

Effectiveness and Sustainability
合规卓越与可持续发展之路
Ethics and Compliance at Ericsson
爱立信道德与合规管理体系

This is Ericsson

We enable communications service providers and enterprises to capture the full value of connectivity
我们助力通信服务提供商及企业充分挖掘和实现连接的全部价值



100,000
employees worldwide
全球员工

51
R&D budget (SEK b)
研发预算

60,000
granted patents
已授予专利

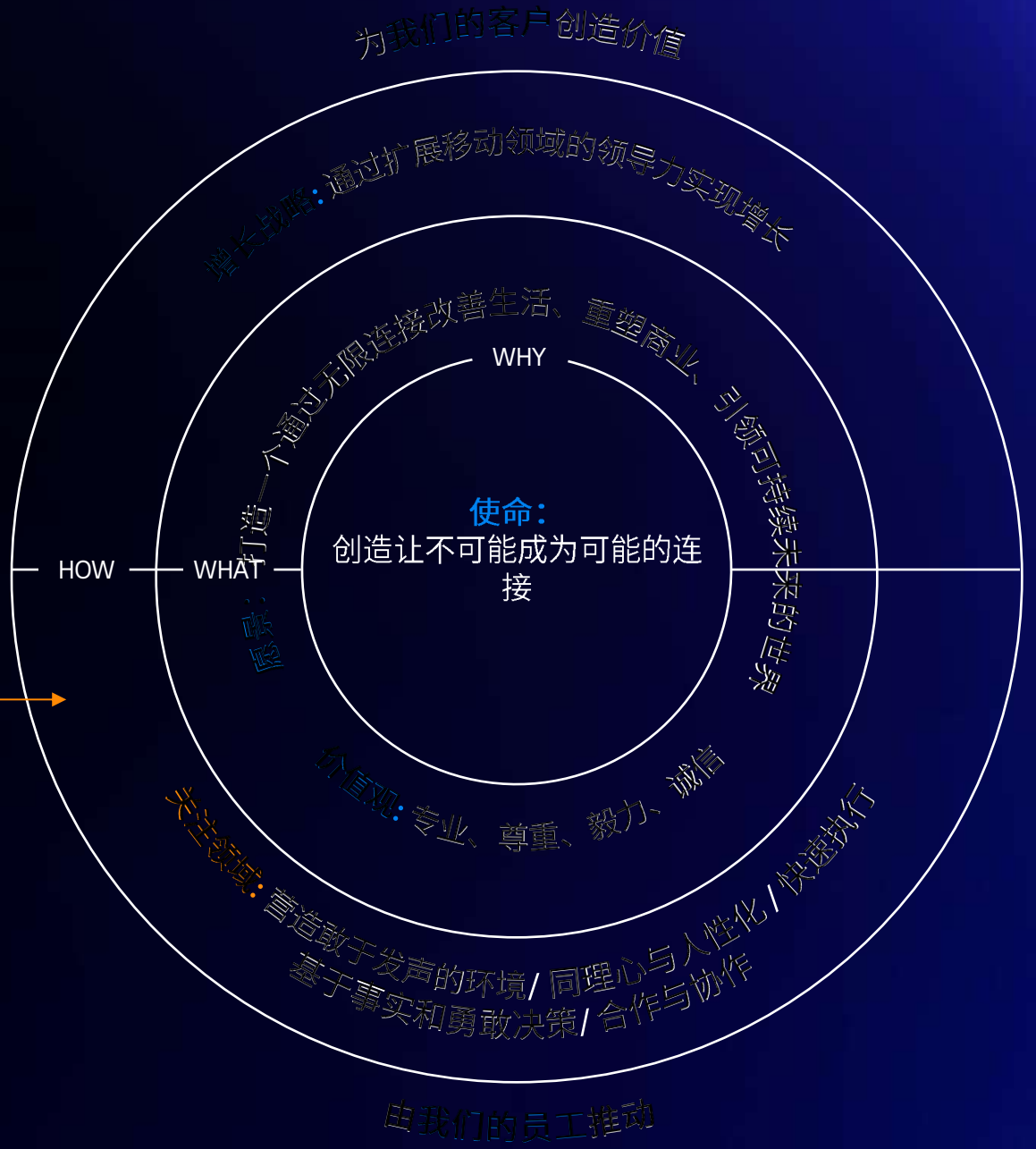
263
sales (SEK b)
销售额

180
Countries
国家

Note 1. Data as of December 31, 2023
数据截至2023年12月31日

我们的公司故事

这就是一切开始的地方



"Ultimately, conducting business responsibly with integrity is the only way we can drive real and positive change. We are all jointly accountable for the future direction of the company and for what we together can enable in society."

