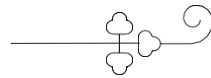


Groth & Co

Established 1869



Code of Conduct

Updated October 1, 2022



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“Together with our clients, we work strategically to create competitive advantages through intellectual property. We want to ensure that Groth & Co provide our clients with the best possible advice, whilst also running our own business in a responsible and sustainable manner, consistent with our longstanding commitment to diversity and sustainability.

Our “Code of Conduct” defines our company and is the cornerstone of our business.

How we act individually and as a group speaks to who we are and what others have come to expect from us. Our continued success depends on whether the actions we take and the decisions we make are not only legal, but also ethical.

We have worked with intellectual property rights since 1869 making us Scandinavia’s first company in the field. I am proud of what we do and how we do it.”

Mats Lundberg, Managing Director, Groth & Co



Introduction

About Groth & Co

Groth & Co offers business advice on intellectual property rights. We have experts in the areas of patents, trademark, design, domain names, copyright, litigation, monitoring, name creation and more. Intellectual property is an important part of the creating welfare and often a prerequisite for new companies and business ideas. These in turn leads to new jobs, higher financial growth, and increased profitability for the public as well as the private sector, which results in greater prosperity and welfare for all.

With our experience and expertise in intellectual property along with our solid business acumen, all of us at Groth & Co continuously strive to strengthen, develop, and enhance the business activities of our clients.

The Code of Conduct reflects the firms' values and principles and lays out the moral and ethical standards that everyone at Groth & Co are expected to adhere to. It also applies to Groth & Co in its role as an employer.

About our Code of Conduct

Our Code of Business Ethics presents an overview of our framework of policies and instructions which applies to all our business activities. The Code serves as a common ethical guideline for the firm and sets clear standards for what behaviour is expected from everyone at Groth & Co. It also clarifies that a shared responsibility is fundamental for running a business with integrity.





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Groth & Co's compliance team continuously work to educate and inform all employees about the crucial part of our business that is to monitor and systematically manage risks within our advisory services. These are risks relating to money laundering, terrorism financing, ethics of legal practice, sanctions legislation, insider trading and anti-corruption. Our employees are trained to constantly weigh ethical considerations to ensure we act in line with the firm's values. A qualified team of people from Groth & Co ensure that our employees meet the firm's standards of responsible and ethical behaviour when accepting new engagements and clients. Good business ethics and our employees' compliance with relevant laws, regulations and internal policies are fundamental in all the firm's operational areas.

Our commitments

Human rights & Working Conditions

Human rights

We believe that everyone must contribute to creating a better world. Accordingly, promoting and respecting human rights is fundamental for us when we operate our business. Our work should never contribute to or cause a disregard for human rights.

In all our business, we respect the international recognised human rights laid down in the UN General Declaration of Human Rights and UN international conventions on civil and political rights as well as economic, social, and cultural rights. We have conducted several human rights charity projects together with our collaborative partners. For more on this, see below under *Sponsorships & Donations*.



Anti-discrimination

At Groth & Co, there is a zero tolerance for discrimination based on gender, transgender identity or expression, ethnicity, religion or other belief, functional variation, sexual orientation, or age.

The work against discrimination is a responsibility of all employees and it is important that everyone is aware of Groth & Co's anti-discrimination policy. We are convinced that different life experiences and perspectives are necessary for the development of individuals as well as well as our business as a whole.

Fair Employment, Diversity & Gender Equality

It is essential for us to identify, hire, and retain the best people at each position at the firm. We actively promote fair employment conditions and workforce diversity that includes different people from diverse backgrounds. All employees should enjoy equal opportunities based on their competence, experience, and performance. We encourage a working environment where all employees can contribute to their full potential.

Equality is a matter of democracy and concerns power, influence, and resources. Someone's gender, age, ethnicity, religion etc, should not affect how they are treated in working life. Our work is characterized by a competent and conscious approach to the conditions of people with different identities, backgrounds, and characteristics.

At Groth & Co, equality between women and men is a common and accepted organizational culture. In that culture, we manage women's and men's talents and differences – for the sake of job satisfaction, creativity, and efficiency. We have a gender equality plan which reflects our vision of the gender equality workplace.



Occupational Health, Safety & Well-being

As our employees and their knowledge lays the foundation for Groth & Co, we want to protect and improve the health and safety of everyone who works for us. We believe that health and well-being require the promotion of healthy and safe work conditions and the prevention of occupational risks and ill health. It is important that we quickly address and act on unsafe working conditions, both as regards to physical and psycho-social aspects.

The firms' wellness policy aims to stimulate wellness activities among the employees, such as stress management and individual and collective activities. The work environment at Groth & Co is designed to meet each employee's individual needs.

Travelling

At Groth & Co we always consider the aspects of health, safety and environmental responsibility when travelling and planning trips. We manage cost and time commitments carefully so that the travels are as effective and productive as possible. We do not travel if a more environmentally friendly alternative is possible for the purpose of the e.g., meeting or gathering.

Environmental responsibility

We recognise that climate change and the unsustainable use of natural resources are two of the most pressing issues of our time. The environmental impact of our services, i.e., business advice, is limited. Nevertheless, we operate and design our networks and as deliver our services for minimal environmental impact.

We also take responsibility through daily activities, such as reducing paper consumption, recycling and by using eco-friendly goods as far as possible. We have comprehensive environmental and responsibility policies, in which it is stated that our suppliers must weigh environmental considerations in everything



from business travel and transport to the choice of materials. We have conducted and contributed to several environmental charity projects and organizations. Learn more about this below under [Sponsorships & Donations](#) as well as on our website under [Commitments & CSR](#).

