

NIINA RATSULA - ANNA ROMBERG - HELGE KVAMME

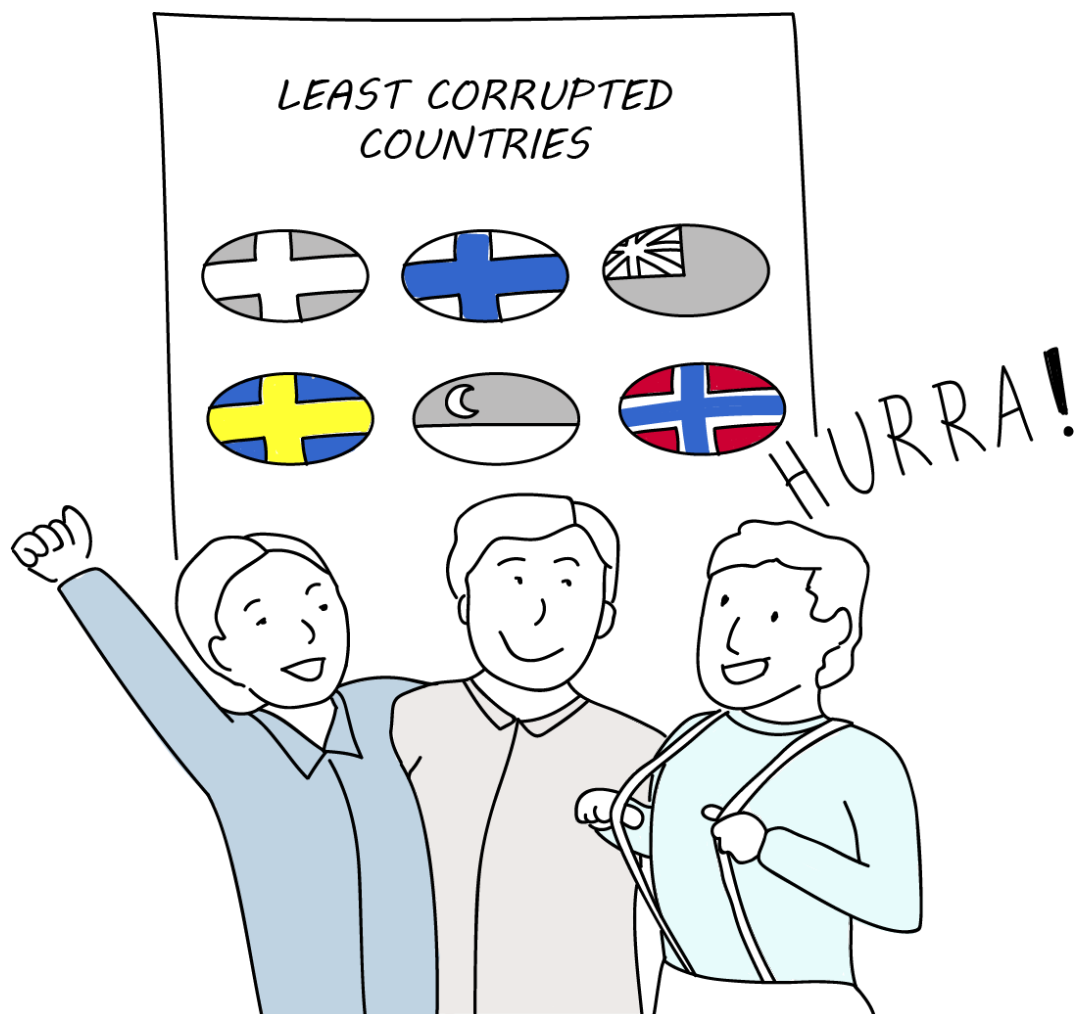
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NORDIC  
BUSINESS  
ETHICS  
NETWORK



# NORDIC BUSINESS ETHICS SURVEY 2019

A STUDY OF NORDIC EMPLOYEES' PERCEPTION OF ETHICS AT WORK



We are proud to present the first

# NORDIC BUSINESS ETHICS SURVEY

How do you define 'business ethics' when both words, in themselves, represent wide concepts? Based on our experience 'business ethics' is most tangible in its absence. When something is perceived not to be in line with commonly accepted rules or expected behavior, it is flagged as 'unethical'. Until then we perceive things to be ok.

In various global studies, our Nordic countries, are perceived as well governed and with low levels of corruption. On the other hand, we may also be described as 'blue eyed' and the culture of trust is very prevalent. When something 'unethical' is revealed by the media, we may be shocked and inclined to label these situations as abnormal. A scandal due to unethical conduct is not only damaging in terms of reputation, but is also expensive, demotivating for the employees and very likely damaging to customer relationships.

We founded Nordic Business Ethics Network as we believe there is a need for a transparent dialogue around the challenges and opportunities involved in to corporate conduct, ethics and integrity. Our mission is to support businesses to build a strong ethical culture with integrity at the core of how that organization defines itself and how it operates. The Nordic Business Ethics Survey aims to show where we stand and how we can become better. The survey also studies the prevalence of unethical behavior and how breaches of ethical guidelines and misconduct are dealt with in our organizations.

The study was conducted in collaboration with Kantar, one of the world's largest insight, information and consultancy groups. A total of 1.500 responses were collected in Finland, Norway and Sweden. Based on these responses, we see clear trends and similarities between the three countries but also some differences. In general, we seem to want to behave in the right way but are not trained how to identify and react to unethical situations. And worryingly, there is a tendency not to

react even when something unethical is noted because we are afraid of losing our jobs; do not think it would make a difference if we speak up or do not think it is our responsibility to step in.

In scandals that have been revealed, for example gross negligence of customers in the health care sector in Finland, laundering of dirty money in Swedish banks or corruption cases in Norway, we see that indications and knowledge of the misconduct were present, but was ignored or not dealt with in a professional way. Unfortunately, we see in the survey that even if employees know how to report concerns, less than half intervene in any way, and only 2% have filed a whistleblowing report. Some even say that they have been put in a situation where they have had to compromise the ethical standards. The most common reason for this was that 'my manager told me to do it'.

Our ambition with this study is to advance the discussion around right and wrong behavior in our workplaces and contribute to the efforts to build an ethical culture and ethical leadership. We want to promote the understanding of how a proactive approach and transparent discussions are a clear business advantage and raise the bar of what is expected in terms of processes and leadership.

Our aim is to conduct this study on a recurring basis and also extend it to be a 'truly Nordic' study. In addition, we are proving an opportunity for companies and organizations to conduct in-house specific studies based on the same methodology to establish a benchmark against the national and Nordic context.

Thank you for being part of this important initiative!

Niina Ratsula  
Anna Romberg  
Helge Kvamme



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## HOW TO READ THE REPORT

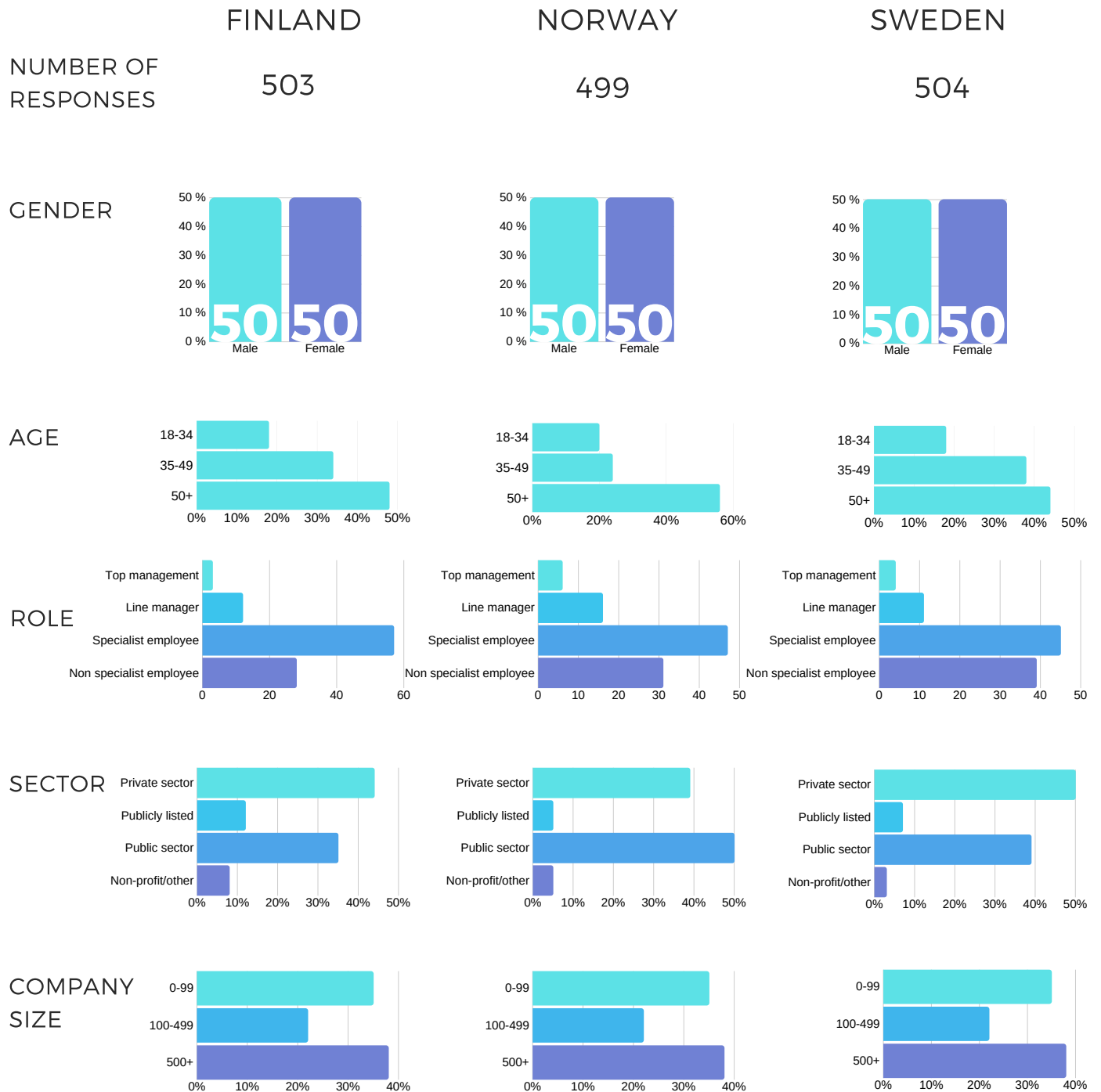
The survey has been divided into three sections: the foundation for an ethical working environment, observations of unethical behavior at work and the ethical standards of an organization.

The results are, in general, presented by the country dimension and by respondent role (i.e. top management, line manager, specialist employee and non-specialist employee) where deemed of interest.

Each section is concluded with an overall analysis where we aim to highlight the most interesting findings and provide some personal insights. In addition, we have summarized some practical take aways how to improve based on our collective experience.

All quotes in the report are actual quotes provided by the respondents.

# RESPONDENT PROFILE



This survey is owned and managed by Code of Conduct Company Oy and Anchor Integrity Oy.  
The survey data was gathered in cooperation with Kantar TNS during January - February 2019.

# **FOUNDATION FOR AN ETHICAL WORKING ENVIRONMENT**

# ETHICS AT THE CORE

ETHICS STARTS WHERE THE LAW ENDS  
AND THE LAW IS FOUNDED UPON ETHICS

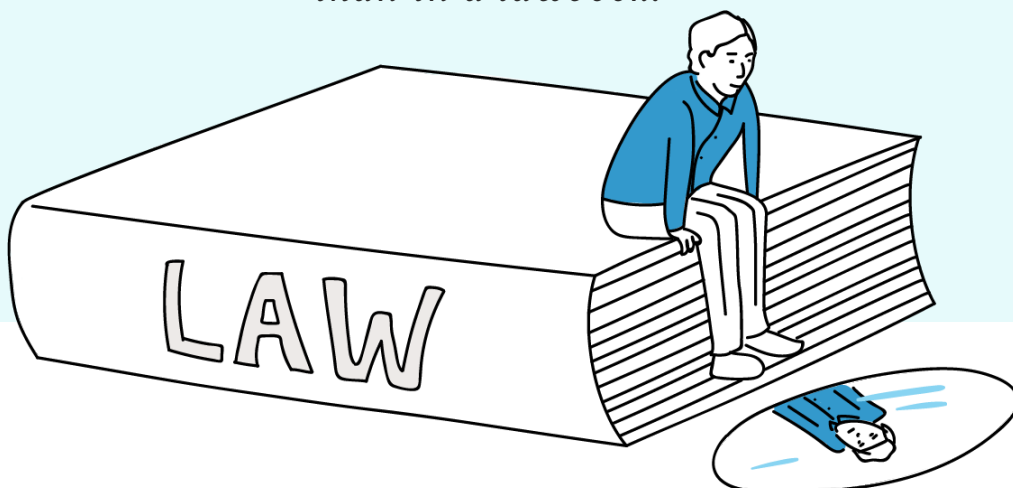
The law sets common standards for what a society has agreed to be acceptable and what is not. But expectations are constantly evolving and sometimes the law follows, however, oftentimes there is a delay.