Börje Ekholm
President & CEO

"最终，负责任地开展业务并保持诚信是我们能够真正推动积极变革的唯一途径。我们共同对公司的未来以及我们在社会中能够实现的目标负责。"



The transformation towards a best-in-class ethics & compliance program and a culture of integrity
向一流的道德与合规体系以及诚信文化转型

Initial actions
初始行动

- Recruited experienced professionals into the compliance organization 招聘经验丰富的专业人士加入合规组织
- Promoted Speak Up culture and reporting 推广畅所欲言的文化和举报机制
- Awareness and training for high-risk positions 提升高风险职位员工意识提升和为其提供培训
- Ethics & Compliance (E&C) steering documents enhanced 改进道德与合规（E&C）指导文件
- Risk assessments initiated 启动风险评估
- Anti-Bribery and Corruption (ABC) controls 反贿赂和腐败（ABC）控制措施

Results of continued improvements
持续改进

- Fully resourced E&C organization centralized and within the business areas and market areas 合规组织全面配备资源，业务领域和市场领域均有覆盖。
- Managers and gatekeepers at all levels accountable to lead with integrity管理层和各级“守门人”带头以诚信领导。
- Business leaders are equipped with information and support to make risk-based decisions with confidence业务领导获得信息和支持，能够自信地做出基于风险的决策。
- Integrated compliance processes and controls 合规流程和控制措施已集成到核心业务流程中
- Testing to self-identify potential E&C Program deficiencies, run root-cause analysis and ensure swift remediation建立自查和根本原因分析机制，确保及时整改。

Long term goals
长期目标

- Sustainable compliance program and controls embedded across the organization, with responsibility of business leaders致力于可持续合规项目和控制措施的全面嵌入
- Data-driven decisions打造以强大道德企业文化为基础、数据驱动运营的组织。
- Increased simplification and digitalization防止回到导致公司陷入困境的旧做法。

Key initiatives from start until now
从初始阶段至今的关键举措

Cultural Evolution文化演变



Evolved culture of integrity supported by tone from the top and robust training and communication高层定调，强化培训与沟通

Rewards and Sanctions奖励与惩罚



Variable compensation is impacted by key integrity indicators and behaviors薪酬与诚信指标和行为挂钩

Business Transformation业务转型



Business accountability for process adherence and its testing业务对流程遵循及测试负有责任

Third Part Management (TPM) Life Cycle management 第三方生命周期管理



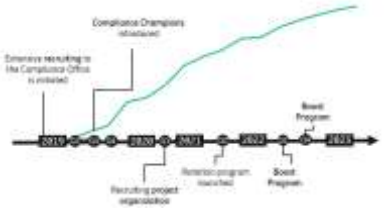
Risk-based approach to third-party management aligned across Compliance, Sourcing and Sales基于风险导向的方法，涵盖合规、采购和销售

Data Driven Operation数据驱动运营



Tools enabling effective and efficient monitoring of the E&C program 工具支持E&C项目的高效监控

Adequate Resources资源充足



Qualified resources in Assurance Functions
complemented
by empowered gatekeepers 合规保障职能配备合格资源，守门人赋能

