

Hannes Snellman's Sustainability Report 2023

# Making an Impact as a Law Firm

HANNES SNELLMAN

## Greetings from the Managing Partner

Since 2020, Hannes Snellman has been a member of the UN Global Compact Network, the world's largest corporate sustainability initiative that supports companies in doing business responsibly by aligning their strategies and operations with the Ten Principles of the UN Global Compact in the areas of human rights, labour, environment, and anti-corruption and by taking strategic action to advance broader societal goals with an emphasis on collaboration and innovation.

Hannes Snellman is committed to the Ten Principles of the United Nations Global Compact, with "Reduced Inequalities", "Climate Action", and "Peace, Justice and Strong Institutions (Rule of Law)" as our focus areas.

Corporate citizenship and pro bono have been strongly rooted in our culture and operations ever since Hannes Snellman founded the firm in 1909. Each generation of our team has continued the efforts to keep the heritage of serving the community up to date and thriving, ensuring our ways of working develop and live in time. For us, corporate citizenship and sustainability means the practical realisation of the fundamental professional values of our firm, attorneys, and law firm professionals. We continue to be involved in a wide range of initiatives related to corporate citizenship and sustainability by promoting, with our expertise and resources, values and causes that benefit our community. Our firm also contributes to the society by participating in the development of legislation, by giving external lectures in collaboration with universities to educate and inspire the next generations, and by developing our own working environment. We work to improve diversity, equality, work-life balance, and socio-economic equality in several different projects and working groups both inside and outside our firm.

Green transition, ESG, and sustainability themes have significantly increased their weight during the last few years. The ability to transform business and operations to meet the ESG and sustainability criteria set by regulators, investors, customers, employees, lenders, and other stakeholders, as well as compliance with the increasing amount of EU wide regulation and reporting requirements have become business critical to many companies, starting from the largest and moving towards the rest. This can be seen not only in our own internal emphasis areas but also clearly in the volume and balance of our assignment work, with continuing increase in mandates relating to the green transition, different forms of renewable energy, environmental permitting, green financing, compliance, board role and liability, and other governance mandates.

As before, political and economic uncertainty and rapid changes in our operating environment continue to increase the strategic nature of the lawyer's role and the size and challenge of assignments and emphasise the importance of ethical practices in a global environment. Mandates continue to be carried out in often unprecedented situations under rapidly changing and multi-faceted conditions, involving new stakeholders, such as governmental or hostile parties, and with very fast schedules. The financial interests and risks involved are often great, and the effects extend widely and evolve over a long period of time. Human rights, labour, environment, and anti-corruption considerations are increasingly at the centre of our work.

In this 2023 sustainability report, we continue to describe our actions to integrate the Global Compact and its principles into our business strategy, culture, and daily operations.

Riikka Rannikko

Managing Partner, Helsinki

## Implementation of the UNGC Principles

Hannes Snellman has a heritage of serving the community. For us, corporate citizenship and sustainability means the practical realisation of the fundamental professional values of our firm and attorneys. Today, we are involved in a wide range of initiatives related to corporate citizenship by contributing with our expertise and resources to promote values and causes that benefit our community. Our firm also contributes to the society by participating in the development of legislation, by lecturing to inspire young people, and by developing our own working environment.

### Global Compact Membership and Our Focus Areas

Since 2020, Hannes Snellman has been a member of UN Global Compact, the world's largest corporate sustainability initiative.

During our sustainability journey, it has become quite clear that if we want to make a true impact with our sustainability efforts, we needed to make choices. Using the UN Sustainable Development Goals as a framework, we had identified our focus areas, Reduced Inequalities, Climate Action, and Peace, Justice and Strong Institutions, which form a basis for our concrete actions.

As a professional services firm, the biggest impact we can make is actually by way of indirect action: on the one hand, advising and supporting our clients, and on the other hand, engaging in discussions and initiatives in the society.

In May 2023, Hannes Snellman hosted the UN Global Compact Network Finland's annual meeting and seminar at our premises in Helsinki.

"If you could do anything to change the world, what would you do?"

## Corporate Citizenship Team

We have a dedicated 20-strong corporate citizenship team guiding our initiatives in a wide range of matters - our pro bono work, our work to raise funds for charitable causes and our participation in number of foundations that promote culture, education, and social matters. Our firm also contributes to the society by participating in the development of legislation, outside lecturing and mentoring to inspire young people and by developing our own working environment.

