



SETTERWALLS

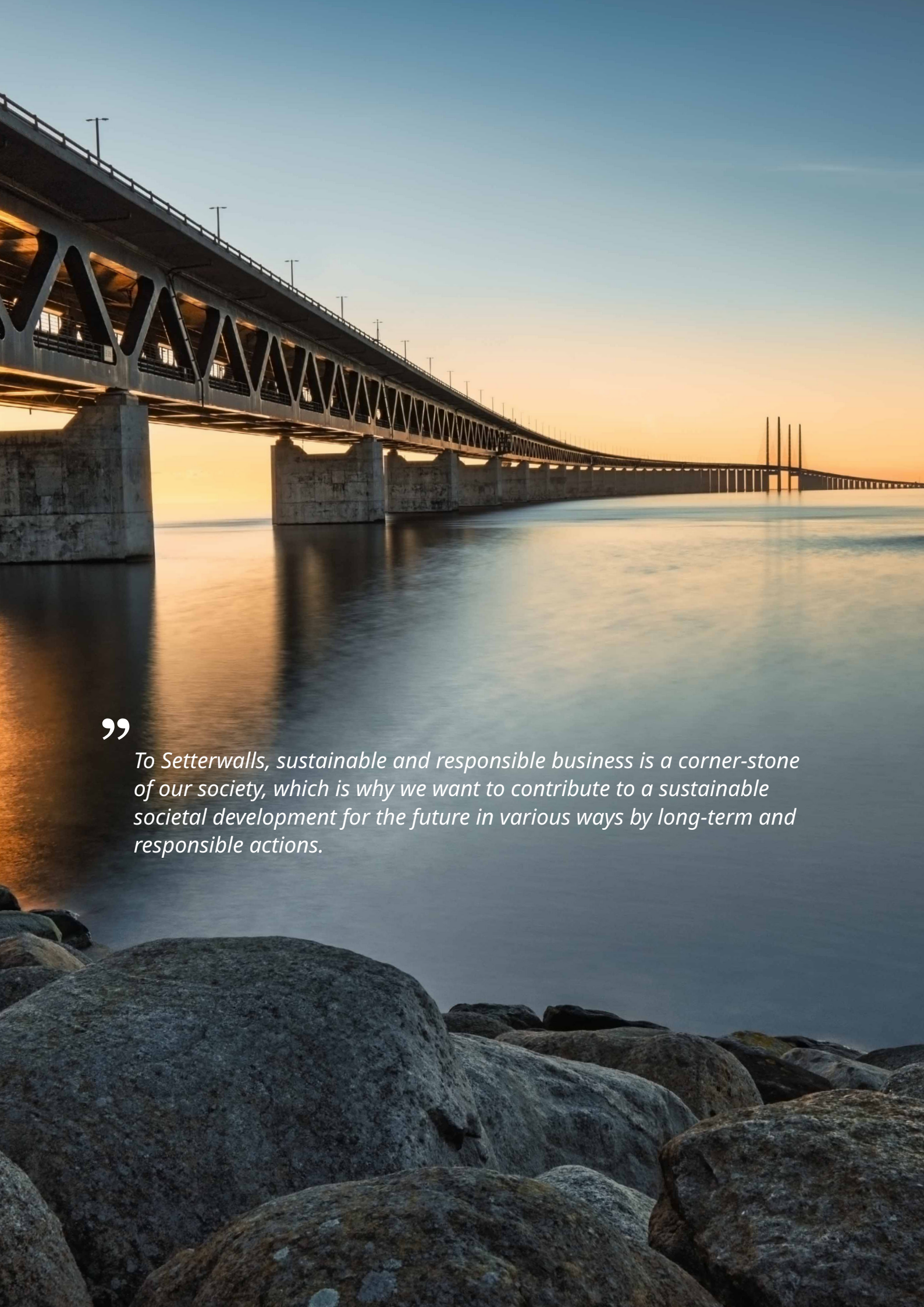
Sustainability Report 2023

Setterwalls Advokatbyrå AB
556774-5772



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To Setterwalls, sustainable and responsible business is a corner-stone of our society, which is why we want to contribute to a sustainable societal development for the future in various ways by long-term and responsible actions.

Management's comments

In 2023, the world continued to face serious challenges in the form of political unrest, conflict zones and extreme climate events. All of this comes as a reminder as to how fragile our world is and how our lives can change overnight. Against this background, it was particularly important for us to take a tighter grip on the Firm's sustainability initiatives to ensure that we achieve our own targets, as well as the UN Sustainable Development Goals. We are convinced that together we can make a big difference in advancing continued sustainable business and doing what we can to create a more sustainable world.

In this report, we outline the internal and external activities conducted during the year, ranging from internal initiatives to improve the work environment of our employees to ways in which we support the community and work with our clients to help them with their sustainability and ESG strategies.

