



AIR NAVIGATION SERVICES  
OF SWEDEN

**CODE OF CONDUCT**

English version

# INTRODUCTION

– the significance of a code of conduct



## YOUR SERVICE PROVIDER FOR AIR TRAFFIC MANAGEMENT

LfV has a long history of competence and knowledge as a leading service provider for air traffic management.

LfV delivers air traffic management services and smart solutions for aviation to customers and stakeholders both nationally and internationally. We support our customers, enabling them to take a position in the marketplace. This is our customer value proposition. Our company values; Solution oriented, Committed and Innovative, in addition to our Code of Conduct guides us all in LfV and permeates our organisation, our actions and our corporate culture. Aviation safety is our foundation and our highest priority when we deliver and develop our services. Our assignments are based on trust and long-term commitment where we, in addition to aviation safety, focus on offering services that meet increasing demands on capacity, availability and sustainable development within Aviation.

## OUR CODE OF CONDUCT

In today's industry and global society high standards of business ethics, morality and compliance of regulations are a requirement. At LfV we have a joint Code of Conduct – applicable for all. Our Code of Conduct applies in our day-to-day work, our business relationships and when we represent LfV in various contexts.

LfV's Code of Conduct clarifies our ethical protocol and guidelines. This is the basis for our behaviour in relation to our customers, suppliers, partners and each other. LfV's Code of Conduct is approved by our Board of Directors and as employees of LfV, we are all responsible for acting in accordance and compliance with our Code of Conduct. There may be occasions where you, as an employee, cannot find all the answers in our Code of Conduct. If so, contact your immediate manager or one of your colleagues to discuss your concerns and reflections. As a business partners, customer or supplier, you can always contact LfV's Head Legal Counsel.

At LfV, we all contribute to LfV's appeal, trust and attractiveness – towards our customers, business partners and suppliers as well as for our owners and other significant stakeholders.

Ann Persson Grivas  
Director General, LfV



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# HUMAN RIGHTS

– equality, liberty and dignity

LFV supports and respects the international human rights based on the UN's Global Compact. To the extent we are able to affect, we ensure that LFV does not participate in any crimes against human rights.

As a state enterprise, we follow the common governmental core values of the state of Sweden with respect for the rights and integrity of citizens – equal value, liberty and dignity. The employees must perform their job with respect for the individual and foremost the employees must fulfil requirements for non-discrimination with regards to the personal integrity of individuals. Key words in this respect are equality, equal rights and integrity.

This signifies that all of us have the same fundamental liberties and rights regardless of age, gender or origin. We counteract all types of discrimination.

Opportunities to advance must not be based on gender, transgender identity or expression, ethnic origin, religious or other beliefs, disability, sexual orientation or age. Everyone must be treated with respect regardless of who we cooperate with.

We adhere to the European Convention that indicates that each and everyone is entitled to respect for their private and family life, their home and correspondence. Therefore, we treat personal data with the utmost caution and in accordance with statutory principles.



# SUSTAINABLE BUSINESS

## – constitutive principles

LFV's operations and services are based on a number of national as well as global guiding and fundamental principles as well as EU-law. LFV's approach is based on the common governmental core values of the state of Sweden. These are based on national law, summarized into six fundamental principles: Democracy – Rule of law – Objectivity – Freedom of opinion – Respect – Efficiency and service.

LFV also supports the ten principles of the UN's Global Compact for sustainable businesses constituted for business and industry. This is the UN's plea to companies and businesses globally to adapt their strategies and operations to the principles on human rights, labour terms, environment and anti-corruption.

All our employees should be familiar with the fundamental principles of our Code of Conduct – its significance, compliance therewith and other adopted policies and regulations. LFV also works to ensure that the approach in our guidelines permeates the companies where LFV is an active owner. We want our suppliers, customers and other business partners to comply with the ten sustainability principles of the UN's Global Compact as well as taking part of LFV's Code of Conduct.

