

HAMMARSKIÖLD & Co

# From principles to implementation and company culture

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**UN Global Compact Training Course**

**9 May 2016**

*”Companies – from the largest to the smallest in size, from the most developed to the least developed countries – are striving to ingrain universal principles on human rights, labour, environment and anti-corruption into their management and operations.”*

H..E. Ban Ki-Moon, UN Secretary-General  
Global Corporate Sustainability Report 2013

# DN.EKONOMI

FÖRSTASIDAN | STHLM | EKONOMI | SPORT | KULTUR | LEDARE | DEBATT | BOSTAD | MOTOR

## "Ericsson betalade 116 miljoner i mutor"



## Stora Enso kände till barnarbete

Skogs- och papperskoncernen Stora Enso kände redan 2012 till att det fanns barnarbete inom företagets verksamhet i Pakistan, rapporterar TV4:s Kalla fakta. Det gäller en underleverantör i Pakistan som låter barn samla in returpapper som sedan säljs till ett företag som Stora Enso köpte 35 procent av i september 2012.

9 mars 2014 kl 19:55, uppdaterad: 10 mars 2014 kl 06:35

När Grekland skulle köpa Ericsson radarsystem Erieye betalade det svenska företaget 116 miljoner kronor till en mutbärande företagare.

# SVD NÄRINGSLIV

START | BÖRS | BÖRSFORUM | NYHETER | PENGAR | SÖK FÖRETAG | MOTOR | KARRIÄR

## Mejl, miljarder och misstänkta mutor

Teliachärvan i Uzbekistan är den osannolika berättelsen om maktfullkomliga direktörer, en girig diktaturregim och en svensk regering som ingenting ser. En nyckelperson är diktatorns mångsysslade dotter, Gulnara Karimova, popstjärna, modelejon och professor, allt på samma gång.

Östtyska räddar Telia Sonera



## Shell i rätten för utsläpp

För första gången någonsin ställs oljefjätten Shell hemma i Nederländerna inför domstol efter anklagelser om miljöbrott utomlands. Fyra nigerianer har tillsammans med en miljöorganisation stämt Shell i Haag, där företaget har sitt huvudkontor. De kräver att Shell tar ansvar för tre oljeutsläpp i Nigerdelta under 2000-talet. Shell hävdar att utsläppen var ett resultat av sabotage och att företaget har gjort vad det har kunnat för att strida mot



ANALYS  
ÅGARANSVAR  
TORBJÖRN ISACSON

har med trovärdighet att göra och är avgörande för vår långsiktiga framgång." Och när det gäller grönsaker heter det "Likaväl som att säkerställa att våra grönsaker är av förstklassig kvalitet, tar vi ansvar

ens med höstens fisklöd i Vegeån i skånska Bjuv, som berodde på stora utsläpp från Findus årtproduktion. Där polisanmälades Findus för miljöbrott.

ret nästan alltid hos någon annan i det sönderslagna system som blivit resultatet av avregleringen. Fungerar inte strömmen ligger alltid felet hos någon annan än den som kunden har köpt sin el

offentliga organ som ska sköta granskningen av allt från finans och vård till livsmedel. Inom livsmedel är ansvaret exempelvis spritt på flera hundra olika myndigheter. Men en upphandling som

Findus, Telia, SL, SJ och Vattenfall är alla exempel på bolag som skyltat ifrån sig på för att ta sitt ansvar som ägare.

# Skandalbolag klandrar andra

http://www.svd.se/nyheter/inrikes/barnarbete-bakom-h-m-plagg\_628467.svd

## SVD NYHETER

NYHETER | NÄRINGSLIV | KULTUR | OPINION | SPORT | RESOR  
STOCKHOLM | SVERIGE | VARLDEN | BÖRS | VALET 2014 | WEBB-TV

## Barnarbete bakom H & M-plagg

Det svenska klädföretaget H & M använder bomull som plockats av barn i Pakistan. Detta trots att H & M tydligt tar ställning mot barnarbete.



## Rekordböter för kartell

Bryssel. Det blir rekord (8 miljoner kronor) för de skapade karteller.

## Åtal mot Volvochefer kan svälla

Rättegången mot tre Volvochefer som misstänks ha mutat Saddams Husseins regim i utbyte mot affärer har skjutits upp i minst ett halvår. Samtidigt står det klart att åtalet kan komma att utvidgas.