Over the past year, we further developed our sustainability strategy to meet the challenges of our industry, initiated a more in-depth review of our supply chain and continued to fulfil our responsibilities in areas ranging from the environment, gender equality and human rights to our ongoing anti-corruption efforts. We have further progressed our sustainability advisory services to provide comprehensive and integrated advice to help our clients manage environmental, social and governance risks while highlighting the opportunities arising from sustainable business and responsible leadership.

In conclusion, we are proud of how well our organisation has weathered the global challenges we have faced over the years, and while we have more challenges ahead, we are convinced that our collective efforts will pave the way for a brighter future – for our people, our clients and our planet.

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Setterwalls' vision, as a leading business law firm, is to continue to support Swedish business and be the natural choice for clients and employees.



Henrik Kjellander

Managing Partner
Stockholm



Jenny Hammarberg

CEO
Gothenburg



Marc Tullgren

Managing Partner
Malmo

Business model and corporate structure

Setterwalls is, and has been for many years, one of Sweden's leading business law firms. We provide high-quality advisory services across the entire spectrum of business law, contributing to the success of our clients, which are primarily large or medium-sized companies, organisations, institutions and public authorities. Around one-third of our business is international in nature and our clients and cooperation partners are located all over the world.

Setterwalls has a decentralised corporate structure with Group-wide management and cooperation. Each company has its own board, with an overall board acting centrally for Setterwalls Advokatbyrå AB. The Board of Directors has a control function that receives input from the CEO about events relevant to the company, and also acquaints itself with relevant reports.

Setterwalls conducts legal practice through Setterwalls Advokatbyrå AB (corp. id. no. 556774-5772), which is owned by the three branch companies in which all Setterwalls employees are employed:

- Setterwalls Advokatbyrå Stockholm AB (556874–3230)
- Setterwalls Advokatbyrå Göteborg AB (556594–3221)
- Setterwalls Advokatbyrå Malmö AB (556624–3787)

This sustainability report covers the 2023 calendar year and has been prepared in accordance with the Swedish Annual Accounts Act. The report describes Setterwalls Advokatbyrå AB's sustainability goals, and the activities conducted during the year based on the UN Sustainable Development Goals.

The focus areas of the firm have been developed on the basis of the materiality assessment performed by the firm, and thus form the basis of our sustainability strategy. The report is structured around the prioritised sustainability goals we identified, creating a strategy based on our core values of inclusion, diversity, fairness, climate action and upholding the rule of law.

The Managing Partners (in Stockholm and Malmo), the CEO (in Gothenburg) and our national sustainability team were involved in verifying and signing the content of this year's report.

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Our employees are key to our ability to run a sustainable and successful business for the long term.



Setterwalls for the long term

Since the firm was founded in 1878, our organisation and employees have had a strong sense of social responsibility. We are committed to a way of working that ensures efficient resource management and an equal and inclusive work environment, with long-term investment in relationships with clients, employees and other stakeholders.

Our vision to support Swedish business and be the natural choice for clients and employees makes sustainability issues an integral part of our working practices, our corporate culture and our product. We are experiencing increased demand for ESG-related advisory services, and as engagement grows and new legal requirements enter into force, we are always working to remain at the forefront.

Sustainability is part of Setterwalls' Business Plan, and our concept of "Setterwalls for the long term" incorporates our structure for priority ESG sustainability issues, i.e. the environment, employees and social responsibility, along with governance issues. During the past year, we conducted a joint programme across the offices categorising and analysing initiatives and risks, action plans and policy documents based on the materiality analysis. The work was led by Setterwalls' sustainability team, which has incorporated the findings into other management functions.



Sustainability focus 2023

The firm's focus areas have been developed on the basis of the materiality assessment performed by the firm, and thus form the basis of our sustainability strategy. The report is structured around the prioritised sustainability goals we have identified, creating a strategy based on our core values of inclusion, diversity, fairness, climate action and upholding the rule of law.

Goal 4 Quality Education

Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.

Setterwalls has strong ties to education and research. We contribute to teaching at several universities and offer thesis project internships at all our offices. We sponsor a PhD programme in civil law at Stockholm University and also financially support the activities and research of the Stockholm Centre for Commercial Law.

To help more people to get into higher education, we also support the organisation Läxhjälp (Homework Help) in its important work of helping upper secondary school students to achieve qualifications to continue their education. In 2023, we expanded our involvement by joining Läxhjälp as a partner. The commitment provides places for a group of three homework helpers and fifteen pupils in the Homework Help Programme, which runs for a whole academic year at a time. Setterwalls also publicises the opportunity to become a homework helper through our contact with students at universities.



Goal 5 Gender Equality

Achieve gender equality and empower all women and girls.

Setterwalls aims for long-term sustainability and increased gender equality in society, especially in business. In addition to continually and proactively promoting gender equality issues in our own organisation and in the legal profession, during the year we also worked with 17 Nätverket as a step towards this goal. 17 Nätverket is an advocacy organisation that promotes women's entrepreneurship and business with the vision of equal numbers of women and men owning and running large companies.