DEMOCRACY LEGALITY OBJECTIVITY  
FREEDOM OF OPINION RESPECT  
EFFICIENCY SERVICE

### THE TEN PRINCIPLES OF THE UN'S GLOBAL COMPACT

#### HUMAN RIGHTS

- Principle 1. Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 2. make sure that they are not complicit in human rights abuses.

#### LABOUR TERMS

- Principle 3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4. the elimination of all forms of forced and compulsory labour;
- Principle 5. the effective abolition of child labour; and
- Principle 6. the elimination of discrimination in respect of employment and occupation.

#### ENVIRONMENT

- Principle 7. Businesses should support a precautionary approach to environmental challenges;
- Principle 8. undertake initiatives to promote greater environmental responsibility; and
- Principle 9. encourage the development and diffusion of environmentally friendly technologies.

#### ANTI-CORRUPTION

- Principle 10. Businesses should work against corruption in all its forms, including extortion and bribery.



#### FACTS ABOUT UN'S GLOBAL COMPACT

The UN's Global Compact initiative consists of ten universal principles for sustainable entrepreneurship in the areas of human rights, labour terms, environment and anti-corruption. The principles are based on the UN's Declaration of Human Rights, the International Labour Organization's (ILO's) Fundamental Conventions on Human Rights in the work place, the Rio Declaration and the UN's Convention Against Corruption.

## CODE OF CONDUCT FOR SUPPLIERS

Goods and services supplied to LFV must be produced under conditions compatible with the fundamental principles of sustainable business. This means that suppliers must observe the following practices:



### AVOID THE USE OF CHILD LABOUR AND FORCED LABOUR

Child labour means work performed by a person of compulsory school age or younger. Forced labour means work or services performed under threat of punishment or similar physical or mental coercion.

### AVOID THE OCCURRENCE OF DISCRIMINATION AND HARASSMENT

Discrimination refers to differential treatment of workers that is not based on merit or qualities but on irrelevant grounds. Harassment refers to harsh or inhuman treatment, including sexual harassment or any form of physical punishment.

### MAINTAIN A REASONABLE LEVEL OF WAGES AND WORKING CONDITIONS

Comply with laws and regulations governing working conditions in the countries in which they operate, particularly with regard to pay, working hours and working environment.


### ENVIRONMENTAL CONSIDERATIONS

The business shall be conducted in an environmentally responsible manner and the supplier shall comply with local and national environmental legislation.

### ANTI-CORRUPTION

The supplier shall have zero tolerance for bribery, corruption and other unethical business practices and shall actively work to prevent such practices from occurring in the supplier's business. This means in particular that the supplier shall not directly or indirectly offer or give any improper payment or other compensation to any person or entity for the purpose of obtaining, retaining or directing business or obtaining any other improper advantage within the scope of its business. The supplier shall not directly or indirectly solicit or accept any form of improper payment or other compensation from third parties that may affect the objectivity of business decisions.





*LFV supports and respects the international human rights based on the UN's Global Compact. To the extent we are able to affect, we ensure that LFV does not participate in any crimes against human rights.*

# UN GLOBAL COMPACT



# A UNIQUE CORPORATION

– a public authority with a state enterprise assignment

LFV is a state enterprise subordinate to the Government of Sweden. As a state enterprise, LFV is an administrative authority and we comply with various public laws and regulations. For example, the principle of public access and public procurement rules. The common governmental core values of the state support our way of conducting and developing a good administrative culture – that includes democracy, human rights and the rule of law, efficiency and accessibility.

LFV also conducts business operations, including air navigation services, consulting services and export services. The commercial operations are conducted both within LFV and through our wholly and part owned subsidiaries and affiliated companies. The companies follow the applicable company law regulations.

Below are some of the rules and principles that may be useful to be familiar with. If you are unsure what is applicable, ask your manager, a colleague or LFV's Chief Legal Counsel.