UN Sustainable Development Goals form a basis of our corporate citizenship work. We have identified three SDGs to be in focus at Hannes Snellman: Reduced Inequalities, Climate Action, and Peace, Justice and Strong Institutions (Rule of Law).

## Insights on Environmental, Social and Governance Issues

Our cross-practice team of experienced lawyers advises companies identifying and navigating the legal challenges and possibilities presented by ESG initiatives to meet the regulatory compliance and stakeholder demands facing the business. During 2023, our experts have contributed, among others, to these themes:

- > ESG in Contracts Requirements, Monitoring, and Risk Management
- > Environmental Criminal Liability of a Company

#### Articles

Events

- > Politics of Corporate Governance in the EU
- Environmental, Social & Governance: Law Over Borders Comparative Guide 2023, Finnish and Swedish Chapters

#### Blogs

- ESG in Companies' Contract and Value Chains

   Viewpoints on Integration of Sustainability Requirements
- Dismantling Obligations of Finnish Wind Farms: A Report by Hannes Snellman's Lawyers for the Ministry of the Environment
- > EU Sustainability Reporting Directive Into Force in January 2024 — Are You Up to Date in Terms of Your Company's Obligations?
- > Latest Developments in Hydrogen Regulation
- EU's Proposal for a Directive on Corporate Sustainability Due Diligence Is Hitting the Home Stretch – 5 Points of Debate to Follow up on in the Trilogue Negotiations
- > The Finnish Supreme Administrative Court: Government Inaction in Combatting Climate Change May Lead to Court Proceedings
- Priority Status for Projects Fostering the Green Transition in Finland: Which Projects Benefit and How?
- Clarity Needed for Hydrogen Rules Current Status of the Regulation Guiding the Renewable Hydrogen Production
- Hydrogen Investments Balancing Between
   Climate Goals and Regulation

### Our Focus SDG – Reduced Inequalities

It is only through active initiatives to cultivate a diverse and inclusive work environment that we live by our values and reach our vision. Across the firm, we work together to create a workplace where everyone can achieve their potential. Focusing on diversity and inclusion helps us attract and retain the top talent and meet our clients' needs.

Our inclusion, equity, and diversity efforts are embedded into everyday activities. To increase the diversity of the perspectives and to nurture an increasingly inclusive culture where diversity is valued and leveraged for the benefit of our people and our clients, we work on a range of initiatives across the firm.

#### Global Compact Principle: Labour

- > Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- > Principle 4: the elimination of all forms of forced and compulsory labour;
- > Principle 5: the effective abolition of child labour; and
- Principle 6: the elimination of discrimination in respect of employment and occupation.



#### Hannes Snellman's Diversity, Equity, and Inclusion Principles



We focus on recruiting individuals who bring their own backgrounds and experiences to work. This contributes to a work environment that is rich with collaborative thoughts, insight, and talent.



Our clients expect to collaborate with resilient, innovative, empathetic, and advanced teams. We bring them people who think differently together and have the joint insights that we are proud to impart to our clients.



Our journey towards increased diversity and inclusion takes time, consistency, and tenacity, and it concerns all of us. Focus on awareness and education enables us to move forward.



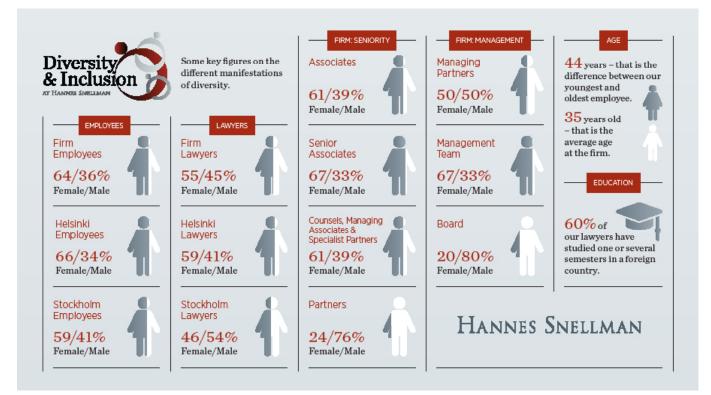


Our talents have individual expectations, preferences, and life situations, which evolve over time. We work to cater for tailored career paths and solutions that enable work-life integration.

Leadership capabilities play a decisive role in creating a diverse culture in which everyone can achieve their potential. Our leadership model emphasises team building, speaking up, understanding, feedback, approachability, and talent development.



It is a prerequisite of success that our own organisational bodies are diverse and committed to catalysing inclusivity.