Sponsorships & Donations

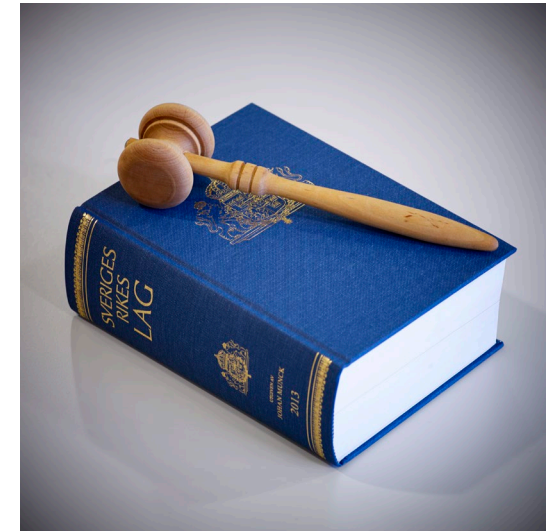
Groth & Co view Sponsorships and Donations as a valuable way of developing our business and supporting causes which we find valuable for our society. It is a great way to contribute to making the world a better place, which we believe is a responsibility for all. We are careful to always conduct Sponsorships and Donations ethically and in a way that creates social value as well as supports our business objectives. When working with Sponsorships and Donations, we take the 2030 Agenda into great consideration.

The Sponsorships and Donations conducted by Groth are primarily results of our CSR work. For more than ten years, we have conducted a number of charity projects together with collaborative partners under the slogan “Together We Can Make A Difference™”. Since 2009, we have planted trees around Lake Victoria, dug a water well in Mali, built a school kitchen in Uganda, built water ponds, started businesses, and donated laying hens in Kenya, and conducted several other projects. Please read more about this at our website under [Commitments & CSR](#).

Business Ethics, Precautionary Measures & Customer Privacy

Gifts, Hospitality & Improper Payments

Gifts and hospitality should always support a clear business objective and follow our Code of Conduct as well as relevant laws and regulations. They should always be openly disclosed and accurately recorded, of reasonable value and appropriate to the nature of the business relationship. We accept no form of direct or indirect bribery or undue influence. Giving or receiving bribes is strictly prohibited in Groth & Co’s business.



We ensure that all our actions and decisions are in the best interest of our clients, our business, and the society. For this, transparency and integrity are fundamental for us at Groth & Co. All payments are certified by two people and incoming payments are reviewed by accounting. By doing this we can maintain that no unauthorized payment or incoming transcript should be made without being noticed.

Anti-corruption & Fair Competition

Groth & Co accepts no form of corruption and abide by the anti-corruption legislation as well as other anti-corruption regulation that we are bound to follow. We systematically manage risks within our advisory services relating to anti-corruption.

We believe that free and fair competition leads to the best outcomes for not only our clients and the society but also our business. We follow competition-law and other relevant regulations and fully support competition and ethical conditions anywhere we conduct our business activities.

Insider Trading & Money Laundering

At Groth & Co we continuously work with monitoring and systematically managing risks relating to insider trading and money laundering.

An efficient capital market is dependent on ethical behaviour from all parts. At Groth & Co, we always pursue the highest ethical standards and respect the laws and regulations concerning insider trading. We are careful to protect confidential business information from unauthorised people.

We make sure to earn all our revenue in ethical and legal ways through following standard processes and carrying out all our financial activities ethically and transparently. We never deal with suspected criminals, partake in any acquisition or control of criminal property or falsify or destroy relevant documents.



Ethics & Avoidance of Conflicts of Interest

Groth & Co belongs to SEPAF, the Association of Intellectual Property Law firms in Sweden. SEPAF aims to uphold ethics and a high degree of professionalism in the field, and their general conditions offer customers security. They have an ethics committee which ensures that members follow ethical guidelines and asserts that any agency that violates the regulations is held accountable.

At Groth & Co we have a routine to assert avoidance of Conflicts of Interests and Decisions. The routine is implemented before accepting any new engagements.

Customer Privacy

Clients trust us with their sensitive information. It is extremely important that we uphold their trust by respecting and securing their privacy. We are careful to maintain the privacy of the client information and use it only in the ways needed to complete our work.

All employees, including trainees, permanent service personnel (cleaners, etc.) have a duty of confidentiality regarding conditions relating to Groth & Co's technical operation and safety, as well as relationships with clients.

Sensitive Information

Since information is one of the most valuable and sensitive assets at Groth & Co, it is important that we protect it carefully. We follow relevant legal, contractual, and business requirements. We strive to guarantee the confidentiality, availability and integrity of our business information and treat all non-public information with care. Everyone must sign a non-disclosure agreement before employment or execution of services begins.





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Responsible Sourcing

Sourcing strengthens our competitiveness as well as our profitability. Through implementing a set of processes, tools and rules, our sourcing approach supports our business activities. We consider responsible purchases to be essential for building reliable, long-term business relations and using the firm's assets in the most efficient way possible.

Whistle-blower function

We view breaches of the Code of Conduct seriously and instruct our employees to report all suspicions and observations of breaches of the Code of Conduct or any of our other policies. This can be done to our compliance team or any member of the management group. The report will then be dealt with promptly.

