

LegalWorks Nordic AB

Code of Conduct

Rev. 1

Introduction

This Code of Conduct applies to all employees of LegalWorks Nordic AB (“**LegalWorks**”), and to all lawyers working as subcontractors and partners to LegalWorks supplying services to customers under the LegalWorks name.

LegalWorks lawyers are all trained, experienced and qualified lawyers. Many have worked for major corporations and law firms in Scandinavia, UK and the U.S., and have extensive experience of providing pragmatic and business minded advice to their respective stakeholders in the capacity as in-house legal counsel to an organisation.

With few exceptions LegalWorks lawyers are not members of the Bar Association of the country of practise, despite being qualified to join. The main reason for this is that we believe that what we are offering is something different from what the traditional law firms offer, namely advice that is based on extensive experience from working from the inside of a company. We consider us more as in-house counsel who happen to work as external consultants, and find it difficult to identify ourselves with the more traditional role as “advocate”.

Quality

For us at LegalWorks, delivering top quality to our customers is of course essential. For this reason, we have established the following quality goals for our work:

- Both LegalWorks’ customers and the general public must have confidence in LegalWorks, and in the loyalty and integrity of the LegalWorks staff.
- LegalWorks’ advice shall be of high quality, be tailored to the matter at hand and be based on a good understanding of the applicable law and underlying business logic.
- The most valuable internal asset of LegalWorks – the collective competence and experience of the LegalWorks staff – will be utilized and enhanced to develop and improve our services and our way of working.

Confidentiality and discretion

Customer confidentiality and discretion in customer matters are of the utmost importance to us. In addition to what is set out in LegalWorks’ general terms and conditions, we therefore undertake the same duty of confidentiality and duty of discretion as those set out in the Code of Professional Conduct for Members of the relevant Bar Association.

Conflicts of Interest

LegalWorks will not be able to represent a customer if that would involve a concurrent conflict of interest. A concurrent conflict of interest can exist if: (i) the representation of a customer will be directly adverse to another customer or (ii) there is a significant risk that the representation of one or more customers will be materially limited by LegalWorks' responsibilities to another customer, a former customer or a third person or by a material personal interest of a member of the LegalWorks staff. However, LegalWorks may represent a customer despite the aforesaid if: (i) LegalWorks reasonably believes that it will be able to provide competent and diligent representation to each affected customer, (ii) the representation is not prohibited by law and (iii) each affected customer gives informed consent, confirmed in writing.

If LegalWorks, after having accepted an assignment, identifies the existence of a circumstance that would have obliged LegalWorks to decline the assignment in accordance with the above (had LegalWorks known when accepting the assignment), LegalWorks may need to resign from the assignment.

Compliance with laws

It is LegalWorks policy to conduct all of its business in a transparent, honest and ethical manner. LegalWorks take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all its dealings wherever it operates. LegalWorks do, accordingly, not accept or receive anything that looks, sounds, feels or very faintly smells like a bribe or kickback.

The following conduct is expressly prohibited:

1. Payment or receipt of money, gifts, loans or other favors where such transaction is unlawful or which may tend to undue influence business decisions or compromise independent judgment;
2. Payment of bribes to government officials to obtain favorable rulings; and
3. Any other activity that would similarly degrade the reputation or integrity of LegalWorks.

LegalWorks avoids giving gifts of any material monetary value to clients or potential clients. Branded items related to marketing campaigns and seminars that are of minimal real value are our only exception.

LegalWorks staff and lawyers that works as sub-contractors and partners to LegalWorks don't accept gifts of any material monetary value from anyone seeking business of any kind from LegalWorks. An employee, sub-contractor or partner can attend a meal or event with a LegalWorks business contact, but even in that situation, expenses should be kept minimal and there should not be even the faintest hint of any *quid pro quo*.

LegalWorks staff shall never be engaged in any unlawful activities and shall not give any advice that can be used to further any unlawful activities.

Data privacy

LegalWorks respects and is diligent in protecting the privacy of employees, consultants and our clients, and will comply with applicable Data Privacy and Protection laws.

Work environment

LegalWorks is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, we expect that all relationships among persons in the workplace will be professional and free of bias, prejudice and harassment.