We see corporate scandals evolve due to practices that were acceptable some years back but are now condemned. Money laundering, bribes masked as 'market intelligence' and misusing company assets for personal gain are not new phenomena, it is just that now these things are brought out in the open. Sometimes the behavior can not be deemed illegal. But the law and enforcement practices are constantly evolving. What may seem legal may still not be the right thing to do.

Disrespectful behavior, passive leadership that contradicts corporate values, favoritism, nepotism, jeopardizing safety at work, distorting facts and protecting poor management and governance, are the most common themes of unethical behavior in our Nordic organizations. But the survey respondents also told us about serious acts of misconduct like giving, receiving or asking for bribes, sexual harassment and leaking or misuse of confidential information.

Unfortunately, they are telling the same story as the recent headlines. We know unethical conduct occurs in our workplaces. When considering the issues of right and wrong, we should more often look in the mirror rather than in a lawbook.

*When considering the issues of  
right and wrong, we should more  
often look in the mirror rather  
than in a lawbook.*



*"The ethical value proposition of my employer (e.g. products, producing public services) is important to me."*



*"Ethical business practices (e.g. transparent manners, equal treatment or people and ethical leadership style) is more important to me than other factors such as salary and benefits, career path and job description."*

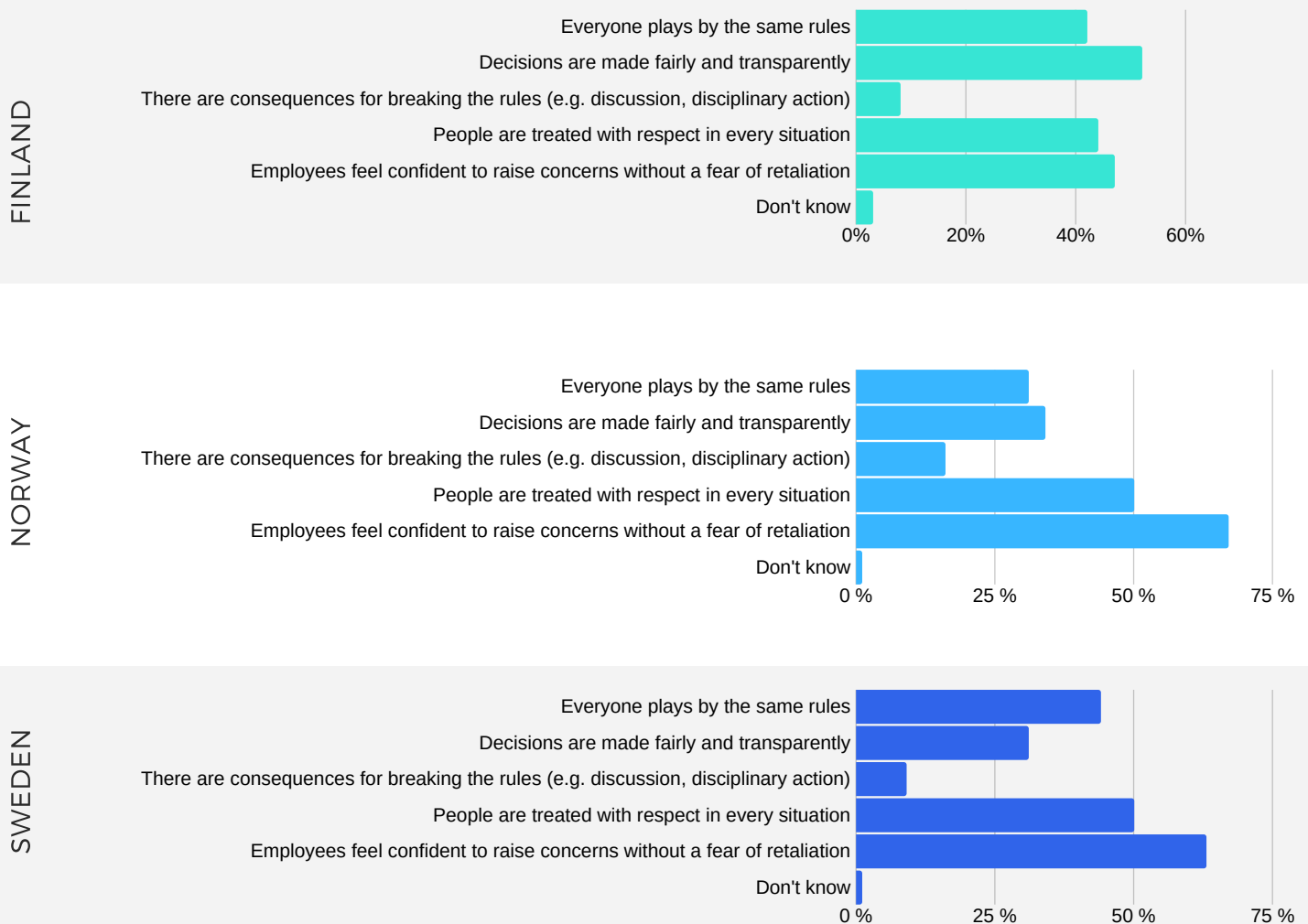


**I'LL RATHER HAVE AN  
ETHICAL WORKING  
ENVIRONMENT THAN A PAY  
RAISE OR A PROMOTION!**



# WHAT CONSTITUTES AN ETHICAL WORKING ENVIRONMENT?

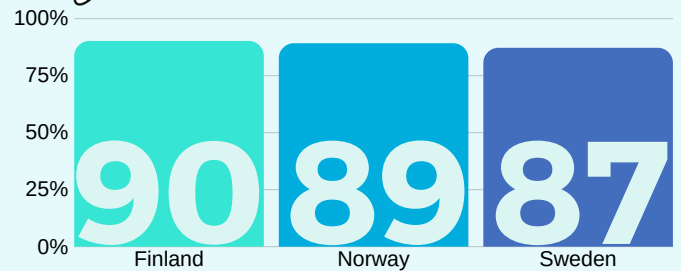
Respondents were asked to select the two most important factors which constitutes an ethical working environment.



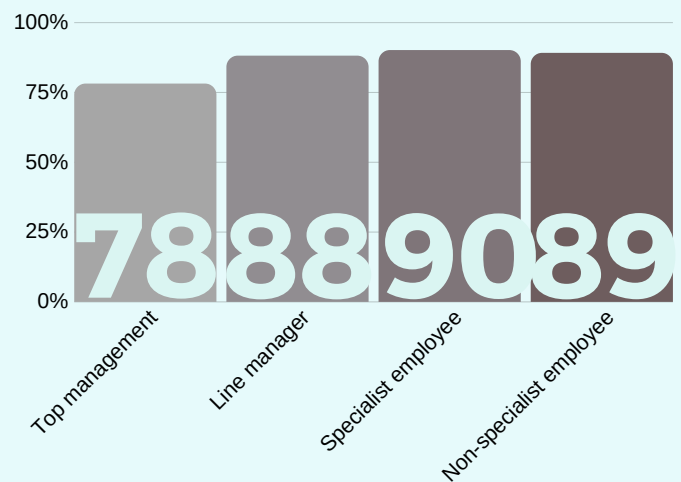
# SAME RULES FOR ALL?



*"It is very important or important to me that leaders and other employees play by the same rules."*

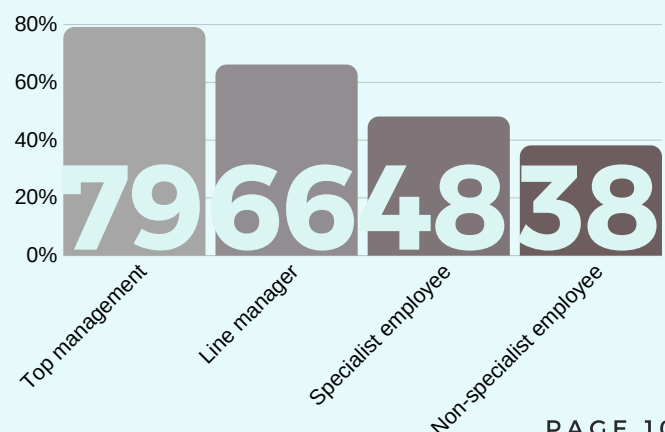


*"It is very important or important to me that leaders and other employees play by the same rules."*

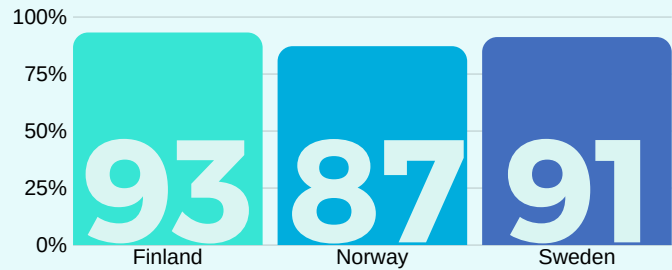


*"In reality, leaders and other employees play by the same rules all or most of the time."*

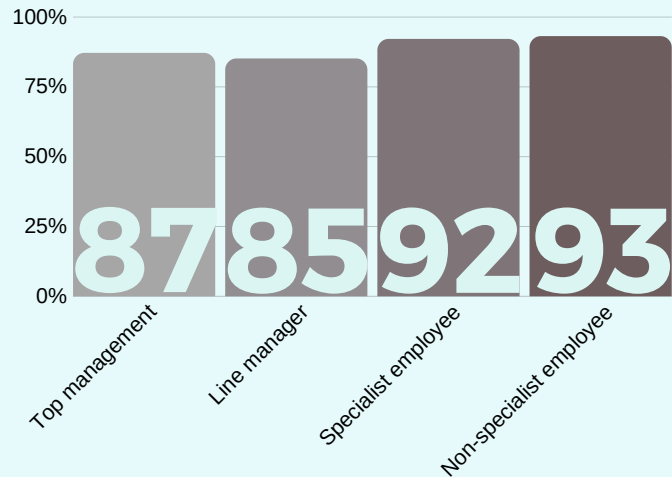
Respondents were asked how well this situation was displayed in their organization.



*"It is very important or important to me that decisions are made fairly and transparently."*

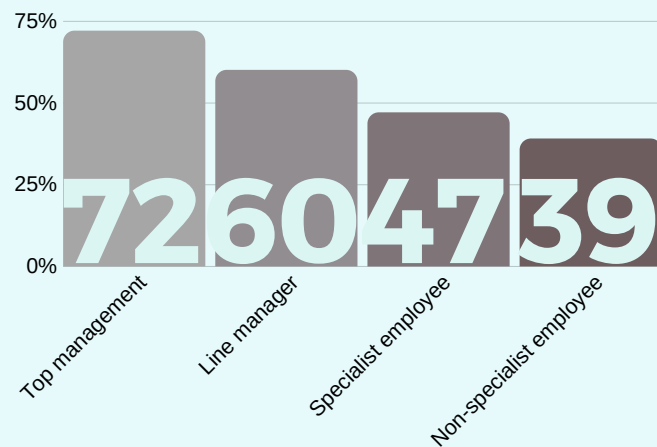


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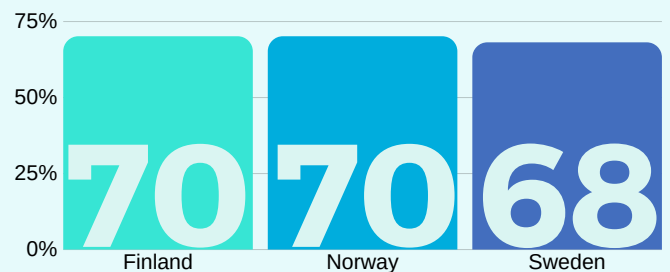


**MANAGERS MORE OFTEN PERCEIVE DECISIONS TO BE TRANSPARENT AND FAIR THAN EMPLOYEES**

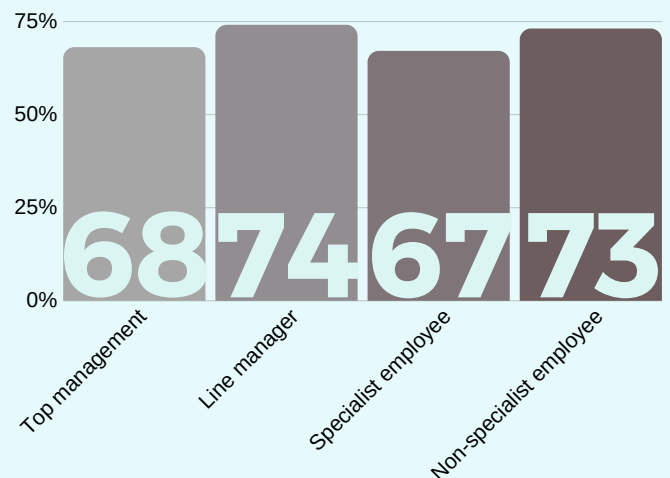
# MISCONDUCT IS MORE LIKELY THAN NOT TO GO UNPUNISHED



*"It is very important or important that there are consequences for breaking the rules."*

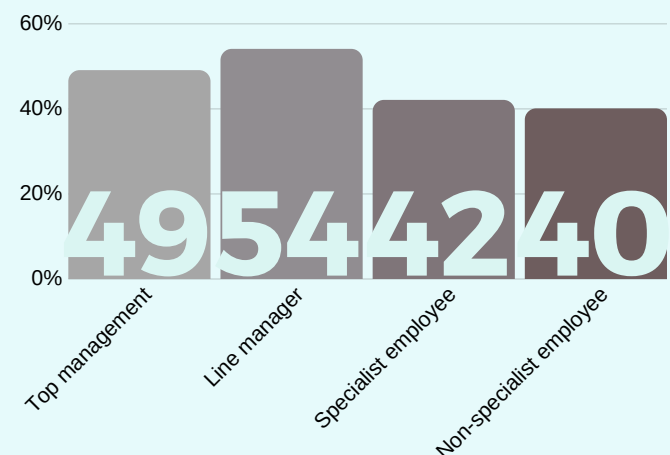


*"It is very important or important that there are consequences for breaking the rules."*



*"In reality, there are consequences for breaking the rules."*

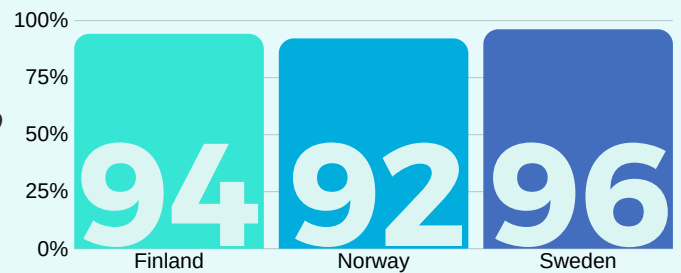
Respondents were asked how well this situation was displayed in their organization.



