

30 June 2023

Transparency Act

Account of due diligence pursuant to section 4 of the Norwegian Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (Transparency Act)

This report has been prepared in accordance with section 5 of the Transparency Act and summarises the approach taken by Wikborg Rein Advokatfirma AS ("**Wikborg Rein**") to identify and assess actual and potential adverse impacts to human rights and decent working conditions in our own operations, supply chain or business partners, and provides

- a general description of Wikborg Rein's business and the company's procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions and
- the results of Wikborg Rein's human rights due diligence, including measures that have been or are planned to be implemented in this regard and the results or expected results of such measures.

This report covers the period 1 January 2022 up to the date of this report.

1 POLICY STATEMENT

Wikborg Rein is committed to respecting fundamental human rights and ensuring decent working conditions. We believe that our success as a reputable law firm is inseparable from our responsibility to advocate for justice, fairness, and the well-being of all individuals affected by our services.

We recognize that the provision of legal services goes beyond the realm of legal expertise alone. It encompasses a broader duty to actively promote and safeguard the rights and dignity of every person we encounter – be it within our organization, among our clients, or within the wider community.

To solidify our commitment, we have enshrined the following principles in our organization:

1. **Universal Respect for Human Rights:** We are dedicated to upholding the principles enshrined in international human rights instruments such as the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights and the ILO's core conventions on fundamental principles and rights at work. We affirm our unwavering respect for the inherent rights and equal worth of all individuals, irrespective of their background, identity, or circumstances.
2. **Safe and Supportive Working Environment:** We will foster a workplace that ensures the physical and psychological safety, well-being, and personal growth of all employees. We reject all forms of discrimination, harassment, or unfair treatment and strive to create an inclusive culture that values diversity, equality, and open dialogue.

3. **Ethical Client Engagement:** We will seek to make clients align with our commitment to human rights and decent working conditions. We will use our legal expertise and influence to advocate for these principles, advising clients on their legal obligations and encouraging responsible practices that promote fairness and respect for human rights.
4. **Due Diligence in Our Supply Chain:** We recognize the importance of responsible sourcing and partnerships. We will conduct due diligence to ensure that our suppliers and business partners share our commitment to human rights and decent working conditions. Where necessary, we will collaborate with them to address any identified risks or areas for improvement.
5. **Continuous Learning and Improvement:** We will foster a learning culture where employees are empowered to deepen their understanding of human rights, labour standards, and the challenges faced by diverse communities. We will provide ongoing training, resources, and opportunities for dialogue to facilitate continuous improvement in our approach to respecting human rights and promoting decent working conditions.

By embracing these principles, we contribute to a just society and to upholding the values that underpin the integrity of our profession.

2 OUR BUSINESS OPERATIONS

2.1 Description of company

Wikborg Rein is a Norwegian law firm with Norwegian and international law operations through its offices in Oslo and Bergen, its branch office in Shanghai and offices through its subsidiaries in London and Singapore (this constitutes the group). The group mainly offers legal advice, including litigation and transaction advice, to Norwegian and international businesses.

Wikborg Rein has 370 employees including partners, with the split across our various offices as follows: Oslo 227, Bergen 68, London 51, Shanghai 16 and Singapore 8.

2.2 Description of supply chain and other business partner relationships

Wikborg Rein does business with a range of third parties in its ordinary course of business. Our supply chain and business partner relationships mainly consist of office rental suppliers, insurance providers, event and catering suppliers, IT providers and consultants. We also have working relationships with other law firms.

The majority of the suppliers to and business partners of Wikborg Rein's operations in Norway are also based in Norway. Likewise, the suppliers and business partners of our overseas operations are also mainly local (i.e. based in the same country as the relevant Wikborg Rein operation).

In addition we have different corporate social responsibility partnerships such as with the Norwegian Helsinki Committee and Stine Sofie Stiftelsen.

