

Code of Conduct

The Board of Directors

As one of the leading business law firms in the Nordic region, Vinge has a great responsibility to ensure that the firm's operations are conducted in a responsible and sustainable manner. The responsibility applies in relation to our clients, employees, suppliers and society in general.

Corporate responsibility and sustainability issues have been of major importance for us for some considerable time and we have been systematically working on issues regarding, e.g., gender equality, work environment, environment and climate and business ethics and by preparing several internal policy documents and procedures.

Due to Vinge's leading role as an adviser within corporate responsibility issues, it is also of major importance that we practice what we preach. This code of conduct is thus intended to clarify our values and working methods regarding corporate responsibility issues as well as to form a solid foundation for our future efforts.

In accordance with the code of conduct, we endeavour to provide the best advice to our clients, create a good work environment for our employees and assume responsibility for how we affect society in general.

1. Introduction

Vinge's code of conduct is intended to clarify how we ensure that we conduct our operations in a responsible and sustainable manner. The code of conduct addresses respect for human rights, the promotion of good working terms and conditions, reduction of environmental impact and business ethics.

The code of conduct is based on the principles contained in the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. In addition, the code of conduct is also in accordance with the Swedish Bar Association's Guidelines for Enterprises and Human Rights. The areas addressed in the code of conduct focus on those risks and effects which are relevant to Vinge.

The requirements which are set forth in the code of conduct relate to both legal requirements which Vinge and its employees are obliged to comply with as well as requirements which extend beyond statutory obligations. This is in line with the aforementioned regulatory framework.

Vinge's code of conduct has been adopted by Vinge's board of directors, which is ultimately responsible for the implementation thereof. In order for the code of conduct to remain up-to-date and relevant, an annual evaluation will be performed where the code of conduct will be updated, if required.

In addition to the code of conduct, Vinge also has a number of other, more detailed, policy documents which address specific areas. Where relevant, references will be made to these policy documents below.

1.1 Application

The code of conduct applies to all employees (business support staff, associates, partners and temporary personnel as well as student trainees and summer interns) at all of Vinge's offices.

Each individual employee is responsible for complying with the code of conduct. It is the partners' and other managers' responsibility to ensure that other employees understand and act in accordance with the code of conduct. In addition, partners and other managers are also responsible, where required, to provide advice to other employees on how the code of conduct should be applied in the course of day to day work.

The code of conduct cannot provide answers to each specific situation but rather should be viewed as guidance in relation to how to act responsibly. In the event that any situation arises where the code of conduct does not provide a clear answer, the person concerned should seek guidance from their responsible partner or manager.

2. Human rights

Vinge respects the internationally recognized human rights, which in this context should be viewed as the rights prescribed in the UN Universal Declaration of Human Rights, the UN International Convention on Civil and Political Rights, the UN International Convention on Economic, Social and Cultural Rights as well as the ILO core conventions.

We undertake to follow and implement the *UN Guiding Principles on Business and Human Rights*, which entails that we should avoid causing or contributing to a negative impact on human rights or have any direct link to negative impact through our operations, our services or business relations.

This obligation applies both to our own organization and in relation to our advisory activities.

3. Employment terms and conditions

Our employees are our most important asset. Accordingly, we endeavour to be a good employer for all employees and offer an inclusive workplace which is permeated by respect, gender equality, diversity, contributory influence and personal development.

3.1 A workplace free from discrimination

Vinge works towards gender equality and diversity on the basis that human dissimilarity contributes to an attractive and dynamic workplace. We do not accept any form of discrimination and actively work towards counteracting discrimination and otherwise endeavour to ensure equal rights and opportunities irrespective of a person's gender, cross gender identity or expression, ethnicity, religious or other beliefs, disability, sexual orientation or age throughout the entire firm. Vinge has a *Policy and Plan for Equal Treatment* which provides further details in respect of the work within this area.