Männen har enligt åtalet betalat ut mutor på drygt 20 miljoner kronor under 2000-2002 till den dåvarande regimen i Irak. Syftet ska ha varit att



FOTO VATTENFALL/NUON, EVE

## USA visar intresse för Telia-härva

Av: SIX Affärsvärlden  
Publicerad 17 mars 2014 09:00

Telia Sonera har informerats om att det amerikanska justitiedepartementet DOJ (Department of Justice) har en pågående utredning om Telia Soneras transaktioner i Uzbekistan.

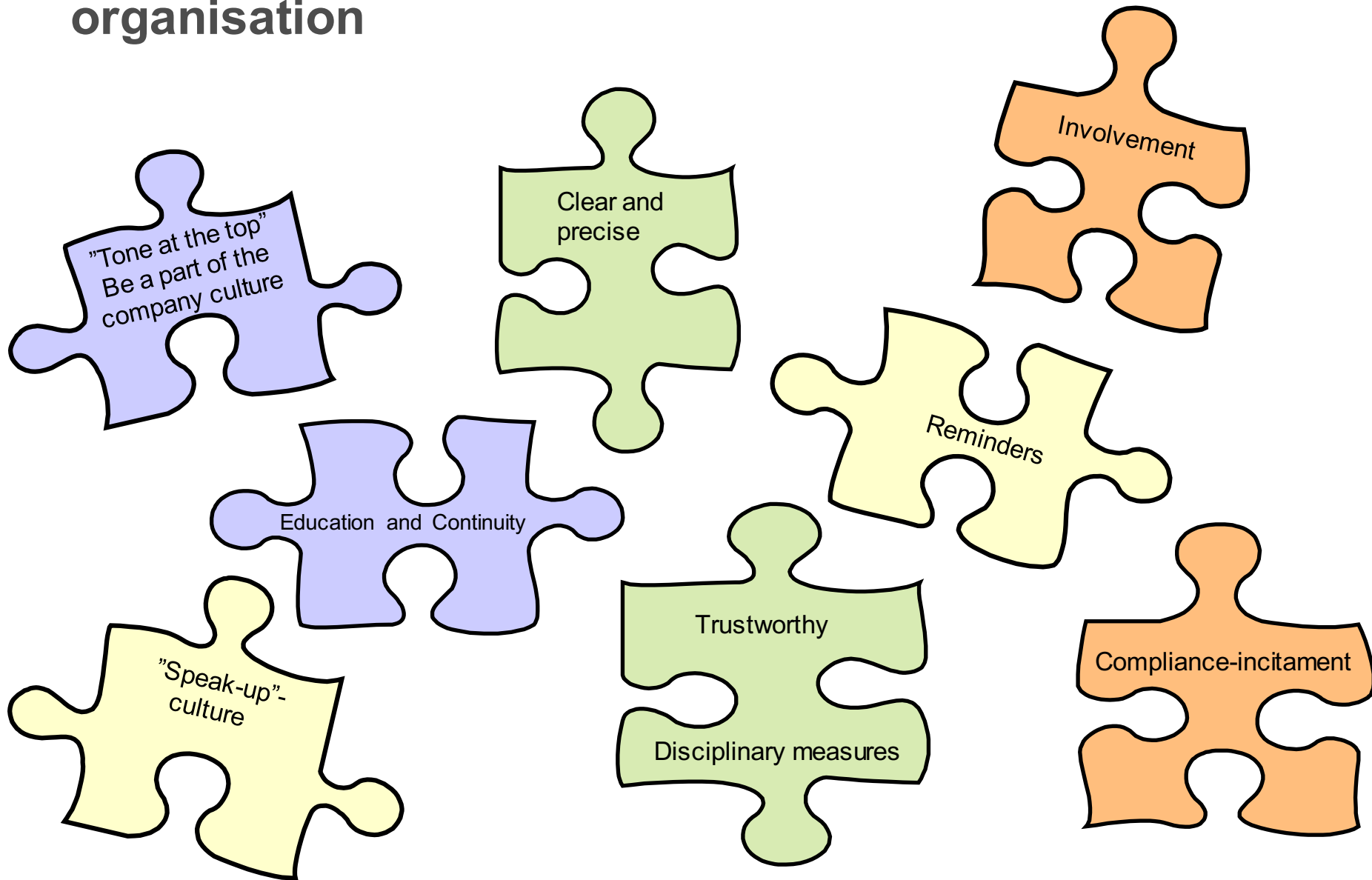
# DN.EKONOMI

Bolag fälls för asfaltkartell



Byggföretagen Skanska, NCC, Vägverket och Peab döms nu att betala mångmiljonbelopp för kartellbildning kring asfaltläggning. Men straffbeloppen är kraftigt sänkta. Skanska ska betala 170 miljoner kronor, jämfört med de 557 miljoner