## THE PUBLIC ACCESS PRINCIPLE

Every Swedish citizen has a constitutional right to access public documents. This means that LFV has a duty, if requested, to disclose such documents. Public documents are documents stored by an authority that were received or drafted by the authority. The obligation to disclose public documents is limited by confidentiality rules. Disclosure of a confidential document is prohibited. This may relate to information regarding national security, and LFV's business and operating conditions, which are subject to confidentiality. Confidentiality applies not only externally, but also internally within LFV. Only persons within LFV who need confidential information applicable to their work, may access the confidential information.

### THIS IS A STATE ENTERPRISE

A state enterprise is a state or municipal entity that produces goods or provides services based on commercial principles. From a legal point of view, a state enterprise is an administrative authority which is part of the state or the municipality and therefore not a legal person, such as a limited company.

## FREEDOM TO DISCLOSE INFORMATION

Freedom to disclose information entails that civil servants have a right, under certain circumstances, to breach professional secrecy under the confidentiality rules. This entails a right to contact media such as the press, radio and television with the purpose to publish the information in some form. Freedom to disclose information does not entail a right to disclose documents. Information must be provided verbally. Freedom to disclose information is associated with a prohibition against investigating who disclosed the information.

*Freedom to disclose information is not an absolute right, as there are restrictions set out as there are restrictions for important public interests. As an employee at LFV, you must pay special attention to business confidentiality and confidentiality in relation to national security.*

## LOYALTY CLAUSE

LFV's State Enterprise Agreement, L-AVA; which governs our employment terms, stipulates that employment conditions shall be based on mutual loyalty and trust. As an employee, you must protect and promote LFV's interests and observe discretion both internally and externally related to business affairs/company matters.





## PUBLIC PROCUREMENT

LFV complies with the public procurement laws and strives to procure the right goods or services at the right price, for the right terms and in time. This means, among other things, that we try to use competitive opportunities available in the market and that we follow the five basic principles of public procurement legislation regarding equal treatment, non-discrimination, proportionality, transparency and mutual recognition.

## INFORMATION SECURITY

Information is one of LFV's most important assets. Handling of various types of information is an important part of our work. Information security means guaranteeing accuracy, accessibility and confidentiality regarding information that is handled in the governance processes.

Information security comprises all of LFV's information. This stipulates information in writing, pictures/photos, audio or other medium, but also information in the form of knowledge among employees. It also entails securing accuracy, accessibility and confidentiality in the systems that we utilise to handle information. LFV has a management system for information security – in order to meet both internal and external requirements.



# LFV – THE WORKPLACE

– our common responsibility

## JUST CULTURE

LFV's Just Culture is based on the European Just Culture Declaration and is a part of LFV's flight safety work. This is about our operative employees; the air traffic controllers being able to rest assure that they will not suffer any consequences for actions, inadvertence or decisions that are reasonably in proportion to their experience and training but where gross negligence, wilful conduct or destructive behavior is not tolerated. It is important for our employees to be able to trust a well-functioning reporting culture as reporting and investigation of incidents is a significant part of the proactive flight safety work.

All employees are responsible for complying with our Just Culture principles. LFV regularly reviews and evaluates compliance with the Just Culture principles. This is done through safety culture values, in line with the EU Performance Plan.

## WORK ENVIRONMENT

Our undertaking on work environment and health issues shall contribute to a sound working environment characterized by a high level of safety/security, good working conditions, that we are content at work. The work environment issues involve both the physical and psychological working environment.

The work environment is an integrated part of the daily work at LFV, as well as in our development processes. Managers and employees jointly generate a good working environment in the workplace. All employees are responsible for being aware of and comply with laws, regulations and contracts which exists to enable us to work in a safe and secure environment. Flight safety is our highest priority. It is therefore particularly important that our work place is alcohol and drug free. For those who work operatively with air traffic control, there are specifically strict rules.

