Business ethics policy template

This template is centred around European Sustainability Reporting Standards G1, while broadly incorporating the commitments in the Swedish Regions’ Supplier Code of Conduct. It is structured to allow you to adapt it based on your operations and value chains, including the double materiality analysis you conduct under the Corporate Sustainability Reporting Directive, if you are in scope of this directive.

Note that even if some topics are not material for your own operations, they may be material in the manufacturing of goods or in the extraction of raw materials. Also note that according to the Corporate Sustainability Due Diligence Directive, you shall develop this policy in consultation with your employees and their representatives.

**Business Ethics Policy**

**1. Introduction**

[Company Name] is committed to conducting business with integrity, transparency, and accountability. We are also committed to complying with legal and regulatory requirements and to continuously improve our work.

**2. Scope**

This policy establishes principles and guidelines to ensure that all employees, suppliers, and business partners across our value chain uphold the highest ethical standards in line with international best practices.

**3. Corporate Culture**

We foster a corporate culture based on:

* **Integrity and honesty** in all business dealings.
* **Transparency and accountability** in decision-making and reporting.
* Respect for **human rights**, **environmental sustainability**, and **good governance**.

**3.1. Corruption and Bribery**

[Company Name] has a zero-tolerance policy for all forms of corruption and bribery, including:

* **Bribery and embezzlement** – No offering, giving, soliciting, or accepting of bribes or kickbacks is allowed.
* **Trading in influence** **and** **abuse of functions** – No misuse of position for personal gain is allowed.
* **Illicit enrichment, money laundering, and obstruction of justice** – Compliance with anti-money laundering laws and cooperation with authorities.

**3.2 Fair Competition and Anti-Competitive Behaviour**

No agreements are entered into that distort competition or abuse market dominance.

Business dealings comply with antitrust laws and fair trade regulations in all jurisdictions where we operate.

Employees and suppliers must refrain from engaging in price-fixing, market allocation, bid-rigging, or other forms of unfair competition.

**3.3 Ethical Tax Practices**

We refrain from engaging in aggressive tax planning that exploits deficiencies in tax regulations to shift profits to low-tax jurisdictions.

Tax arrangements must be legally sound and transparent, ensuring compliance with all relevant tax laws and regulations.

**3.4 Political Engagement and Lobbying Activities**

Political engagement and lobbying activities must be transparent, lawful, and aligned with company values.

No company resources may be used to support political parties, candidates, or campaigns unless explicitly permitted by law and approved by senior management.

Lobbying efforts must focus on responsible business conduct, sustainability, and ethical governance.

**3.5 Management of Relationships with Suppliers Including Payment Practices**

Business relationships are managed with integrity, ensuring fair payment practices and ethical supplier treatment.

Suppliers must adhere to our Supplier Code of Conduct, which includes human rights, workers’ rights, environmental standards and business ethics standards.

Due diligence is conducted before engaging suppliers, to prevent and mitigate adverse impacts on human rights, workers’ rights, and the environment, as well as unethical business practices, in the supply chain.

**3.6 Animal Welfare**

[Company Name] is committed to upholding high standards of animal welfare in all operations and supply chain activities.

Suppliers must ensure that animals are treated humanely, ethically, and in compliance with international animal welfare regulations.

**3.7 Protection of Whistleblowers**

Employees, suppliers, and stakeholders are encouraged to report unethical behaviour through confidential and protected channels.

Retaliation against whistleblowers is strictly prohibited.

Reports are investigated promptly and handled with discretion.

**4. Implementation and Enforcement**

We regularly identify and assess business ethics risks in our own operations and supply chains.

Supplier and business partner assessments ensure alignment with this policy.

Violations of this policy may result in disciplinary action, termination of contracts, and legal consequences.

A whistleblowing channel is in place for stakeholders to report business ethics concerns confidentially.

[add link to whistleblowing channel]

**5. Governance and Accountability**

The Board of Directors oversees the business ethics commitments, performance and strategic direction.

Senior management is responsible for policy implementation and compliance.

Regular training and capacity building on business ethics are provided to employees, with mandatory participation for new or reassigned employees.

**6. Reporting and Transparency**

We disclose our material impacts, risks and opportunities in accordance with the Corporate Sustainability Reporting Directive, including the European Sustainability Reporting Standards.

Internal and external audits are conducted to detect and prevent unethical behaviour.

Stakeholder engagement ensures continuous improvement of our business ethics practices.

**7. Review and Continuous Improvement**

This policy is reviewed at least every two years and updated without undue delay following significant changes. Revisions reflect evolving legal standards, best practices, and stakeholder feedback.

We are committed to the highest ethical standards in line with international best practices.

Approved by:

[Name]

[Title]

[Date]