#### **Diversity & Inclusion Initiatives**

By promoting and working to improve gender balance, work-life balance, and socio-economic balance, we are building a stronger organisation for our employees, offering a more sustainable service to our clients, and contributing to a more equal society.

#### Cooperation with Inklusiiv

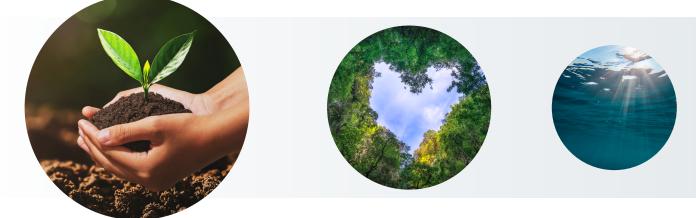
Hannes Snellman has cooperated with Inklusiiv since 2020. Inklusiiv is a non-profit organisation with a mission to advance diversity and inclusion in working life.

Inclusivity and diversity are important to us, and joining Inklusiiv provides a great platform to share best practices and learn from others. Cooperation with Inklusiiv also supports the ongoing initiatives we are already working on. We strongly believe that inclusivity and diversity foster employee well-being and make any culture and organisation stronger. They are, however, also topics that require constant attention and actions not only at an organisational but also at a societal level. The cooperation with Inklusiiv helps us to implement our strategic aspirations.

#### Law Mentoring Programme

Since 2021, Hannes Snellman has cooperated with Oikismentorointiohjelma ry in a law mentoring programme that helps students from less privileged backgrounds to apply to law schools in Finland.

In spring 2023, a total of 15 Hannes Snellman lawyers acted as mentors in 1–1 mentorships, providing concrete advice and help to students regarding their goal of attending law school in Finland. Participation in the scheme is free for the students, and the participants are chosen by Oikismentorointiohjelma ry. The mentor–mentee pairs got together several times during the spring and discussed various topics, such as applying to law school, studying law, working as a lawyer, and the different career opportunities that the legal field offers.



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#### Discussion Event at SuomiAreena 2023

In June 2023, Hannes Snellman organised a discussion event as part of SuomiAreena. The discussion focused on the issue of the mental burden of expert work at a societal level and how the workload reflects on the Finnish workforce now and in the future. The discussion addressed challenges of the present and the changes needed in the future and searched for possible solutions.

SuomiAreena is the largest social discussion event in Finland during the summer. It is part of the International Democracy Festivals Association, established by several democracy festivals from Europe and the Nordic and Baltic regions.

SuomiAreena is a platform for us to participate in discussions at a societal level.

#### Corporate Culture

Our Corporate Culture Task Force leads Hannes Snellman's work in the field of culture. The particular focus of the task force is to keep our culture on our daily agenda — especially in the areas that we want to strengthen: speaking up, collaboration, combining private and work life, and a fun and relaxed atmosphere.

During 2023, the team has contributed to the firm's cultural development by mapping how the culture has evolved, facilitating workshops for both new and experienced staff in Helsinki, and joining the trainee's innovation project with a cultural focus.

#### Celebrating Diversity Events

At Hannes, we work together to create a workplace where everyone can be themselves and achieve their potential. A part of this work is understanding and becoming better at diversity, equity, and inclusion.

In connection with the Helsinki and Stockholm pride weeks in June 2023 and August 2023, respectively, we raised awareness of the main DEI themes throughout the week and invited all Hannes Snellman staff to have a cake and coffee break to celebrate diversity and discuss themes related to diversity, equity, and inclusion. At the events, our Corporate Citizenship Team's reduced inequalities working group also shared their thoughts on the theme and presented the work we have done at the firm to develop our diversity, equity, and inclusion.

At the event, the staff had the opportunity to leave their ideas in an idea box about how we could develop diversity, equity, and inclusion at Hannes Snellman in the future. Our DEI working group received many new ideas from these initiatives to develop our DEI efforts further.



#### Our Focus SDG – Climate Action

We recognise our corporate responsibility in environmental matters and the importance of environmental management for achieving a more sustainable business within the legal sector.

#### EcoVadis Cooperation

We are cooperating with EcoVadis, the world's largest and most trusted provider of business sustainability ratings with a global network of more than 100,000+ rated companies.

In the 2023 auditing, we were rated in the silver category, and compared to the previous auditing, we improved our overall score and our score in the area of Ethics and Sustainable Procurement.

Hannes Snellman has been a member of EcoVadis since September 2022.

