



TRAFIKVERKET

Trafikverket's (Swedish Transport Administration) Code of Conduct

Approach to ethical issues



Why do we need a Code of Conduct?



Trafikverket's Code of Conduct – a part of the contract

“All of us who work at Trafikverket have a responsibility to preserve confidence in public institutions. Public confidence is easily damaged and, once lost, difficult and time-consuming to regain. We also build relationships – based on respect and responsibility.

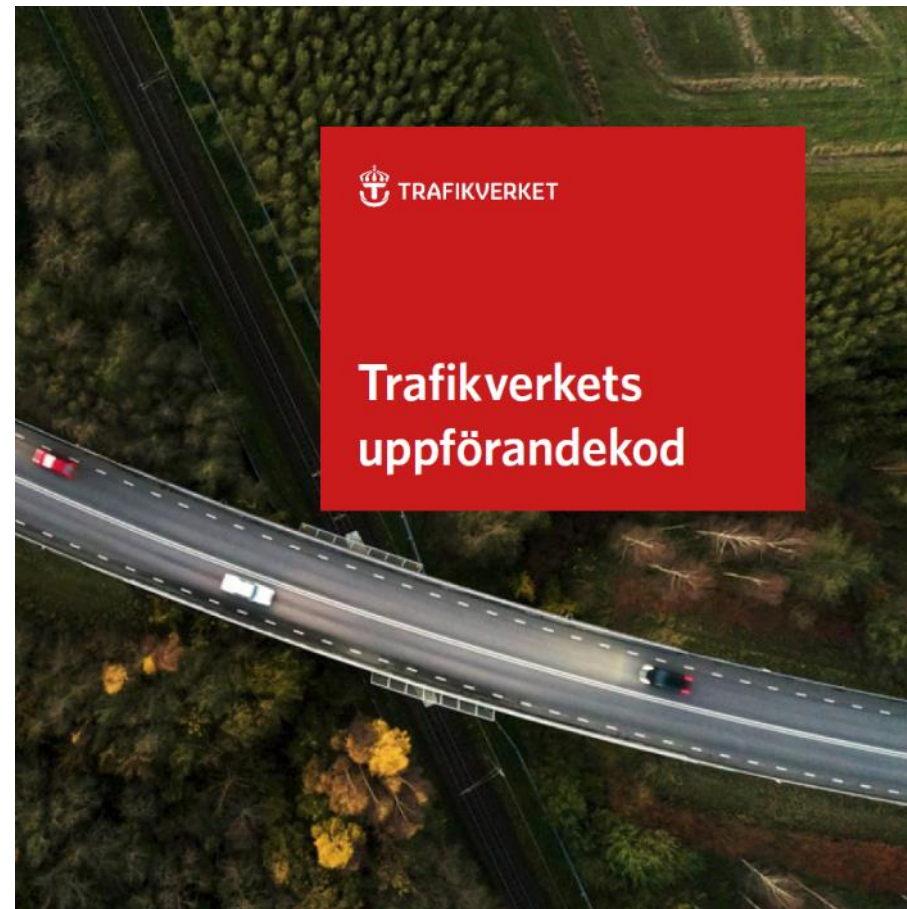
That is why we need a Code of Conduct. It highlights the conduct expected within Trafikverket and in our dealings with contractual partners and society at large.

We therefore require our suppliers and other contractual partners to comply with the principles set out in this Code of Conduct.”

Roberto Maiorana, Director-General

Elements of the Code of Conduct

- Corruption, bribery and conflicts of interest
- Healthy competition
- Entertainment
- Alcohol and drugs
- Anti-discrimination and diversity
- Environment
- Safety, safety culture and working environment
- Travel
- Reporting misconduct



Corruption, bribery and conflicts of interest

- Do not accept any form of improper payment, gift or other consideration that may influence, or be perceived to influence, the objectivity and impartiality of Trafikverket.
- Do not offer such inducements to others.
- Avoid situations in which personal interests may conflict with those of Trafikverket.
- Do not mix private interests with the activities of Trafikverket.



