer sheets of paper per day than in the previous year.

In comparison to the last “normal” year, 2019, print consumption has dropped by 29%. This reduction should be seen in light of the fact that, at the same time, the number of employees has been increasing.

“That the figures are lower than in 2020, when most of us worked from home and which must therefore be regarded as an unusual year, shows very positive progress,” says Niels-Jørgen Will-Nielsen.

He hopes it is yet another step towards further paperless matter management and a further reduction in paper consumption.

Less equipment for recycling

Another area where the IT department has taken steps to minimise our climate footprint is the recycling of used IT equipment.

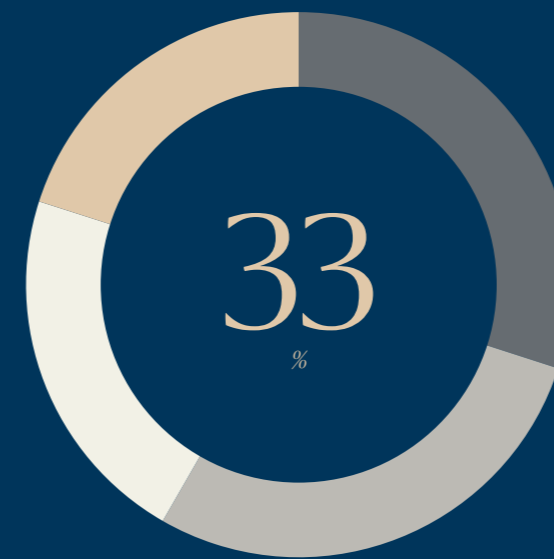
Since 2019 we have been working with Codeex, a specialist recycler of used IT equipment. Some is repaired and resold, while some is recycled.

According to an environmental report from Codeex, in 2021 Gorrissen Federspiel sent 72 pieces of IT equipment for recycling. This corresponds to an environmental saving of 18,000 kg of fossil fuels, 50,400 kg in CO₂ emissions, 1,584 kg chemicals, 108,000 litres of clean drinking water and 165,600 kWh.

The number of pieces of used IT equipment sent for recycling in 2021 was lower than in previous years. Our Head of IT sees this as a positive sign.

“We try to buy IT equipment that has a long life span. But technology is changing fast, and with over 500 employees we sometimes need to replace either computers, monitors or mobile phones. In such cases, we send the used equipment for recycling,” says Niels-Jørgen Will-Nielsen.

Paper consumption reduced from 2018 to 2021



2018 / 2019 / 2020 / 2021

According to the report from Codeex, we have achieved environmental savings equivalent to:

18,000 kg
fossil fuels

50,400 kg
CO₂ emissions

1,584 kg
chemicals

108,000 litres
clean drinking water

165,600 kWh
electricity

Coffee supplier reduces climate footprint

At Gorrissen Federspiel we run our kitchens under the motto “as sustainable and organic as possible”. This means there have been a number of new measures in 2021, as well as our kitchen in Copenhagen retaining its Organic Cuisine Silver Label.



An emphasis in 2021 on organic products and sustainable alternatives has resulted in a number of new initiatives in our kitchens and service and catering activities.

“No doubt the greatest achievement, however, was that our canteen in Axel Towers retained the Organic Cuisine Silver Label that it was awarded in 2020”, says Maj-Britt Leander, Head of Meetings and Catering at our Copenhagen office. The Organic Cuisine Label is a state-guaranteed labelling scheme and proof of a kitchen’s commitment to organic food. To obtain the Silver Label, 60-90% of the raw ingredients used in preparing the entire menu must be organic.

“Being awarded the Silver Label was an important milestone, but it is equally important that we managed to maintain the certification. It requires a great deal of focus right the way along the supply chain,” says Maj-Britt Leander.

In this context, in 2021 we entered into arrangements with two new meat suppliers with a strong focus on organic products and sustainability. We want to take responsibility by using local suppliers and purchasing organic products, so helping to reduce CO₂ emissions.

More plant-based alternatives

Maj-Britt Leander points out the general drive for sustainability in the kitchens. This is achieved by serving more vegetarian dishes in the daily buffet, but also by having meat-free days. In 2021 we increased the number of plant-based alternatives.