# Starting points to implement compliance in the organisation



# Why work structured with compliance?

- Live up to the company's commitment within Global Compact
- Ethical company culture – business benefits
- Infringements entail negative consequences
  - fines
  - criminal sanctions
  - damages
  - badwill
  - loss of confidence



# Identify and evaluate risks

AKTIVITET	UTREDNINGSFOKUS			KONTROLLÅTGÄRDER					KVARSTÅENDE RISK			"Testning"	Åtgärder baserade på test/utvärdering
	Konsekvens (1-5)	Sannolikhet (1-5)	Brutto-risk	Åtgärd 1: Utbildning	Åtgärd 2: Instruktioner	Åtgärd 3: Godkännande-procedur	Åtgärd 4: Whistle-blower	Åtgärd 5: Compliance-program	Konsekvens (1-5)	Sannolikhet (1-5) med hänsyn till kontrollåtgärder	Netto-risk		
Mänskliga rättigheter	5	2	10						5	1	5		
Miljörisker	4	4	16						4	3	12		
Oskäliga anställnings-villkor	5	5	25						5	4	20		
Kartell, Missbruk av dominerande ställning	4	3	12						4	2	8		
Korruption	4	2	8						4	1	4		

# Hammariskiöld & Co commitment to Global Compact "COP"

*We are pleased to confirm that Advokatfirman Hammariskiöld & Co proudly affirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour Law, Environment, and Anti-Corruption. Hammariskiöld & Co is truly dedicated to conducting business and providing legal advice of the highest ethical standard. This is a founding principle of the firm. Accordingly, we are delighted to integrate these ten Global Compact principles into our "day-to-day" business. In this annual Communication on Progress, we will describe our actions to integrate the Global Compact and its principles into our business strategy, culture, and daily operations. We are also committed to sharing this information with our clients using our normal channels of communication.*



# 1. Human rights

- Hammarskiöld & Co strives to lead the way in business ethics amongst its peers. Serving as a beacon for the legal community, Hammarskiöld & Co adopted its own internal business ethics policy with even stricter rules than those mandated by the Bar Association. Among other rules, the policy contains:
  - A special screening and acceptance procedure for admitting new clients;
  - A procedure for accepting new matters from existing clients;
  - Additional requirements regarding an employee's independence and integrity;
  - Restrictions on an employee's engagement in other businesses or participation in financial investments;
  - Strict guidelines prohibiting insider trading; and
  - Strict guidelines prohibiting money laundering.



# Human rights

- The unique screening and acceptance procedure that Hammarskiöld & Co has adopted also works as a checkpoint, to assure that the law firm does not accept clients that do not respect basic human rights and that the law firm does not accept assignments that would be contrary to Hammarskiöld & Co's ethical standards or would make the law firm complicit in human rights abuse.
- Since 2014 Hammarskiöld & Co also includes questions regarding human rights and social responsibility in our check list questionnaire that we use in the dialogue with all of our suppliers. This is intended as a tool that can provide us with information in order to analyse if we need to take additional measures during the procurement process to address potential human rights risks within our supply chain. So far this tool has been helpful and has increased our awareness, but it has also shown that many times there are significant challenges for a small company to get sufficient and useful information to assess its supply chain risks.

# Human rights

- In 2015, Hammarskiöld & Co joined **Level the Playing Field**, a project initiated by the Stockholm Chamber of Commerce (SCC) and Swedish Women in Arbitration Network (SWAN). Hammarskiöld & Co is one of ten business law firms participating in the project, which aim is to improve equality and diversity in the industry. Among Sweden's business law firms, six out of ten newly employed lawyers are women, but only one in ten becomes a partner. The work among the participants of the project is focused on finding constructive and concrete ideas to change this. "Gender equality"
- Since 2014 Hammarskiöld & Co also includes questions regarding human rights and social responsibility in our check list questionnaire that we use in the dialogue with all of our suppliers. This is intended as a tool that can provide us with information in order to analyse if we need to take additional measures during the procurement process to address potential human rights risks within our supply chain. So far this tool has been helpful and has increased our awareness, but it has also shown that many times there are significant challenges for a small company to get sufficient and useful information to assess its supply chain risks.