## OTHER OCCUPATIONAL PURSUIT

Other occupational pursuit could be another employment, assignment or involvement in an association, society or other company, in addition to ones' principal job. As an employee at LFV, you may have obligations in addition to your principal job, as long as it does not affect your work, competes with or harm the trust for LFV.

## SALARY AND EMPLOYMENT TERMS

LFV has salary and employment terms based on Swedish legislation and which is supplemented by regulations in various collective agreements.



## DISCRIMINATION AND DIVERSITY

LFV shall be a workplace where everyone is respected, and diversity is a condition for our progress. This means that all managers and employees must contribute to and ensure that nobody is treated differently due to gender, age, ethnic origin, disability, sexual orientation, trade union affiliation or political views.

LFV does not accept any form of offensive special treatment, bullying or discrimination. LFV shall be characterized as a workplace where respect for all individuals and diversity contributes to creativity, innovation and an improved working environment.

## COOPERATION AND UNIONS

LFV respects freedom of association and the right of all employees to be members of a union. LFV cooperates with the central and local unions providing them the possibility to have influence and insight into our operations.

## OUR CORE VALUES

LFV's core values are fundamental in relation to what we stand for. They guide us in our actions and how we behave as employees toward each other and to the world around us. It is vital and important how we express ourselves – what we communicate to each other, customers, business partners and stakeholders.

All employees represent LFV and our brand, therefore we must act and behave by being solution-oriented, committed and innovative. Regardless of whether you are in contact with customers, business partners or our stakeholders on a daily basis or rarely, you are an ambassador for LFV and our brand. Your actions and behaviour influence others' impression of you and the organization you represent and ultimately our LFV brand.



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# THE ENVIRONMENT

– for sustainable aviation

The fact that LfV supports the principles of the UN's Global Compact within the environmental area, indicates that LfV supports preventive measures to counteract environmental damage. We initiate action to contribute to greater environmental responsibility and encourage development and dissemination of environmentally friendly technology. The environmental impact of aviation, especially in relation to climate-affecting emissions, is an important issue for upholding a sustainable society. In Sweden, LfV has a distinctive responsibility to actively work to lower climate burden from aviation.

## INDIRECT ENVIRONMENTAL IMPACT

LfV impact the environment both directly and indirectly. When conducting air navigation services, guiding flights in the airspace, the indirect impact arises when the aircraft emits carbon dioxide and hence affect the environment.

This is why we affect the conditions for our customers, facilitating the possibilities to fly optimally in regards to fuel-emissions and in all aspects of the flight route. In all, so that flights can have as little environmental impact as possible. LfV also cooperates with many other parties to develop and support the use of new technology and new work methods. We strive to prioritize the environment in the day-to-day air traffic management operations.

## DIRECT ENVIRONMENTAL IMPACT

The greater part of the direct impact of our operations consists of energy and fuel consumption from our buildings and premises, our day-to-day operations, and emissions from our business trips. LfV's day-to-day work to improve conditions is by focusing on reducing the use of resources and our own carbon dioxide emissions. LfV selects landlords and premises based on an environmental perspective and strive to minimize environmental impact from our own buildings and premises. LfV schedule and conduct meetings and trips with as little impact on the environment as possible. Care for the environment is a part of our day-to-day work.



### LFV's ENVIRONMENTAL FACTS

We conduct a structured and systematic environmental performance. The environmental management system is certified according to ISO 14001.

We train air traffic controllers in fuel management, i.e. fuel and emission saving methods, for example green approaches.

We contribute with route expertise for airport owners in regards to environmental permits and license matters.

Jointly with Danish Naviair, we run an environmental project on harmonized descent speed. This is a new type of speed limit in the sky in order to reduce fuel consumption during descent.

We support SESAR European ATM Master Plan. This plan includes long-term goals for air aviation services to contribute to reduced fuel consumption.

