

# CODE OF CONDUCT

Applicable from 26 June 2023

.legal's work and business practices are based on good conduct and respect for our customers, employees, and surroundings. Responsible business conduct has always been and continues to be a cornerstone of how we operate; it also forms the basis for what can be expected from us by both customers, partners, and employees.

## Introduction

Our ethical rules express our expectations for the ethical behaviour of our employees and establish the framework for our dialogue with business associates and other stakeholders. We strive to ensure the highest level of integrity in our business.

In such, .legal has a zero-tolerance policy towards practices such as bribery and corruption. Furthermore, we conduct our business in an honest and ethical manner, ensuring that our customers and partners can rely on us to act fairly and ethically. This Code of Conduct outlines .legal's commitment to ethical standards and compliance with laws in different areas, including – but not limited to – gifts, confidentiality, fair competition, anti-money laundering, human rights, discrimination, forced labor, and export control.

## Anti-Bribery and corruption

Any offer of money or other valuables with the intention of influencing a business decision is considered bribery. .legal neither accepts nor provides any form of bribery.

.legal is committed to complying with all applicable Danish laws and regulations on anti-bribery and anti-corruption. This means that we will not offer, give, request, accept, or receive any bribes, whether financial or other advantages, to influence the actions of our customers or our employees improperly. We will promptly report any knowledge or suspicion of bribery to our customers.

We have implemented policies and procedures to prevent bribery and ensure that our employees and subcontractors also adhere to these obligations. Our customers have the right to verify compliance through audits, and we will fully cooperate with such efforts.

## Gifts

Gifts, both given and received, can foster business relationships and create mutual understanding. However, they can also create conflicts of interest or give the impression that .legal's business judgment can be influenced or purchased, which is naturally not the case.

Gifts are therefore only accepted or given when (1) they are a friendly gesture, (2) they are not in the form of cash, or (3) they are not considered inappropriate or excessively large.

Furthermore, employees at .legal must never accept gifts, entertainment, or favours if they create an indirect expectation of reciprocation, regardless of the value of the gift or whether it provides an advantage to the employee.

## Confidential Information

Confidential information must not be used for the purpose of obtaining inappropriate benefits or advantages. Improper use of confidential information can result in disciplinary action and legal consequences.

### **Fair Competition**

.legal conducts business in accordance with applicable competition laws. Customers who use our products and services are and remain customers of .legal in a fair, legal, and transparent manner.

### **Anti-Money Laundering**

.legal prohibits employees from engaging in transactions that facilitate money laundering or result in the use of funds for purposes other than those permitted, ensuring that every money transfer is fully traceable.

### **Human Rights**

A fundamental element of our social responsibility is our commitment to uphold principles of human rights, which is why .legal naturally supports the [United Nations \(UN\) Universal Declaration of Human Rights](#).

### **Discrimination**

We treat all clients, partners, and employees with respect. All .legal employees have equal opportunities and are treated equally. Furthermore, it is expected that everyone treats others with respect regardless of their background. We hire and retain employees solely based on their ability to perform tasks – never due to gender, marital status, pregnancy, race, colour, age, sexual orientation, religion, political opinion, union membership, role as a worker representative, nationality, health status, or disability. All employees will be treated with respect and dignity. We do not tolerate workplace bullying, intimidation, violence, physical or sexual harassment, or abuse. Adequate measures are in place to promptly address any violations of the above guidelines.

### **Forced labor and slavery**

Employees shall not be subjected to any form of forced labour, including child labour, and the organisation unambiguously condemns and prohibits all forms of slavery or coerced labour. There shall be no imposition of recruitment deposits or fees, unlawful withholding of compensation or benefits, submission of official documentation by the employer, or compulsory overtime imposed upon employees. The organisation upholds the fundamental principle of respecting individual freedom and dignity, ensuring that every employee is treated with fairness, integrity, and respect.

### **Environment**

We do what is reasonable and practicably possible to minimise the impact of our activities on the environment.

### **Freedom of association and collective bargaining**

We ensure that all employees have the right to organise and join associations, and engage in collective bargaining without any limitations or sanctions. We establish suitable mechanisms to address disputes, including employee claims, and maintain open and effective communication channels with our employees.

### **Supplier Relationships**

We expect our suppliers to recognise their social and environmental responsibilities as well and treat their business associates and partners fairly and with integrity, so that we also fulfil our objective of purchasing goods and services responsibly.

### **Export control, Sanction Laws and Restrictions**

At .legal, we are committed to upholding ethical standards and complying with applicable laws and regulations.