Delphi

2023/2024

Sustainability report



I am delighted that you have found our sustainability report. It means that you, just like us, want to create change and improvement. In a very troubled world, marked by wars, injustices, and climate threats, we all need to take responsibility and make efforts to make a difference. Our sustainability work aims to make change for the better and are a core element that permeates our entire business – from our external legal advice to our internal projects and processes, as well as our non-profit initiatives. By reporting our efforts, we want to continue building sustainable and strong relationships with clients, employees, and other stakeholders who share our values and goals.

This report provides a comprehensive insight into the firm's commitment to conducting a sustainable business law operation and covers several different areas within environment, social responsibility, and ethics. The report includes, among other things, Delphi's

plan to reduce the operations' climate footprint and which climate projects the firm is investing in. The report also describes the efforts Delphi makes to promote equality and diversity in the legal profession, as well as the non-profit community engagements the firm undertakes. Furthermore, the report addresses Delphi's ethical framework and how the firm ensures fair and responsible operations.

I am proud to see that our sustainability efforts are recognised and appreciated by clients as well as law students in various rankings and surveys. It is proof that our work makes a difference and that we are on the right track. But we will not settle there. We will continue to challenge each other, our clients, and the industry to constantly try to pave the way forward. A proactive and long-term sustainability effort is absolutely crucial for our business.

Delphi turns 40 this year. We have come a long way and much has happened in

40 years. We have navigated through many crises. From the real estate crisis in the 90s, the IT crash in 2002, and the financial crisis in 2008 to the corona pandemic. We have also won many awards and received numerous honors, including Law Firm of the Year, the Justitia Prize, and Great Place to Work. We have been top ranked by international ranking institutes such as Chambers and Partners and The Legal 500. However, Delphi's core has always remained the same. Delphi is, now and then, a proactive and brave law firm. We dare to think differently and go our own way, which perhaps may be the key to our success.

Thank you for taking the time to read our sustainability report and thanks to all our employees who do a fantastic job every day for each other, our clients, and society.

Enjoy your reading!





Stefan Erhag
Executive Partner
/ Advokatfirman Delphi

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About us.

Delphi is a progressive law firm with respected specialists in most areas within business law. We tailor our service, expertise and offers to match each client's business needs, by combining deep business understanding with new smarter ways of thinking. We provide clear advice and recommendations based on each client's unique business challenge, as a strategic partner to our clients. We pave the way forward, by challenging each other, our clients, and the industry. Always aiming for our main objective – the best business.

We have the same strong drive, whether it concerns mergers and acquisitions, capital markets, EU and competition law, litigation and arbitration, or legal matters within areas such as IT, tech, and outsourcing – and much more. With us, each client gets a skilled partner with deep knowledge of their world, to help make successful decisions.

We are a different law firm. We dare to think new. We dare to go our own way.









150

46 500

offices

employees

lawyers

partners

MSEK turnover

We love challenges.

Our employees are our key focus. They make it possible for us to provide first-class legal advice to our clients. Therefore, we aim to be a progressive workplace where our employees thrive and develop. We invest heavily in our employees' development so they can deepen their specialist skills, business know-how, and above all, their leadership. Our core values come from our own culture and are well established within the firm. They guide our daily and long-term work, and our conduct going forward.

• We always go that extra mile

We never settle for good enough, instead we always find new ways to create added value for our clients.

Transparency and honesty

To gain confidence and trust, transparency and honesty is vital in everything we do and say. This creates the base for equality and the possibility for everyone to be an influential part of our success.

Developing leadership

Our employees are our most important asset and we honour and build personal- and team leadership so that everyone can reach their full potential and make a significant difference



Being a sustainable firm is part of our business plan. For us at Delphi, sustainability transcends our entire business. Sustainable thinking means that everything we do is characterised by competence, reflection and responsibility for our clients, co-workers, and society. As a result, our aim is to always be proactive and develop our work and use of resources as efficient as possible. Regardless of whether it concerns minimising our environmental impact, or our ambition to be the most attractive workplace. Our vision is to take responsibility for our employees, fellow people, and the environment to contribute and take part in making society a better place. We see this ambition as a natural and ongoing part of our daily work.

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Sustainability at Delphi.

Delphi's sustainability report aims to compile our sustainability efforts, achieved milestones, and future plans. Our ambition is to be transparent towards existing and future clients, current and future employees, collaboration partners, and other stakeholders. The report is drawn up in accordance with provisions of ÅRL 6 kap, even though we are not yet subject to the reporting requirements. Our sustainability plan is developed based on our current conditions, but we always strive to continuously develop the work and broaden our responsibility.

The sustainability report is based on completed and planned activities within environmental, social, and economic fields. Within the firm, in society and in our legal advice. Our internal sustainability efforts focus on our employee's competence development and well-being, increased diversity and gender equality, environmentally friendly and climate-promoting measures, as well as ethics and regulatory compliance. In society, we contribute by providing free legal advice through our pro bono partnerships, encouraging youth in vulnerable areas to pursue further education, and supporting selected organisations.

Delphi's sustainability work is primarily conducted at all our offices, however, minor variations may occur within certain areas.

The global goals and our commitment.

Agenda 2030 and the UN's global goals for sustainable development guide our operations and all parts of our strategic sustainability work. We have analysed our internal strengths and weaknesses in environmental, social, and economic sustainability. We have also analysed our external opportunities to maximise the positive impact of our sustainability work and the external threats and risks which might stand in the way of our progress. We have identified our main stakeholders as partners, employees, law students and other potential employees, potential and existing clients, suppliers and other partners. Based on these analyses, as well as requirements and expectations from our stakeholders, we have identified six goals with strong connections to our business, and where we can make a major difference. In the following chapter we present our work.



Gender equality (SDG 5)

Gender bias is undermining our social fabric and devalues all of us. It is not just a human rights issue; it is a tremendous waste of the world's human potential. By denying women equal rights, we deny half the population a chance to live life at its fullest. Political, economic and social equality for women will benefit all the world's citizens. Together we can eradicate prejudice and work for equal rights and respect for all.



Decent work and economic growth (SDG 8)

Economic growth should be a positive force for the whole planet. This is why we must make sure that financial progress creates decent and fulfilling jobs while not harming the environment. We must protect labour rights and once and for all put a stop to modern slavery and child labour. If we promote job creation with expanded access to banking and financial services, we can make sure that everybody gets the benefits of entrepreneurship and innovation.



Reduced inequalities (SDG 10)

Too much of the world's wealth is held by a very small group of people. This often leads to financial and social discrimination. In order for nations to flourish, equality and prosperity must be available to everyone – regardless of gender, race, religious beliefs or economic status. When every individual is self sufficient, the entire world prospers.



Responsible consumption and production (SDG 12)

Our planet has provided us with an abundance of natural resources. But we have not utilized them responsibly and currently consume far beyond what our planet can provide. We must learn how to use and produce in sustainable ways that will reverse the harm that we have inflicted on the planet.



Climate action (SDG 13)

Climate change is a real and undeniable threat to our entire civilization. The effects are already visible and will be catastrophic unless we act now. Through education, innovation and adherence to our climate commitments, we can make the necessary changes to protect the planet. These changes also provide huge opportunities to modernize our infrastructure which will create new jobs and promote greater prosperity across the globe.



Peace, justice and strong institutions (SDG 16)

Compassion and a strong moral compass is essential to every democratic society. Yet, persecution, injustice and abuse still runs rampant and is tearing at the very fabric of civilization. We must ensure that we have strong institutions, global standards of justice, and a commitment to peace everywhere.

The descriptions above are the global goals definitions. In the following sections, we describe what the goals mean for us and how we contribute to the global goals in general.

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1. Gender equality.

Although the number of women in leading positions within the legal profession increases, men are still the overwhelming majority of partners in the larger commercial law firms. On average, three out of four partners are men. Concurrently, there are more women than men studying and graduating from law school. For several years, Delphi has worked actively with gender equality issues to even out these differences. We want to create a sustainable and attractive workplace for current and future employees. Equality is an obvious matter of justice, and to be successful – an absolute necessity for us and our clients.



In accordance with the goal **Gender equality (SDG 5**) we have chosen to focus more specifically on the following targets:

- 5.1 End discrimination against women and girls
- Value unpaid care and promote shared domestic responsibilities
- 5.5 Ensure full participation in leadership and decision-making





Justitia Prize

The Justitia Prize (Justitiapriset) is an award that recognises significant contributions to gender equality in the legal profession. Delphi has been honored with the Justitia Prize in 2021 and 2017, as well as the Initiative of the Year Award in 2023 for the Parental Group. The Parental Group is an internal platform where lawyers can regularly meet, share experiences, and find practical solutions to the challenges that arise when parenthood and work are combined.