The rating categories in 2023 were:

Platinum – top 1% (overall score between 78 and 100) Gold – top 5% (overall score between 70 and 77) Silver – top 25% (overall score between 59 and 69) Bronze – top 50% (overall score between 50 and 58)

#### The Chancery Lane Project

Combining our legal expertise and ambition to positively impact the climate, we began our cooperation with The Chancery Lane Project (TCLP), the largest global network of lawyers and business leaders using the power of climate contracting to deliver fast and fair decarbonisation. Within the TCLP network, more than a hundred climate clauses have been written and are freely available for anyone to incorporate into commercial agreements and legal documents. Clauses have been drafted by legal experts and peer reviewed to ensure high quality. So far, most of the clauses are drafted for England and Wales, and we aim to expand the jurisdictions by transposing clauses applicable in Finland and Sweden.

#### A Million Trees to Finland Project

In June 2023, our employees in Helsinki were encouraged to participate in the "A Million Trees to Finland" campaign. The aim of A Million Trees to Finland is to inspire climate action through the contemporary art practice of planting trees. This is achieved by sharing tree seedlings and by planting trees and site-specific mini forests. These actions combine art and green design and create natural spaces and quietness in urban locations while also contributing to biodiversity. A Million Trees to Finland is part of Finnish artist Nina Backman's ongoing Silence Project. Backman sees the tree planting initiative as both contemporary art practice and a collective, concrete action to raise awareness and develop innovative solutions to climate change.

#### Environmental Policy

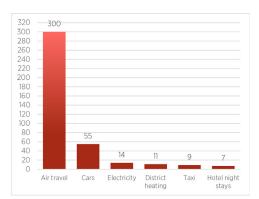
Hannes Snellman's environmental policy covers the immediate impacts of the buildings, products, and services used by Hannes Snellman, as well as the services that we provide and that we are able to control. In addition to complying with statutory regulations, we are committed to operating in accordance with the principles described in our policy.

Hannes Snellman's environmental policy is included here as Appendix 1.

#### Global Compact Principle: Environment

- Principle 7: Businesses should support a precautionary approach to environmental challenges;
- > Principle 8: undertake initiatives to promote greater environmental responsibility; and
- Principle 9: encourage the development and diffusion of environmentally friendly technologies.

#### Emissions / CO2 tons



#### Supplier Policy

During 2023, we have worked on a supplier policy, which will allow us to improve the transparency of our supply chains.

Hannes Snellman's supplier policy outlines the minimum standards its suppliers must meet when conducting business with Hannes Snellman, along with observing all laws and regulations applicable to their operations.

Hannes Snellman's supplier policy is included here as Appendix 2.

#### Waste Management Plan

Hannes Snellman's waste management plan describes how we manage the waste generated by our activities in an environmentally responsible and cost-effective manner. It covers the of waste we produce, the methods and procedures we use to collect, store, transport, treat, and dispose of it, and the facilities and service providers we partner with. Our waste management plan helps us to comply with the relevant environmental regulations and standards and to contribute to our sustainability goals of reducing our environmental impact and enhancing our social responsibility.

Hannes Snellman's waste management plan is included here as Appendix 3.

#### Carbon Footprint

We calculate our carbon footprint on a yearly basis and offset our emissions through Gold Standard projects. For the 2022 emission offset, 369 tonnes in total, we chose the 400 MW Solar Power Project in Bhadla, Rajasthan, India.



#### Sustainable Projects

We regularly advise our clients in projects that support their efforts in sustainable business.

Some of our reference projects in 2023:

Counsel to Metsähallitus in the Pyhäjoki–Raahe and Närpiö Offshore Wind Power Development Projects

Hannes Snellman was engaged by the Finnish state enterprise Metsähallitus in the Pyhäjoki–Raahe and Närpiö offshore wind power development projects. The envisaged nominal capacity of the projects is 3,000 MW.

#### Counsel to Exilion in the Negotiation of a Long-Term Power Purchase Agreement with Statkraft for Wind Power Acquired by DNA

DNA has agreed with Statkraft on the acquisition of wind power from the Ii Palokangas wind farm owned by Exilion. The electricity to be sold by Exilion under the 10-year PPA will be produced in Exilion's Ii Palokangas wind farm, which is under construction in Northern Ostrobothnia. Under the PPA, Exilion will supply annually 85 gigawatt hours (GWh) of the production of the Ii Palokangas wind farm.