3.2 Good and safe work environment

Vinge shall offer a good and safe work environment as a natural part of our day to day work. We shall promote health and increase the organization's ability to counteract ill health and adopt an overall perspective in respect of health which includes both physical, psychological and social well being. The resources allocated for this work should be tailored to both the work requirements and the workload in order to prevent ill health. Accordingly, we map and analyse the risks in our work environment and regularly endeavour to rectify and prevent these and try to prevent and prohibit work injuries and illness. We also endeavour to implement early and active contributions if work injuries or illness occur. Vinge has the overall responsibility for health and safety at work, although each employee should actively contribute to this through,

for example, following our guidelines and policies. Vinge's *Work Environment Policy* addresses these issues in further detail.

3.3 A workplace characterized by respect

Each employee is an ambassador of Vinge and it is thus of the utmost importance that we treat both our co-workers and third parties with respect. A good starting point is to treat others as you would wish to be treated.

We do not accept any form of bullying, harassment, sexual harassment or other forms of victimisation and have clear guidelines governing how we should act in the event an employee is exposed to any form of victimisation. Any employee who becomes aware that another employee is victimising, harassing, sexually harassing or discriminating against a colleague or an external contact has a responsibility to act by personally taking action (if this is within the scope of his or her authority) or by notifying the responsible persons of the state of affairs in question. The measures which should normally be taken are described in further detail in Vinge's *Policy and Action Plan against Harassment, Sexual Harassment and Victimisation*.

3.4 Good development possibilities

The fact that Vinge's employees are committed and given the opportunity to pursue personal and professional development is a decisive factor in being able to attract and maintain competent personnel. Vinge should be a workplace where continued professional development is encouraged. We prepare development plans for all employees on an annual basis. In addition, knowledge dissemination and internal work rotations within Vinge are encouraged.

4. Environment and climate

The starting point for our environmental and climate work is that the operations should be conducted with the least possible effect thereon and that we continually reduce the negative environmental and climate effects that we have.

Our primary environmental and climate effect occurs in the supply chain of the goods and services that we purchase and the transportation thereof. In addition, we have an environmental impact through our employees' business trips as well as how we utilize our business premises. Vinge's environmental and climate policy thus focuses on these areas, as described in further detail in our *Environmental Policy*.

4.1 Transports and travel

In conjunction with the choice of means of transportation and couriers to and from Vinge's offices, the best alternative from an environmental perspective should, wherever possible, be chosen. In conjunction with booking of business trips, environmental aspects should

be weighed into the choice of the most appropriate means of transportation. A travel policy which further clarifies this is set out in our *Environmental Policy*.

4.2 Purchase of goods and services

In conjunction with the purchase of goods and services, the alternative with the lowest environmental impact should be chosen to the fullest extent possible. As regards procurements, relevant environmental requirements will also be included. Further guidance in relation hereto is contained in Vinge's *Environmental Policy*.

4.3 Business premises and real estate management

In conjunction with the formulation and management of our business premises, we should choose to reduce the negative environmental and climate impact to the fullest extent possible. When "green lease agreements" are offered, it is our ambition to enter into such agreements.

4.3.1 Waste management and recycling

Vinge is continuously endeavouring to reduce the total amount of waste produced by our operations. To the fullest extent possible, we will sort waste and, where possible, recycle. Hazardous waste will be handled so that the risk of any negative environmental impact is minimized.

4.3.2 Energy use

Vinge endeavours to minimize the use of energy in our business premises and to use energy from renewable energy sources. Accordingly, we have the possibility to enter into green electricity agreements with our electricity suppliers and, to the fullest extent possible, have sensor-controlled lighting in our business premises in order to reduce energy use.

4.3.3 Environmentally adapted material in conjunction with new construction and renovation

In co operation with the landlord/property owner, we endeavour to ensure that our business premises are located within properties which have the highest possible environmental certification.

4.3.4 Regular dialogue with the property owner in sustainability issues related to business premises

We regularly communicate with our landlords in order to highlight the environmental issues which arise in conjunction with the operation of the premises, co operate concerning long term reduction of energy use and exchange of information in relation to environmental and energy issues.