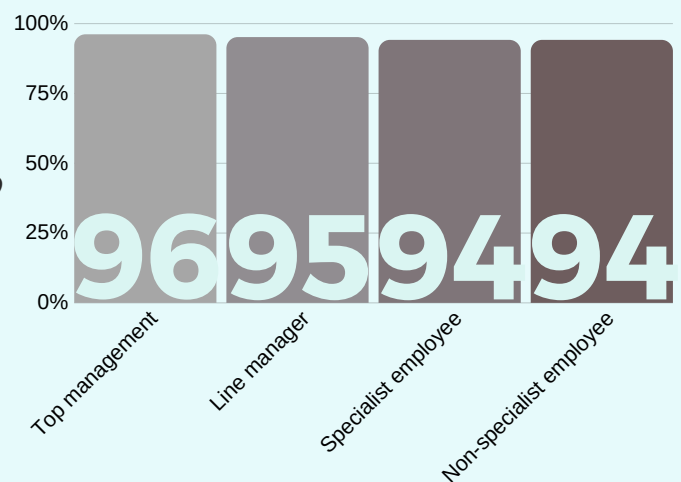


## COULD I GET SOME RESPECT, PLEASE!

*"It is very important or important to me that people are treated with respect in every situation."*

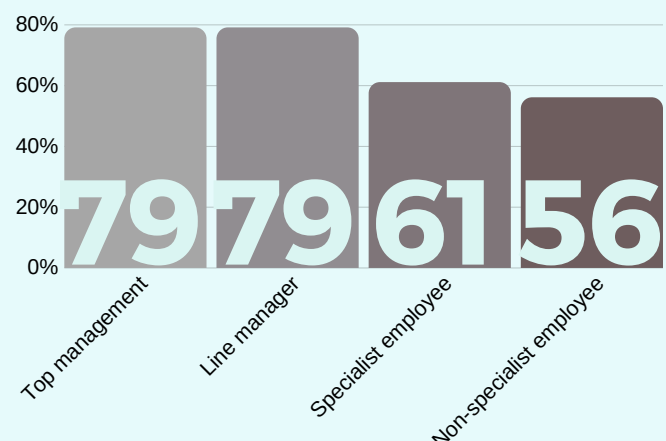


*"It is very important or important to me that people are treated with respect in every situation."*

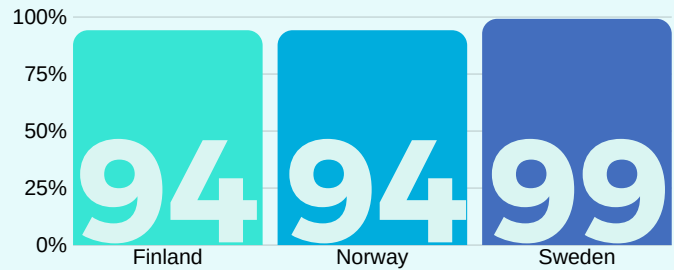


*"In reality, people are treated with respect in every situation."*

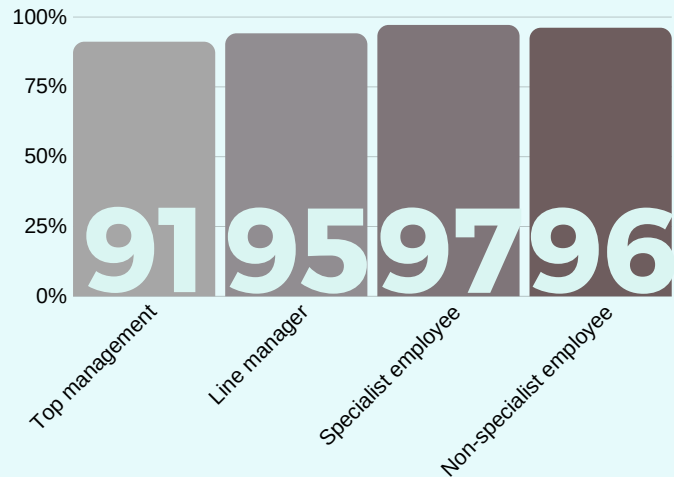
Respondents were asked how well this situation was displayed in their organization.



*"It is very important or important to me that employees feel confident to raise concerns without a fear of retaliation."*

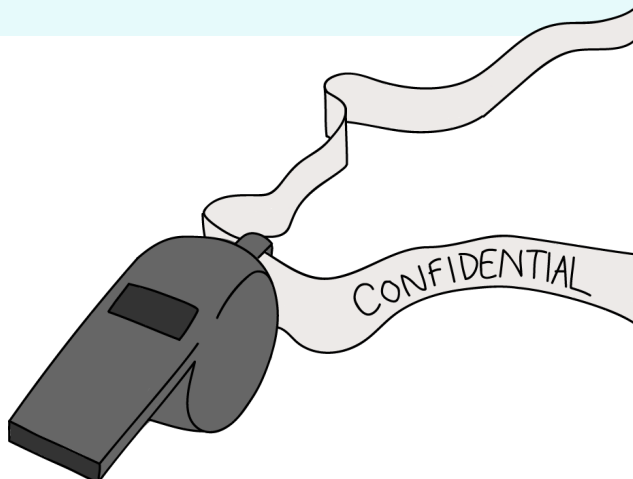
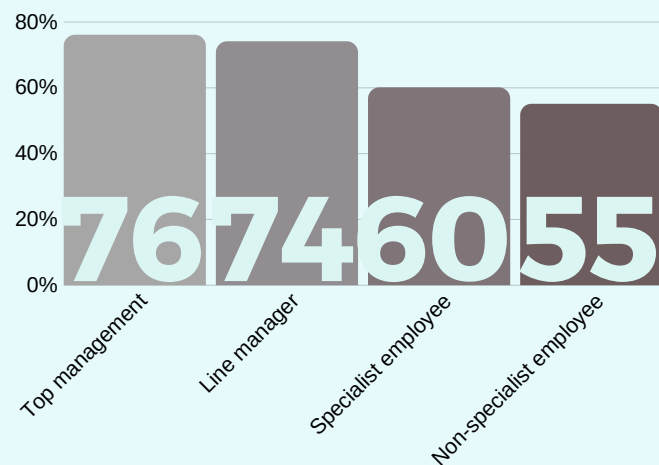


*"It is very important or important to me that employees feel confident to raise concerns without a fear of retaliation."*



*"In reality employees feel confident to raise concerns without a fear of retaliation."*

Respondents were asked how well this situation was displayed in their organization.



**WE CAN CREATE A SAFER ENVIRONMENT FOR EMPLOYEES TO RAISE CONCERNS**

# SUMMARY

In summarising an ethical working environment the results were clear from all countries that the employees expected a high standard of ethics of their employers. We want our companies to do more than generating money. And a strikingly high number of the respondents perceive ethical working practices to be more important than salary or career path. Based on this, we can conclude that a salary raise or promotion are worth less, to over 90% of the respondents, than transparent and fair business practices.

When assessing the ethical foundation for an organization, we explored the importance of same rules for all, transparent and fair decision making, consequences for misconduct, respect and possibility to raise concerns without a fear for being punished. When it comes to the importance of actual practices, we see some differences between the countries. In Finland the most important factor is that decisions are made fairly and transparently, whereas the importance of being able to raise concerns without a fear of retaliation is valued highest in both Norway and Sweden. Can we assume that employees in Finland expect someone else to make the right decision, where employees in Norway and Sweden are most concerned with whether they have made the right decision?

In general we can see that the top and line managers that responded to the survey had a more positive view of the actual practices than non-managerial employees. For example, almost 75% of top and line managers believe that their employees feel confident to raise concerns. However, when asking employees the confidence drops to 55-60%. In general, we see that the importance of the various parameters is fairly equally assessed apart from the importance of playing by the same rules. Here we see that top management rates this less important (10%) than the other respondent groups. When it comes to practical application, 79% of top management thinks that leaders and employees always play by the same rules, while only 38-48% of employees agree.

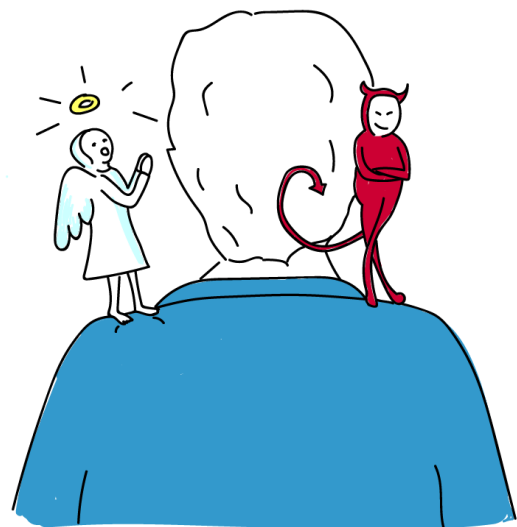
Why do top management and managers perceive the reality as better than employees? Is this because issues are not brought to their attention? Can it be an indication that employees do not speak up? Our experience is that business circumstances are rarely black and white: decisions have to be made quickly and sometimes it is not possible to have a perfect view of the practical consequences or impact. Transparency and honest dialogue, respect and a speak-up culture is key to enable ethical business in the grey zone.

## KEY TAKEAWAYS

### FOUNDATION FOR AN ETHICAL WORKING ENVIRONMENT



1. There is no question that ethical working practices are a very important factor for employees.
2. Transparency is a key element in building an ethical culture.
3. Leaders and managers should encourage a transparent dialogue and humbly acknowledge that they tend to have a 'rosier' picture of the reality.
4. Leaders should reflect on whether allowing separate rules for leaders and employees fosters the desired ethical culture.