Goal 12 Responsible Production and Consumption

Ensure sustainable consumption and production patterns.

Setterwalls aims to become a carbon-neutral company and is making continual improvements to minimise our carbon footprint. This work includes making ourselves, our partners and our suppliers aware of the importance of resource efficiency in everything from travel and transport to premises, purchasing and sorting recycling and waste.

As one phase in this ambition, we are a corporate supporter of Vi-Skogen, a Swedish aid/development organisation that fights poverty and improves the environment through tree planting.

We are also members of the Net Zero Lawyers Alliance, with the ambition of working with other law firms around the world to speed the net zero transition through the mobilisation of capacity and commercial business law services.



Sustainability in advisory services

As a business law firm, we take an active role in promoting societal development and creating a more positive future through our advisory services. We aim not only to be experts in the law, but also to have a comprehensive understanding of our clients' needs and the potential risks that may arise. By integrating sustainability and social responsibility into our advisory services, we actively contribute to promoting the UN Sustainable Development Goals (SDG), and in doing so, support a more sustainable and fair world. Our specialists have extensive experience in helping clients with the sustainability challenges they face, including:

ESG reporting and public disclosure requirements

Guidance on ESG reporting and public disclosure requirements, including identifying relevant key metrics and guidelines.

Transactions and Due Diligence

Identify risks and opportunities connected with ESG issues in corporate acquisitions, mergers or other business transactions.

Investment advice

Advice on ESG integration in investment decisions and portfolio management.

Guidance to company boards and managements

Guidance to company boards and management on integration of ESG factors into strategic decision-making and governance.

Disputes and litigation

Dispute resolution for situations connected with ESG issues, including environmental crimes, labour law issues and corporate liability.

Compliance

Development and implementation of ESG policies and guidelines to ensure their compliance with international standards and regulations.

Sustainability practices

Development and implementation of sustainable business practices and strategies that support the SDGs. This may include advisory services on environmental issues, social responsibility and financial sustainability.

Knowledge sharing

In 2023, our specialists contributed to and participated in a number of publications and events based on compliance and sustainability issues. For example, we contributed a series of articles on the Foreign Direct Investment (FDI) screening regime and the EU Foreign Subsidies Regulation (FSR).





Knowledge sharing, advisory services and networking activities in 2023

Demand for advisory services, dialogue and knowledge related to sustainability issues is increasing, and throughout the year Setterwalls has played an active and visible role in both advisory services and knowledge sharing.

Sustainability as an aspect of legal advice is on the rise, and during the year Setterwalls assisted clients in a number of different areas, and acted in an advisory role on:

- **Renewable energy development issues** related to co-located batteries, wind farms, solar energy and waste management, as well as in several transactions in connection with the development, financing or acquisition of assets with a capacity for renewable energy production.
- **Oversight and risk management** in the implementation and administration of whistleblower functions, internal investigations in the case of suspected irregularities and in the establishment of value chain control processes based, for example, on anti-corruption and sanction regulations.
- **Information security risk management** in issues arising from the use of AI and its impact on IT security and personal data protection.



During the year, Setterwalls co-organised and took an active part in raising awareness, increasing knowledge and creating dialogue on important issues connected with sustainability, for example:

- **The Pan-Nordic Conference on Environmental and Ethical Marketing Claims, Oslo.** Conference on regulatory knowledge-sharing co-organised by Setterwalls in association with representatives from Nordic business law firms and industry.
- **Swedish Offshore Wind Forum, Gothenburg.** Cross-sectoral dialogues regarding topical issues in offshore wind energy between representatives from the wind power industry and key stakeholders, along with industry and policy makers.
- **Webinars and seminars** organised in-house or in cooperation with representatives of industry and business and policy-making bodies. The topic of the year ranged from energy transition to whistleblowing and climate tariffs.

Social sustainability internally and in society

Employees for the long term...

The expertise and commitment of our employees are key to a sustainable and successful business for the long term. So our employees are our most important resource. A significant part of our in-house sustainability work is therefore about creating an attractive workplace where our skilled employees can develop and thrive. Setterwalls takes a long-term approach to maintaining good employee participation and leadership to ensure our values are reflected throughout our culture and working practices. We attach great importance to employees being professional, responsible and committed, which in practice means that, together, we take responsibility for an inclusive workplace with employees who grow in their roles.

... and being the natural choice for future employees.

It's also important to attract new talent, keen to join Setterwalls and build the future together with us and our clients. Every year, we recruit several new employees straight from university and it's important to our business that future talents continue to see Setterwalls as an attractive employer.

Our presence in universities is important in terms of building good relationships with future employees. Our cooperation with legal associations allows us to tell people about our company and what working at a business law firm involves. Our talent programme, our internship periods and the opportunity to work as a summer law clerk are other initiatives that give students a closer relationship with Setterwalls and provide an insight into working with business law.