## Right to asylum

- In 2016 Hammarskiöld & Co started financially supporting a non-profit student organization in Stockholm called **Asylrättstudenterna**. Hammarskiöld & Co is also assisting the board members pro bono by giving general advice and acting as a discussion partner. The organization is founded by and has its members among law students in Stockholm. The aim of the organization is primarily to offer its members education focused on relevant law in relation to immigration, e.g. the right to asylum. The members' voluntary work is focused on giving legal advice to refugees arriving to Stockholm meeting their immediate needs in this respect. "Right to asylum"

## Promoting Supplier Diversity

- In 2015 Hammarskiöld & Co also became involved in a project aimed at promoting supplier diversity among immigrant-owned businesses, which was launched by the American chamber of commerce in Sweden, the American embassy and the IFS (Internationella Företagarföreningen). Hammarskiöld & Co is supporting the project members by providing pro bono legal assistance relating to the project, such as giving advice on compliance and drafting policies and agreements.
- The aim of the project is to link Sweden's immigrant entrepreneurs and their companies with larger companies in Sweden so that the immigrant-owned companies can be considered in the procurement processes of the larger companies. The core values of the program are fairness and equal opportunity. The main aim is to give immigrant-owned business an opportunity to reach the Swedish market and in that way boost growth in disadvantaged areas and promote employment throughout Sweden. In the long run, the program will hopefully bring prosperity and develop role models in under-served communities.

# Integration of Refugee Children into Swedish Society

- During the last year, Hammarskiöld & Co established an internal working group with the aim to support the current refugee situation in Stockholm. One of the goals of the group is to give the children escaping war and coming to Sweden opportunity to do something “fun” and integrate in the Swedish society. In 2015 the group raised enough money to offer these children 75 hours of soccer training. Employees of Hammarskiöld & Co also gave sports equipment, toys and clothes as donations to the new homes of the children.
- In addition, lawyers working at Hammarskiöld & Co have applied to work pro bono as mentors for refugee children who are not accompanied by their parents in order to help the children integrate better into the society. The mentoring is a project initiated by the Swedish Bar Association.

## Activities for Critically Ill Children

- Hammarskiöld & Co is also committed to supporting critically ill children. One bright example includes helping establish the charitable foundation **MinStoraDag** (My Big Day). Hammarskiöld & Co prepared all of the legal work necessary to create the foundation, pro bono. The mission of MinStoraDag is to grant wishes to children with serious illnesses and diagnosis. The foundation's work is unique as each child is actively involved in planning his or her own wish.



## 2. Labor principles

- Ethics policy
- Safety policy
- Quality policy
- Anti-drug policy
- IT and security policy
- Equality and diversity policy
- Policy on parental leave compensation
- Crisis plan
- Pension policy
- Anti-harassment policy
- Confidentiality policy
- Guidelines prohibiting insider trading
- Guidelines prohibiting money laundering



# Employee satisfaction and development

- Hammarskiöld & Co believes that employees who are engaged and motivated feel happy and do a better job at work. Good employee morale promotes excellent treatment and service for our clients. In the Partnership Agreement, one of the firm's most basic principles is "*To have fun at work.*" We therefore believe in engaging our employees in activities inside and outside office hours to promote a well-functioning team spirit and friendship within the firm. We continuously arrange different social activities and participate in common sporting events or competitions.



## Employee satisfaction and development

- Each associate has a designated partner acting as a mentor and they meet on a regular basis to discuss the associate's professional and personal development. For each new associate, a “buddy” associate is appointed to help introducing the new employee to the firm and his/her new colleagues.
- We have a development plan for each associate, which includes follow-up meetings twice a year, lunches and reviews to support the individual associate's development. We make plans with measurable goals giving employees the opportunity to fully develop their skills. We also give additional support in the areas of education, special coaching, and experience in particular subject areas and business development.