For the first time, the Justitia Prize launches the prize Initiative of the Year, aimed at highlighting concrete efforts to achieve measurable results in gender equality and diversity. This year, the Justitia Prize wanted to recognise the important work of tackling one of the biggest barriers to gender equality in the legal profession: the perception among many lawyers that it is not possible to combine demanding work with active parenthood. The Initiative of the Year is awarded to a firm that convincingly addresses this issue by providing a platform for exchanging experiences and practical solutions. The firm has also established clear guidelines for the firm's expectations and practices to enhance the prospects of reintegrating employees into work after parental leave. At a time when parental leave is still predominantly taken by women, measures that enable the combination of career and parenthood are crucial. The winner of the Initiative of the Year 2023 is Delphi's Parental Group.

Justitia of the Year

The Justitia of the Year is an individual award presented alongside the Justitia Prize to a person who has made significant contributions to gender equality in the legal profession. In 2019, the award went to Delphi's partner Agnes Hammarstrand, and in 2023, John Neway Herrman, Senior Associate, received the honor, primarily for his involvement in the business network Delphi Young Business Forum.

The winner of the Justitia of the Year has demonstrated a solid and longstanding commitment to gender equality and engages in the issue in multiple ways. He has initiated a diversified platform (Delphi Young Business Forum) where young lawyers can connect with each other for social and professional exchange. Furthermore, together with Linn Strömberg, he has launched the Parental Group at Delphi, which supports lawyers in balancing parenthood and work. The Justitia of the Year also provides training for junior associates aimed at supporting them in their networking and sales activities. Another objective is to coach the junior associates to view factors such as gender, background, and age as strengths rather than obstacles. His numerous and wide-ranging initiatives have thus been significant from both a gender equality and an equity perspective. The winner of the Justitia of the Year 2023 is John Neway Herrman.

The Justitia Prize

The Justitia Prize

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/ Gender equality

Information and education

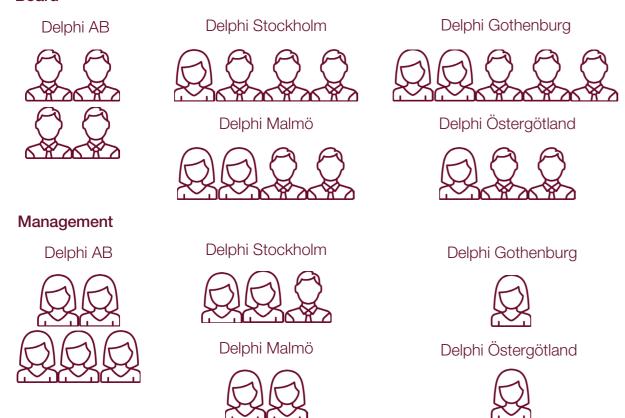
At Delphi, gender equality is an important topic at board meetings, partner meetings and staff meetings. This issue must always be prioritised and be processed. Every year we also organise workshops and seminars on diversity, equality and inclusion with external lecturers who are experts in the field. These courses are mandatory for all employees, and with topics ranging from unconscious bias and how to build an inclusive corporate culture. We also get inspiration from other companies beyond the industry that have succeeded in these matters.

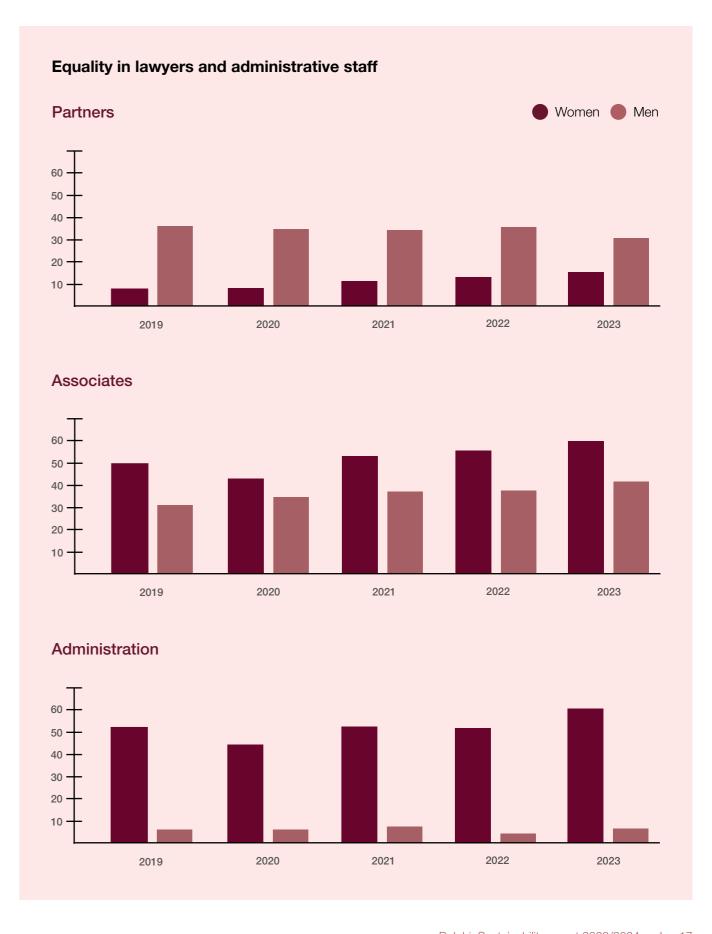
Statistics on gender

To prevent discrimination and promote gender equality, we strive for as equal gender as possible in all departments, across all categories of employees, and in leadership positions. We are not there yet, but we are moving in the right direction. According to the latest industry report from Affärsvärlden, the average percentage of female partners in commercial law firms in Sweden was 24 percent, while the corresponding figure at Delphi was 35 percent as of the end 2023. We maintain ongoing statistics that are compared with previous years and are reported in the activity report of the equality group.

Equality in board and management

Board





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/ Gender equality

Inclusive leadership

We have several customised leadership programs for senior associates and partners as part of our internal program, *Delphi Academy*.



Delphi OnboardingAssociates
level 1-4



Delphi Business School Senior Associates level 5-8



Delphi Leadership
Partners

Our programs aim to ensure our employees' legal competence, business understanding, and leadership skills. It is important for us to integrate good leadership into our culture as we believe that effective leaders are essential for creating a sustainable workplace.

Senior associates from level 5 participate in the Delphi Business School, where they are trained in project management, business acumen, and self-leadership, among other topics. For newly appointed partners, we have an onboarding program that focuses on leadership and business acumen. For more senior partners, we offer training programs that focus on strategic, operational, and cultural leadership.

Inclusive leadership is an integral part of all these programs, and each year the firm's partners are evaluated by their employees regarding the extent to which they have contributed to a more gender-equal corporate culture. Employees also evaluate themselves annually on how they perceive their contribution to a more gender-equal corporate culture. Senior associates and partners also evaluate themselves and others through Delphi's 360-degree evaluations, followed by external coaching. The results are discussed with the immediate supervisor with the aim of developing the individual's leadership abilities.

As part of our gender equality efforts, we created a mentorship program for junior associates in the firm in 2017. The purpose is to provide younger lawyers with the opportunity to expand their internal network within the firm. In addition to networking, the program allows us to identify challenges and issues that arise in our operations. It is also a unique opportunity for junior associates to gain a deeper understanding of our business.

Competence development and actions to counteract discrimination

Delphi's equality group aims to create a gender-equal and inclusive workplace where everyone can develop on equal terms. The goals of the group's work include retaining and developing our talents across all categories of employees at Delphi and ensuring that no employee feels treated differently because of their gender. This is followed up through employee surveys, regular follow-ups, exit interviews, and individual employee discussions.

The group also annually monitors Delphi's gender equality efforts by developing and comparing a number of Key Performance Indicators (KPIs) established by the group according to:

Billable hours for male lawyers and female lawyers as a percentage of the budget.

Progress regarding gender distribution upon election of new shareholders.

Progress regarding gender distribution among partners and other personnel categories.

Analysis of exit conversations should the reason for termination concern gender equality issues. The analysis is reported to partners and board annually.

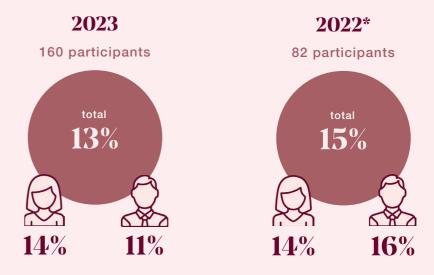
The percentage of employees that experience gender discrimination – measured through continuously conducted surveys.

Measure "total satisfaction" through continuous conducted employee surveys.

Each year, the group produces a report with outlined goals, action plan, KPIs and measures. The report is available to all employees on Delphi's intranet.

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The number of employees at Delphi that believe that employees at the firm are treated differently based on gender:





* In 2022, the measurements where only made in Stockholm



Statistics for parental leave

We keep statistics with annual follow up on our employees' number of days of parental leave, linked to gender. The statistics are presented in the equality group's annual activity report.