Testing framework测试框架



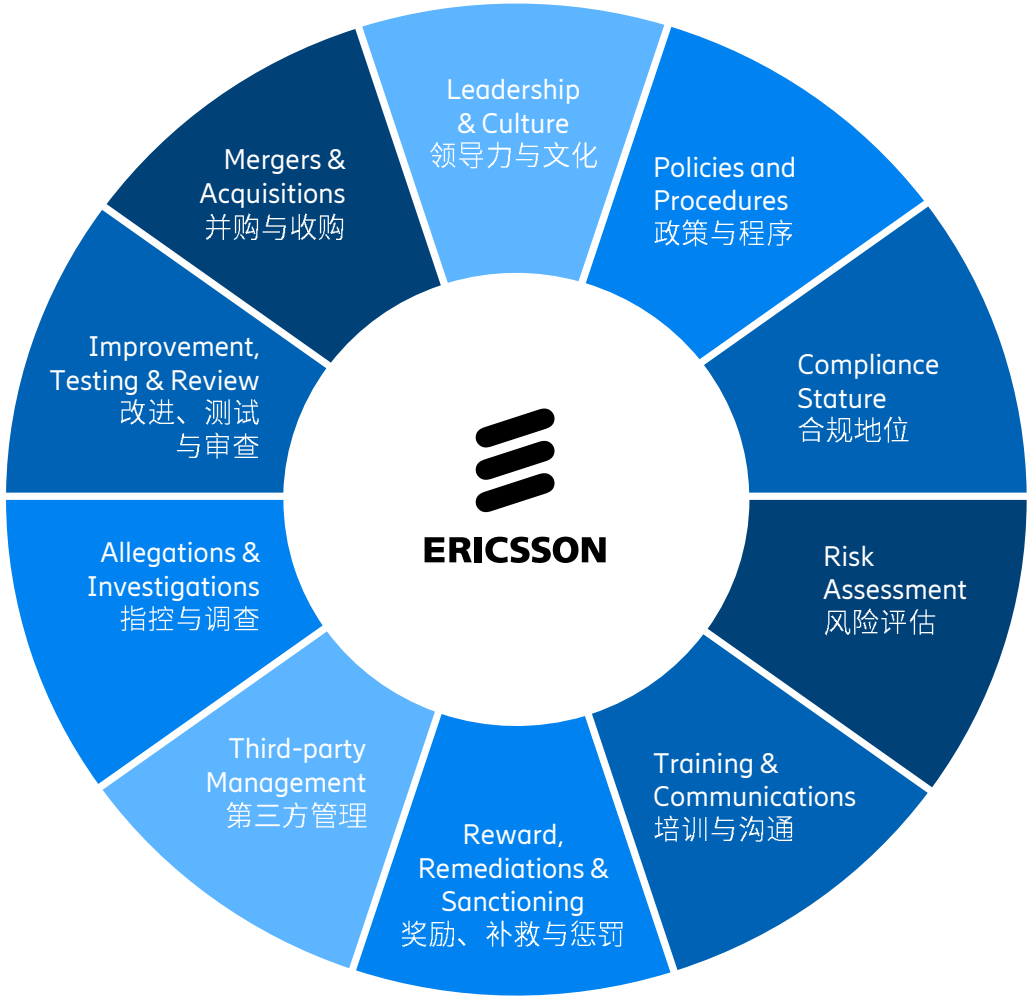
Cross-organizational testing framework deployed跨组织测试机制

Allegations & Investigations指控与调查



Enhanced processes and tools, ensuring end-to-end case management from allegation to remediation端到端案件管理流程，从举报到整改

Ericsson's Ethics & Compliance Program
爱立信道德与合规体系



Driving our ongoing Cultural Evolution through tone from the top and ethical leadership
文化演进与领导力

Our Compass
我们的指南针



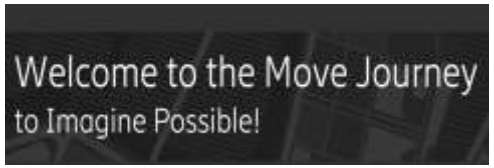
- Employees regularly reaffirm commitment to Code of Business Ethics. 员工定期确认对商业道德准则的承诺。
- Guides us as a trusted partner. 指导员工行为，成为值得信赖的合作伙伴。
- Ensures integrity-driven conduct. 确保以诚信为驱动的行为。

Leadership Training
领导力培训



- Leaders attend Ethics and Compliance focused workshops and training. 领导者参加道德和合规研讨会和培训
- Focus on managing blind spots and ethical decisions. 专注于管理盲点和道德决策。

Ericsson on the Move
爱立信在行动



- Cultural evolution supports ethical business practices. 文化演变支持诚信商业实践。
- Emphasis on critical thinking and psychological safety. 强调批判性思维和心理安全。
- Encourages a speak-up environment for fact-based, courageous and ethical decisions. 鼓励畅所欲言以及基于事实、商业道德的决策。

Speak Up Newsletter
畅所欲言通讯



- Monthly internal publication. 每月内部出版物。
- Shares anonymized misconduct cases and highlights external enforcement actions.分享匿名的不当行为案例、外部执法行动。
- Celebrates colleagues acting with integrity. 为诚信行事的同事庆祝。

Pillars of Ethics & Compliance program reviewed regularly, enhanced as needed
道德与合规项目：定期审查，不断完善