Objectives and performance focus

At Setterwalls, we strive to improve our performance throughout our value chain. We aim to maintain the highest possible healthy attendance level and an employee turnover rate of around 10 percent (from the current 14.5 percent).

Our priority is to proactively promote good health among our employees. The objective is to identify positive solutions for a quick return to work after sickness absence, with a particular focus on support for women, who historically have shown a higher level of sick leave than men. See graph and explanation on page 25.

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*To attract talent and retain our employees,
we proactively create a workplace and
environment where everyone thrives and has
the opportunity to develop.*



Internal sustainability initiatives in 2023

Setterwalls has long endeavoured to create a workplace where everyone thrives and has the opportunity to learn, interact and develop within their respective areas. Over the past year, the focus has been on “Responsible employer”, under the headings below.

Health and wellness

- Joint fitness activities.
- Talks on diet, exercise and recovery.
- Regular health checks for all employees.
- Periodic examinations and well-being measurements for all employees.
- Ergonomics rounds and naprapathy treatments.
- Sports Committee responsible for organising regular joint health activities throughout the year.
- CPR training.
- Hygiene and sanitary items in toilets.
- Own gym or partners close to the office.

Equality and diversity

- Talks to increase knowledge and awareness of inclusion and diversity.
- Clear career plans for all employees, aimed at creating the right conditions for them to achieve their full potential.

Policy documents for employees’ social sustainability

- Setterwalls Working from Home Policy
- Setterwalls Equal Treatment Plan
- Setterwalls Work Environment Policy
- Setterwalls Personal Data Policy
- Setterwalls’ Whistleblower Policy
- Setterwalls Alcohol and Drug Policy
- Setterwalls Rehabilitation Policy

Leadership

- Regular leadership programmes for partners and managers.
- Courses and self-leadership programmes for senior legal professionals.



Our employees in 2023

At year-end 2023, Setterwalls had 342 employees, of whom 193 were women and 149 men. The graphs show the gender distribution based on different parts of the organisation. We can see that our efforts to promote gender-equal recruitment and ongoing investments in an inclusive and stimulating workplace are paying off.

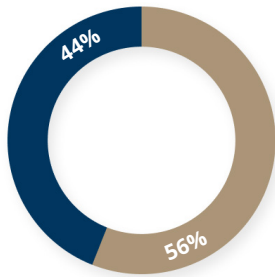
In 2023, 67 percent of all new recruits were women, with women representing 64 percent of newly recruited legal professionals. This supports positive development in all parts of Setterwalls, particularly in those areas where challenges remain. We are working both in the short and long term to increase gender equality, with a particular focus on the proportion of female partners and senior legal professionals, as well as the proportion of men in business support and management teams.

Skills-based recruitment for greater diversity

Our diversity efforts are built on a skills-based recruitment process. Several people participate in the process, a clear recruitment profile is used, all candidates are asked the same interview questions, all candidates undergo skills-based tests and we apply positive discrimination, which means that if we have two candidates who are equally competent, we select the one who is most different from us. Furthermore, to ensure that we never set salaries according to gender we apply a clear salary scale for legal professionals and conduct an annual salary survey of all employees.

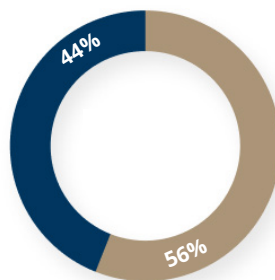
Parenthood and career

Setterwalls endeavours to make it easier for all employees to combine work and parenthood. Specific measures taken include providing supplementary parental benefit, provide the opportunity for working from home, scheduling internal meetings as far as possible between 9 a.m. and 4 p.m., and developing positive attitudes to parenthood through dialogue.



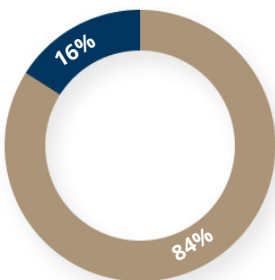
All employees

Setterwalls has grown by 18 percent over the past five-year period and in 2023 employee growth was close to 9 percent, with the majority of new hires being women (irrespective of role).



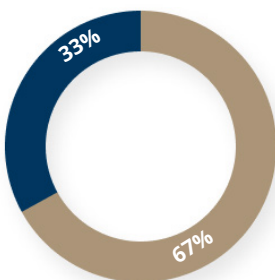
Associates

The gender representation among lawyers and associates is in line with that among total employees. Of newly recruited legal professionals, 64 percent are women, while the share of female senior legal professionals is lower at 47 percent, indicating a challenge for long-term gender equality work.



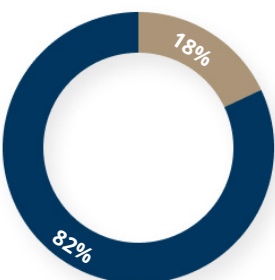
Business support

Business support includes finance, human resources, information technology, marketing and communications, along with administrative functions. Setterwalls is working towards a more balanced gender representation in business support.