2023	3091 days in total	2 396 Q days were used by 19 women	695 days were used by 7 men
2022	2445 days in total	1962 Q days were used by 20 women	483 days were used by 7 men
2021	1845 days in total	1 474 Q days were used by 20 women	371 days were used by 10 men
2020	1210 days in total	822 Q days were used by 18 women	388 days were used by 9 men
2019	1 610 days in total	1136 Q days were used by 23 women	days were used by 9 men

Statistics for client and internal hours

Regarding the statistics for client and internal hours, we measure external hours (client) compared to internal hours (trainings, workshops, internal projects, etc.) to see if there are any difference between the sexes. We also measure to see how billable hours differ between male and female lawyers, as a percentage of the budget. This information is included and published on the intranet as part of the equality group's annual report.



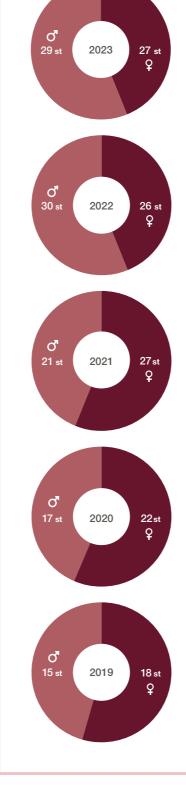


Equality within the partner group and other employee categories

Another KPI that is followed up on an annual basis is the development of gender distribution within the partner group and across all other employee categories. The goal is to achieve as equal gender distribution as possible in all groups. From 2022 to 2026, we aim to have a totally equal distribution between men and women in the selection of new partners and a totally equal distribution between men and women in new hires within administration. We prioritise the underrepresented gender in recruitment if candidates have equivalent qualifications. To increase the proportion of female partners, it's crucial that the candidates for new partner selections is diverse, meaning there is an equal gender distribution among our senior lawyers.

Exit due to equality issues

Our offboarding routines include exit talks with every employee before they leave. During the exit talks, reasons for termination are discussed, and the employee is always asked if they have experienced any harassment or discriminatory treatment during their employment. At the end of the year, an analysis is conducted based on the information gathered in the exit talks to gain a deeper understanding of why employees choose to leave Delphi. The analysis is anonymised and presented to the management team and the board. No one has reported harassment as a reason for leaving their position, and our goal is to maintain it at that level in the future. Other reasons such as work-life balance and leadership issues are also communicated to management and the board and are followed up on.

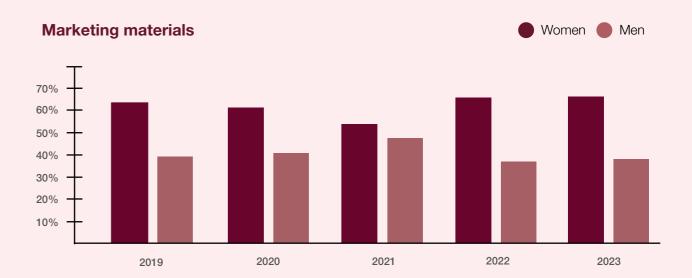




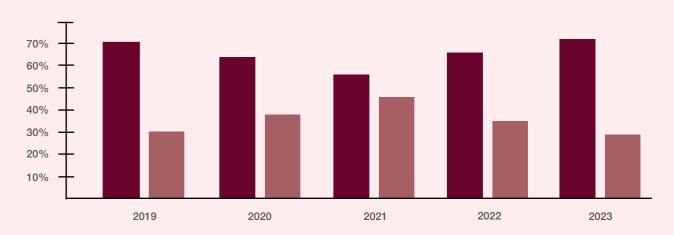
Gender distribution in marketing

Since 2019, we annually measure the proportion of men and women who appear in our marketing. We keep statistics on marketing images, posts on Delphi's social media, our website, presentation templates, image bank, et cetera. We also keep statistics about the gender distribution of participants from Delphi representing the firm at various types of external events connected with recruitment. All KPIs are reported and followed up by the equality group.

261 Likes 17 Comments 3 Shares



Participants at events



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2. Decent work and economic growth.

Our co-workers are our most valuable asset, since they enables us to deliver high-end legal advice. Therefore, it is very important for us that we present a workplace where our employees feel comfortable, can be challenged, thrive, and develop. We strongly believe that great results are created when employees are allowed to grow in their professional role, participate and influence, and are given the opportunity to reach their full potential. We pave the road forward, by challenging each other, our clients and the industry. Always aiming for our main objective – the best business.



We have chosen to focus more specifically on the following targets linked to the goal **Decent work and economic growth (SDG 8)**:

8.1	Sustainable economic growth
8.5	Full employment and decent work with equal pay
8.6	Promote youth employment, education and training
8.8	Protect labour rights and promote safe working environment























Rankings and awards

Delphi is highly ranked by reputable international ranking institutes such as Chambers and Partners, The Legal 500, and IFLR1000, and has been top ranked in the Swedish review Law Firm of the Year several times, most recently in 2023 when we won the category Law Firms 200+ MSEK. Recently, we were also awarded Excellence in Client Relations by Regi, a symbol indicating high client satisfaction and a high recommendation value according to our clients. Delphi is also ranked seventh among commercial law firms by law students in Universum's latest student ranking, The Most Attractive Employers of 2024. Additionally, we have received the Justitia Prize three times for our gender equality efforts and have been certified according to Great Place to Work's international standard since 2021.

What makes Delphi unique according to clients?

Easy to get in touch with, responds quickly, has broad knowledge, and brings in additional expertise when needed. Additionally, the individuals we have the most contact with are very nice.

Client, Law Firm of the Year 2024

Competence, experience, effective communication, commitment, results, knowledge, business understanding, adaptability.

Client, Law Firm of the Year 2024

Delphi is a very approachable and attentive law firm and we receive good, tailored advice. They really deliver well.

Client, Chambers and Partners, 2024

The lawyers at Delphi always keep a creative mindset to find solutions for our business.

Client, Chambers and Partners, 2024

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To integrate a good leadership in the work culture is important – that our managers are good leaders is a necessity for us to be a sustainable workplace.

Increasing competence

We always aim to deliver first-class advice to our clients. To stay ahead in our fast-paced business, with legal and technological development, we make sure our employees get new insights, understanding and increased knowledge. At Delphi we provide tailor-made training programs for our employees, within *Delphi Academy*, that continuously adds competence, so they can keep up with our everchanging world.

Our programs aim to ensure our employees' legal competence, business understanding and leadership. Integrating inspiring leadership in the business culture is important. Making sure that our managers are excellent leaders is the key to making us a sustainable workplace.

In addition to Delphi Academy, we offer several opportunities for development:

- Secondment and exchanges
- External network programs
- Sponsorship and mentorship programs
- Delphi Young Business Forum
- 360 evaluations with coaching
- Individual funds for external educations
- Delphi Select individually adapted training courses for further education and individual opportunities for development

Delphi Academy

Delphi Onboarding

Associate

Delphi's culture

Legal competence development

Digital tools & Al

Business finance/business analysis

Legal design

Delphi Business School

Senior Associate / Counsel

Delphi Leadership

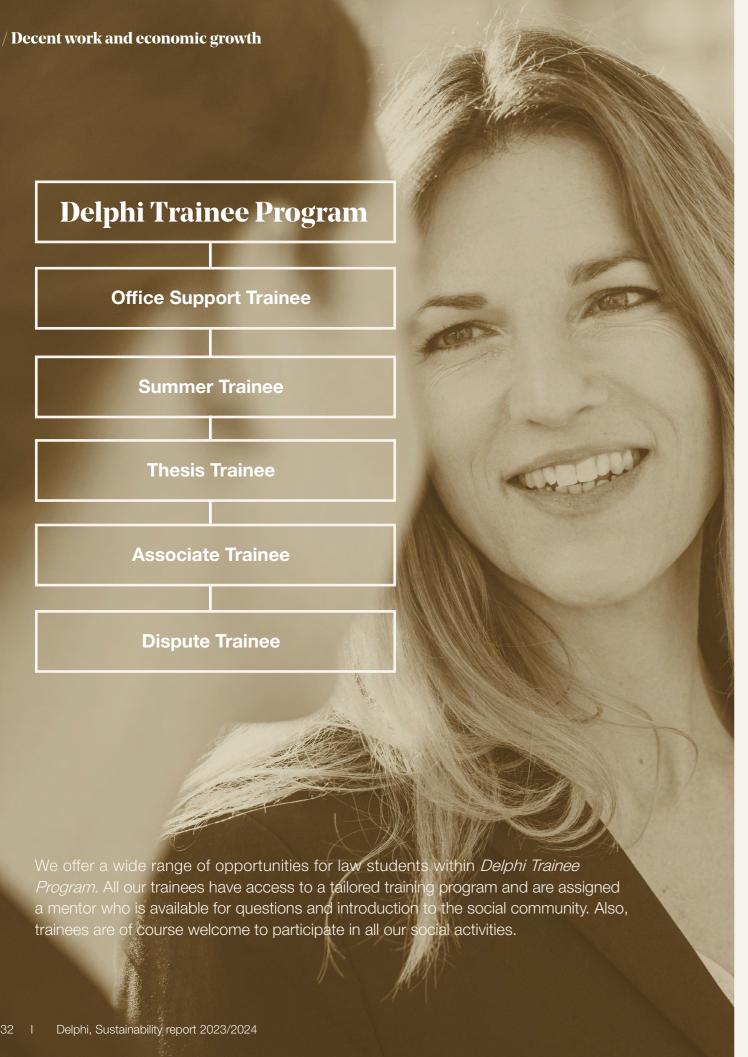
Partner

Leadership & project management

Entrepreneurship & acquisition

Legal specialisation

Personal branding



Employee satisfaction survey

Delphi conducts regular surveys throughout the year to continuously understand the organisation's well-being and to quickly address various issues if needed. Additionally, every year, we conduct a larger employee survey in collaboration with Great Place to Work, as a complement to the regular surveys. In the latest Great Place to Work survey, an impressive 91 percent of all employees at Delphi answered that they think Delphi is a great place to work at – that is the highest result we have achieved since starting the survey.