## Counsel to Myrsky Energia in the Formation of a 1.8 GW Wind Power Joint Venture with CIP

Hannes Snellman acted as legal advisor to Myrsky Energia in the formation of a joint venture with Copenhagen Infrastructure Partners (CIP) concerning the investment and development of 1.8 GW portfolio of onshore wind power in Finland. Our assignment, commenced in 2022, entailed all legal aspects of the structured sales process and structuring of the transaction followed by the creation of the contractual framework for the joint venture and the development. The estimated investment value of the portfolio is approximately EUR 2.3 billion. Advice on Eltel AB's EUR 25 Million Issue and Listing of Sustainability-Linked Hybrid Capital Securities

Hannes Snellman acted as legal advisor on Eltel AB's issue and listing of EUR 25 million of subordinated sustainability-linked hybrid capital securities. Eltel is a service provider for critical infrastructure listed on Nasdaq Stockholm (Mid Cap). The capital securities have no maturity date, and the proceeds from the issue will be used for partially refinancing certain existing indebtedness and to support Eltel's expansion within renewable energy infrastructure and efforts to improve profitability. Eltel will apply for the capital securities to be admitted to trading on Nasdaq Stockholm Sustainable Debt Market. Danske Bank A/S, Nordea Bank Abp, and OP Corporate Bank plc acted as joint lead managers.

## Counsel to United Bankers in the Acquisition of Taaleri Forest Fund III

Hannes Snellman acted as an advisor to United Bankers' UB Timberland Fund (AIF) when it agreed to acquire Taaleri Forest Fund III LP. The forests managed by Taaleri Forest Fund III comprise 19 forest properties covering a total surface area of approximately 7,650 hectares of which more than 6,400 hectares is productive forest land. As a result of this forest transaction, United Bankers will become, through its funds, the third largest private forest owner in Finland.

Counsel to Aneo in the Acquisition of Two Wind Farms in Sweden from Marguerite Infrastructure Aneo acquired two wind farms in Sweden.

#### Advice on Hydrogen Economy and Regulatory Framework

Client and stakeholder trainings and consultation on hydrogen economy and the related regulatory framework, including existing and upcoming regulation on the production and use of renewable hydrogen and renewable hydrogen-based fuels and hydrogen infrastructure. Review of risks in contractual and value chains and recommendations for next steps. In addition, participation and contribution to different working groups supporting the development of the Finnish hydrogen economy.

## Advice on Sustainability Reporting, Supply Chain, and Board Advisory

Trainings to companies' boards of directors, management teams, and personnel and consultation on a wide range of ESG questions in the legal field, including new and upcoming legislation on corporate sustainability reporting (CSRD), corporate sustainability due diligence (CS3D), sustainability in contract and value chains, and ESG claims and litigation.

## Report to Ministry of Environment on Wind Farm Dismantling Obligations

In a report to the Ministry of the Environment in Finland, published on 6 November 2023, our lawyers Klaus Metsä-Simola and Minna Juhola addressed the environmental and legal implications of end-of-life wind turbines.

The report was prepared as part of the Ministry's work to implement the new Government Programme of Finland, which requires that a comprehensive regulatory obligation to dismantle and restore the wind turbines be introduced. The report also provides some comparative insights from other European countries that have already adopted such obligations.

#### Our Focus SDG – Rule of Law

#### Pro Bono Work

Pro bono work is a crucial way of implementing Hannes Snellman's corporate citizenship associated with the practice of law. Hannes Snellman has a particularly strong tradition of handling pro bono assignments. Pro bono refers to an attorney's work promoting a matter that is considered good for society, performed free of charge or at a clearly reduced fee. We focus on areas where our skills are best used and where we are most able to make an impact.

Staff suggestions form the basis of our pro bono work. The fundamental starting point is the provision of legal advice in accordance with the firm's strategy and our areas of expertise. Moreover, in pro bono work we represent the firm and observe the same criteria associated with quality and the organisation of work applicable to other assignments and duties. We are proud of what our people achieve and the difference they make. Most of our staff is engaged in pro bono work. The initiatives range from individual questions to broader long-term cooperation involving larger teams.

Our pro bono assignments include, among many others, the following long-term partnerships: The International Federation of Red Cross, UNICEF, and Suomen Partiolaiset ry – Finlands Scouter rf. Most of our pro bono assignments are anonymous.

## Firm Level Pro Bono Target for the Year 2023

To emphasise the importance of pro bono work, we have a yearly target for pro bono hours. The firm's recommendation is that all staff members dedicate at least six hours for pro

#### Global Compact Principle: Anti-Corruption

> Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

bono or charity projects per year. Our goal for the 2023 is to increase the number of hours we spend on pro bono work compared to 2022.