Management

Setterwalls has one female CEO and two male managing partners (each based at one of our three offices). Women make up the majority in management positions, but the proportion of male representatives has doubled since 2020, helping to bring about a more equal distribution in the long term.



Partners

Women make up a majority in all employee categories except for partners. In 2023, one woman joined the partnership collective and the goal is equal representation.

Equality and diversity

Setterwalls works actively to promote equal treatment and diversity, based on the principle that every individual is of equal value and that our organisation is enriched by differences. At Setterwalls, everyone is treated equally, irrespective of age, disability, gender identity, gender reassignment, gender or sexual orientation, civil status, family status including pregnancy, parenthood or other carer status, race, religious, political or other beliefs, full-time or part-time status or any other characteristic that may discriminate against our employees. We firmly believe that diversity fosters creativity and that our organisation is enriched by different ideas and perspectives.

We continually track and plan our diversity work and then follow up on the results of our work, and our communication, both internally and externally. In 2021, an action plan was developed, focusing on ensuring that all employees feel included and are given the same opportunities to make a career at Setterwalls. In 2022 and 2023, work on this action plan continued, including training and regular surveys of our organisation.

To ensure all legal professionals are given the same opportunities to meet the requirements to become a partner, irrespective of gender, we have introduced a clear career path for what is expected at different career stages and skills development in both law and leadership. This work also includes clear feedback on performance, target achievement and further development, and, in some cases, coaching and mentoring. We also take action to implement equal distribution of 'invisible labour'.

Good work environment

Setterwalls endeavours to offer a positive work environment for our employees. Through continual improvement, we are focusing on creating a safe, healthy and stimulating work environment and empowering employees to influence their individual work situation in terms of variety, cooperation and social interaction in the workplace. Setterwalls has zero tolerance for bullying and discrimination.

One risk identified is that during intensive periods there may be a high workload. For preventive purposes, the focus has been on proactive recruitment and the introduction of new procedures for continual monitoring of workload levels and a more even distribution of work between different individuals and practice teams. In addition, flexible working hours are offered and technology creates opportunities for individuals to influence their own work situation, helping to create a sustainable balance for the long term.

Initiatives and regular monitoring

Whistleblowing

Setterwalls has established whistleblower channels that employees can use to report irregularities anonymously.

Safety inspections

A safety inspection is carried out every year, focusing on the physical working environment. This year's safety inspection showed a positive physical work environment with no reasons for comment.

Regular employee surveys

Setterwalls monitors the organisation's well-being through regular surveys at all three offices. In 2023, these surveys indicated a consistently high level of employee engagement. This metric reflects employee loyalty and the result of organisational initiatives aimed at developing and maintaining Setterwalls as an inclusive and attractive employer, where the employee is given the opportunity to balance work and leisure. (As different survey methods are used in the three offices, the analysis is summarised without quantitative data.)

More frequent surveys are planned for 2024. The responses will be treated as anonymous and in real time, which will give us a clear overview of how satisfied our employees are and will help us to proactively address issues that may affect wellbeing. In addition, we will use a tool for monitoring results over time.

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Setterwalls offers employees regular health checks and ergonomic reviews to identify and prevent potential health-related risks.

Setterwalls Academy

All our legal professionals have an established, clear training programme that adheres to the rules of the Swedish Bar Association. All lawyers are obliged to maintain and develop their professional competence and undergo at least eighteen hours of structured training per year, according to the statutes of the Swedish Bar Association. In 2023, we were pleased to welcome seven newly recruited lawyers.

New Setterwalls employees

Newly recruited legal assistants receive a comprehensive onboarding programme with the support of a mentor and a supervisor, and engage in a number of skills and development initiatives to quickly learn their role and the business.

During their first two years of employment, all legal professionals participate in a general training programme aimed at ensuring a broad level of knowledge of business law. The programmes cover everything from business administration and business law English, to a basic knowledge of our different areas of expertise. Employees also attend training sessions that include issues relating to our Code of Ethics, conflicts of interest, money laundering and GDPR. In addition to the Setterwalls Academy, all teams groups hold customised training programmes for legal assistants based on their specific practice areas. In addition, legal professionals who are not yet lawyers attend external training to take the bar exam.



Specialisation and leadership

For our more senior legal professionals who are further along in their careers, we offer more advanced and specialist training, as well as a tailored leadership programme. The leadership programme develops participants' self-leadership ability, taking responsibility for their personal career, and leading others through coaching and feedback. Building stable and sustainable client relationships is another important aspect of this programme. In 2023, a sales programme for legal assistants was developed, focusing on client relationships and sales based on level of experience.