Salary mapping

We conduct a salary survey every year and analyse the results. We map the salaries in the different staff categories based on gender to ensure there are no unjustified differences. For this purpose, we use external experts who provide a state-of-the-art tool for analysis.

A sustainable working life

At Delphi, we strive for all our employees to have a healthy work-life balance and we aim to facilitate our employees' ability to combine work with parenthood. We implement smart meeting times and therefore schedule recurring internal meetings between 9 am and 3 pm. We adapt which projects and clients employees work with in certain phases

/ Decent work and economic growth

of life (such as during the early years of parenthood), and we always aim for an inclusive approach with clear communication so that everyone understands what is happening and why various demands, such as deadlines, are set. In 2022, the Parenting Group was also launched, with the aim of providing an internal platform where lawyers can regularly meet, share experiences, and find practical solutions to the challenges that arise when combining parenthood and work.

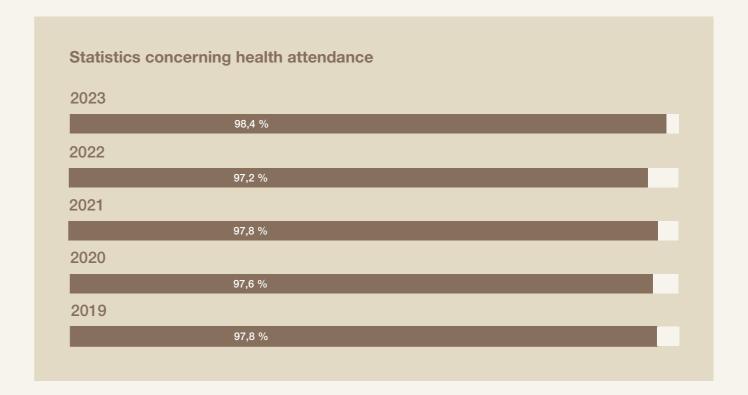
We regularly monitor the development of a sustainable work life through employee surveys and discussions. In addition, we conduct regular surveys where questions about sustainable work life are captured, making it easier to monitor how our employees are doing in real-time. The results are discussed and followed up in smaller groups. In addition to the regular surveys, we engage in ongoing dialogues with, among others, our work-related health and safety committee and our junior associates committee to capture the distinctions of certain issues and to gain an overview of the topics more easily being discussed in the organisation. Two representatives from the junior associates committee are regularly invited to the management team to enable a good dialogue between management and associates.

Illness prevention

Stress-related illnesses are unfortunately common at many law firms. To reduce stress and promote balance and recovery we actively work on different types of health promotion efforts. We look at workload on an individual and group level every week, focusing on the wellbeing of employees and the organisation.

We provide preventive aids including health insurance and occupational health. If an employee wants, they can have ergonomic briefings and annual health checks. If needed, there is also individual help from the occupational health care services. We also have health coaches connected to the company that can be used in consultation with HR or manager.

Through our health program *Delphi Healthy* we look to strengthen our employee's mental, social and physical health by offering a variety of initiatives such as workouts, health activities, mental health exercises and lectures about health.







Sustainable recruitment

A strategically important focus for Delphi is the ability to recruit and retain the right talents over time. To succeed in maintaining a balanced and strong workforce, we need to continuously replenish with new employees. Our strategy and ambition are to have best practice leadership combined with challenging and complex cases and individually tailored development opportunities.

We actively engage in establishing connections with law students during their studies to communicate our employer offering and what we stand for. We believe in being open and transparent about who we are and what we offer to attract, for us, the right employees who stay long-term. To establish suitable connections, we participate in career fairs at various universities and also organise smaller gatherings for students through different associations.

Delphi Talent Day is our major annual recruitment event where law students from across the country have the opportunity to visit and get to know Delphi and our employees. Through Talent Day, we identify our brightest talents and future colleagues.

Some comments from the 2023 event:

"Delphi is on top of my list of employers I want to apply to after graduation!"

"I really feel like the atmosphere at Delphi is better than many other firms of the same size."

"Delphi feels like a pleasant workplace and attracts nice people. Everyone at the event (both employees and students) was super lovely, and there was a pleasant atmosphere."

Friends of Delphi, our knowledge platform offered to law students, aims to prepare students for the professional world and bridge the gap between the theory and practice of business law. Here, we provide articles, webinars, e-learning modules, templates, and much more. We also host exclusive events, trainings, and workshops for our Friends of Delphi members, who numbered approximately 1,600 as of the turn of the year 2023/2024.

/ Decent work and economic growth

Flexibility and alternative workplaces

The new normal at Delphi, after the pandemic years, is that our employees have a higher degree of flexibility in their daily lives with the opportunity to work remotely two days a week, if it aligns with their tasks. However, we still see the office as our primary workplace. The main reason for this is our belief that personal interaction is incredibly important for nurturing Delphi's corporate culture, facilitating interaction among our employees, enabling smooth knowledge and information exchange, and facilitating important further education and development.

What we noticed during the pandemic years is that the majority of our senior associates experienced benefits from remote work in terms of opportunities for recovery, increased focus, and better work-life balance. However, our junior associates more frequently missed the sense of community and access to daily knowledge transfer and guidance. Risking the loss of such knowledge transfer would pose a significant risk to the continued employee development in a knowledge-based company like Delphi. Last but not least, we also think it's very nice to see each other in person!

Employee benefits and business activities

Delphi offers employee benefits such as occupational pension, healthcare allowance, enhanced parental allowance and healthcare insurance. In 2023, we also installed RedLocker, a vending machine with free menstrual products, at our office in Stockholm. Delphi also organises various types of health activities as part of *Delphi Healthy*, including running sessions, yoga classes, personal training sessions, paddle tennis, outdoor days, and much more. We also arrange team-building activities and events such as conference trips, after-work gatherings, summer and holiday parties, kick-offs, and similar occasions.

Governance documents

Our governance documents and policies are available to all employees on our intranet, including for example:

- Anti-corruption policy
- Al policy
- Alcohol and drug policy
- Work environment policy
- Sustainability policy
- Integrity policy
- IT safety policy
- Equality policy
- Quality policy
- Environmental policy
- Facility rules policy
- Anti-harassment and offensive discrimination policy
- Travel policy
- Code of conduct for suppliers
- Policy for whistle blowing

In addition to having all policies readily available on our intranet, we ensure compliance by having all new employees go through our onboarding program, which includes familiarisation with the policies. The policies clearly outline how to act in the event of an incident and specify who is responsible for compliance.



3. Reduced inequalities.

Delphi aims for diversity among employees, and a workplace that reflects Sweden's multicultural society of today. For us, it goes without saying that diversity not only enriches and creates new opportunities for our business, but it also gives us competitive advantages together with a more innovative and open working climate. Among other things this means that we must see, understand and honour all individual's competences and differences. Diversity also means that we can assist our clients in a better way, by using different viewpoints and insights, but also through language skills and diverse cultural understanding.



Linked to the goal **Reduced inequalities (SDG 10)** we have chosen to focus on the following targets:

10.2

Promote universal social, economic and political inclusion

10.3

Ensure equal opportunities and end discrimination



/ Reduced inequalities

Policy on discrimination and offensive treatment

Delphi has a policy and an action plan concerning discrimination and offensive treatment and reprisals. The policy defines our view on harassment or offensive treatment and how we can act proactively to avoid them. It dictates the leaders and employees' responsibilities and how we as the employer should handle any harassments, offensive treatments, and reprisals. It also states what to do for an employee that has been exposed to any harassment or offensive treatment.

To ensure compliance, the policies are available for all employees on our intranet. In our digital onboarding program for new employees, it is mandatory to take part of and agree upon these policies within a month of a new employment. We make sure this is implemented via our digital education portal.

Every year we conduct an employee survey, part of the survey specifically concerns harassment, offensive discrimination, and reprisals. The results are reported at the staff meeting that follows the completion of the survey. If any irregularities have appeared then it will be dealt with immediately.