3 ADDRESSING ADVERSE IMPACTS ON HUMAN RIGHTS AND DECENT WORKING CONDITIONS AT WIKBORG REIN

3.1 Human rights policies and procedures

Wikborg Rein firmly supports and upholds internationally proclaimed human rights, with the aim of ensuring that we do not cause or contribute to, and are not linked to, any adverse impacts on human rights and decent working conditions. Our commitment to human rights is enshrined through our Ethical Guidelines and further reflected in our internal policies and procedures relating to human rights in all countries where we operate, as well as through our external commitments. As a member of the UN Global Compact, we actively integrate human rights principles into our operations.

Our overall commitment to respect human rights and decent working conditions is further discussed on page 5 in our [Ethical Guidelines](#) (Norwegian) and on page 40 in our [Sustainability report](#).

In furtherance of the above, Wikborg Rein has in place the following policies, procedures and guidelines for, among other things, furthering the firm's work on human rights:

- Our Ethical Guidelines, as mentioned above.
- A Supplier Code of Conduct, which further specifies our expectations that our suppliers and business partners abide by the same or similar principles in their own operations as those outlined in our Ethical Guidelines, including but not limited to human rights and working conditions.
- A process for conducting third party due diligence assessments, covering areas such as (but not limited to) corruption, money laundering and sanctions risks, as well as risks relating to adverse impacts on human rights and decent working conditions. This process is enshrined in our Third Party Due Diligence Procedure, applied in conjunction with our due diligence questionnaires that suppliers and business partners above a certain risk threshold are required to complete.

Wikborg Rein is also in the process of adopting a specific process for handling information requests received under the Transparency Act, in order to ensure such requests are dealt with in a timely and compliant manner.

In addition we will, based on the experience we have now gained through our initial human rights due diligence and risk assessments, establish a human rights and decent working conditions impact assessment policy and new internal risk assessment processes concerning human rights and decent working conditions.

In our own operations, our employment contracts regulate the working hours of our employees, in conjunction with the Norwegian Working Environment Act Chapter 10 section 10-4. We have processes in place to make sure we are compliant with the limitations prescribed in the Norwegian Working Environment Act. We regularly (minimum monthly)

monitor working hours and follow up with our employees, to make sure that the workload is reasonable, and that there is a balance between working hours and time off.

3.2 Our approach to preventing adverse impacts on human rights and decent working conditions

Wikborg Rein has developed and established a compliance process where regular training, awareness programs, education, and reporting to the company's management are emphasized. Through this process, Wikborg Rein will work proactively with a focus on human rights and decent working conditions.

In our commitment to preventing adverse impacts on fundamental human rights and decent working conditions, we adhere to international laws and regulations pertaining to human rights, such as the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights and the ILO's core conventions on fundamental principles and rights at work. Further we adhere to national legislation as applicable, including the Human Rights Act (*Nw: Lov om styrking av menneskerettighetenes stilling i norsk rett*).

In addition, we carry out human rights due diligence in accordance with the OECD Guidelines for Multinational Enterprises, and the Norwegian Transparency Act

We are committed to maintaining a responsible and ethical supply chain that upholds our values of respecting fundamental human rights and promoting decent working conditions. Our third party due diligence process plays a crucial role in ensuring that our suppliers and business partners share these values and meet our standards.

Our Third Party Due Diligence Procedure applies to all Wikborg Rein offices globally, including all Wikborg Rein's partners, employees and other persons and/or entities working for or on behalf of Wikborg Rein. The Procedure aims to assess prospective suppliers' compliance with applicable laws, regulations, and internationally recognized standards and supplements and should be read together with Wikborg Rein's Code of Conduct (ethical guidelines) and its underlying policies and procedures, including Wikborg Rein's Anti-bribery and -corruption Program. These documents form the foundation for our due diligence process, which involves a systematic and thorough evaluation of our suppliers, taking a risk-based approach based on sector and supplier spend. We have also developed a questionnaire to address specific issues relevant to human rights and decent working conditions.