Leadership and employee participation

Every employee should be given the opportunity and conditions to achieve their full potential through regular coaching and feedback. So Setterwalls continues to develop leadership and conduct leadership evaluations and leadership training programmes for company management and partners. Particular demands are therefore placed on the partners and the management team, who have a greater responsibility to act as role models and support employee development. Employees share, in an ongoing dialogue, their development and individual goals with their supervisor or manager, as well as follow-up through performance reviews. To ensure employees' views are taken on board on a regular basis, we have developed a system of discussion forums for different employee categories, where current issues affecting employee satisfaction, gender equality and work environment issues can be raised and then dealt with by management.

Developments planned for 2024

The sales programme will continue in the years ahead, with further training in areas of expertise. Internal training initiatives and the Setterwalls Academy training programme will also continue during the year. In addition, the senior legal professionals will continue on the leadership programmes, which during the year will include participation in negotiation techniques. A new feature in 2024 will be training in the form of a workshop on business rhetoric.



Setterwalls Wellness

It is important to us that our employees enjoy their work and thrive at Setterwalls. Our employees are the most important resource in terms of our ability to run a sustainable business in the long term. So a key factor in the risk assessment of our business is the health and well-being of our employees, and that they are given the best possible conditions to be able to perform, develop and thrive.

Focal areas for Setterwalls Wellness:

- Diet
- Physical activity
- Recovery and stress management

Employees' needs and motivations vary, so a wide range of activities, fitness and training sessions and health checks are offered. These activities are important to both well-being and job satisfaction, and provide the conditions for success in a professional role.

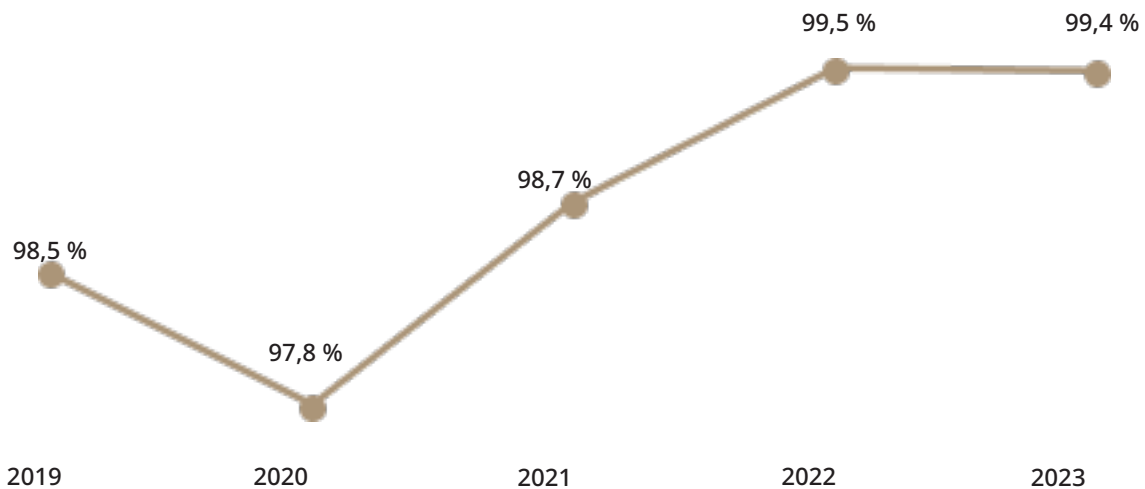


Inspiration and motivation in 2023

In addition to offering our employees a generous fitness allowance and health insurance, Setterwalls continued to develop the Setterwalls Wellness concept, aimed at inspiring and encouraging employee interest in well-being and a healthy lifestyle.

Healthy attendance rate

In 2023, the healthy attendance rate was 99.0 percent for women and 99.8 percent for men. Overall, the healthy attendance rate was 99.4 percent, which is in line with the rate for the previous year (99.5 percent), and an improvement over the past five-year period (98.5 percent in 2019).



Setterwalls is taking measures to reduce the amount of sickness absence by acting promptly if we notice a pattern in an employee's absence. For long-term sick leave, we have a well-functioning procedure developed in collaboration with our wellness partner.



Setterwalls' social responsibility

Setterwalls has a responsibility for the society we operate in and an obligation to contribute to positive social development based on fundamental freedoms, human rights and democratic principles in line with international frameworks.

We aim for long-term sustainability and increased gender equality in society, especially in business. We are committed to try to make conscious choices in our day-to-day business and to contribute to the agendas and activities of other businesses and organisations, large and small.

We safeguard human rights

Setterwalls safeguards human rights as an integral part of the service we provide for our clients. All our advisory and risk assessment services follow the human rights guidelines of the Swedish Bar Association. We provide our client companies with the right conditions for observing and upholding human rights in their activities, which also reduces their business risks. Our internal guidelines on human rights are set out in our Code of Ethics and Code of Conduct.

As a business law firm, Setterwalls follows the Swedish Bar Association's guiding principles on generally accepted legal practice, taking into account the UNGP (UN Guiding Principles on Business and Human Rights) and the IBA's (Practical Guide for Business Lawyers) guidelines for business and human rights.