Another focus area is minimising food waste. By careful planning of the weekly menu, our chefs look to use seasonal and local products. There is also a focus on how to incorporate leftovers into new and exciting dishes. In addition, employees are very welcome to buy and take home leftovers from the buffet service.

Sustainable coffee solution

It’s not only in the kitchens where we have a strong focus on sustainable operations. Across the whole of service and catering, beyond the kitchens, 2021 has seen a shift to more sustainable solutions.

In 2020 we changed coffee supplier, meaning all coffee and tea is now organic. In 2021 they took the further step of introducing more sustainable coffee packaging in a return system where the containers are both significantly larger and can be reused more than 100 times.

According to a report from the Danish Technological Institute, changing from the 1 kg coffee

“It may seem like just a small thing, but in the big picture it all counts. We’re constantly looking to find areas where we can shift to more sustainable solutions, both in our operations and with our suppliers.”

bags to the return system with 5 kg recycled containers can reduce the climate footprint by 63% based on a number of factors such as materials, processes and transport.

“We want to run our business with the smallest climate footprint possible. That is why we’re also very happy that our coffee suppliers are now offering more sustainable solutions. Moreover, for each kilo of coffee sold our supplier donates €1, of which €0.5 goes to coffee farmers in Sumatra and €0.5 to an initiative to prevent the extinction of orangutans,” says Maj-Britt Leander. In 2021, employees consumed 2.7 tonnes of coffee beans.

Every little counts

As Head of Meetings and Catering, Maj-Britt Leander is constantly aware of how even small changes can make a difference. In recent years, for example, cleaning cloths containing microplastics have been removed, single-use plastic products have been replaced by more sustainable alternatives and we now only use biodegradable bin bags. In 2021 the boxes we use for gifts to our clients were also replaced. The new boxes are made from recyclable cardboard, so that it is a recyclable product.

“It may seem like just a small thing, but in the big picture it all counts. We’re constantly looking to find areas where we can shift to more sustainable solutions, both in our operations and with our suppliers. We’ve come a long way in recent years, and we’ll of course continue along this track,” says Maj-Britt Leander.

It is our expectation that the kitchen in Axel Towers will maintain the Organic Cuisine Silver Label in 2022, and we will continue to focus on initiatives, new solutions or products that support the vision of more organic solutions, sustainability and animal welfare.

Anti-corruption



Anti-corruption

When it comes to anti-corruption, we are committed to the principle of the UN Global Compact:

Principle 10:
Businesses should work against corruption in all its forms, including extortion and bribery.

Our ambitions

It goes without saying that, as a law firm, we expect all employees at Gorrissen Federspiel to comply with all applicable rules and regulations, including the rules relating to anti-corruption.

However, it is not enough to “only” stay within the law. Decency is an integral part of our DNA, and something that has also materialised in our ethics – one of our five core values. Although we have clear internal guidelines in terms of anti-corruption and bribery, we obviously do not want to have clients who engage in such practices.

It is important for us that all employees are familiar with the procedures for what to do and where to go if they become aware of a violation of anti-corruption rules or other suspicious activities. It’s for this reason that all new employees are introduced to our anti-corruption policy. Any suspected breaches of the anti-corruption rules can be reported through our whistleblower scheme.

In 2018 we endorsed the advokatKODEKS (the Lawyer’s Code), and initiative that operates under the auspices of the Association of Danish Law Firms. We continue to support this initiative, which commits us to work with five selected elements including the handling of ethical dilemmas.

The importance of focusing on anti-corruption

As a law firm, running the business in an ethical and decent manner is of paramount importance. It is essential for our business that we are the first choice of our clients, and this is something that we take very seriously. We work hard every day to not only to live up to our clients’ trust but to fulfil our own high standards.

When you live by your reputation and good name, as we do, any suspicions of corruption, kickbacks or fraud can be damaging to your business. We are therefore extremely vigilant in meeting compliance obligations and being sure to act in a responsible and ethical manner.

As an organisation we are aware that it is no longer enough just to have “our own house in order”. We are also judged on the people, companies and organisations that we work with.

As part of the legal sector, it is also important for us not to be the cause of negative publicity that could damage the profession as a whole.

In our assessment of our business model, we have not found corruption to be a significant high-risk area for us, and we have not identified any material corruption risks in our activities or in our relationships with business partners that have not already been addressed by our compliance measures.