In 2023, we recorded all in all 1,610 pro bono hours, which was almost 100% more than the previous year.

#### ISO/IEC 27001:2013 Standard

As a result of the successful information security ISO 27001 audit process during 2021, we received an ISO/IEC 27001 certificate. The certificate is valid for three years and followup audits have been conducted by KPMG in November 2022 and October 2023. The scope of the registration is the protection of customer data including digital information, assets, and personnel. Locations included in the scope are Helsinki and Stockholm.

ISO/IEC 27001 is an international standard on managing information security. It details requirements for establishing, implementing, maintaining, and continually improving an information security management system. Organisations that meet the standard's requirements can choose to be certified by an accredited certification body following the successful completion of an audit.

The certificate is included here as Appendix 4.

#### WhistleB Service

Hannes Snellman strives to maintain a transparent business climate and high business ethics. We value the safety and respectful treatment of everyone affected by our business. Our people have a vital role in our success. Whistleblowing provides an opportunity to report suspicions of misconduct, i.e. anything that is not in line with our values and policies. Our whistleblowing service is an early warning system to reduce risks. It is an important tool to foster high ethical standards and maintain client and public confidence in us.

Whistleblowing can be used to report a concern about something that is not in line with our values and ethical code and that may seriously affect our organisation or a person's life or health.

Hannes Snellman's whistleblowing service is provided by an external partner WhistleB, Whistleblowing Centre, to ensure anonymity and uncompromised confidentiality.

#### Annual Donations

One of our traditions is to make annual donations to charities that share our values and are proposed by our people. All chosen causes reflect the UN Sustainable Development Goals we have identified as top priorities at Hannes Snellman: "Reduced Inequalities", "Climate Action", and "Peace, Justice, and Strong Institutions".

#### UNICEF

We continued to support our long-term cooperation partner UNICEF in Finland and in Sweden.

Our cooperation with UNICEF involves various forms, such as offering pro bono legal advice, working with UNICEF's testament donation programme enabling individuals to leave a legacy for children in need through their wills, and monetary donations to support humanitarian work and development programmes around the world.

Our cooperation with UNICEF reflects the firm's commitment to corporate social responsibility and our vision and values. We at Hannes believe that every child has the right to a safe, healthy, and happy life and that supporting UNICEF is one of the most effective ways to make a positive impact on children's lives.

We also recognise that working with UNICEF provides an opportunity for our lawyers and other professionals to use their skills and expertise for a good cause.

#### Caravan to Ukraine

Caravan to Ukraine is a Finnish association founded at the beginning of 2023, the purpose of which is to raise money to provide Ukraine with vehicles filled with equipment (such as generators) urgently needed to support the country and its efforts in the ongoing war. Caravan has already completed three rounds of deliveries to Ukraine in 2023, consisting of altogether 24 off-road vehicles, 26 generators, and 18 vacuum stretchers. Caravan has no administrative costs as all persons involved in the association's work carry it out on a pro bono basis. Caravan is planning to carry out another vehicle delivery in December (the "Christmas Caravan"), and it will continue with the program in 2024.

#### Doctors Without Borders

Médecins Sans Frontières (MSF) is an international medical humanitarian organisation. Its work is guided by principles of impartiality, neutrality, and independence. The organisation provides lifesaving medical care where it is needed most. Its medical teams work with people affected by conflicts, natural disasters, and epidemics. MSF also provides access to primary healthcare in areas where there is none. The organisation treats people irrespective of their ethnicity, gender, religious beliefs, or political views.

#### Other Charity Actions

#### Commuapp.fi #1000tekoa Charity Event

Hannes Snellman partnered up with Commu to help those in need at Finland's largest volunteer event #1000tekoa, organised in Helsinki on Saturday 25 November. Commu, United Nations award winning platform of helping, is the largest platform for helping others in Finland, matching people who need help with people who want to offer help. During the event, 1,000 bags of food and 500 warm lunches were given away to those in need. Hannes Snellman donated money to support the event, and our some of our staff volunteered at the event.



## Our Goals and Steps Forward

In 2023, we have continued to develop the Corporate Citizenship function of the firm within the three chosen focus areas: "Reduced Inequalities", "Climate Action", and "Rule of Law". In addition, sustainability and ESG have played an increasingly important role.

In 2024, it will be important to further integrate the sustainability and corporate citizenship work into the firm's daily operations with an emphasis on utilising our experience and know-how in this respect in client work.





#### ENVIRONMENTAL POLICY

Hannes Snellman recognises its corporate responsibility in environmental matters and the importance of environmental management for achieving a more sustainable business within the legal sector.