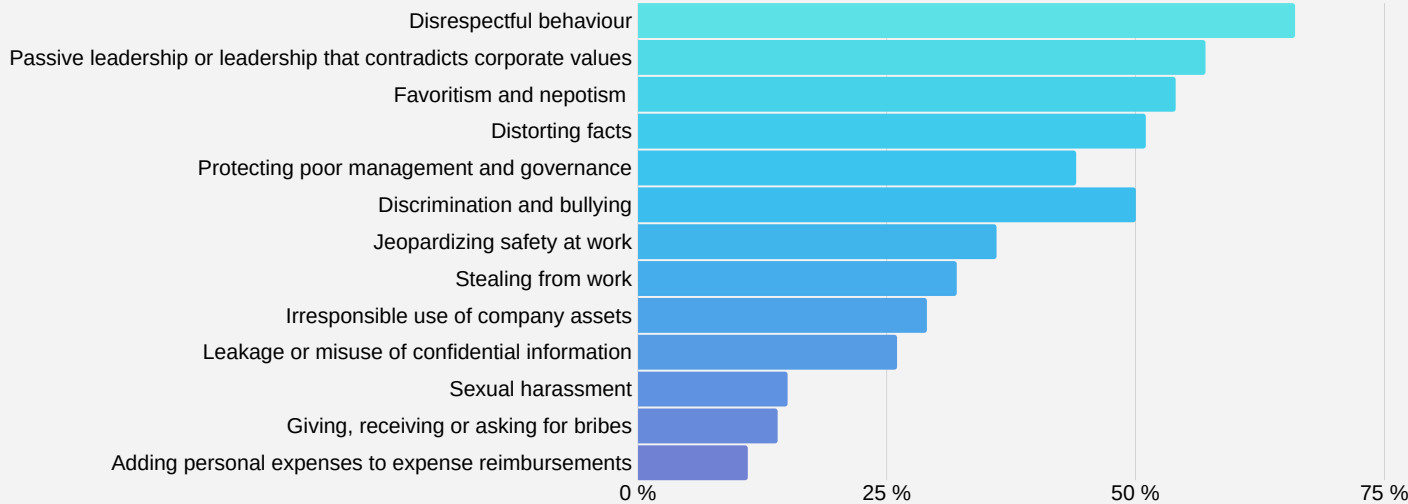


# **OBSERVATIONS OF UNETHICAL BEHAVIOR AT WORK**

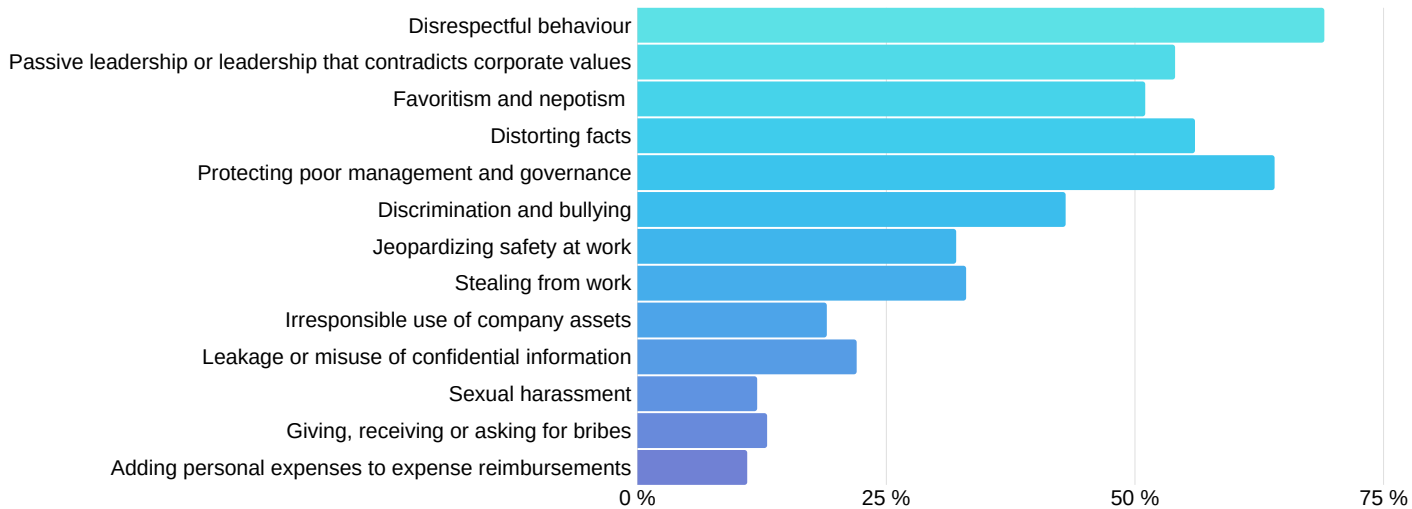


# OBSERVATIONS OF UNETHICAL BEHAVIOR AT WORK

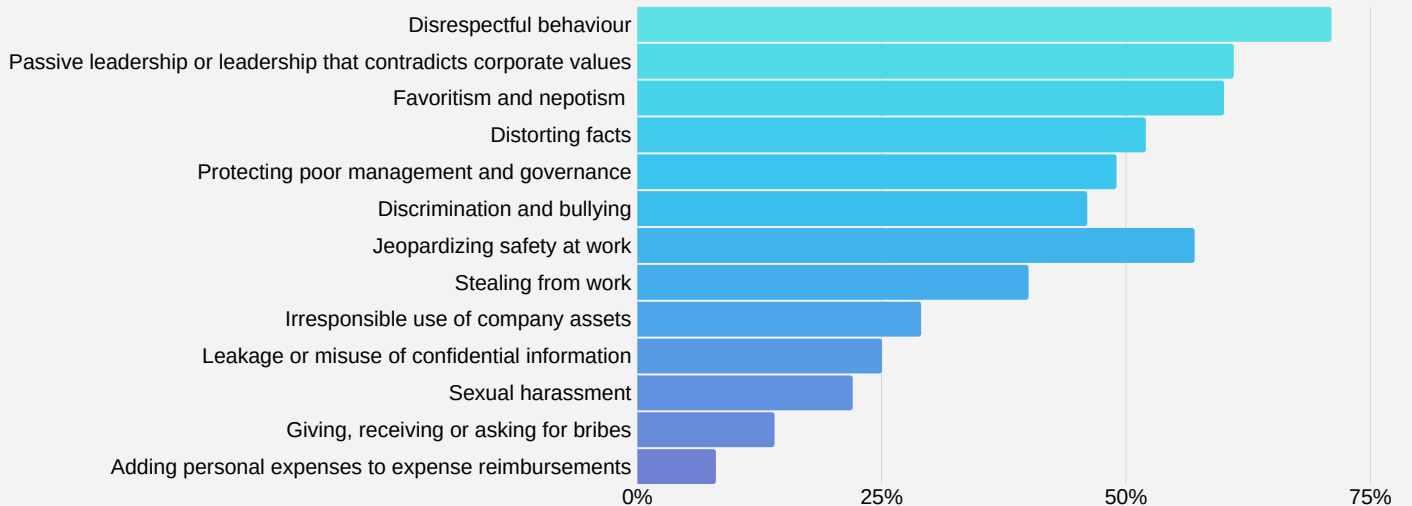
FINLAND



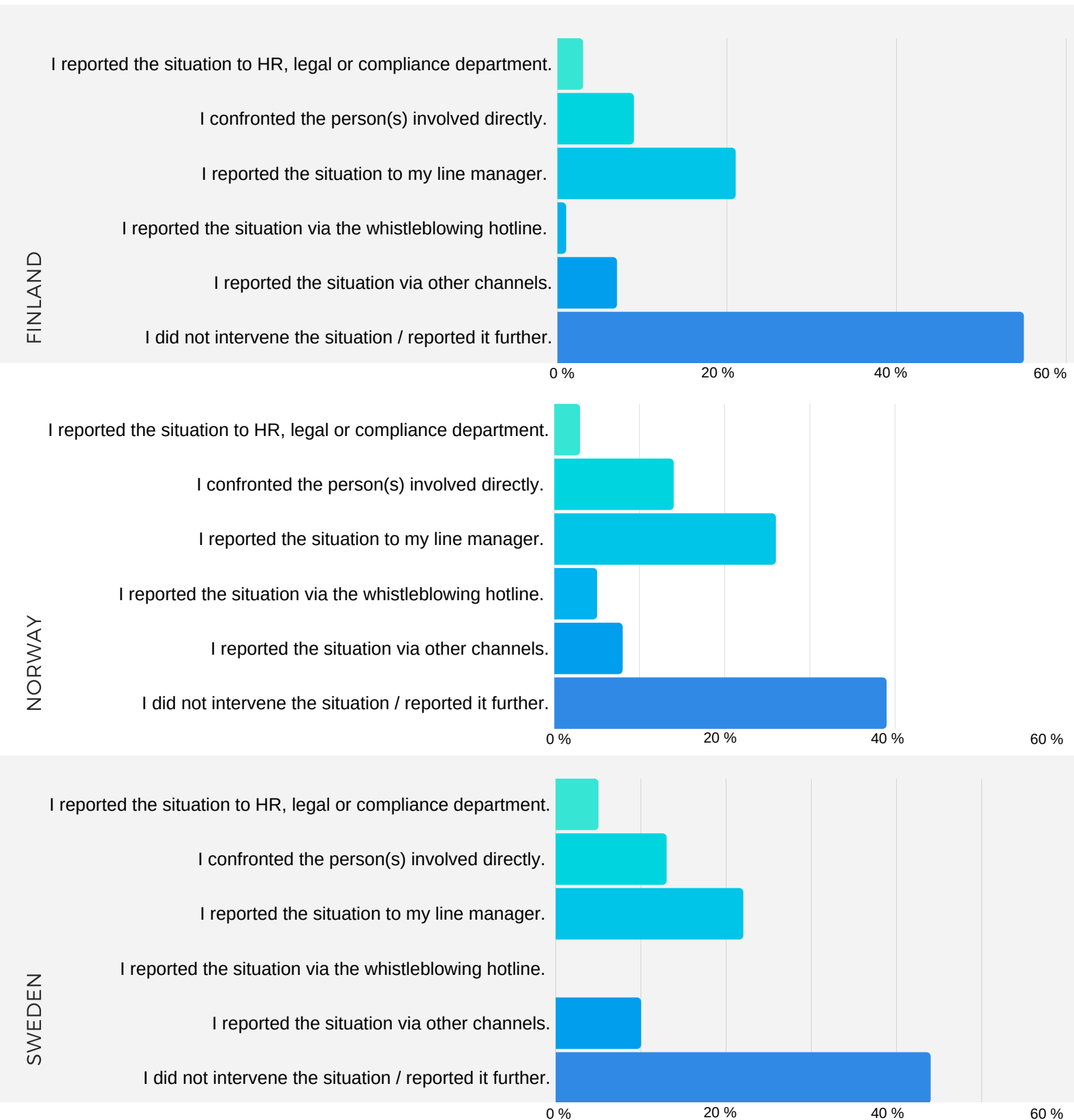
NORWAY



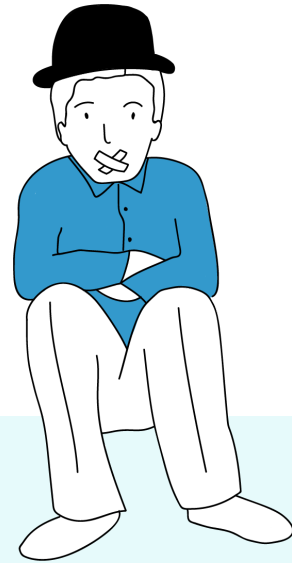
SWEDEN



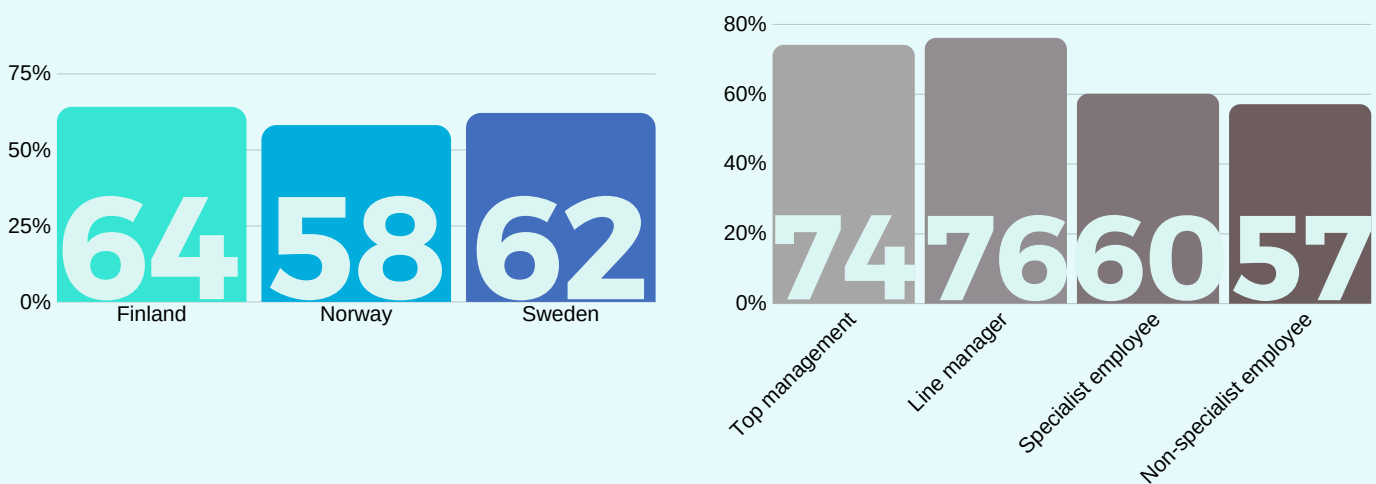
# ACTIONS TAKEN WHEN HAVING OBSERVED UNETHICAL BEHAVIOUR



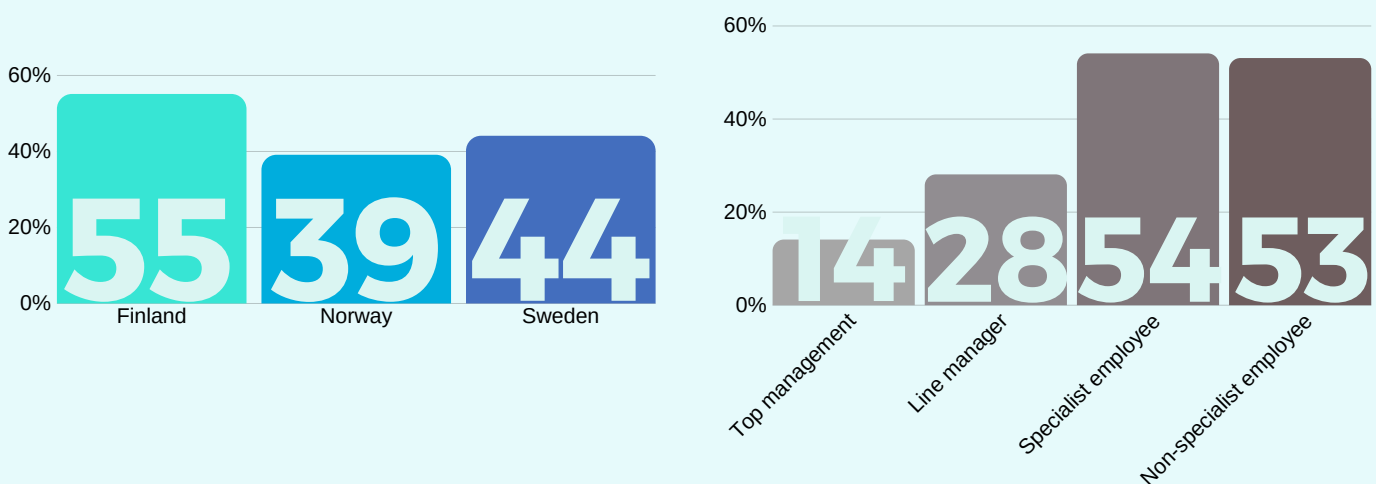
# STANDING UP FOR WHAT IS RIGHT DOES NOT COME EASY



*"Yes, I know how to act when I see something that is illegal or unethical."*

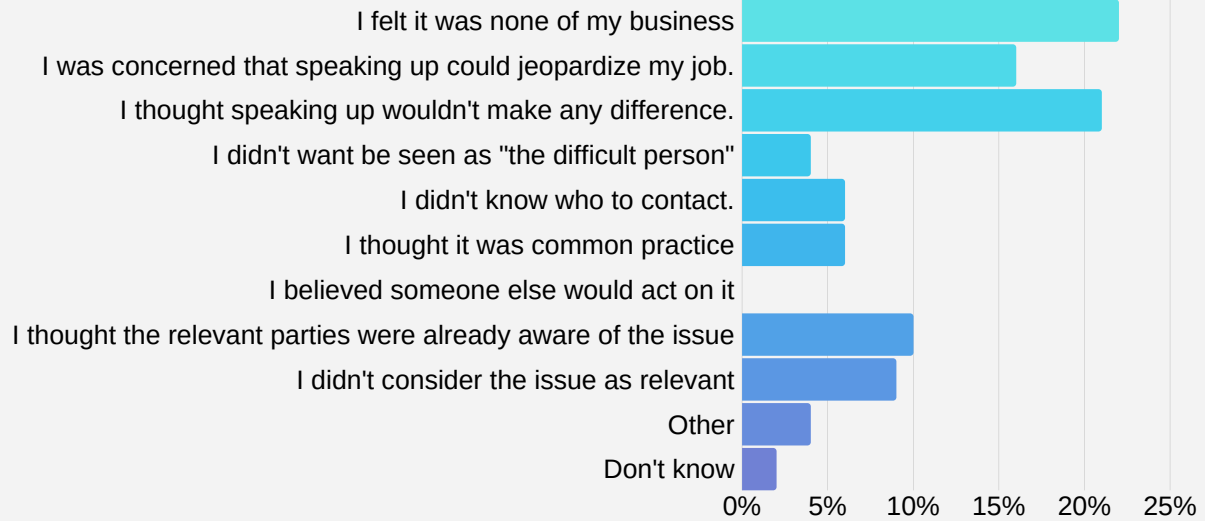


*"I did not intervene when I witnessed something illegal or unethical."*

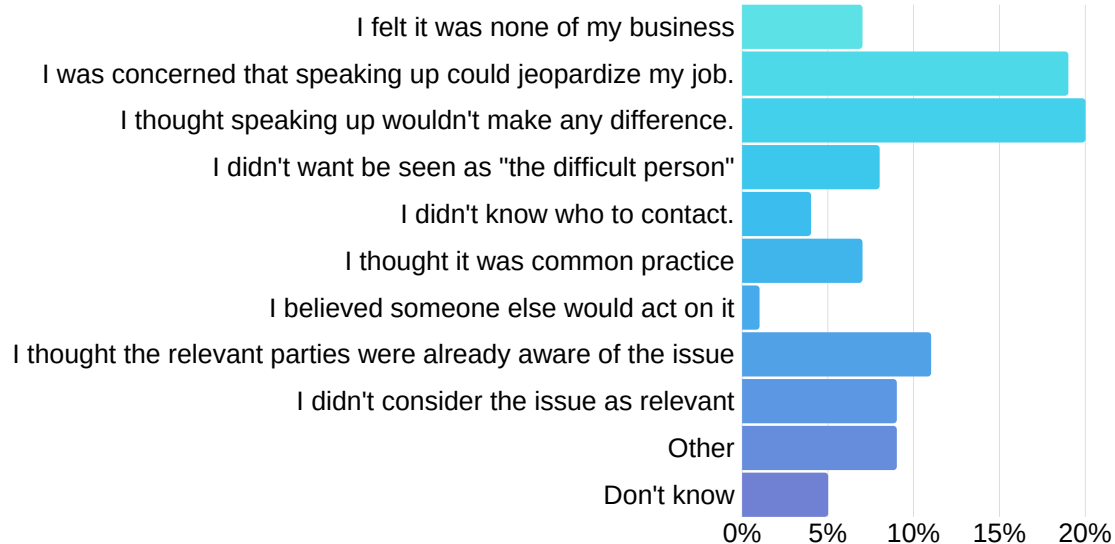


# WHY DO WE NOT INTERVENE WHEN WE SEE THAT SOMETHING IS WRONG ?

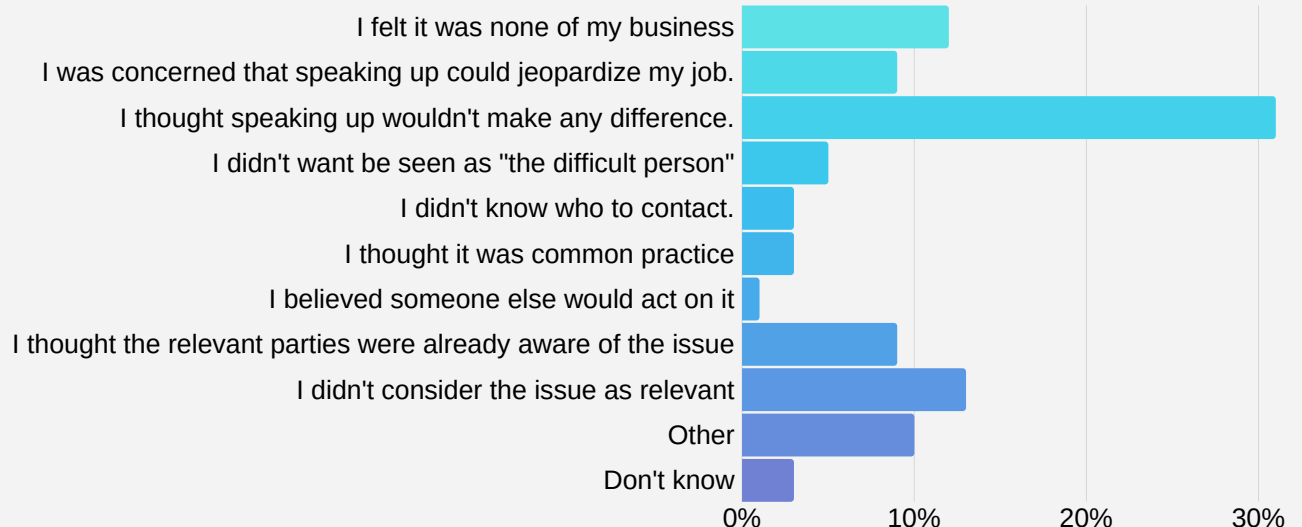