Healthy competition

- Competition law promotes fair and healthy competition for the benefit of customers and clients.
- Trafikverket is working to counter illegal behaviour such as cartelisation and market sharing.
- Breaches of health and safety rules and tax regulations, misuse of social security funds, money laundering and exploitation of workers also have an adverse impact on healthy competition.
- Any suspicions will be reported to the competent authority.



Entertainment

- Activities are mainly financed through taxes.
- The money must be used for its intended purpose, and all costs that arise must benefit the activities.
- Internal and external entertainment shall be characterised by moderation and restraint.
- Restrictive approach to alcohol.

Alcohol and drugs

- Our workplaces must be free of alcohol and drugs.
- No one may drink or be under the influence of alcohol or drugs during working hours.
- Alcohol consumption during leisure time must not affect the ability to work, safety or the working environment on the job.
- Contractors and other contractual partners are expected to have their own alcohol and drug policy, as well as procedures for taking action when necessary.

Anti-discrimination and diversity

- Respect for basic human rights in operations.
- Each individual is unique and should be treated with respect.
- Diversity at all levels of the organisation, and zero tolerance for discrimination, harassment or abusive behaviour.
- Suppliers and other collaborating actors shall respect human rights and combat discrimination.



The Environment

- Lead the development of an environmentally sustainable transport system.
- Environmental consideration shall be a natural element of our day-to-day activities.
- All planning, construction and management of the transport system shall be carried out in an environmentally sound manner.

Safety, safety culture and working environment

- Safety first
- Prerequisite for the effective functioning of the transport system and our workplaces.
- Vision Zero.
- Everyone has a responsibility.