## Employee satisfaction and development

- Our administrative and support staff is offered introduction training and ongoing training in English. Specific/individual courses are discussed, documented, and followed-up on during the yearly Performance Management Cycle, ensuring that all support staff receives training to meet the requirements of their role within the firm. The support staff has a development plan with measurable goals and follow-up meetings once a year, to reach their full potential in necessary areas.

## Equality in the work place

- We recruit more women than men from universities, but we still have fewer women becoming partners. It is crucial for the firm's long-term success to retain the most competent employees, male or female. Therefore, the firm works with a number of measures to encourage our associates to focus on the partnership track. These include external mentoring, membership in different networks, and promoting a leadership program for senior associates on parental leave.





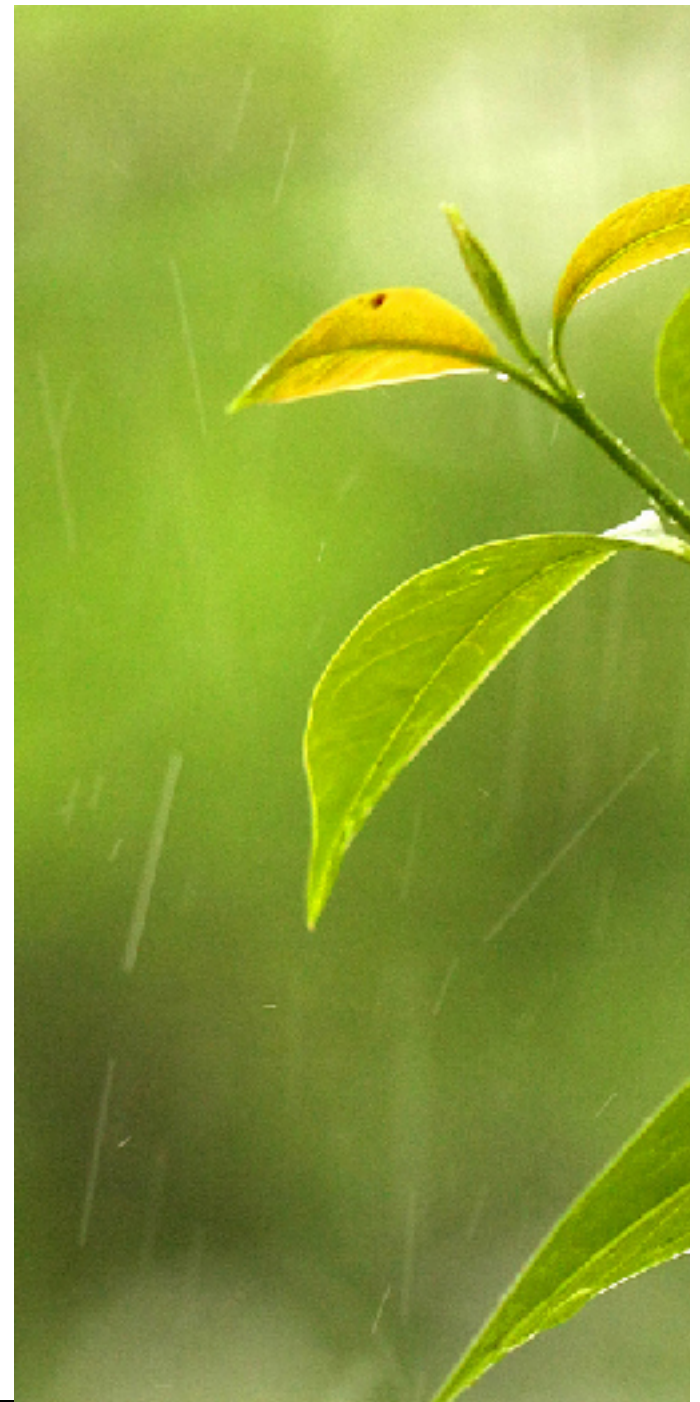
## Equality in the work place

- To assist with the many challenges encountered by being a high performing individual at Hammarskiöld & Co, we have a service agreement with a home care company, which provides a wide range of housekeeping services through quality assured sub-contractors. In exchange for a service charge, our employees receive assistance with small, daily chores which take time and energy.