FINLAND



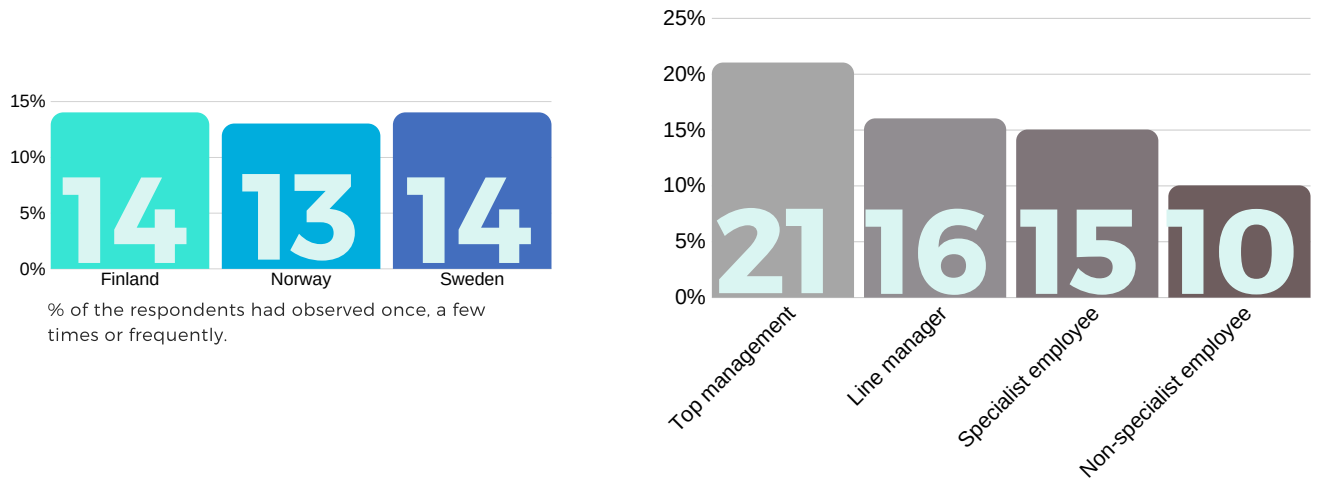
NORWAY



SWEDEN



*"How often have you observed giving, receiving or asking for bribes (e.g. inappropriate gifts, unreasonable entertainment or other personal benefits) at your workplace?"*



# 21 %

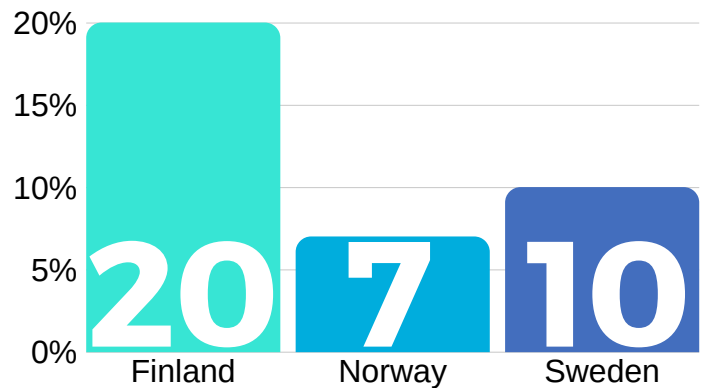
of top management respondents have observed giving, receiving or asking for bribes at their workplace.



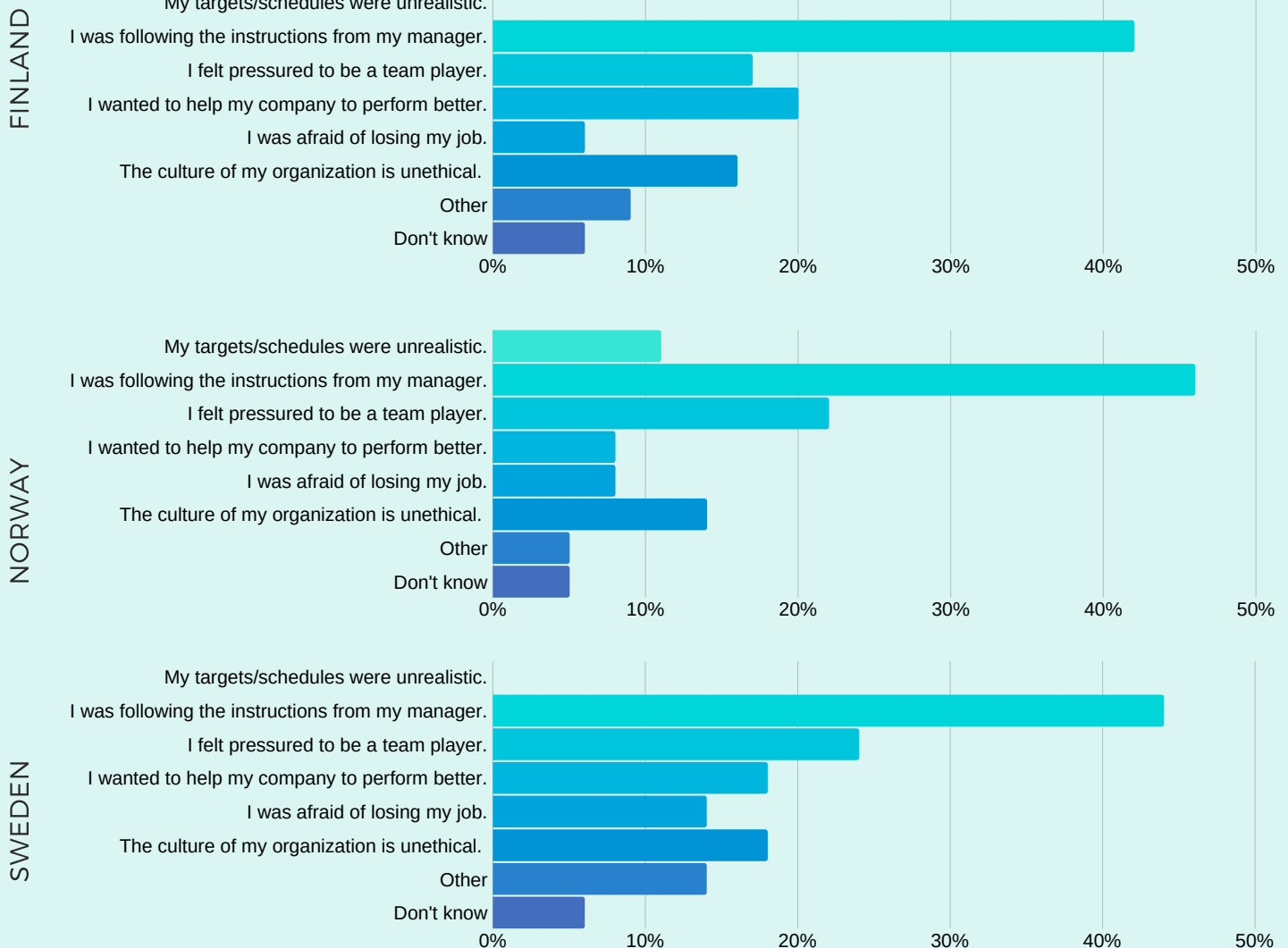
**IS IT CLEAR IN YOUR ORGANIZATION WHAT CONSTITUTES AN INAPPROPRIATE GIFT OR UNREASONABLE ENTERTAINMENT?**

# COMPROMISING THE ETHICAL STANDARDS

*"I've been put in a situation at work where I have had to compromise ethical standards of my organization."*



Respondents were asked why they had compromised the ethical standards.