# ANTI-CORRUPTION

– the importance of good business ethics

## ZERO TOLERANCE

LFV applies zero tolerance for corruption. This means that we must not be involved in, encourage or tolerate bribes. Employees must therefore avoid situations involving anything that may be perceived as giving or taking of bribes, corruption or other inappropriate behaviour. LFV's operations are regulated through documented working procedures, delegations and attestation instructions. LFV counteracts corruption and has a policy regarding corruption, fraud and other irregularities. This also includes risk analysis to identify and take measures to prevent and eliminate risks.

LFV should prevent actions that may affect, or be perceived as affecting objectivity or impartiality such as unfit representation. According to our internal instruction for representation and gift etc., any representation must have a direct connection to LFV's operations. It should be a natural part of the business relationship or equivalent and must be conducted through good judgement and be permeated by moderation and to be well adapted to the occasion.

At LFV, we strive for objectivity, transparency and neutrality. We must ensure confidence in our operations by avoiding situations in which there is a conflict of interest. Amongst other things, this means that we ensure our purchases are handled objectively by individuals who do not have any personal relationships with suppliers.

## BRIBES AND OTHER INAPPROPRIATE BEHAVIOUR

**BRIBE** – inappropriate benefit for employment or an assignment.

**ACCEPTING A BRIBE** – employees or person on an assignment, who receive, accepts a promise of or requests an inappropriate benefit to exercise an employment or assignment. The same applies to a person who receives, accepts a promise of or requests the benefit for another person.

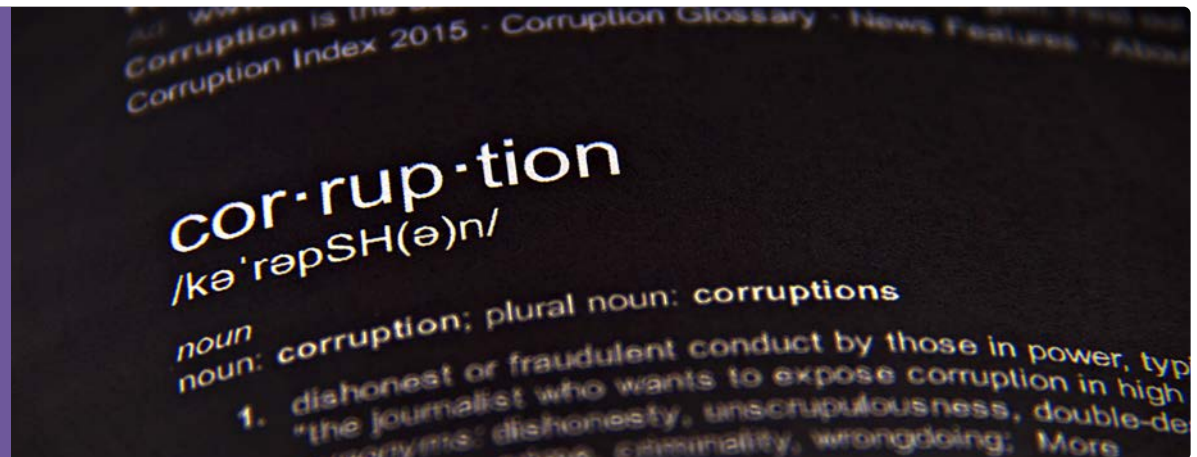
**GIVING OF BRIBE** – a person who gives, promises or offers an inappropriate benefit to an employee or contractor for the exercise of the employment or assignment.

**CONFLICT OF INTEREST** – for a conflict of interest to exist, it is not necessary that a person is biased. If the situation is such that there are typically reasons to suspect bias, that is sufficient to consider that there is a conflict of interest.

### THIS IS CORRUPTION

Corruption means using a public office for purposes of attaining profit for oneself or others.

This definition includes both criminal actions such as bribes, abuse of trust and professional misconduct but also partiality, nepotism and other similar inappropriate behaviour.



