

# CODE OF CONDUCT

*Applicable from 4 March 2026*

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

## **1 INTRODUCTION**

- 1.1 Our ethical rules express our expectations for the ethical behaviour of our employees and establish the framework for our dialogue with business associates and other stakeholders. We strive to ensure the highest level of integrity in our business.
- 1.2 In such, .legal has a zero-tolerance policy towards practices such as bribery and corruption. Furthermore, we conduct our business in an honest and ethical manner, ensuring that our customers and partners can rely on us to act fairly and ethically. This Code of Conduct outlines .legal's commitment to ethical standards and compliance with laws in different areas, including – but not limited to – gifts, confidentiality, fair competition, anti-money laundering, human rights, discrimination, forced labor and export control/sanctions/restrictions.

## **2 ANTI-BRIBERY AND CORRUPTION**

- 2.1 Any offer of money or other valuables with the intention of influencing a business decision is considered bribery. .legal neither accepts nor provides any form of bribery.
- 2.2 .legal is committed to complying with all applicable Danish laws and regulations on anti-bribery and anti-corruption.
- 2.3 This includes:
  - A. To not, directly or indirectly offer, give, request, accept or receive any bribes in the form of financial or other advantages, to encourage a person to perform their obligations, function or activities improperly or to award such person for having already done so;
  - B. to inform the Customer immediately about all bribes or suspicions of bribery it becomes aware of;

- C. to use its best endeavours to prevent bribes (including by adopting adequate policies and procedures);
- D. to use all reasonable endeavours to ensure that .legal's Personnel, including employees, officers, executives, owners, agents and/or representatives, as well as subcontractor(s) used in the performance of .legal's obligations under the Agreement comply with the obligations set out in this clause.

2.4 Customers of .legal reserves the right to verify compliance herewith through audit and .legal agrees to assist the Customer herewith.

2.5 For the avoidance of doubt, any breach of this clause shall constitute a material breach of the Agreement. In such case, or in case the Customer, has serious reason to believe that .legal has been in breach of its obligations hereunder, the Customer shall be entitled to terminate the Agreement with immediate effect without being in default.

### **3 GIFTS**

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

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

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

### **4 CONFIDENTIAL INFORMATION**

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

### **5 FAIR COMPETITION**

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

## **6 ANTI-FRAUD AND ANTI-MONEY LAUNDERING**

6.1 We are committed to high standards of honesty and integrity in all our activities, with a dedicated focus on preventing fraud. Employees are expected to act transparently and in compliance with laws, ensuring fair and ethical conduct. We unequivocally denounce any form of deceit or manipulation and actively encourage the reporting of fraud suspicions. Together, we strive to build a culture emphasising integrity for a trustworthy business environment.

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

## **7 HUMAN RIGHTS**

7.1 A fundamental element of our social responsibility is our commitment to uphold principles of human rights. .legal naturally supports [the United Nations \(UN\) Universal Declaration of Human Rights](#) and [the International Labour Organization's \(ILO\) Declaration on Fundamental Principles and Rights at Work](#), which together form the foundation for our approach to human rights across our operations and supplier relationships.

## **8 DISCRIMINATION**

8.1 We treat all clients, partners, and employees with respect. All .legal employees have equal opportunities and are treated equally. Furthermore, it is expected that everyone treats others with respect regardless of their background. We hire and retain employees solely based on their ability to perform tasks - never due to gender, marital status, pregnancy, race, colour, age, sexual orientation, religion, political opinion, union membership, role as a worker representative, nationality, health status, or disability.

8.2 All employees will be treated with respect and dignity. We do not tolerate workplace bullying, intimidation, violence, physical or sexual harassment, or abuse. Adequate measures are in place to promptly address any violations of the above guidelines.

## **9 FAIR WAGES AND EQUAL PAY FOR EQUAL WORK**

- 9.1 We commit to ensuring fair compensation for all employees and promoting equal pay for equivalent work. This entails strict adherence to payment deadlines in accordance with applicable laws. We will uphold the principles of equal pay for work of equal value and ensure that wages are disbursed promptly and accurately.
- 9.2 Our objective is to cultivate a work environment where fairness and equality are reflected in the compensation structure, acknowledging the contributions of all employees without discrimination.

## **10 FORCED LABOR AND SLAVERY**

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

## **11 ENVIRONMENT**

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

## **12 HEALTH AND SAFETY**

- 12.1 We are committed to ensure that all employees experience a work environment that is safe both physically and mentally. This commitment extends to fostering conditions that promote, not only physical well-being, but also psychological health, creating a socially secure workplace. Recognising the significance of establishing optimal conditions, we aim to cultivate an environment where our employees thrive, enabling them to perform at their best without compromising their well-being.

## **13 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

- 13.1 We ensure that all employees have the right to organise and join associations, and engage in collective bargaining without any limitations or sanctions. We establish suitable mechanisms to

address disputes, including employee claims, and maintain open and effective communication channels with our employees.

#### **14 SUPPLIER RELATIONSHIPS**

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

#### **15 EXPORT CONTROL, SANCTION LAWS AND RESTRICTIONS**

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

15.2 For the purpose of this Section: (a) "Export Control Laws" means all export control laws and regulations applicable for the party in question; (b) "Product" means the services, deliverables, goods, software, and/or other material performed, delivered, procured, or made available under this Agreement; and (c) "Sanctions" means economic, trade or financial sanctions laid down, administered or enforced by under the applicable law.

15.3 Each party shall comply with all present and future Sanctions and Export Control Laws applicable to such party or to the Products.

15.4 .legal represents and warrants that neither .legal nor any of .legal's employees, officers, directors, Affiliates, direct or indirect shareholders nor any other person or entity having a direct or indirect ownership or controlling interest in them or .legal, are or risk becoming (i) a person targeted by Sanctions, including, but not limited to, persons designated on the UN Financial Sanctions Lists, the EU's Consolidated List of Persons, Groups and Entities Subject to EU Financial Sanctions; or (ii) directly or indirectly owned or controlled by any such person (each a "Sanctioned Person"). The Customer may terminate this Agreement with immediate effect in case of breach of the foregoing. .legal agrees, represents and warrants that it will notify the Customer in writing immediately, and the Customer may terminate this Agreement with immediate effect and may immediately suspend to perform its obligation, in whole or in part, in this Agreement, if .legal or any of .legal's employees, officers, directors, Affiliates, direct or indirect shareholders or any other person or entity having a direct or indirect ownership or controlling interest in them or .legal, becomes or reasonably risks, becoming a

Sanctioned Person or if .legal or they become directly or indirectly owned or controlled by one or more Sanctioned Persons.

15.5 .legal represents and warrants that .legal is not: (i) a Russian national, a natural person residing in Russia, or a legal person, entity or body established in Russia, or a legal person, entity or body whose proprietary rights are directly or indirectly owned for more than 50% by any such person, entity or body (each a "Restricted Person"); or (ii) a natural or legal person, entity or body acting on behalf or at the direction of a Restricted Person.

15.6 .legal undertakes, at the request of the Customer, to provide the Customer with a declaration of the points (i) and (ii) of this clause and to prove the accuracy of such a declaration by providing documentation to the Customer. The Customer may terminate this Agreement with immediate effect and may immediately suspend to perform its obligation, in whole or in part, in this Agreement in case of breach of the foregoing.