# IT'S NOT JUST WHAT WE DO, BUT ALSO WHAT WE DO NOT DO

So, we know that we have ethical issues in our workplaces. And we know that this is neither good for the business, our shareholders and our customers nor for the working environment. But why do we not get more involved when witnessing behavior and activities that are not right? What we see is that two in three say that they know what to do when witnessing something illegal or unethical. Yet over half of the employees who have witnessed misconduct decide not to do anything about it. Worryingly, one in four line managers also decided not to do anything.

Unfortunately, this reflects what we have also seen in the field. If the organizational culture does not support speaking up, there is a big hurdle for raising concerns. Think about it yourself: how often have you intervened when witnessing something unethical? In Finland the most common reason for not intervening is the perception that "this is none of my business". In Norway and Sweden most of the respondents felt that speaking up would not make any difference and in Norway the respondents were also concerned that speaking up could jeopardize one's job. Top management have a rosier picture of the speak up environment where 76% thought that employees felt comfortable raising concerns while only 55% of non-specialist employees thought the same. It seems like employees in Finland more often, than their peers in Norway and Sweden, are put in a situation where ethical standards had to be compromised. And the most common reason in all countries for compromising the ethical standards were "because my boss told me to".

What about corruption and bribery then? 14% of the respondents said that they had witnessed corruption or bribery in some form and an additional 9% said that they were uncertain about whether it was bribery that they had witnessed. 21 % of top management respondents said that they had witnessed bribery or corruption. And in contrast to the general use of the whistleblowing hotline, corruption cases are more likely than not reported in the whistleblowing hotline. Over half of the employees that had witnessed corruption or bribery said that they had filed a report using the whistleblowing hotline.

No matter if it's a minor operational issue, suspected fraud, corruption or other serious misconduct, the response should never be ignorance. And it is crucial to provide a confidential means for reporting, and for having expertise and resources to look into the reports. The organizational culture is created by the daily actions by what is said and done, but also by leaving things unsaid or undone.



## KEY TAKEAWAYS

### OBSERVATIONS OF UNETHICAL BEHAVIOR AT WORK

1. Culture is created - every day!
2. Train managers in identifying ethically compromising situations and self-reflection.
3. Train employees in how to act when witnessing an ethically compromising situation.
4. Ensure that you have a safe working environment, not only physically but also psychologically. Everybody should feel comfortable raising their concerns!

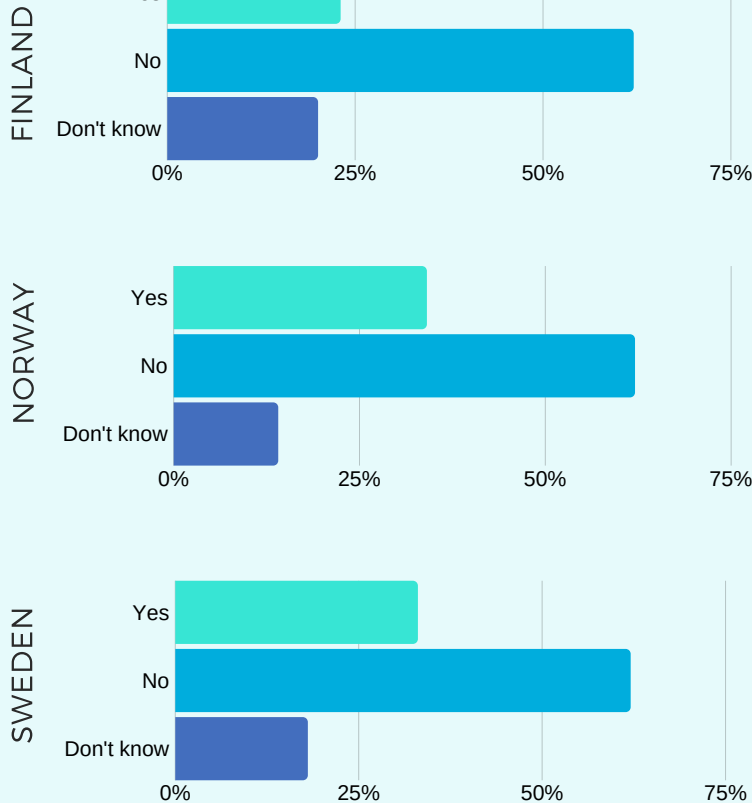
# **THE ETHICAL STANDARDS OF AN ORGANIZATION**



# CULTURE IS BUILT THROUGH TRAINING AND PROCEDURES

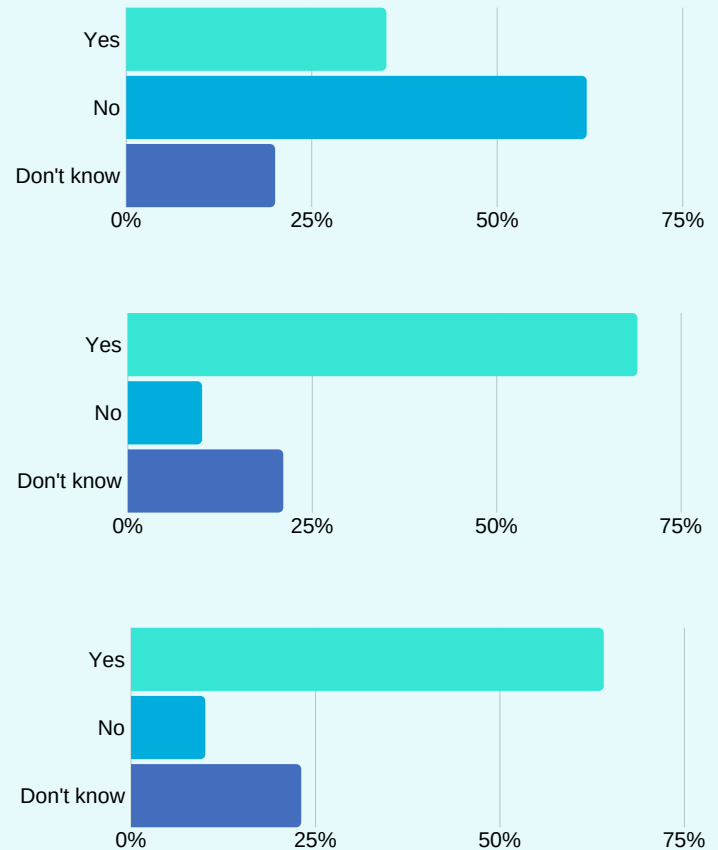
## TRAINING

Respondents were asked if their organization regularly organizes training about ethical workplace behaviour



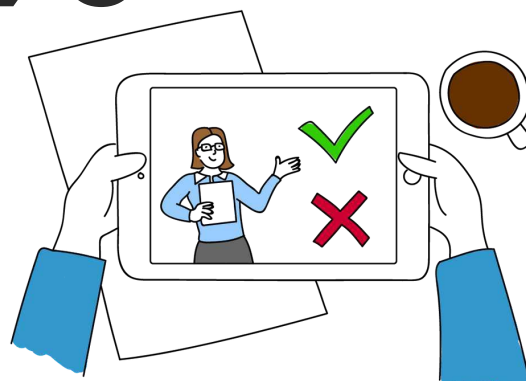
## CODE OF ETHICS & CONDUCT

Respondents were asked if their organization has a Code of Ethics and Conduct.



# 26 %

of employees receives regular training about ethical workplace behavior

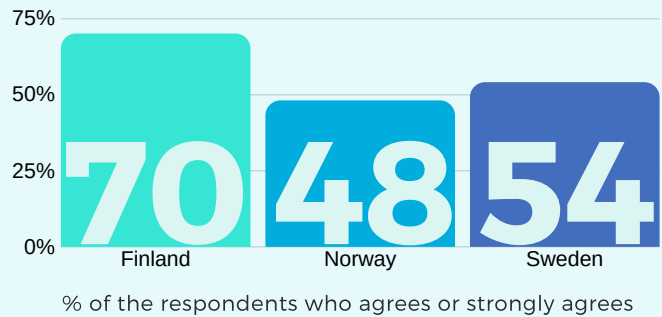


# 26 %

of the respondents who have encountered an unethical situation do not know if their organization has policies prohibiting such conduct.

# CULTURE IS BUILT BY WALKING THE TALK

*"My manager promotes integrity and doing the right thing in his/her speeches."*



*"Usually, my manager provides a good example of ethical business behavior."*



*"Issues of right and wrong are often considered in the meetings and decision making."*

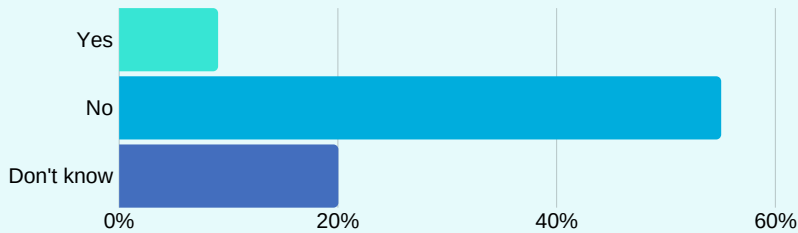


# CULTURE IS BUILT BY REWARDS AND INCENTIVES

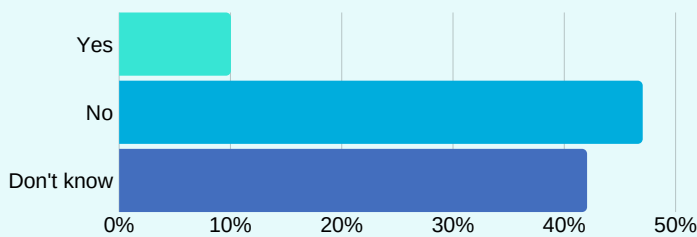
## INCENTIVES

Respondents were asked if ethical behaviour is factored into the incentive structures of their organization

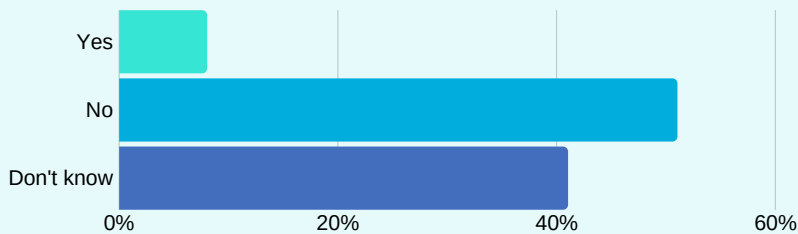
FINLAND



NORWAY



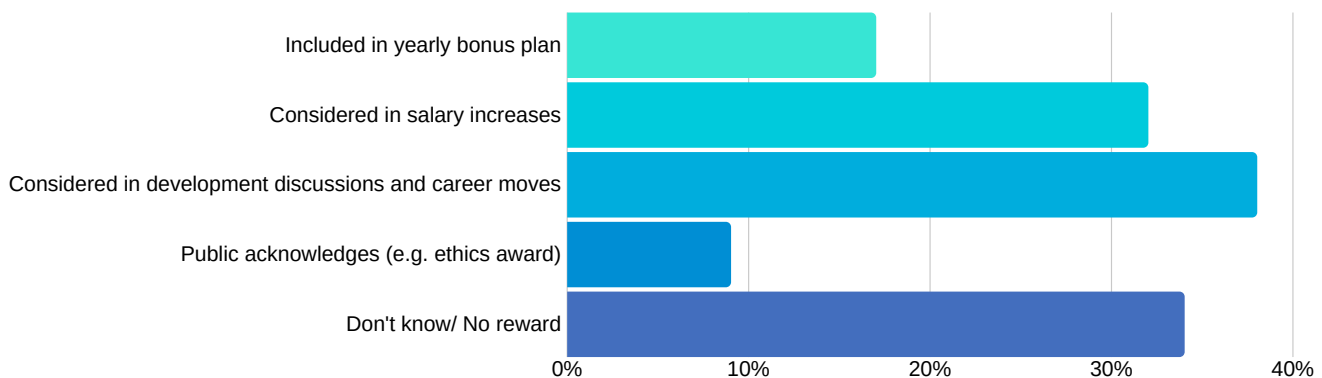
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**9%**

have ethical considerations included in the incentive structures of their organisation