### 3. Caring for the environment

- Within the project, we identified four main groups to which our environmental efforts are focused.
  - Energy
  - Purchase
  - Recycling
  - Travels



# Energy

- We are working to improve energy monitoring and reduce Hammarskiöld & Co's impact on the environment, especially the use of heating, electricity, and water consumption. Our office is situated in an old 17<sup>th</sup> century listed building, which affects the kind of measures that can be taken. We are however continuously improving energy efficiency while steering towards renewable sources.
- During 2015, Hammarskiöld & Co has started a close co-operation with our landlord on a climate project aimed at improving the interior climate in the premises by installing a ventilation system for supply of cool air. This increases the energy efficiency by contributing to easier heat recovery. This project will be on-going for several years.
- As from 1 January 2015, our office has a separate electricity meter that is separated from other electricity consumption in the office building. In 2015, our energy consumption decreased by 10.8 per cent compared to 2014.



# Energy

- In 2014, our Office Manager started a project together with external consultants in order to reduce our energy consumption by reviewing different types of sources of light used in our offices. The project resulted in an action plan that was introduced in 2015, cutting our energy consumption related to electric lightning by 70 per cent (corresponding to an annual reduction of CO2 by 150 tons per year). This project continues in 2016 as it turned out that the currently available sources of LED-light are often not compatible with the electric fittings at the office.
- Since 2014 Hammarskiöld & Co's IT department has worked systematically to reduce the number of individual appliances in the company's machine park. For example, the number of individual desk printers has been reduced by 45 per cent, saving both energy and other consumables such as ink cartridges, as well as saving costs.

# Purchases

- We have adopted procurement policies to ensure that environmental aspects are considered when purchasing supplies and services for the law firm. Hammarskiöld & Co also maintains an active discussion with our suppliers to improve transportation and delivery routines and avoid unnecessary transport.
- In 2014 our Office Manager started working with Hammarskiöld & Co's main supplier in order to establish which of the products we purchase have the most significant environmental impact.
- Increase our purchase of eco-labelled products which resulted in that 27 of our 155 most common products being exchanged for better alternatives.
- An important goal for 2015 was to discontinue the use of bottled water, which resulted in a significant decrease of re-occurring transport – one of our goals for 2015.

# Recycling

- Improve recycling and waste disposal.
- Since 2014 Hammarskiöld & Co increased the number of different fractions that we recycle.
- All waste from the office except food waste is categorized and sent for recycling.
- During 2015 we could note that food waste is the only waste that we still do not have a possibility to recycle.
- We aim to reduce our paper by increasing digital information send-outs and decreasing unnecessary copying/printing.



## Travels and transportation

- Hammarskiöld & Co's ambition is to, as far as possible, chose the most cost-effective travel alternative with the lowest possible impact on the environment.
- Transportation to and from the office must, to the greatest extent possible, be done eco-efficiently by increasing the use of vehicles powered by renewable energy.
- During 2014 our administrative departments have worked actively with their respective suppliers to reduce the number of transports.
  - From 320 per year in 2013 to 200 in 2014, a reduction by 40 per cent
  - Goal for [2016] to reduce the number of transports further to 160 per year.

## 4. Anti-corruption

- Our business principles require that we always comply with the applicable laws and regulations. Hammarskiöld & Co has a zero tolerance policy for corruption and bribery.
- Hammarskiöld & Co has an appointed ethics committee that oversees our employees' compliance within the areas of anti-corruption, insider trading, anti-money laundering requirements, and the rules and regulations of the Swedish Bar Association. The ethics committee is responsible for our internal policy relating to anti-corruption, insider trading, anti-money laundering, and conflicts of interest.
- All of our employees are given continuous mandatory education about anti-corruption, including instruction on what to do should they encounter or suspect it. Every other year we revisit the course material and instruct all of our employees to complete the mandatory online course on the prevention of money laundering.

## Anti-corruption

- Hammarskiöld & Co's unique Client Acceptance Committee reviews and approves all new client admissions and requests, assuring that all new clients fulfill our ethical requirements and that they are compatible with Hammarskiöld & Co's business model. We also have comprehensive IT and record keeping systems in order to identify any potential conflict of interest that could arise. These systems include processes for identifying and conducting due diligence on new clients in compliance with Swedish anti-corruption rules and regulations.
- During the "Almedalen week" 2015, Hammarskiöld & Co held a joint seminar with ICC Sweden, focusing on anti-corruption programs in the business sector. The seminar was part of a one-day initiative against corruption, arranged by Transparency International, the Swedish Anti-Corruption Institute, and the American Chamber of Commerce in Sweden together with a number of organizations and business partners.



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