This policy covers the immediate impacts of the buildings, products, and services used by Hannes Snellman, as well as the services that we provide and that we have the possibility to control. In addition to complying with statutory regulations, we are committed to operate in accordance with the following principles.

#### **1** Premises and Purchases

- (a) In our offices, we use renewable energy. We commit to save energy, water, paper, and other such resources.
- (b) As set out in our Waste Management Plan, our objectives is to reduce and collect waste, recycle and improve our disposal practices to avoid deterioration of the environment and negative impacts on the health and safety of the employees.
- (c) Through our own actions and by negotiating with the landlord, we ensure that our premises are designed, constructed, furnished, and operated to optimise their environmental performance and to promote the obtaining and maintaining of an environmental certification for our office premises.
- (d) We consider environmental issues when making decisions regarding our purchases and choose environmentally friendly goods and services for our internal and external events, for instance by favouring sustainable options.
- (e) Hannes Snellman's Supplier Policy outlines criteria its Suppliers must meet when doing business with Hannes Snellman, along with observing all laws and regulations applicable to their operations.
- (f) We give non-material and/or sustainably produced gifts.

#### 2 Travelling

- (a) Whenever possible and relevant, we encourage our employees to attend meetings virtually instead of flying to a meeting.
- (b) We travel by train instead of flying whenever travelling shorter distances.
- (c) We choose hotels that have obtained environmental performance certificates.
- (d) We support walking, cycling, and the use of public transport instead of taxis or private cars. In Helsinki, Hannes offers employees the commuter ticket benefit.

#### 3 Communication

We encourage our employees to implement our environmental policy and provide related training to our employees. This policy and the obligations and responsibilities required by any environmental management system implemented by us will be communicated to all employees.



#### 4 Monitoring and Management

- (a) We are a member of the UN Global Compact initiative, and our sustainability work is based on the UN Sustainable Development Goals (SDGs). We follow UN Global Compact's reporting guidelines.
- (b) We set annual environmental improvement targets and regularly monitor our progress and our consumption and carbon footprint by using the EcoVadis platform.
- (c) This policy will be reviewed and updated regularly with the assistance of our Corporate Citizenship team. In case of material changes, our Board shall approve it.

#### 5 Compensating Our Emissions

We compensate our carbon footprint on an annual basis by investing in projects that reduce or sequester carbon. We compensate through Gold Standard projects.

#### 6 Other

We collaborate with and provide pro bono services to selected environmental organisations.



#### HANNES SNELLMAN SUPPLIER POLICY

Introduction	<ul> <li>Hannes Snellman's supplier policy outlines the minimum standards its suppliers must meet when conducting business with Hannes Snellman, along with observing all laws and regulations applicable to their operations.</li> <li>In this policy, "Supplier" means an individual or a legal person who provides Hannes Snellman with products or services. The definition also includes the Supplier's own contractors and business partners who participate in the delivery of products and/or services to Hannes Snellman. The Supplier is responsible for communicating the requirements of this policy to such contractors and business</li> </ul>
	partners.
<b>Business Conduct</b>	Compliance with Laws and Regulations
	The Supplier must comply with all laws and regulations applicable to its operations. In addition, the Supplier must be committed to the highest standards of integrity, honesty, and ethical conduct in all its activities.
	Prohibition of Corruption, Bribery and Money Laundering
	Any form of extortion, bribery, or corruption, including improper offers of payments to or from employees or organisations, is prohibited. The Supplier shall establish and maintain policies and procedures to prevent extortion, bribery, corruption and other unethical conduct, and proactively train its employees in the matter. The Supplier shall implement protective measures and refrain from any activities which may be considered part of a money laundering process.
	Fair Competition
	The Supplier shall compete fairly in compliance with all applicable competition laws and regulations. The Supplier shall have policies and procedures in place to ensure that its directors and employees do not engage in any anti-competitive practices.
	Confidentiality and Information Security
	To protect confidential information and data, the Supplier must implement appropriate information and data security processes. It is the responsibility of the Supplier to adopt and maintain processes that adequately protect personal, proprietary, and confidential information, including information that is accesses, receives or processes on behalf of Hannes Snellman. In addition, the Supplier must comply with the EU General Data Protection Regulation and other applicable privacy, data protection, and information security laws and regulations.
	Trade Sanctions
	The Supplier shall comply with all applicable financial, trade, and economic sanctions imposed from time to time by the European Union, the United States