Finding new ways and diversity work

The legal profession consists of a relatively homogeneous group of people. To increase diversity within the industry, we believe that diversity must be pursued both at individual law firms and at industry level to get optimal impact within reasonable time. Otherwise, stagnation is at risk with negative consequences for us as well as the industry.

Very few of our applicants have a foreign background or come from vulnerable areas. Because of this, we have committed ourselves for several years to find ways to get more applicants from these categories.

Seeing this as a long-term project we need to reach out to students earlier, from 7th graders up to high school to inspire and motivate them to go for higher education and especially get them interested in the legal profession and to study law. We believe this will contribute to a more diverse workplace in the long run.

We collaborate with NU: Nolla Utanförskapet and F1RST to bring light to the diversity issue. Together we arrange homework workshops, other workshops, study visits, we offer internships for those who are in 7th to 9th grade, we invite youths from segregated areas to inspirational seminars about working as lawyers and other types of legal professions.

During 2022 we began to collaborate with the mentoring program Öppet Hus where several of our employees acts as mentors. Öppet Hus is a non-profit association that is politically and religiously independent. They work towards opening doors to the job market, predominantly for young adults with a foreign background. Through their mentoring program, and in other ways, the association aims to promote, support and encourage young adults to work and continue their studies.

Fair recruitment

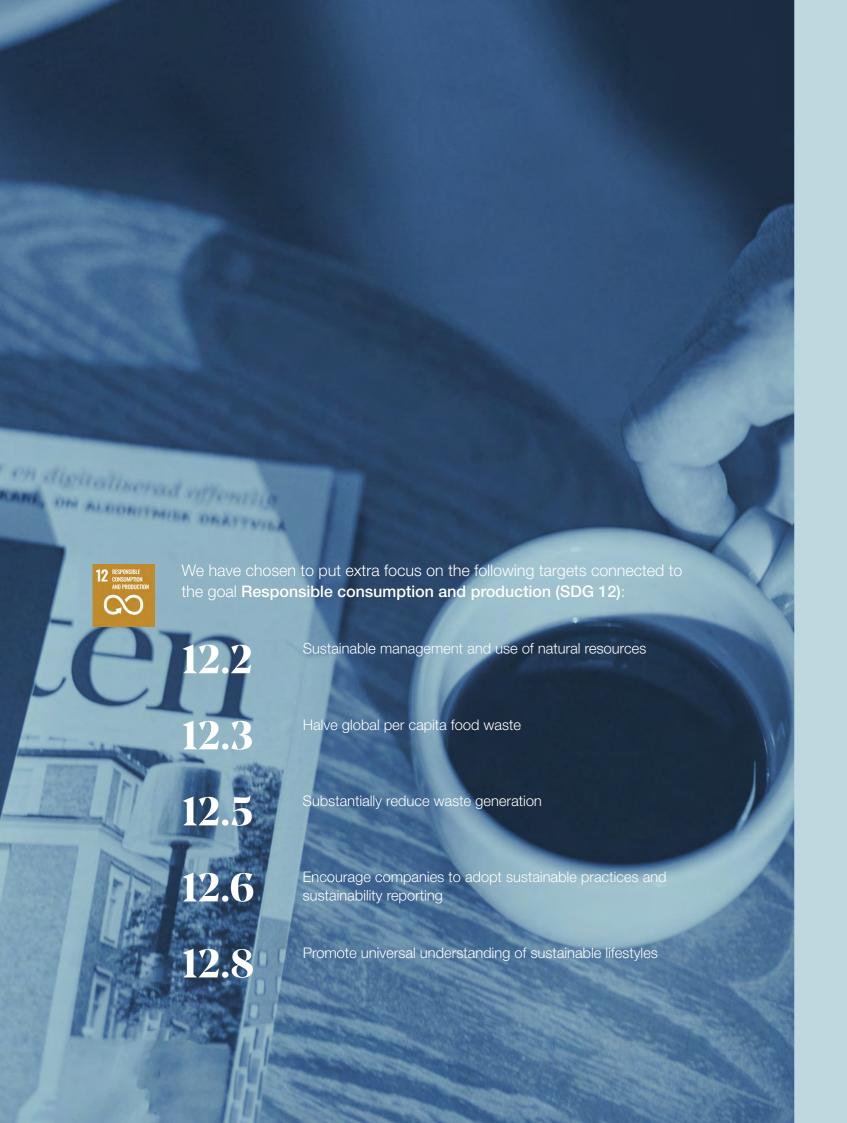
At Delphi we have several recruitment processes. Lawyers are often recruited via our annual event *Delphi Talent Day,* advertisements, or recruitment consultants. Administrative staff are mainly recruited via advertisements or recruitment consultants.

Regardless how the recruitment is done, we basically use the same process to ensure that all candidates are treated equally regardless of gender, ethnicity, religious affiliation, and sexual orientation. During the first part of the recruitment process, we use a digital tool, this means that the applications are received anonymously.

Selection takes place based on a collective assessment of personal letter, CV, education certificate and grades from the law program (applies to lawyers) no indications are shown about the individuals. The next step for candidates is to do a personality test and a problem-solving test. Based on the results, along with assessment of the application documents, a decision is made for candidates to move on to a first interview.

Next step is another interview with lawyers or administrative manager, depending on position, as well as an interview with HR based on the individual's responses to the personality test. The interview is competence-based and ensures that all candidates are asked the same questions. When we engage external recruitment consultants, we ensure that they also use non-discriminatory recruitment methods.





4. Responsible consumption & production.

To us sustainable thinking means that everything we do is characterised by competence, reflection and responsibility for our clients, employees, and our environment. As a result, our approach is the use of proactive thinking and developing our work to use resources as efficiently as possible. Regardless of whether it is to minimise our environmental impact or the aim to become the most attractive workplace. Our vision is to take responsibility for our employees, fellow people, and the environment, and contribute to the creation of a better society. This aspiration is part of our daily work, and ongoing. We believe changes, both small and large can make a difference, and all sustainability measures are significant. Our environmental impact as a service-producing company consists essentially of travel and transport, purchase of goods and services, waste, energy use and paper consumption. Therefore, we have looked at these areas with extra care, to identify where we can make a difference.

Information and education

Delphi conducts ongoing internal workshops and training sessions to inform and educate our employees on sustainability issues. It is also mandatory for all new hires to undergo training on Delphi's sustainability efforts as part of our onboarding program.

Climate smart offices

We are proud of our Stockholm office, which is located in Mästerhuset, a building which is state of the art in sustainable construction. Mästerhuset is Stockholm city's first LEED-certified office building in the Platinum level. It means that the building is at the absolute forefront of sustainable design, building technology and operation. All tenants have signed a green lease, meaning that we work long-term with environmental work, together with the property owner Pembroke. The lease describes the common way of working and exchanging information that the tenant and property owner have agreed on to reduce environmental impact in areas such as energy and indoor environment, material choices and waste disposal. From December 31, 2024, the area around Mästerhuset will be classified as an environmental zone class 3, which means that gasoline and diesel-powered vehicles are prohibited. The introduction of the environmental zone is expected to contribute to improved air quality and a faster transition to electric cars, lower noise levels, and reduced emissions.

In 2019, our Malmö office moved to the Epic property, which is the first office building in the Nordic region with pre-certificate according to WELL, and a certification from LEED. WELL is based on how the construction can support human health, wellbeing and productivity. Parts of the building consists of locally upcycled material. By refining and recycling building material locally, and avoiding long transports, the climate footprint is reduced. Epic was awarded Construction of the Year 2021 in the category hotel/office, by Byggindustrin.

Energy and water consumption

In Stockholm, our electricity supplier is Energi Försäljning Sweden AB. The company is licensed to sell electricity labelled Good Environmental Choice. This means that the Nature Conservation Society has approved the company to provide eco-labelled electricity. Our electricity is therefore produced according to strict environmental criteria. Our building is also one of Stockholm's most environmentally smart buildings, using 50 precent less energy than the criteria from Bolagsverket. Measuring and monitoring of the energy consumption in the building is very detailed. Approximately 19,000 different measuring points collect data every minute to measure room temperature, air quality, air flow, lighting, heat flow and cooling flow. There is also among 1,200 motion sensors in the building to further optimise the energy consumption.

To save resources, we always aim to make climate-smart choices when it comes to energy and water consumption. On a day-to-day level, we run our dishwashers when they are fully loaded and use the eco program, our light sources use low energy consumption, we turn off the lights and turn off computers when the offices are unmanned. Mandatory ventilation controls are carried out regularly, and sustainable storage of data is provided by our external IT-supplier. Their focus is on circular life cycle management of IT hardware and visualises the climate impact during the entire life cycle.

