

## Bech-Bruun's Code of Conduct

### Statement by the Managing Partner

Bech-Bruun's work and business methods are based on good conduct and respect for our clients, our employees and our surroundings. We comply with the Code of Conduct for the Danish Bar and Law Society. We have, among other things, adopted advokatKODEKS, the new code of conduct of the Association of Danish Law Firms, according to which we undertake to continue to work with the five principles of the code, and we have signed the UN Global Compact where we undertake to carry on our activities in accordance with the ten principles of the charter.

Responsible business conduct is a basic element in the way we do business, and it forms the basis of what our clients and business partners can expect from us.

Steen Rode, Chief executive partner

### Preamble

Our Code of Conduct provides for our expectations to the ethical behaviour of our employees and reflects how we expect to engage with our stakeholders.

Ethical behaviour is essential to us and to our business. We take a zero-tolerance approach to bribery and corruption. We are committed to conduct business in an honest and ethical manner.

### 1. Bribery

Bech-Bruun does not accept or provide bribes in any form or anywhere. A bribe is considered as any offer of payment or anything of value to influence a business decision or government action.

### 2. Gifts

Gifts and entertainment can be part of building business relations. However, sometimes gifts can lead to conflicts of interests, or leave the impression that decisions are influenced adversely.

We allow employees to give and receive gifts as long as:

- No cash is involved
- It is a gesture of goodwill
- It is not considered improper or substantial

No gifts or entertainment can be accepted if they imply any expectation of a return of favour, no matter how insignificant the value of the gift might be, and regardless of whether the gift would benefit the employee.

### **3. Confidential information**

When collecting and applying information, we make sure to act fairly and appropriately. Confidential information may not be applied to obtain an inappropriate benefit or advantage as this could cause loss or damage to us and our stakeholders. Inappropriate use of confidential information is pursued and may result in disciplinary action and have legal consequences.

### **4. Conflicts of interests**

Bech-Bruun will not accept instructions involving existing or imminent conflicts of interests. In-house procedures and the legal profession's most advanced quality assurance system allow us to identify potential conflicts through advanced searches. Potential conflicting interests are referred to our in-house Conflicts and Ethics Committee.

### **5. Fair competition**

Bech-Bruun carries out all activities in full compliance with applicable legislation. We are committed to serve clients in a competitive and transparent manner.

### **6. Money laundering**

Bech-Bruun will not engage in transactions that facilitate money laundering or any offer of illegal activity. We assure that money transfers are traceable, and extensive internal procedures ensure compliance.

## 7. **Suppliers**

Our aim is to purchase goods and services in a sustainable way and accordingly we expect our suppliers to acknowledge their social and environmental responsibilities including acting fairly and with integrity.

## 8. **Human rights**

Bech-Bruun supports and respects the United Nations Universal Declaration of Human Rights and is a signatory to the UN Global Compact. Once a year, we communicate on our progress on Human Rights cf. principle 1 and 2.

## 9. **Discrimination**

Bech-Bruun is an inclusive firm and treats all clients, employees and stakeholders respectfully. All of Bech-Bruun's employees have equal opportunities and are treated and expected to treat others equally, regardless of personal background, gender, nationality, race, age, sexual preference or faith.

## 10. **Environment**

Bech-Bruun supports and advocates a reduction of our own impact and of the impact of our surroundings on the environment. We take all reasonable and appropriate measures to minimize adverse effects on the environment and encourage our employees to care for the environment and to help increase our daily focus on recycling, energy consumption, etc.