	of America, the United Kingdom, or the United Nations and/or other relevant countries or organisations, as applicable.	
Human Rights	Hannes Snellman supports the principles of the United Nations Global Compact, the United Nations Universal Declaration of Human Rights, and the European Convention on Human Rights. The Supplier is expected to respect and protect the same fundamental and internationally recognised human rights in all areas of its operations and ensure that it does not contribute to adverse human rights impacts through its activities.	
	The Supplier must identify its human rights impacts, implement mitigating actions when required, and provide effective remediation in the event of adverse human rights impacts.	
Occupational health, Safety and Security	The Supplier shall provide its employees with a healthy, safe and secure workplace, comply with applicable laws and regulations, and	
	- treat all its employees equally, fairly, and respectfully	
	- not accept any kind of forced, bonded or involuntary labour or use of child labour	
	- recognise and respect employees' rights to freedom of association and collective bargaining in accordance with applicable laws	
	- remunerate its employees in accordance with applicable laws and collective agreements	
	- prioritise its employees' safety and health and comply with all applicable statutory occupational safety and health regulations.	
Environmental Impact	The Supplier shall comply with environmental laws, regulations and standards that apply to its operations and practice environmentally conscious practices in all locations where it operates.	
Non-Compliance	Any non-compliance with this policy shall be reported to the compliance officer (mervi.barth@hannessnellman.com).	



### Hannes Snellman Waste Management Plan

#### 1 The objectives of the waste management plan

The goal of the waste management plan is to

- a) provide guidelines on waste reduction, recycling, collection and disposal practices, to avoid deterioration of the environment and negative impacts on the health and safety of the employees,
- b) increase employees' awareness of waste sorting; and
- c) increase the recycling ratio in the office premises.

#### 2 Waste Types Produced in the Hannes Snellman Premises

Type of Waste	Amount of	Action	Emptying	Executor
	Waste		Frequency	
Mixed waste	N/A*)	Collected separately	Daily	Contractual supplier
Bio waste	N/A*)	Collected separately	Daily	Contractual supplier
Energy waste	N/A*)	Collected separately	Daily	Contractual supplier
Cardboard	N/A*)	Collected separately	Daily	Contractual supplier
Glass	N/A*)	Collected separately	Every 4 weeks	Contractual supplier
Metal	N/A*)	Collected separately	Every 4 weeks	Contractual supplier
Paper	N/A*)	Collected separately	Every 4 weeks	Contractual supplier
Hazardous	N/A	Collected separately	On a need basis	Designated responsible person
waste				from Hannes Snellman
(batteries,				
bulbs, etc.)				
Old kitchen	N/A	Collected separately	On a need basis	Contractual supplier on a need
equipment,				basis
furniture				

\*) Based on the landlord's waste management process, it is not possible to separate Hannes Snellman's portion from the amount of the entire property and all tenants. (Appendix 1)

#### 3 Collecting the Waste in the Office Premises

Waste collection covering mixed waste, bio waste, energy waste, paper, and cardboard is arranged in every office floor in Helsinki according to a waste collection plan in Appendix 2.

In addition, collection point for glass and metal is available in the office cafeteria on the  $5^{\text{th}}$  floor.

Collection point for the hazardous waste is organised on the 7<sup>th</sup> floor.

#### 4 Contractual Supplier for Waste Management in Hannes Snellman's Premises

Contractual partner for cleaning and waste management in Helsinki is LTQ-Partners Oy.

#### 5 Concrete measures to improve waste management

- Clear instructions with pictures for sorting waste at recycling points
- Minimizing food waste with catering instructions



- Guidance to avoid plastic products, or overpackaged products
- Leasing electronical equipment, such as computers, mobile phones, printers
- Guidance to avoid printing, printing instructions to reduce the amount of paper





# Certificate of Registration

KPMG IT Certification Ltd certifies that the following organization

## Hannes Snellman Attorneys Ltd.

complies with the requirements of standard

### ISO/IEC 27001:2013

for the following scope of registration

Nordic Law Firm Hannes Snellman Attorneys Ltd. protection of customer data including digital information, assets and personnel. Locations in scope: Helsinki and Stockholm office

Statement of Applicability version 1.0 (1.9.2021)

Certification number

Mika Laaksonen, CEO KPMG IT Certification Ltd.

Issue Date October 21, 2021 Original Issuing Date October 21, 2021 Expiration Date October 21, 2024





To verify that this certificate is current, please refer to the KPMG IT Certification Ltd: www.kpmg.com/fi/it-sertifiointi

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## HANNES SNELLMAN