Sustainable business travel and deliveries

As a service company, business travel accounts for the largest share of our emissions currently. Just over one-third of our emissions come from travel. We actively work to reduce travel and strive to hold meetings and training sessions digitally whenever suitable. We prioritise environmentally friendly modes of transportation, such as trains over flights, whenever possible. We also provide loaner bikes for our employees and encourage choosing eco-friendly taxis if taxi transport is truly necessary. At some of our offices, we



/ Responsible consumption & production

also offer company bikes to employees. In early 2024, Delphi switched its travel booking service to Yehego, which promotes climate-smart choices in business travel. Yehego compares time, cost, and carbon dioxide emissions for different travel options.

Delphi collaborates with various bicycle couriers, such as Inte Bara Post AB, whose ambition is to provide as sustainable service as possible in the best way possible. They only use their electric and hybrid cars when necessary, such as when delivering outside the Stockholm tolls. Within the tolls, they use cargo bikes because they have no emissions at all. To reduce the number of courier deliveries, we prioritise digital solutions for signing contracts and similar documents, which also reduces the number of printouts.

Environmentally friendly handling of waste and recycling

We handle our food waste and practice waste sorting at all our offices. We have sorting bins in both staff kitchens and near our reception and preparation areas. We sort cans, glass, plastic, metal, food waste, and combustible waste. In separate rooms, we sort paper, cardboard, lamps, batteries, electronic waste, and more. Computers, mobile phones, and other electronics are always reused to the greatest extent possible. We aim to salvage and extend the lifespan of existing office furniture, for example, by repainting bookshelves, cabinets, et cetera, instead of purchasing new ones, and renting certain parts of the furniture. We continuously work to reduce the purchase of physical books and magazines in favour of more environmentally friendly options such as e-books, legal databases, electronic news services, among similar things.

Purchasing policy

Sustainability is a natural part of our entire business, and we firmly believe that even the smallest action counts. As a service company, the procurement of goods and services constitutes a significant part of our environmental impact. It is essential that the affected employees have clear guidelines for our priorities when purchasing products.

The aim of our purchasing policy is to ensure that we hire responsible companies and use resources as efficiently as possible, so we can reduce our negative impact on our environment and planet. The purchasing policy covers the categories food and drink, office supplies and consumables as well as hotels and conference.

Some guidelines when purchasing products are to choose eco-labelled and ethically certified products to the greatest extent possible, prioritise quality over quantity. We don't buy new products until the old ones are used up. We choose organic, locally grown and vegetarian food as much as possible, avoid plastic packaging and disposable items,



reuse office furniture, and when we purchase new, review the opportunity to buy or rent used ones, and we choose environmental certificated hotels and conference facilities.

When it comes to profile products, like the ones we hand out at student fairs and to employees, we always strive for products that are useful and sustainable. Sustainable considering both quality and material. We generally have a restrictive attitude towards handing out too many profile products and especially if they do not meet our sustainability requirements.

Careful use of consumables

We aim to avoid all types of paper printing as much as possible. To reduce our printing, it requires us to only print what is absolutely necessary. All our offices use so-called pull print solutions, meaning print management software that leads to reduced waste from incorrect and forgotten printouts. Delphi's policy is to always communicate digitally in the first instance; for example, only sending out digital newsletters, Christmas cards, et cetera, and when possible, we take our meetings and educational training over Teams. Our employees have access to double computer screens, this reduces the need to print documents as we for example counter read documents and several other databases and services with e-literatures, regulations, practices, digital journals and articles, et cetera, which has significantly reduced our purchases of physical books and newspapers.

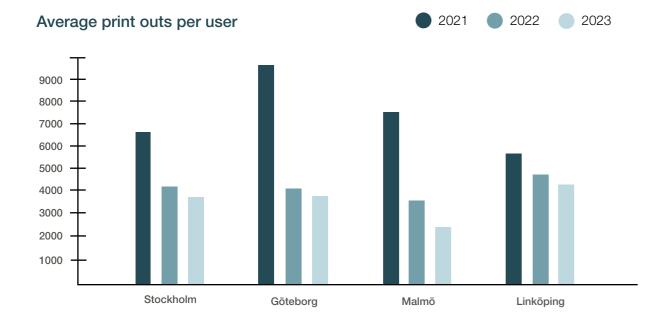
Furthermore, we only have digital pay slips, digital HR and evaluation processes, digital contract management systems, digital expense management, electronic archiving, and a fully digital invoicing process, which has greatly reduced our paper consumption. We encourage completely digital case management wherever possible, and we send the majority of our contracts for digital signing.

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Responsible consumption & production

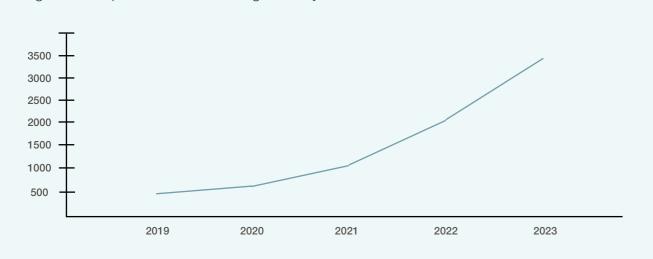
Paper consumption

We strive to print as rarely as possible and have made significant progress over the past three years. For printouts, we use Svanenmärkt (Nordic Swan Ecolabel) paper with double-sided printing as the default setting.

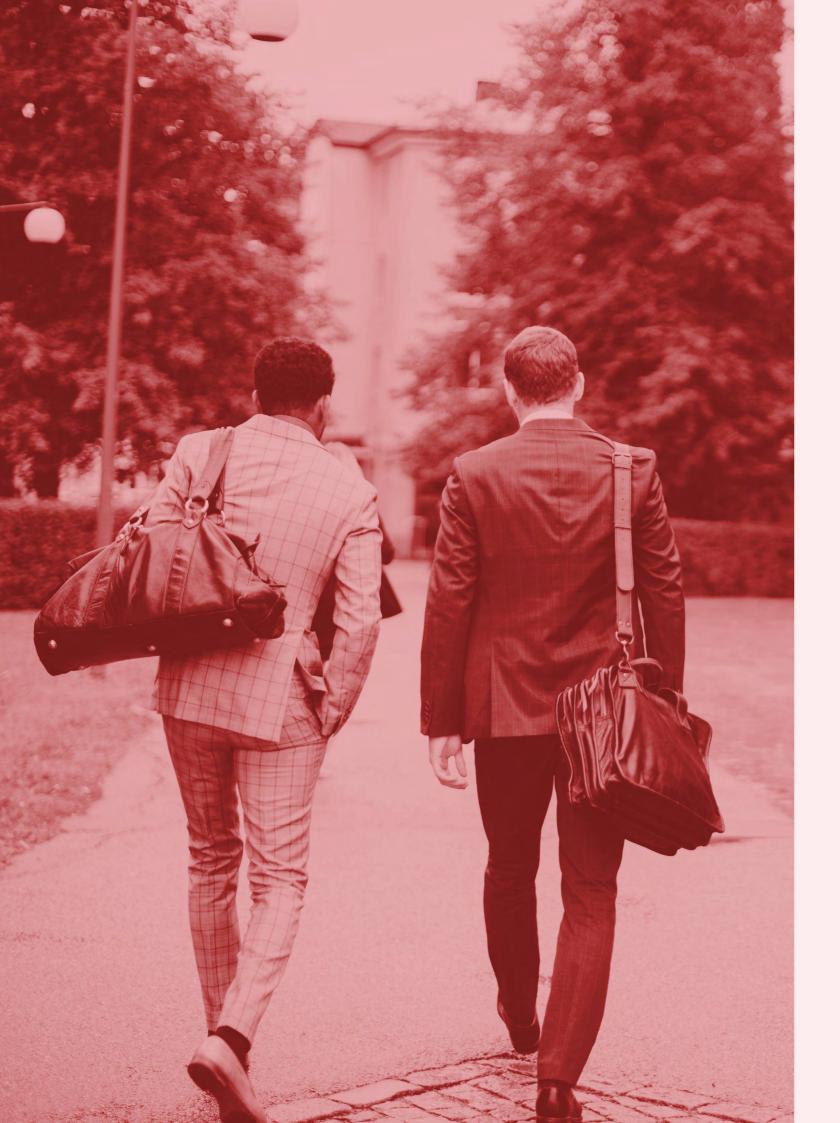


Digital signing

We use digital signings whenever possible. Over the past five years, the number of sent digital envelopes has increased significantly.







5. Climate action.

Delphi's environmental work is all about minimising the negative impact on our immediate surroundings and our planet. We always strive to find new ways and solutions to manage our resources, as respectfully and responsibly as possible. For us, it's about doing multiple things concurrently – educating and informing, reducing emissions, contributing to increased carbon sequestration, promote biodiversity, and working to preserve healthy ecosystems. Being a sustainable partner and workplace is a significant and essential part of our business strategy, reflecting an approach that permeates our entire business. We strive to involve our employees in various climate and environmental projects because we believe that participation creates a greater understanding and higher engagement with these issues.



