

Ethical Code

Entral AB

Version 1 - 2023-06-15

This policy belongs to Entral AB, registration no. 559010-5853, and was approved by CEO Mathias Nilsson on June 15, 2023. The Quality Manager is responsible for ensuring that the policy is revised and re-approved by the CEO as needed.

1. Introduction

“Our vision is to eliminate organized crime from the workplace. We are committed to being a positive force for change, shaping the attitudes, behaviors, goals, and visions of others. We always compete fairly and actively promote fair practices.

No matter the circumstances, we do what is right. We never take shortcuts and remain deeply committed to our core values—even when those values are challenged. Our commitment is clear: we are always part of the solution, never part of the problem.”

— Mathias Nilsson, CEO

1.1 The Entral Ethical Code

This policy (hereafter referred to as the Ethical Code) outlines Entral's commitment to ethical business practices, both within the company and in external interactions.

All employees and subcontractors are expected to uphold these standards and to act promptly in addressing any deviations. This policy serves as a foundation for preventive efforts and offers practical guidance for navigating various situations.

1.2 Definitions

The following definitions are used throughout this document:

- **Business contact**
This refers to any individuals or organizations that influence or are influenced by Entral's activities, including contractors, consultants, authorities, and partners.
- **Employee**
This refers to any individuals working on behalf of Entral, including full-time and part-time staff, temporary workers, consultants, migrant workers, contractors, home workers, trainees, and senior management.
- **Ethical Code**
This refers to the Entral Ethical Code, i.e., the requirements stipulated by this document.

2. Standards of Integrity and Ethical Conduct

2.1 General

This section defines key principles for engaging with external parties, managing business relationships, and handling gifts. All representatives of Entral are expected to follow these guidelines to ensure transparency, trust, and ethical excellence.

2.2 Maintain Integrity Against External Influence

Entral will not tolerate dishonest attempts by any external party to influence our decisions. Examples of such dishonest attempts include:

- Bribery
- Coercion
- Providing misleading information
- Offering gifts or favors beyond acceptable limits

Anyone working on behalf of Entral who permits such improper influence will face disciplinary and legal consequences, including employees, management, board members, temporary staff, and in-house consultants.

2.3 Interact appropriately with business contacts

Entral builds trust through the competitive pricing, performance, quality, and expertise of its products and services, treating all business contacts fairly. Bribery, fraud, industrial espionage, theft, coercion, price fixing, and any actions that distort competition are strictly prohibited.

Employees who attempt to influence business contacts dishonestly will be subject to disciplinary and legal consequences.

2.4 Handle gifts responsibly

Gifts of significant value should generally not be given or accepted at Entral, including cash, valuable items, travel, services, or promotional items. Holiday or celebratory gifts must remain modest to avoid creating any sense of obligation.

All gifts should align with the principle of preventing any perception of impropriety for both giver and receiver. In case of uncertainty, the decision should be referred to a supervisor.

3. Ethical Leadership and Compliance

Compliance with all applicable laws and regulations is essential in every business interaction. The Board and Management are responsible for ensuring that employees are well-informed about relevant laws, understand their importance, and are guided by clear, robust policies. This commitment reinforces Entral's dedication to integrity and ethical practices across all levels of the organization.

4. Anti-Corruption Responsibility and Reporting Policy

The management at Entral is responsible for preventing corruption, while employees are expected to report any known instances of corrupt practices to their immediate supervisor.

Failure to report makes an employee complicit. Those who fulfill this reporting duty are however protected from any negative repercussions, and all information provided will be treated confidentially.

5. Implementation, Compliance, and Enforcement

Entral ensures that procedures and guidelines are developed to implement and maintain the Ethical Code, integrating them into daily operations.

Entral responds to violations of its guidelines or legal regulations with necessary organizational, disciplinary, and legal measures to address the issue and prevent future misconduct. Severe cases may result in employment termination or immediate termination of consultant agreements.

Policy approved by CEO



Mathias Nilsson