Respondents were asked how ethical behaviour is factored into the incentive structures of their organization

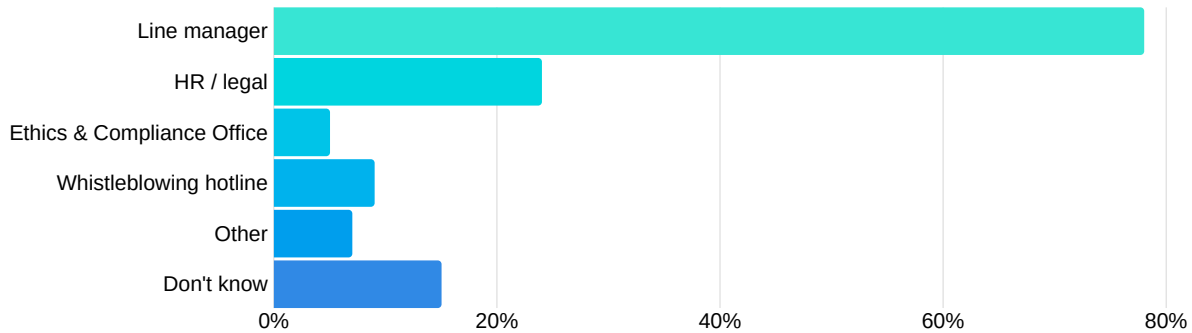


# CULTURE IS BUILT BY LISTENING TO CONCERNS

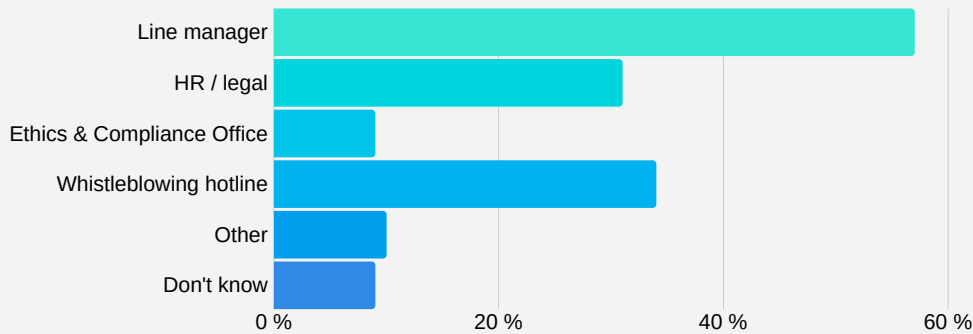


Respondents were asked what channels their organization has for raising concerns

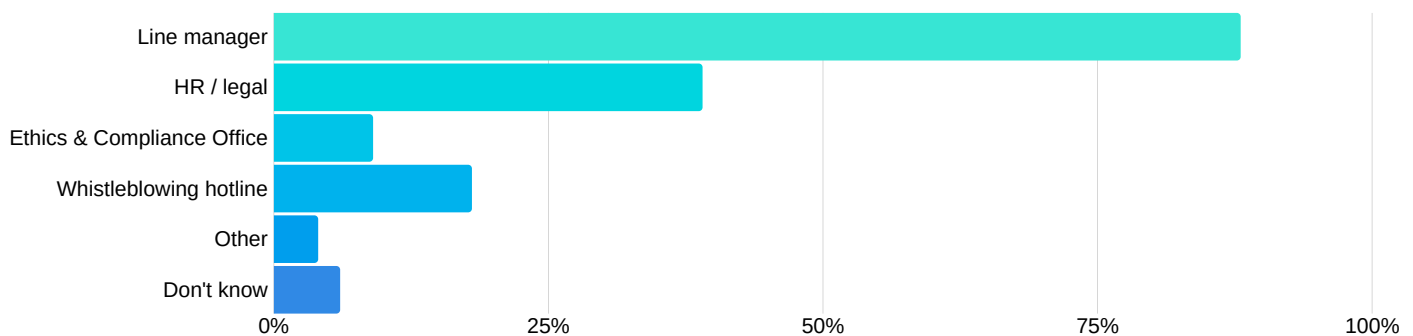
FINLAND



NORWAY



SWEDEN



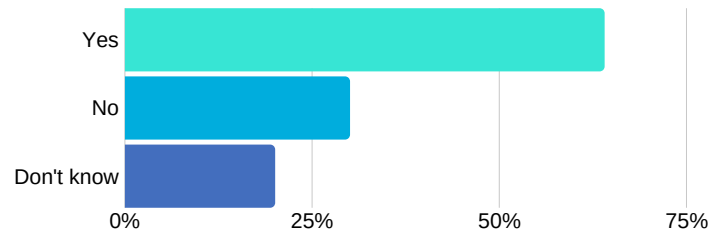
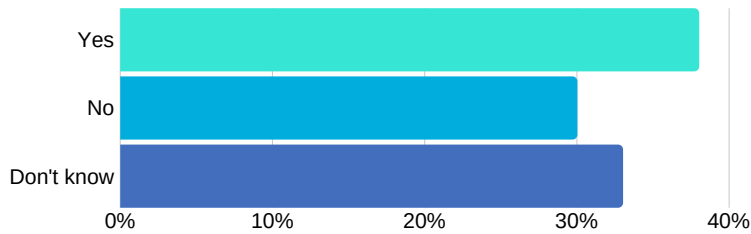
## CONFIDENTIAL CHANNELS

Respondents were asked if their organization provides a confidential reporting channel for reporting suspected fraud or unethical behaviour. If applicable it provides for anonymous reporting.

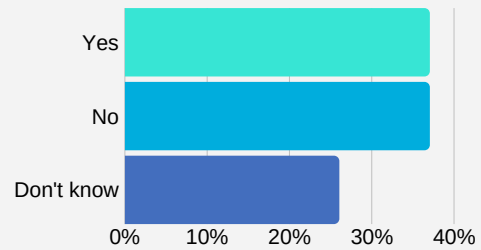
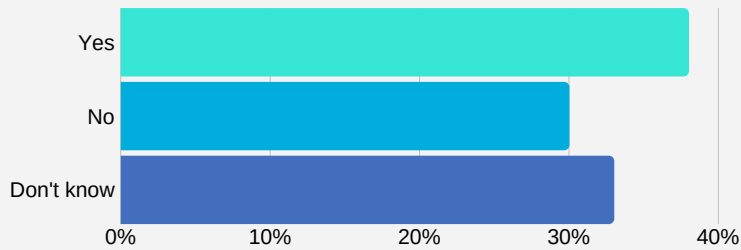
## DEDICATED FUNCTION OR PERSON

Respondents were asked if their organization has nominated a function or a person to whom ethical concerns can be addressed.

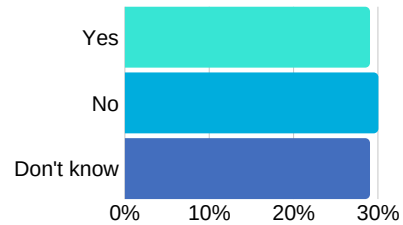
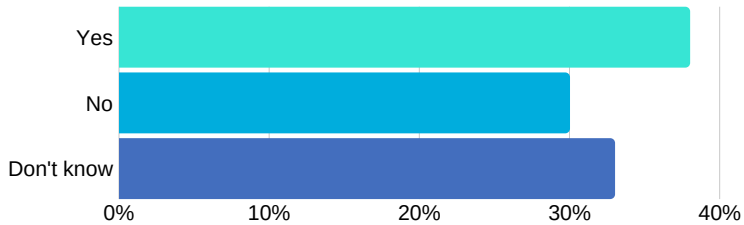
FINLAND



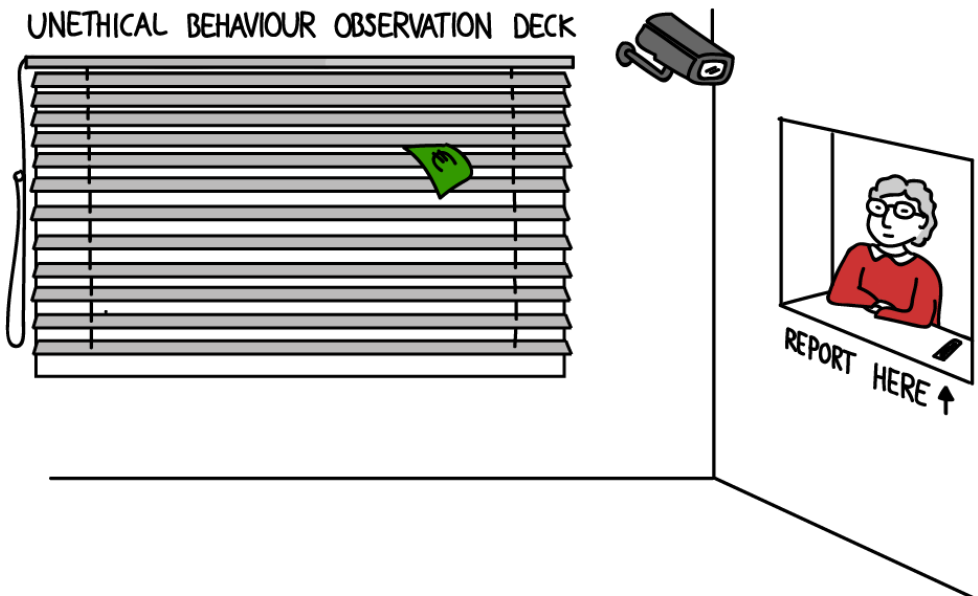
NORWAY



SWEDEN



### UNETHICAL BEHAVIOUR OBSERVATION DECK



# CULTURE IS BUILT THROUGH LEARNING AND CORRECTING

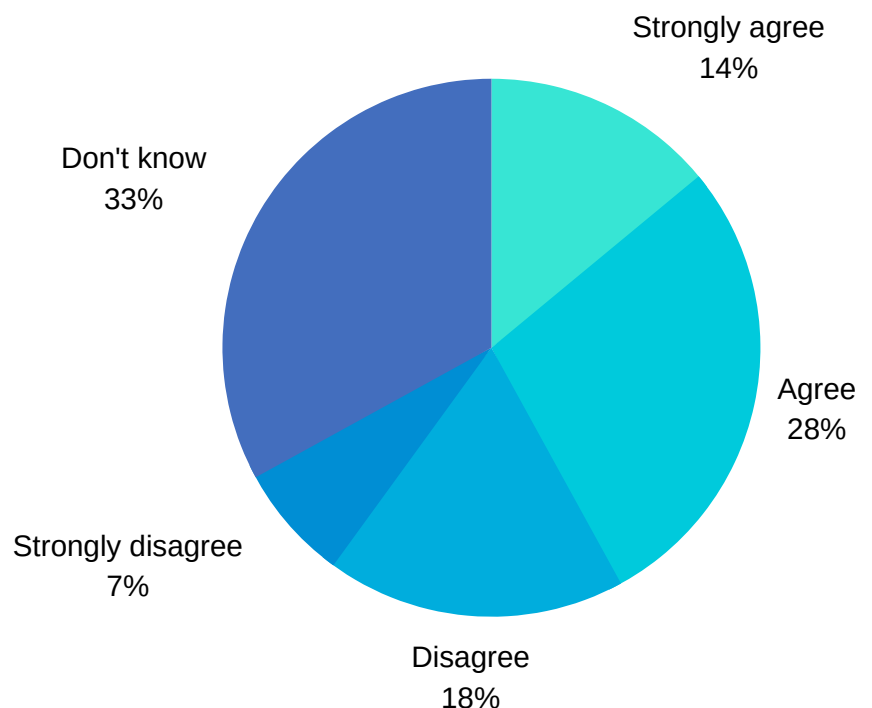
*"Unethical behavior is disciplined in my organization."*



**33%**

of the respondents do not know if unethical behavior is disciplined in their organization.

*Unethical behaviour is disciplined in my organization.*



# CONCLUSIONS

In concluding the ethical standards of an organization we have assessed whether an organization provides training, have established standards such as a code of ethics and conduct and whether the ethical standards are visible in the daily operations. In addition we have asked what kind of channels are provided for raising concerns.

As we are professionals in the field, and have provided hundreds of hours of training to employees and managers, we were surprised that so few of the respondents receive continual training on ethical matters. Only one third of the respondents are being trained. And in the light of this we can understand why employees may feel reluctant to speak up. Training brings confidence and awareness of what type of behavior is expected. The most common channel for reporting is the line manager, and in this context it is worrying that one third of the line managers have decided not to do anything when they have encountered some misconduct. Confidential whistleblowing channels are becoming increasingly common, however, this is an area where many organizations can reap low hanging fruits. But it is not only about collecting reports but also ensuring that there is sufficient competence and adequate processes to assess and manage the concerns as well.

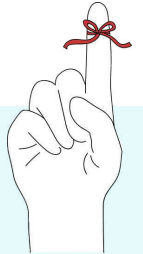
Having a Code of Ethics and Conduct seems to be more common in Sweden (64%) and Norway (69%) than in Finland (35%). What surprised us here was the high number of respondents that did not know whether they had a Code of Ethics and Conduct. A code that employees are not made aware of and is not conveyed through training is a wasted investment. When assessing situations where employees have witnessed something unethical, 28% of the respondents said that they personally thought it was unethical however they were not aware that their organization would condemn such conduct. Perhaps their policies and procedures have not been updated in line with the increased expectations?