Linked to the goal to combat **Climate action (SDG 13)** we have chosen to focus on the following targets:

13.3

Build knowledge and capacity to meet climate change

Paris Agreement and EU taxonomy

Our sustainability efforts also target the Paris Agreement and the EU taxonomy. To contribute to the goals of the Paris Agreement and keep global warming well below 2°C and strive to limit it to 1.5°C, we must actively work to reduce our climate footprint.

We also consider the EU taxonomy, which identifies and compares environmentally sustainable investments through a common classification system for environmentally sustainable economic activities. The taxonomy is a tool to achieve the EU's climate goals and the objectives of the EU's growth strategy that protects the climate – the Green Deal.



Climate change mitigation



Climate change adaption



Pollution prevention



Circular economy



Sustainable use of water and marine resources



Healthy ecosystem



Climate action / Climate action

Climate analysis

Together with external experts, we have calculated our direct and indirect greenhouse gas emissions according to the Greenhouse Gas Protocol (GHG Protocol). The GHG Protocol is the global standard for calculating corporate climate footprints and consists of:

Scope 1: The company's direct emissions, i.e., emissions that the company itself generates and can influence.

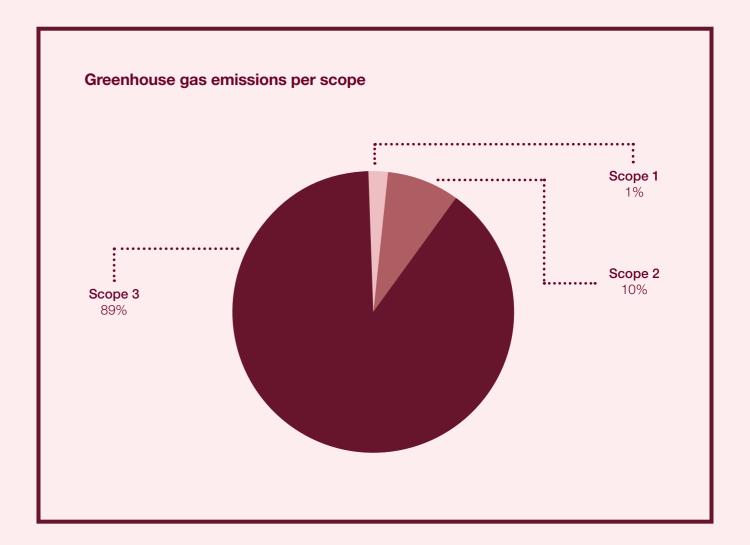
Scope 2: Indirect emissions in the form of purchased energy from external suppliers, which the company can influence by choosing climate-friendly suppliers.

Scope 3: Other indirect emissions that occur in a company's value chain but are more difficult for the company to influence.

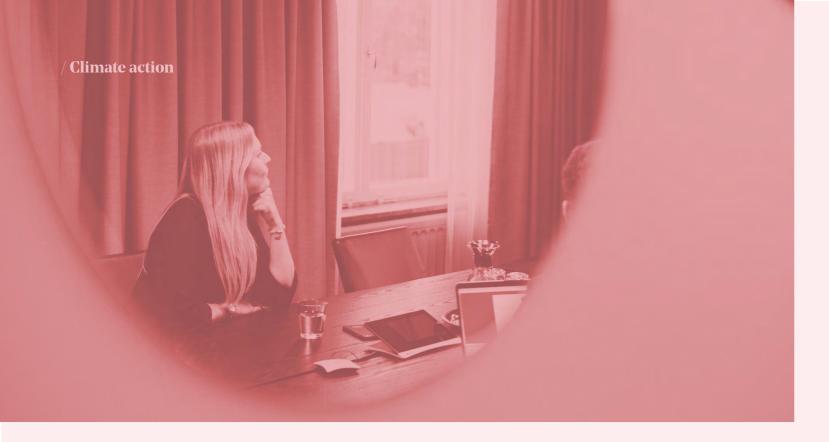
Delphi's total greenhouse gas emissions in 2023 amounted to 488 tons CO2e, equivalent to 2.4 tons CO2e per employee. The corresponding figures for 2022 were a total of 471 tons CO2e and 2.4 tons CO2e per employee.

Our main greenhouse gas emissions are:

- 1. Air travel 39%
- 2. Office and promotional materials 13%
- 3. Electricity and heating 10%
- 4. IT hardware 9%
- 5. Cleaning services 7%







Action and reduction plan

During 2023, Delphi developed an action and reduction plan to work towards reducing our carbon footprint.

The following reduction measures shall be implemented at all offices:

Reduce waste and promote recycling

Implement procedures to reduce waste generated in our operations and promote recycling. Minimise the use of disposable items and consider reuse of materials where possible. Prioritise products with minimal packaging and low environmental impact.

Evaluate purchases and suppliers

Implement Delphi's supplier code of conduct and apply Delphi's purchasing policy for procurement. Establish procedures at each office to ensure compliance with these policies for all purchases and ensure that all new suppliers commit to adhering to the supplier code of conduct.

The requirements in our policies shall be given high priority in the evaluation and procurement of new suppliers to promote collaboration with suppliers who share Delphi's environmental goals.

• Encourage sustainable behaviors among employees

Encourage and educate our employees on environmentally friendly behaviors and practices in the workplace to contribute to reducing Delphi's environmental footprint.

Digitalization

Reduce paper usage and energy consumption by transitioning to digital processes and digital document management to a greater extent. Transition to primarily digital libraries.

Increased energy efficiency and climate-smart offices

Delphi shall use renewable energy at all offices. Property owners providing energy-efficient premises shall be prioritised for potential relocation and property searches.

Improve transport efficiency

Only eco-friendly cars will be approved as company cars from January 2024.

Public transportation, walking, or cycling shall be prioritised over taxi rides. Short taxi rides within the city center must be justified before expenses are approved.

For domestic internal meetings and gatherings, only train travel will be approved, except in rare exceptions. For external meetings domestically, train travel shall be prioritised whenever possible. Digital meetings will be held when appropriate.

For external conferences and gatherings abroad, the number of participants from Delphi shall be carefully considered, meaning the benefits of sending multiple participants shall be weighed against our environmental goals.

Internal conference trips should preferably be arranged to destinations that can be reached in an environmentally friendly manner. Before booking trips abroad, environmentally friendly destinations shall be evaluated as alternatives.

Communication and engagement

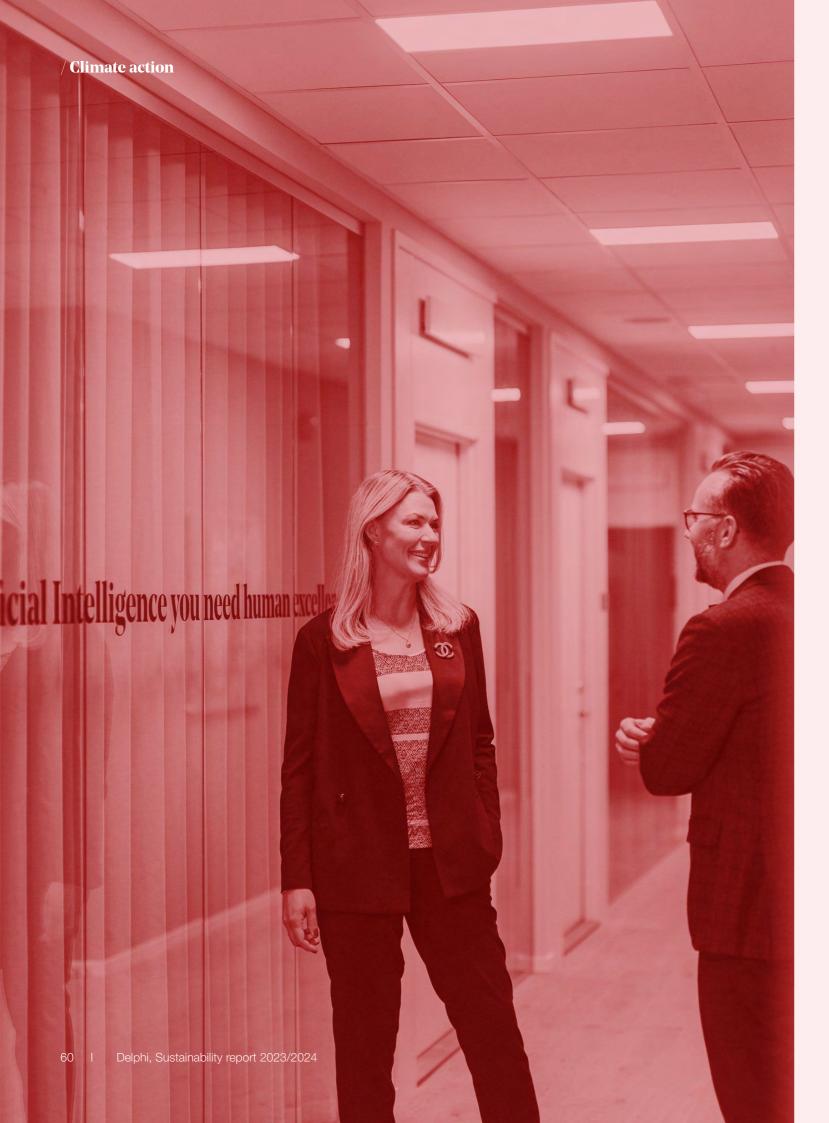
We shall inform and engage our stakeholders, including employees, clients, students, and society, about Delphi's reduction plan and its goals.