Applying the above-mentioned processes in practice, we have an established process where both existing and new suppliers and business partners will undergo a risk assessment based on industry, country and other relevant risk factors. In the process, suppliers/business partners are classified according to a human rights risk standard in the classes from low to high. In addition, suppliers and business partners must go through a screening process in accordance with our internal due diligence process in addition to a standardised questionnaire designed to assess risks of adverse impacts on human rights and decent working conditions.

Wikborg Rein has implemented a Whistleblowing Policy and set up a whistleblowing channel that is available to all employees (including temporary personnel). Employees may report concerns relating to actual or suspected breaches of relevant laws and regulations, the firm's ethical guidelines and/or generally accepted ethical standards. Reports may be anonymous. Ahead of the next reporting period, we intend to open this reporting channel up to third party stakeholders and extend the remit of potential reports to grievances regarding actual or potential adverse impacts on human rights and decent working conditions that Wikborg Rein's operations may have caused or contributed towards or be linked to.

Other initiatives to support our work with human rights include:

- One of our partners is a member of the Norwegian Bar Association's Human Rights Committee.
- Wikborg Rein has a long-standing partnership with the Norwegian Helsinki Committee, a non-governmental non-profit organization that works to promote human rights, both in Norway and internationally.

4 ASSESSMENT OF ACTUAL AND POTENTIAL ADVERSE IMPACTS ON HUMAN RIGHTS AND DECENT WORKING CONDITIONS RELATING TO WIKBORG REIN'S OWN OPERATIONS, SUPPLY CHAIN AND BUSINESS PARTNERS

4.1 Human rights impact assessment: approach and methodology

As part of Wikborg Rein's due diligence to identify actual and potential adverse impacts on human rights and decent working conditions, Wikborg Rein has taken a number of steps to collect, review and assess relevant information relating to our operations, supply chain and business partners.

For our own operations, our assessment is based on regularly conducted employee surveys that cover all employees within our organization, as well as health and safety reporting tools, where we record any health and safety incidents that may occur. Our employee surveys include a separate module addressing equality and discrimination. The insights gathered from these surveys, in combination with the above-mentioned regular monitoring and follow-up of our employees' working hours and workloads, enable us to understand the experience and perspectives of our employees, identify areas for improvement, and develop concrete action plans and initiatives. In addition we have conducted a comprehensive health and safety risk assessment.

Wikborg Rein offers legal advice to Norwegian and international businesses in a large number of sectors, including but not limited to the following: asset management, construction and infrastructure, ECM/DCM, financial institutions, fisheries and aquaculture, industry, oil and gas, private equity and venture capital, real estate, renewable energy and green investments, shipping offshore and technology and digitalisation. Our core areas of expertise are described on www.wr.no. We have assessed potential adverse impacts of our own operations on external stakeholders based on information about geographical, industry and operational risks across the group.

For our supply chain and business partner relationships, the overall process of our third party management consists of the following steps:

- Risk assessment
- Risk-based integrity due diligence (IDD)
- Mitigating measures and approval process
- Monitoring and follow-up

To ensure compliance with our processes and procedures, we will implement new processes for internal control and follow-up of our third party relationships.

4.2 Outcome of assessment of actual and potential adverse impacts in Wikborg Rein's own operations

In the reporting period, Wikborg Rein has not identified any actual adverse impacts on human rights and decent working conditions in our own operations, save for one workplace injury, which did not result in serious or long-term harm to the relevant employee and some reported instances of discrimination, as mentioned below.

We recognize, however, that there are inherent risks in our business, including but not limited to adverse impacts on working conditions for our employees (notably relating to stress and excessive working hours), and different forms of discrimination.

In terms of the former, everyday work in the legal profession can be both unpredictable and demanding, which can, at times, lead to great work pressure. We are aware of this risk, and that it may affect our employees' working conditions and that it requires monitoring and close follow-up.