Culture corrupts and many ethical scandals are a result of ethical blindness. This is a situation where compromising ethical values become so normal, that one cannot see it anymore. It is the role of leaders to make sure that the incentives and measures in daily work are realistically achievable, and that what gets measured is not only what is being done, but also how the end result is being achieved. Only a few organizations (9 %) have ethical considerations included in their incentive structures. You get what you measure – you get what you pay for. If bonuses are paid and promotions are obtained by cutting corners, ethics training and colorful code of conduct brochures will not make much difference.

We have a lot to learn and improve, but there are certainly many good organizations to learn from as well. What is certain is that the expectations on ethical businesses will continue to increase, which in the long run is a win for all. In the short term, however, it will require some investment.

## KEY TAKEAWAYS

### CREATING AN ETHICAL ORGANISATION



1. Provide clear guidance to the organization on expected conduct. Make sure it is practical and not only 'wish-statements'.
2. Make it clear that the full objective is not just to hit target, but to hit it in the right way.
3. Provide opportunities for training and dialogue, listen to your employees.
4. Provide confidential channels for reporting suspected misconduct. Make sure you look into the reports in a professional way.



*"We do not talk about ethics apart from on the level of values. Nobody is telling us or giving training about what this really mean in practice in the daily operations. Rarely do we talk about the consequences from unethical conduct."*



*"Sometimes you need to make fast decisions and do not have time to verify. And then you are forced to hide some parts of the decisions."*

*"Many unethical issues are known by all and are approved. In addition there is no anonymous reporting channel through which concerns can be reported."*



THIS IS HOW  
IT HAS BEEN  
ALWAYS DONE

*"The ethical guidance is scattered, there is not a holistic view, the training is missing and compliance is not monitored."*



*"My perception is that many colleagues do 'as always have been done' despite focus on values. At the end of the day you see that invoices are approved because 'that has always been done' despite of that there is no underlying evidence of work performed"*

*"In general people want to behave honestly and ethically - in practice you do not however know what is the right thing to do. Ethical norms are not always actively in mind and you do not think about them. You do not know how to act when the situation is at hand. Other factors are more prevalent like profit, growth and personal success."*



*"After a threat I did not bother to take up any issues anymore at my workplace. When raising the issue I was threatened with termination and nowadays I do not intervene if I am not forced to, and only if I am willing to sacrifice my job."*

*"I reported that this is a violation of our decision making processes. I got the response that if I don't do this way I should evaluate if it was the right workplace for me."*

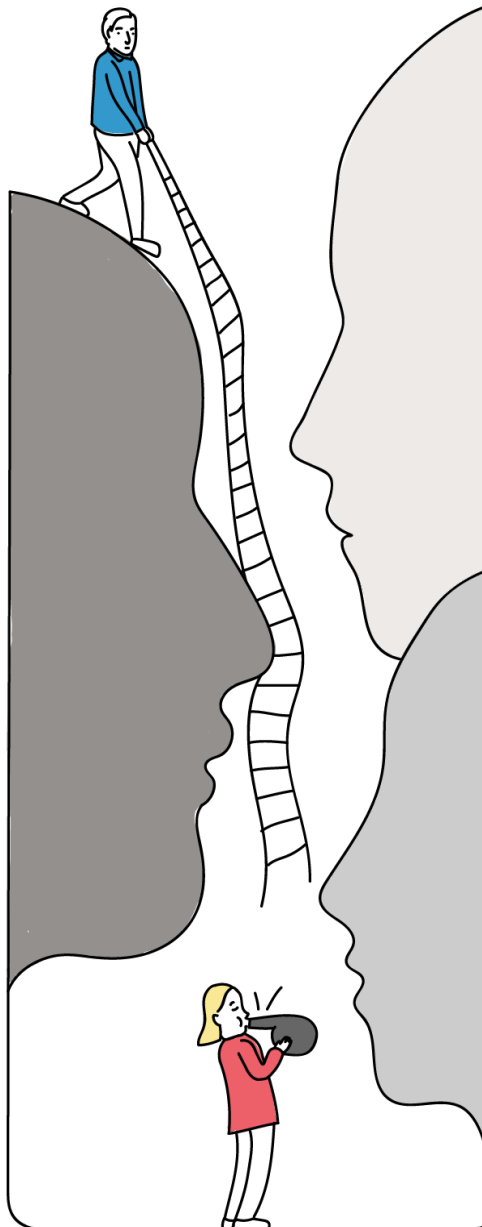
*"The company has a good ethical profile, but the daily operations and profit is what is in focus. Ethical principles are put aside for efficiency."*

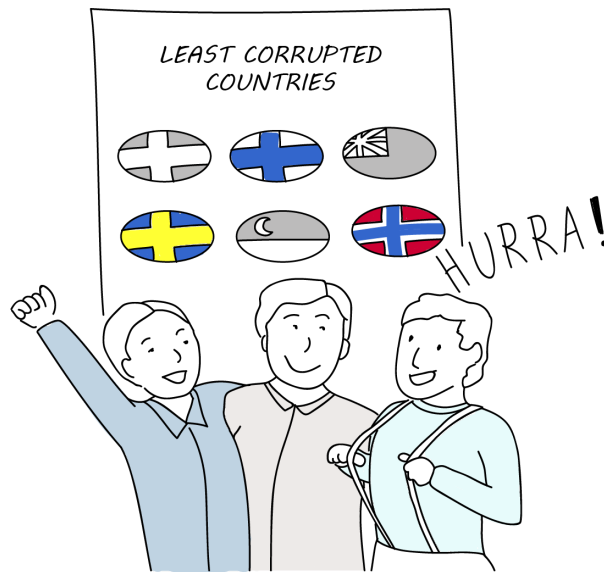
*"A very interesting topic. If I would be this honest at my workplace I would unfortunately be punished."*

*"Hard to say whether it is unethical or ethical - for me it is more about where we are on the 'shade of grey'."*

*"I do not make any comments because I am afraid of consequences from my employer."*

*"I am often asked to fabricate justifications for decisions so that management can make 'the decisions that they want'. I often think about how bad it would look like if the general public would know about this."*





# 83%

think people act with integrity and  
in line with ethical standards

## ARE NORDIC EMPLOYEES 'BLUE EYED'?

### 26%

do not think that or do not  
know if their organisation  
have a culture of openness

22% 30% 26%  
Finland Norway Sweden

### 47%

did not intervene when  
they observed unethical  
behaviour

55% 39% 44%  
Finland Norway Sweden

### 81%

have observed unethical  
activities at work.

83% 76% 83%  
Finland Norway Sweden

# THE BUSINESS ETHICS PROFESSIONALS BEHIND THE SURVEY

The Nordic Business Ethics Survey is an initiative created by the Nordic Business Ethics Network, a professional network for individuals who share a mission to promote responsible corporate conduct and integrity at our workplaces.

Join us at  
[www.nordicbusinessethics.com](http://www.nordicbusinessethics.com).



**NIINA RATSULA**  
CODE OF CONDUCT COMPANY

Niina is ethics, integrity and compliance expert with a passion for corporate cultures. Niina is known for "translating codes of conduct and ethical standards from paper into daily actions and decision making".

Niina spent 12 years in multinational corporations (Nokia and Kemira) focusing on ethics, compliance, internal controls and audit. After successfully leading Kemira's Ethics & Compliance function for over 4 years, in 2018 she started her own business Code of Conduct Company and is now supporting organizations in building their ethics and compliance programs, ethical leadership and internal audit functions.



**ANNA ROMBERG**  
ANCHOR INTEGRITY

Anna is a driven anti-corruption, compliance and corporate governance expert specialising in the prevention, detection and remediation of corporate conduct related compliance issues. She is known for "making things happen in complex organisations" and was responsible for the well recognized Anti-Bribery and Corruption Remediation program at Telia Company as a part of the settlement negotiations with the US DOJ and SEC as well as the Dutch authorities and has since worked as Vice President of Compliance at Cargotec. Drawing upon her extensive corporate experience, she is now assisting global companies with a wide range of assurance, compliance and governance topics through her own business.



**HELGE KVAMME**  
KVAMME ASSOCIATES

Helge promotes Integrity in the fight against Corruption, Bribery and Money Laundering. His goal is fact-finding and root cause analyses of threats to organizations and democracy as well as experience-based preventive initiatives through extensive expertise in Economic Crime Investigations, Anti-Corruption Compliance, incl. FCPA matters and World Bank Compliance Monitorship, and Anti-Money Laundering.

Helges background is in law enforcement (KRIPOS and ØKOKRIM), as Money Laundering Officer for DNB bank, leading PwC Forensics and Anti-Corruption Services in Norway for 14 years and as a partner in Advokatfirmaet Selmer with responsibility for Corporate Investigations and Compliance Services for five years. Lifelong experience has taught Helge an important lesson he wants to share: Integrity is Everything.

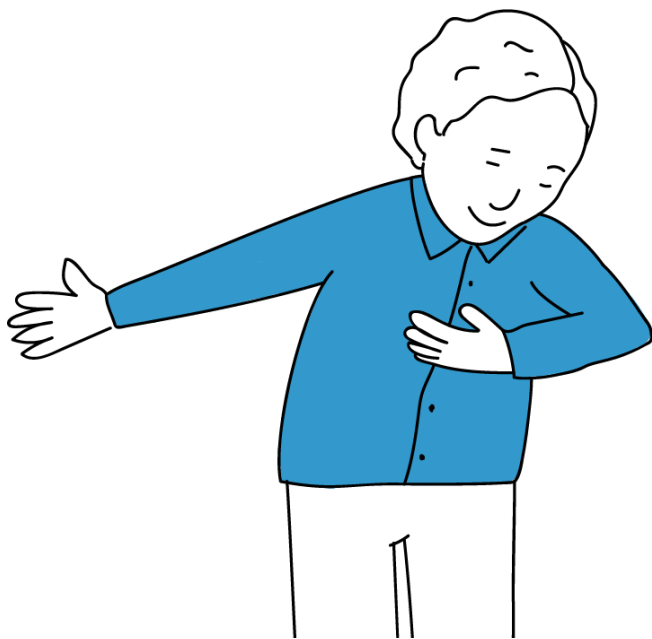
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## SPECIAL THANKS



Thank you **Forensic Risk Alliance (FRA)** for the financial support to conduct this survey.

FRA provide multi-jurisdictional expertise in financial and electronic forensics to help companies manage risks in an increasingly regulated business climate.



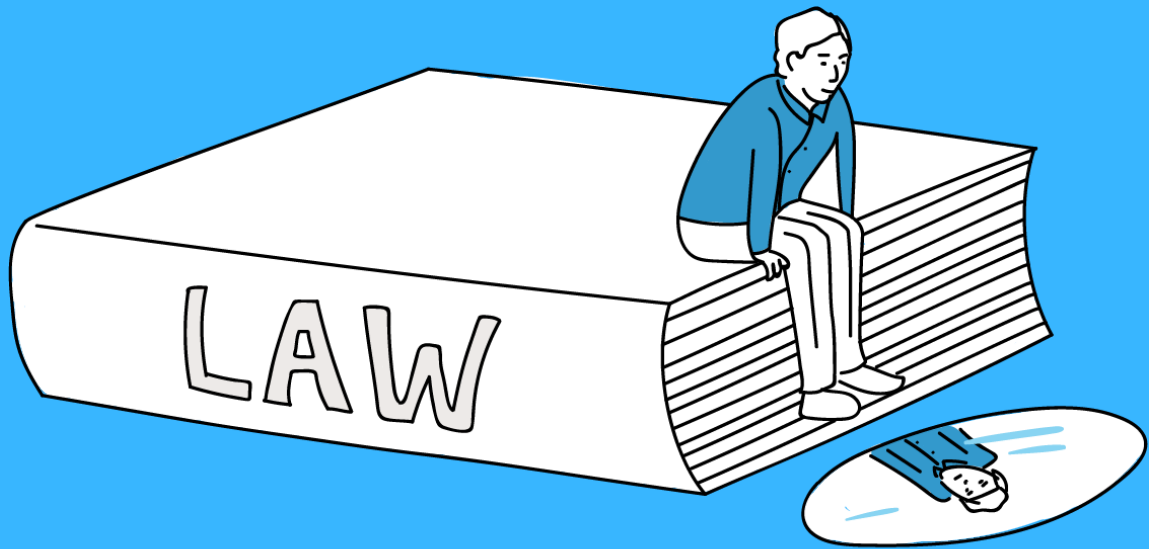
# FINSVE

SUOMALAIS-RUOTSALAINEN KAUPPAKAMARI  
FINSK-SVENSKA HANDELSKAMMAREN

Thank you **Finnish-Swedish Chamber of Commerce (FINSVE)** for the collaboration in marketing the study and arranging the release event in Helsinki in April 2019.

FINSVE aims to develop and deepen the bilateral trade relations between Finland and Sweden, as well as create positive networks around the business world and media.

Thank you **Mannheimer Swartling** in Stockholm and **DNB** in Oslo for providing facilities for the release events in April 2019 and to **ICC Norway** and **Institutet Mot Mutor** for assisting with marketing the release events.



**NORDIC  
BUSINESS  
ETHICS  
NETWORK**