Representation and food

At Delphi, we avoid serving red meat and prioritise food suppliers that offer climate-friendly alternatives. Vegetarian dishes shall be prioritised and served regularly at group lunches and similar gatherings.

Individually packaged meals shall be avoided whenever possible in favor of buffet-style meals.

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Doing multiple things concurrently

Our priority is to reduce Delphi's carbon footprint, but we believe that more actions need to be done simultaneously to achieve Delphi's internal goals, EU goals, and global goals. Therefore, we have initiated various environmental projects to increase our contribution to a better climate. This is done through verified and third party-reviewed climate projects aimed at increasing carbon sequestration in Swedish forests. The climate projects Delphi invests in involve absolute tons of carbon dioxide sequestered and simultaneously contribute to preserving and enhancing the biodiversity and climate adaptation of Swedish forests.

Local climate investments

In 2023, Delphi preserved forest in Tväråträsk in Sorsele municipality and established 2.5 hectares of new forest in Börjelsbyn in Kalix municipality, corresponding to approximately 500 tons of carbon dioxide sequestration in total. The initiative contributes to both saving and increasing the carbon sink in Swedish forests. 20 percent of the climate investment goes to preserving and enhancing the forest biodiversity and climate adaptation. This includes preserving and enhancing habitats for threatened or red-listed species, managing key biotopes, or creating mixed forests. We have a long-term view of this initiative and will annually preserve and establish new forests in Sweden. This initiative also contributes to achieving the global goals, including sub-goal 15.2 which addresses the afforestation and reforestation globally.

Biodiversity in agricultural landscapes

In January 2023, the European Commission presented a new initiative for pollinators to address the alarming decline of pollinating insects in Europe. Essentially, it emphasises that we cannot continue to lose biodiversity as it will negatively affect our food supply and the resilience of our ecosystems. Therefore, Delphi has funded a project to preserve and enhance habitats for wild pollinators. In an area in Bålsta in Håbo municipality, we will implement measures to benefit biodiversity. Examples of measures include creating warm areas, establishing fauna habitats, sowing bee-friendly mixtures, creating traditional flower meadows, placing straw bales, establishing sand beds, creating beetle banks, and planting various deciduous trees and bushes. Measures implemented on the site are based on recommendations from the Swedish Environmental Protection Agency and the Swedish Board of Agriculture, and in consultation with the County Administrative Board. In May 2024, Delphi will be on-site to break ground and implement the selected measures.

6. Peace, justice and strong institutions.

The global goal Peace, justice and strong institutions (SDG 16) is something we hold dear, and it is very close to our core business. Inclusive and fair institutions are an absolute necessity for sound social governance, free from conflicts, corruption, and violence. All people must be equal before the law and have equal access to justice, and the same opportunities to influence decision-making. Peaceful and inclusive communities are the very foundation for a sustainable development. We always strive to promote this.





Anti-corruption

Corruption means giving or receiving a bribery and use of position to obtain undue advantage for one's personal gain. In recent years, legislation regarding bribes has been tightened considerably, in Sweden as well as in many other countries. Therefore, it is important for the board, the management, and the employees to know what is and isn't allowed. Working with anti-corruption is a main issue for us, for the sake of ourselves and for our clients.

It is equally important that everyone we do business with, or otherwise encounter, know that we act ethically and in accordance with applicable laws and regulations. Just like we expect the same ethical approach and legal action of the companies, organisations, and individuals we do business and collaborate with.

A natural part of our work is contact with people and companies, both within the private and public sector worldwide. Regardless of who we do business with and regardless of where we do business, we always act legally, ethically and with integrity. To ensure that all our interactions with clients, suppliers and other collaboration partners are conducted according to current regulations, we have compiled an internal anti-corruption policy. All employees are educated on it as it is part of their on-boarding process as well as in the form of ongoing courses. We also perform complementary, internal, interactive workshops and lectures on the subject.

Policy against bribery and undue benefits

Giving or accepting bribes is prohibited both in Sweden and internationally. Omission and inadequate controls are in some cases viewed as a criminal act. The purpose of our anti-corruption policy is to raise awareness and knowledge of applicable bribery laws, how these laws affect Delphi's business and how our employees are expected to act to avoid both giving and receiving bribes and improper benefits.

The policy must contribute to strengthen Delphi's brand, competitiveness, and client benefit through objectivity, professional behavior, and good relations. We want our clients to choose us as partner based on solid business grounds and not on undue influence. In addition to the policy, we do not receive or offer gifts and other benefits to an official or commercial business contact, should it be contrary to another country's local legislation or other regulations. If the content of the policy differs from what applies locally, the strictest rule will always apply.

Combating money laundering

We follow the Swedish Bar Association guidance for law firms regarding the legislation on the fight against money laundering and terrorist financing. It is mandatory for all new employees to participate in internal training regarding money laundering regulations in connection with their onboarding. It is also mandatory for all employees to participate in these trainings yearly. The purpose of the money laundering act is to prevent financial activities or other business activities from being used for money laundering or financing of terrorism.

Whistleblowing

Starting from December 2023, companies with at least 50 employees will be required to have a whistleblowing function in place. Last year, Delphi implemented Visslan, a digital whistleblowing system, where employees and others who have been in contact with Delphi can report any irregularities anonymously.

Supplier code of conduct

Delphi has an external code of conduct for suppliers and other collaboration partners, aimed at ensuring and demanding compliance throughout the supply chain in our operations, thus taking responsibility for sustainability beyond our own organisation. The supplier code of conduct is based on our own values and is attached in connection with the establishment of new agreements as well as the renegotiation of existing agreements.

Code of conduct

An internal code of conduct is under development.



Community involvement and financial support

Our community engagement embraces people outside our own operation. It includes support of various activities financially but also more personal contributions as we offer our competence, commitment, and services. Helping others is inspiring and has a positive effect on all of us. Being involved and having the opportunity to contribute creates a strong internal commitment. Delphi supports, among others, the networks NU: Nolla Utanförskapet, F1RST and Öppet Hus to support students who live in vulnerable and segregated areas, or who come from a vulnerable home environment.

Delphi strongly condemns Russia's invasion of Ukraine and has engaged in various ways to support the Ukrainian people. We have provided contributions to UNHCR to support their vital efforts in Ukraine. Our employees have been involved by collecting clothes and other necessities and meeting Ukrainian refugees who have arrived in Sweden. Delphi has participated in the Safe Harbor 4 UA Students project and hosted law students as part of our trainee program, in addition to supporting further education at the master's level. In 2023, we also recruited expertise from Ukraine through Ukrainian Professional Support Center (UPSC).

In 2023, we provided financial support to Médecins Sans Frontières, Stockholms Stadsmission, Östergötlands Stadsmission, Team BRA, Giving People, Nolla Utanförskapet, Aktiv Skola och Hela Malmö. Every year before Christmas, Delphi employees also personally engage in supporting the holiday celebrations at a shelter for women and children who are victims of violence.

In addition, we started a collaboration with GeBlod where we give our employees the opportunity to donate blood during working hours, as charitable contribution to society. During 2023, all our employees will be encouraged to run Blodomloppet, in all cities we operate in, to raise awareness of the vital importance of blood donation.

Pro bono assignments

We work pro bono for organisations such as Médecins Sans Frontières, Humanium Metal by IM, Tillväxt Malmö and Chalmers Ventures.

Médecins Sans Frontières is a medical humanitarian organisation that saves lives, they care for and assist people who need it the most. Médecins Sans Frontières helps people affected by crises, war, and natural disasters regardless of political opinion, religion or ethnicity. Delphi assists the organisation on a non-profit basis with business law advice, such as concerns with contracts and labor law.

Humanium Metal is an initiative of IM, Individuell Människohjälp, where illegal firearms are melted down into a new commodity. The returns are channeled back to communities that are severely affected by armed violence, since sustainable development begins with peaceful societies. The process of melting the firearms and the use of the resulting metal requires legal expertise, which Delphi offers IM through our co-operation.

Tillväxt Malmö has the mission of supporting growth companies to expand and create more job opportunities. The target group consists of companies in Malmö that require new networks, financing, and advice to foster their growth. As a partner company, Delphi provides business legal advice to growth companies, pro bono initially but also as ongoing support for the future.

Delphi also works pro bono for Chalmers Ventures which starts, develops, and finances research and knowledge-based companies. As part of the Legal Clinic we offer legal advice to companies within Chalmers Ventures.





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