Our assessment of working conditions for our own employees has been based on the latest employee survey results, which recognized the importance of continuous improvement. The total response rate to the survey was 80%. The survey showed that, over the past 12 months, nine individuals have experienced instances of victimization, bullying, sexual harassment, or other forms of discrimination in the workplace. This is being followed up as described in section 5.

Our health and safety risk assessment allowed us to identify key areas with higher risk of adverse impact. Specifically, these relate to Repetitive Strain Injury (RSI), stress, and noise exposure.

In terms of other risks of adverse impacts, there is some general risk linked to Wikborg Rein's operations in China, not as a result of any adverse findings, but simply due to the inherent human rights risks of operating in China as a result of its scores on a range of key human rights indicators.

We have further identified some general risk linked both to our international client base and to our more complex advisory, escrow and transaction matters. Wikborg Rein operates with clients in industries listed by UNEP as inherently high-risk sectors, which in turn increases the

general risk of Wikborg Rein indirectly contributing or being linked to actions that might have an adverse impact on human rights and/or decent working conditions.

Except as outlined above, Wikborg Rein did not otherwise identify any specific significant risks of adverse impacts on fundamental human rights and decent working conditions in its own operations.

4.3 Outcome of assessment of actual and potential adverse impacts in Wikborg Rein's supply chain and business partner relationships

In the reporting period we did not identify any actual adverse impacts on fundamental human rights and decent working conditions in our supply chain or in relation to other business partners.

However our analysis suggests that we should pay particular attention to suppliers and business partners in the following sectors: facilities, real- estate, office supplies, office furniture, recruitment and mobile phones and IT- equipment. In addition, we should pay particular attention to our engagement of lawyers located outside of Norway.

5 MITIGATING ACTIONS AND TRACKING PROGRESS

Based on the results of our employee surveys, we will focus on enhancing feedback mechanisms, stress management, and work-life balance to further enhance the well-being and satisfaction of our employees as well as addressing the reported issues of bullying, harassment and discrimination. Concrete actions are further discussed in our Equality Report (Nw: [likestillingsredegjørelse](#)) for 2022.

Further, we are addressing the risks identified in our health and safety risk assessment by ensuring our employees receive comprehensive training on health and safety risks and best practices, complemented by mandatory health check-ups for all staff members.

In terms of our client work, we are in the process of further developing our client onboarding tool to take account of risks of a client or project having a potential adverse impact on human rights and decent working conditions.

The work with risk assessments and the establishment of new procedures and processes has given Wikborg Rein an increased focus on issues and risks linked to our own business, both from the client's perspective and the supply chain and our business partner relationships. We have gained a better picture of everyone who is involved in relevant processes and identified areas of potential risk in the process. Furthermore, we have improved existing procedures and processes and established new ones. This work will be further developed in the coming year. Concrete measures are detailed in chapter 6.

6 PRIORITIES FOR 2023

Wikborg Rein Advokatfirma AS will prioritize the following activities and focus areas for 2023 based on the outcome of our human rights due diligence process:

- Conduct human rights training and awareness raising for all employees
- Incorporate enhanced contract clauses into our contracts with suppliers and business partners
- Continue to improve and progress our human rights impact assessment across our own operations, supply chains and business partners, including in respect of our overseas operations
- Update our Standard Terms of Business to stipulate that Wikborg Rein may withdraw from a matter in the event of actual or significant risks of adverse impacts on human rights and decent working conditions
- Engage with high risk suppliers (questionnaire) to further analyse the risks of these suppliers having an adverse impact on human rights and decent working conditions
- Establish an internal human rights impact assessment procedures and accompanying processes/guidelines as relevant
- Implement new procedures for internal control and follow-up
- Implement an external grievance channel
- Formalize a specific process for how to handle information requests under the Transparency Act, in order to ensure such requests are dealt with in a timely and compliant manner
- Further develop our client intake tool to take account of risks of a client or project having a potential adverse impact on human rights and decent working conditions

The Board, 30 June 2023