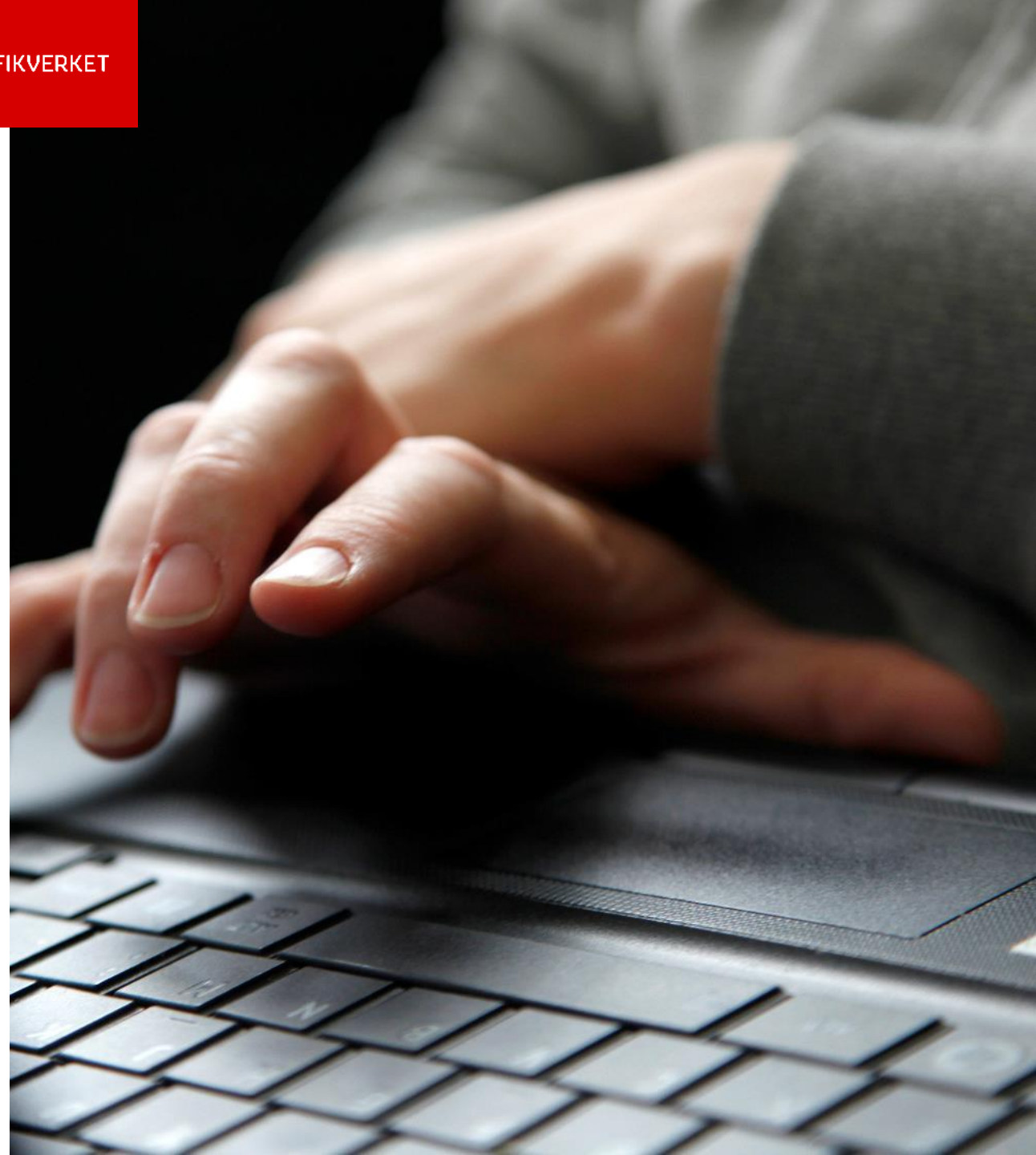


Travel

- Contribute to the achievement of society's traffic safety and environmental goals.
- Based on needs, purpose and the information to be conveyed, is the trip necessary?
- Most cost-effective way possible, taking environmental, safety, economic and working environment conditions into account.

Reporting misconduct

- Report misconduct and failure to comply with this Code of Conduct.
- Immediate manager, if appropriate, or a dedicated whistleblower function.
- Anyone reporting suspected misconduct should never be subjected to reprisals, and should have the option of remaining anonymous.



Trafikverket's whistleblower system

Trafikverket has an agreement with an external party for receiving tip-offs about bribery, corruption or other misconduct. Whistleblowers can choose to remain anonymous.

Information on how to contact the whistleblower system is available on Trafikverket's website **trafikverket.se**

The Code of Conduct is a contractual condition, and applies to all of us in the contract

1. How do you, as a contractor/supplier, ensure that your employees and any subcontractors comply with Trafikverket's Code of Conduct?
2. Note the most important parts of your reasoning about the elements of the Code of Conduct.
3. Document the results of the two previous points in meeting minutes.
4. Feel free to work further on this approach within the framework of the collaboration.

Dilemmas

Surplus material

During road construction, the contractor is left with a small pile of gravel.

The pile cannot be left on site, and transporting it to the contractor's own yard costs far more than the material is worth.

The contractor asks whether you are willing to take the pile home. That way, Trafikverket will not incur a cost.

Is this OK?



Inspiration day at a supplier

You are invited by a supplier to participate in an inspiration day.

What should you think about before deciding whether to accept or decline?



Alterations and additional work – yes or no?

In a major contract, the collaborative climate has become strained. At construction meetings, any issue tends to lead to slightly heated discussions. The parties disagree on many things, and the disagreement makes it difficult to stay on schedule.

The contractor has now sent a notice (URE) stating that certain work constitutes additional work entitling them to extra payment. They therefore want a written order before work starts. The project manager thinks that the contractor has interpreted the documents too one-sidedly, but knows that a delay would be very costly for Trafikverket in later stages.

What are your thoughts in this situation?



Safeguarding public confidence and the desire to do the right thing

We all have a responsibility to **safeguard confidence**
in how public funds are spent.

Trafikverket's suppliers and partners are involved in **work**
to serve the public. There are specific requirements in
carrying out this work.

Within the contract, we must **work together to do what is**
right, not because there are rules, but because it is the
RIGHT THING TO DO.



Thank you!