5. Business ethics

It is of the utmost importance for Vinge's long term work to ensure that its employees adhere to high business

ethical standards. Applicable laws, the Code of Conduct of the Swedish Bar Association as well as internal policy documents constitute the basis for Vinge's business ethics principles. Business ethics standpoints and considerations need to be constantly made within the scope of our operations and primarily address the following areas.

5.1 Anti-corruption

Vinge denounces all form of corruption. In conjunction with entertainment, the arrangement of corporate events, sponsorships or procurements, it is each employee's responsibility to follow the *Code of Business Conduct issued by the Swedish Anti-corruption Institute* as well as Vinge's *Guidelines concerning Gifts and Other Benefits*. Entertainment and corporate events should always have professional relevance and any entertainment activities in connection therewith should be of secondary importance and of limited monetary value. Gifts in the form of cash or gift vouchers may not be received by our employees. Any benefits offered of non-insignificant value must be approved by the employee's manager.

5.2 Money laundering and financing of terrorism

Each employee shall contribute to ensuring that Vinge's operations are not used for money laundering or financing of terrorism by having good client awareness and a good understanding of the purpose of the engagement in question. The member of the Swedish Bar Association who is responsible for an engagement has the ultimate responsibility for ensuring that we comply with the legislation which is intended to prevent money laundering and financing of terrorism when we accept and perform the engagement. All employees receive regular training in relation to these issues. Vinge's *Guidelines for Measures against Money Laundering and Financing of Terrorism* address this issue in more detail.

5.3 International sanctions

We respect international sanctions. The member of the Swedish Bar Association who is responsible for an engagement has the ultimate responsibility for ensuring that we are not personally breaching, or contributing to a third party's breach of, international sanctions when we accept and perform the engagement.

5.4 Avoidance of conflicts of interests

All parties to an engagement shall be checked against Vinge's *client and counterparty register* in order to ensure that there are no conflicts of interests pursuant to the Code of Conduct issued by the Swedish Bar Association. Any decision concerning an acceptance of a new engagement shall be taken by the member of the Swedish Bar Association who is responsible for the engagement. If new parties arise during the course of the engagement, the member of the Swedish Bar Association who is responsible for the engagement shall ensure that

no conflicts of interests arose as a consequence thereof. Where required or in difficult situations, guidance should be obtained from Vinge's *Ethical Committee*. All employees shall also avoid personal or financial activities which could potentially place the employee in a conflict of interest towards Vinge's clients.

5.5 Counteracting insider trading

By virtue of the fact that Vinge and its employees participate as advisers in engagements which relate to listed companies' shares and other financial instruments which are traded on a regulated market or other market-place, it is of the utmost importance that we counteract both insider trading and any suspicion of insider trading. All employees must thus follow Vinge's *Rules concerning Trading with Shares and Other Financial Instruments as well as Certain Fund Units*. The rules entail, among other things, that trading is prohibited during the time in which Vinge possesses potential insider information.

5.6 Information security and duty of confidentiality

All employees have a statutory duty of confidentiality in relation to information which relates to Vinge's clients and client matters and to which they have received access within the scope of Vinge's operations. It is the responsibility of each employee to comply with Vinge's procedures for information management and IT security as well as to use IT equipment in a purposive manner and for work related functions. For further guidance, please refer to Vinge's *Information Security Policy*, *Policy regarding Processing of Personal Data* as well as the *Code of Conduct issued by the Swedish Bar Association*.

5.7 Personal data

Vinge protects personal privacy and will thus always process personal data in an appropriate manner and comply with all regulatory requirements concerning the processing of personal data as applicable from time to time. Each employee is responsible for complying with *the General Data Protection Regulation* and Vinge's *Privacy Policy*.

6. Reporting

All employees are encouraged to report any actual or suspected breach of the code of conduct or any other policy document or guidelines which are referred to in the code of conduct. The reporting may take place either openly or anonymously. For further guidance regarding how reporting takes place, please refer to the *Whistle-blower* page on Vinge's Intranet. We do not accept any form of reprisals against an employee who reports a breach in good faith.