Objectives for 2021

Our aim was to roll-out the anti-corruption policy and for it to be “live” within the firm. First and foremost, this was to be achieved by actively drawing attention to our new policy and making it visible to employees. We initially expected this to happen via our intranet. In addition, we planned to incorporate it into our induction programme and to ensure that all new employees are introduced to the policy. Furthermore, we also expected to incorporate the policy into our ongoing compliance staff training programme.

Progress in 2021 and expectations of continued development

In 2021 we raised awareness among employees of our anti-corruption policy. It was promoted primarily through our intranet, where our employees are used to finding the latest news and updates from across the firm. In addition, we have taken measures to incorporate the policy as a permanent part of our new joiner induction programme, which was implemented in the autumn. Since it has been a priority to incorporate the policy into the induction programme, we are still in the process of making anti-corruption part of our ongoing employee compliance training.

The board of directors reviews the anti-corruption policy on an annual basis to assess whether it needs to be updated. This way we ensure that the policy is always up-to-date and in line with developments in the field. In 2021 the board did not find reason to revise the policy.

We continue to support AdvokatKODEKS (the Lawyer’s Code), which we endorsed in 2018. In 2021 the Association of Danish Law Firms published its third report, to which we contributed. The Association of Danish Law Firms’ third report showed that, among other things, 36% of the 78 law firms that have committed to the Code have drawn up anti-corruption guidelines.

Throughout 2021 we continued with our work and focus on compliance as a whole, an area in which we have brought in more resources. As part of the systemisation and professionalisation of our CSR efforts, we have introduced a number of initiatives, including our anti-corruption policy. Compliance, ethics and decency are integral elements of our firm and ones which will always be key focus areas for us. With regard to our anti-corruption policy in particular, we will continue to focus on raising awareness among employees at the same time as continuing to review it on an ongoing basis.

Aims for 2022

Our aim for 2022 is to continue rolling out and implementing the anti-corruption policy, including arranging for further employee training.

SDG



Objective attained



Partially

Anti-corruption policy to be rolled out to employees

An important step for Gorrissen Federspiel's anti-corruption policy was to bring it to life in 2021 and to ensure that it is not just a policy that lives in a drawer. Today all new employees are introduced to the policy.

"Through our induction programme we ensure that there are no uncertainties as to Gorrissen Federspiel's position on corruption, bribery, kickbacks and gifts."

A policy that lives its life in a drawer and collects dust is of little value. Our aim in 2021 was therefore to implement the anti-corruption policy that was drafted and approved in 2020. The written policy brings together existing practices and makes clear to all employees the firm's position on corruption, bribery, kickbacks and gifts. The policy also clarifies how an employee should act if he or she comes across suspicious activities.

Camilla C. Collet, Chair of Gorrissen Federspiel's CSR Committee, emphasises that corruption and bribery have always been illegal and unacceptable at Gorrissen Federspiel, and that the implementation of the anti-corruption policy in 2021 should not be seen as a sign that we have had no previous policy in this area. It has just not been formalised in an overarching policy.

Part of the induction programme

For Camilla C. Collet, the priority for her anti-corruption work during the year has been to inform employees of the existence and contents of the policy. This has been done through, among other things, updates published on the firm's intranet with details as to where the employees can find the policy.

A further priority has been to ensure that new employees are informed of and understand the policy. When new employees start at Gorrissen Federspiel they all complete the same induction programme. The anti-corruption policy is now a permanent part of the "Guidelines and Policies" section, which includes a review of the most important policies.

"One of the reasons we wanted a written policy was so that new employees don't have to come in and interpret and decipher our culture. All employees, new and old, are now able to find answers to their questions in one uniform policy," she says.

Policy provides clarity

Camilla C. Collet points out that through culture alone you cannot expect everyone to have the same perspective and view as to how something should be interpreted.

"In 2021 alone we welcomed 140 new employees. It would be unrealistic to expect everyone to know how to act and where to turn if they should come across something suspicious. Or that everyone would share the same attitude as to how to define an 'acceptable gift'. Through our induction programme we ensure that there are no uncertainties as to Gorrissen Federspiel's position on corruption, bribery, kickbacks and gifts," she says.

We will continue our strong focus on compliance, including anti-corruption, where the aim for 2022 is to continue the roll-out and implementation of the anti-corruption policy and for anti-corruption to become part of our KYC/AML procedures.