These guidelines address the special responsibility of the lawyer's professional role in upholding human rights and the ability to protect them through the advice they give.

Based on the range of services and clients we have, we do not see any significant risks of human rights violations arising from our activities.

Engagements in 2023

Our values are evident throughout our business and help ensure that our corporate culture is also reflected in our social engagement. Our support of charities therefore not only encourages the development of society, but also gives a lot back by helping our employees grow both professionally and personally.

Stiftelsen Läxhjälp (the Läxhjälp Foundation)

Financial support for a nationwide homework assistance programme. The programme aims to enable more elementary school pupils to meet the entrance qualification requirements for Sweden's upper secondary school and promote gender equality and social inclusion.

17 Nätverket (the 17 Network)

Financial support and advocacy to promote women's entrepreneurship and business with the vision of equal numbers of women and men owning and running large companies.

Rosa Bandet and Mustaschkampen

Financial support through engagement via our social channels in October and November for the fight against breast and prostate cancer.

The Unicef "Spring för livet" (Race for Life)

Contribution to both better health and charitable causes, when employees from Setterwalls participated in Unicef's "Race for Life".

The Blodomloppet race

Contribution to both better health and charitable causes when employees from Setterwalls participated in the Blodomloppet race. The race aims to raise awareness of the vital importance of donating blood.



Setterwalls' responsibility for the environment and climate

Setterwalls prioritises clear environmental goals to reduce our impact on the climate and environment. As part of this work, we have evaluated what more we can do to ensure that the use of resources and business travel is as sustainable as possible, and how we can further reduce waste and improve waste management and recycling procedures.

All Setterwalls offices are constantly striving to minimise our carbon footprint to contribute to sustainable consumption and production - which also supports UN Global Goal 12. In our endeavour to meet this objective, all offices have implemented the following measures and procedures:

1. Systematically reduce paper use by prioritising digital documents and workflows.
2. Prioritise suppliers with sustainable products and services and strive to ensure that what we buy ultimately meets the sustainability criteria established by the Firm.
3. Reduce business travel and where possible opt for digital meetings to reduce the carbon footprint and promote a more flexible working environment.
4. Recycle and minimise waste to reduce the amount of non-recyclable waste.
5. Life-cycle management of technology products where end-of-life computers, monitors and mobile phones are recycled or reused in a responsible manner.

Objectives

- Establishment of a complementary policy on purchasing and supplier procedures, including a supplier code of conduct.
- Enhanced reporting on energy consumption, impacts, targets and outcomes from actions, through in-depth dialogue and action plans with key suppliers and property companies.
- Confirm measurable targets for improvement and include sustainability goals in the next sustainability report.
- Ongoing evaluation of partners, organisations we support and subcontractors from an environmental and sustainability perspective. Emphasise the importance of companies working unceasingly to minimise their environmental impact.

Projects in 2023

- A partnership with the international accelerator Net Zero Lawyers Alliance was launched. The Net Zero Lawyers Alliance provides a digital platform for international law firms to share resources and knowledge and contribute to the Net Zero movement.
- Further enhanced our knowledge of sustainability and upcoming CSRD directives.
- Expansion of recycling facilities and waste minimisation measures in cooperation with office landlords. For example, one of the offices introduced composting to generate soil from food waste.



Projects in 2024

- Conduct a review of travel service providers.
- Launch a guide to carbon offsetting in several areas, including travel and couriers/deliveries.
- Develop measurable targets for statistics and reporting on office travel, transport modes and carbon offsetting.

Governing documents for the environment and climate

- Setterwalls Environmental Policy
- Setterwalls Travel Policy

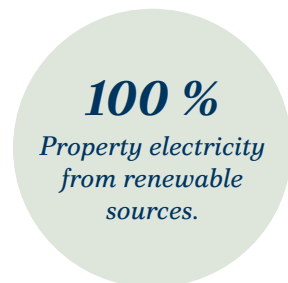
Setterwalls' impact on the environment and climate

As a service provider, Setterwalls' impact stems primarily from travel, purchasing, office properties and waste.

Office properties and waste

Environmental certifications

- Setterwalls' office property in Stockholm is certified under BREEAM in Use, rated 'Very Good'.
- Setterwalls' office property in Gothenburg is certified to BREEAM in Use, rated 'Good'.
- Setterwalls' office property in Malmö has LEED Silver environmental certification. Property company Vasakronan is environmentally certified under ISO 14001, with green leases.



Life cycle management of technology products

In 2023, Setterwalls continued its work on sustainable life cycle management of technology products. As 2024 approaches, further steps will be taken towards establishing circular use of technical facilities, both in-house and in co-operation with suppliers. The aim is to maximise lifetime and value while minimising waste of equipment. The aim is for one third of the PC fleet to have a service life of four to five years, compared to the current three years, with all used PCs continuing to be recycled responsibly. By increasing the lifespan of hardware, Setterwalls is reducing both carbon footprint and residual waste from new construction.