# WHISTLEBLOWER

## – to alert

LFV has a procedure for handling its whistle-blower service that should be followed when reporting irregularities that are in the public interest, such as:

- Bribes or corruption
- Partiality/bias
- Financial fraud such as incorrect accounting, breach of internal control procedures, embezzlement.
- Environmental crime
- Safety- and security deficiencies
- Serious forms of discrimination, bullying and harassments.

In all examples shown above, it must be in the public interest that the irregularity be reported for the protection for whistle-blowers to be put into force.

If a person is named in a report, it could have serious consequences for that individual. It is therefore important that all information that is reported is accurate as far as you are aware. It is not possible to further investigate or review reports that cannot be substantiated. The service should not be used to express general dissatisfaction regarding your own working or employment conditions. This is because, as a rule, such matters do not relate to irregularities that are in the public interest, unless they are completely unacceptable in a wider social sense.

The Act on protection of persons who report irregularities (Lag (2021:890) om skydd för personer som rapporterar om missförhållanden) – the “Whistleblowing Act” – provides protection against reprisals for those who sound the alarm regarding irregularities that are in the public interest and that have occurred or are highly likely to occur within the organisation that the reporting individual belongs to, has been a part of or will be active in at some point in the future. In addition to protecting employees at LFV, the act thereby serves to safeguard also job applicants, trainees, volunteers, shareholders, those providing support to the one making the report and anyone who has terminated their employment with LFV. As an employee of LFV, you can make a report in writing by letter, by email, orally or by booking an in-person or digital meeting with the head of LFV’s legal department or LFV’s internal audit manager. If you wish to remain anonymous, you may use our special reporting service on the LFV intranet. The head of LFV’s legal department and the registrar are the ones who will then receive the report. Those submitting reports externally are able to do so anonymously by submitting an unsigned letter or sending an email from an anonymous address to the head of LFV’s legal department or LFV’s internal audit manager. LFV will respect a whistle-blower’s desire to remain anonymous. However, anonymous reports are more difficult to follow up and confirm. An investigation will be handled with confidentiality in mind.

It is also possible to make a report to the Swedish Transport Agency.



### WHAT IS A WHISTLEBLOWER?

*Whistleblower* is an English term. There is a number of different definitions of the term, but it means a person who reports irregularities of various types and purposes and that have or have had some form of association with an operating entity of an organization. Whistleblowers have, for example, exposed corruption, arms smuggling, bugging by states and registration of opinion of the population, military murder of civilians, environmental crimes and inadequacies in care giving and patient safety.

The term originates from British police, calling on colleagues, trying to catch the public’s attention on ongoing crimes. Once upon a time they used whistles to call up on attention. The word whistleblower appears in the 14th edition of the glossary of the Swedish Academy, published in 2015.



# GLOBAL GOALS

## – Agenda 2030 a universal action plan

In 2015, the UN's member countries adopted 17 new global sustainability goals, Agenda 2030. This is the UN resolution for long-term sustainable economic, social and environmental development connected to ending poverty.

It is a universal action plan which all countries and affected parties should take into account. All states are responsible for contributing to the execution of the action plan.

In Sweden, the Government is ultimately responsible for coordinating Sweden's initiatives to implement Agenda 2030. The cabinet of the Government Offices of Sweden cooperates with municipalities, county councils and governmental authorities to achieve the global goals. It is a fundamental starting point that the work must be based, to the extent possible, on Sweden's nationally established goals, strategies, governance and review procedures, and Sweden's obligations in accordance with international conventions.

The global goals also apply to industry and business, civil society, trade unions, the academies and individuals.

### LFV'S CONTRIBUTION TO AND UNDERTAKING RELATED TO THE GLOBAL GOALS

LFV has been instructed to report on how the organisation contributes to Sweden's ability to achieve the global goals and specifically to assess within which goals and partial goals the organisation has the greatest impact at a national and international level. LFV has identified goals 9 and 11, where LFV primarily can contribute to implement and achieve Agenda 2030.

This is a continuous effort and together we will create conditions for us at LFV to achieve the goals in Agenda 2030.





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