Initiatives in indoor climate and lighting

- Measures to improve the indoor climate and reduce energy consumption in the form of continued switching to LED luminaires and motion-controlled lighting in all offices.
- Actions on recycling, reducing food waste and use of paper.
- Recycling systems for biodegradable food waste, card, newspapers and cardboard, plastic, glass, metal, hazardous waste and deposit-return containers.
- Minimised impact by prioritising digital files and resource-efficient printing.
- Prioritising the purchase of organic and eco-certified food products.
- Vegetarian meal options.

Travel and transport

We focus systematically on reducing the carbon footprint of our travel by prioritising solutions that support digital meetings and, in accordance with our travel policy, employees are required primarily to use options with a lower climate impact.

Couriers and deliveries

Local courier and other deliveries are made above all by bicycle courier or electric vehicle.

Bicycles and bicycle servicing

- We provide loan bicycles to our employees for journeys made during working hours.
- We offer bicycle storage and servicing for employees.
- We offer employees subsidised bicycles.

External engagement in 2023

WLG Impact 2023

During this year's WLG Impact in June, a special tree planting initiative was rolled out as part of our engagement with the global World Law Group (WLG) network, of which Setterwalls has been a member for many years.

Vi-skogen

Financial support for the aid/development organisation Vi-Skogen, which combats poverty and improves the environment by planting trees. Setterwalls gives new employees a gift certificate from Vi-skogen to welcome them at the start of their employment.

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Environmental efforts at Setterwalls are an integral and prioritised aspect of the firm's operations. Environmental considerations are reflected throughout our business and are taken into account in our decisions. We endeavour to minimise our environmental impact and use of resources, and we encourage and support the efforts of the firm and its employees to promote environmental sustainability.

Corporate governance and oversight

Ethical values and anti-corruption work

Lawyers have a particularly important role in democratic states governed by the rule of law, as independent advisors and advocates in relation to the state, authorities and courts. The core values of lawyers – independence, loyalty, confidentiality and no conflict of interest – are key elements in terms of securing our clients’ interests and lie at the heart of everything we do.

We work systematically to maintain high ethical standards, in the form of a common set of values in our relationships within the firm and with our clients and counterparties. To us, it’s important that both our clients and the public have confidence in the loyalty, ethics, morality and integrity of Setterwalls and its employees.

Setterwalls is subject to the supervision of the Swedish Bar Association, whose proactive oversight may involve voluntary and/or mandatory training programmes for our employees to draw attention to important issues in the area of business and human rights.

Objectives and performance trend

Setterwalls endeavours to find improvements throughout its value chain. Risk management and issues related to data security, ethics, anti-corruption, money laundering and terrorism financing are priority areas with clear procedures and objectives that are continually developed to avoid security risks. In-depth knowledge leads to lasting development and the achievement of results.

Policy documents for corporate governance and control functions

- Setterwalls Code of Ethics
- Setterwalls Internal Rules on: Money Laundering and Terrorism Financing
- Investigation Policy for Setterwalls
- Whistleblower Policy



Our work and progress in 2023

- Implementation of enhanced technology-based information security protection.
- Continued proactivity in the work of preparing the organisation and our quality management for the CSRD directive as part of ESG and based on the entire value chain.
- Annual mandatory anti-money laundering training for all employees.
- Ongoing IT training for employees to raise awareness of risks and strengthen security.
- Enhanced controls on sanctions related to Russia's war of aggression against Ukraine.



Risk management

Ethics

Trust is a cornerstone of the legal profession and we endeavour to actively combat corruption, both through our advice to clients and through our own actions. We reject corrupt marketing and follow the Swedish Anti-Corruption Institute's Code of Conduct, which supplements anti-corruption legislation.

In addition to current legislation and the Swedish Bar Association's rules on legal practice, our internal regulations, Setterwalls' Code of Ethics, also apply. This regulates issues including our behaviour, acceptance of clients and cases, insider issues, anti-bribery and corruption, risk management and IT security.

Combatting corruption, money laundering and terrorism financing

Setterwalls conducts rigorous anti-money laundering efforts with a working group across all offices. This is a continuous process that minimises risks through hard work and set procedures. A special internal regulatory framework regarding money laundering and terrorism financing has been established: Setterwalls Internal Rules on Money Laundering and Terrorism Financing. Detailed internal procedures are combined with systems support to verify sanctions and money laundering checks.

As one of the more significant risks in our business may relate to money laundering and terrorism financing, our employees receive regular training on these issues. For example, an annual compulsory anti-money laundering course is run for all employees. In addition, ongoing training on our Code of Ethics is provided to facilitate compliance with our quality assurance system.

Data management and IT security

Setterwalls strongly prioritises control of information security, as this is a crucial factor in terms of our overall security status. Given the ever-growing threat of cyber attacks, protecting our data and information systems is of utmost importance. We strive to ensure the confidentiality, integrity and availability of these assets, which are of key importance to our business.