Gifts, Entertainment & Hospitality礼品、娱乐和招待



- Established guidelines for Gifts, Entertainment & Hospitality (GEH) that are offered and provided.建立礼品、娱乐和款待（GEH）指南
- Approvals through a centralized tool.所有审批通过集中工具进行。

Conflict of Interest 利益冲突



- Requires disclosure of potential or perceived Conflict of Interest (COI)要求披露潜在或感知到的利益冲突
- Mandated regular certification of COI reporting by all employees.所有员工需定期认证。

Third Party Management 第三方管理



- Third Party Management diligence and screening of partners and suppliers.合作伙伴和供应商的尽职调查和筛查
- Business Partner Code of Conduct sets clear expectations.《业务合作伙伴行为准则》明确了期望
- Business and Compliance take ownership and accountability for third parties.业务与合规共同对第三方负责
- Mitigation tool-box to handle risk风险应对工具箱。

Contributions 捐助



- Contributions (sponsorships, donations, memberships and academia collaborations) undergo a risk-based review捐赠、赞助等需基于风险进行审核
- Digitalization of an improved end-to-end process is ongoing.流程数字化持续推进

Compliance Stature合规地位

Global coverage across the world
全球覆盖范围



Tools工具

Digital tools to make fact-based decisions based on data采用数字化工具，基于数据做出事实驱动的决策

Expertise专业能力

Deep compliance expertise supporting the business owners in taking decisions公司拥有深厚的合规专业知识，支持业务负责人做出明智决策

Global team团队规模

Over 100 full-time employees in the Compliance Office located around the world合规办公室在全球范围内拥有超过100名全职员工

Visibility可见性

Chief Compliance Officer has direct reporting line to the Audit and Compliance Committee of the Board首席合规官直接向董事会的审计与合规委员会汇报，确保高度的可见性。

Anti-Bribery & Corruption Risk Assessments
反贿赂和腐败风险评估



To maintain an effective, risk-based Ethics & Compliance program, Ericsson periodically assesses bribery and corruption risks through a dedicated **Risk Assessment program**.

为了维护有效的、基于风险的道德与合规管理体系，爱立信通过风险评估机制、定期评估贿赂和腐败风险。

Risk Assessment Objectives
风险评估目标

- Review operations to identify areas presenting the most significant bribery & corruption risks and to develop a good risk profile. 审查运营以识别出最显著的贿赂和腐败风险领域，并制定良好的风险画像
- Monitor, measure and manage bribery & corruption risks.监控、衡量和管理贿赂和腐败风险
- Develop and implement remedial actions to mitigate or/and minimize identified risks.实施补救措施，以减轻识别出的风险。
- Increase the organization's risk awareness and sense of ownership over the risks.提高组织对风险的意识和风险管控的责任感

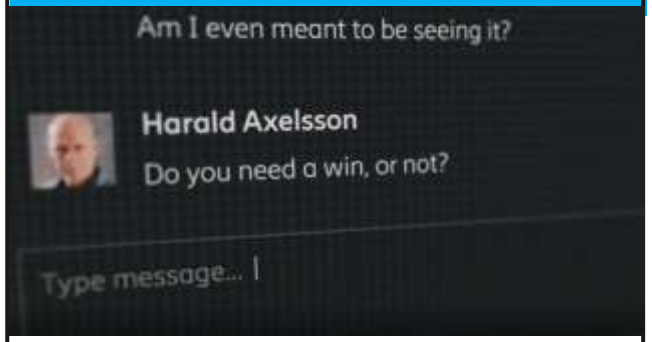


The ABC risk assessments include leadership and culture, sales, third-party management, gifts and hospitality, conflicts of interest, government relations, policies and procedures, sponsorships and donations, joint ventures, and partnerships.

ABC风险评估包括领导力和文化、销售、第三方管理、礼品和款待、利益冲突、政府关系、政策和程序、赞助和捐赠、合资企业和合作伙伴关系。

Enhancing awareness through training and communication通过培训和沟通提升合规意识

Fresh Approach to Training新颖的培训方法



We have re-imagined what mandatory all-employee training can be, captivating viewers with a new cinematic delivery style to encourage learning and retention. 我们重新构想了所有员工的强制性培训，通过电影风格吸引观众，以鼓励学习和记忆。

Compliance learnings:
From required to desired合规学习：从必需到渴望

Our Learning Platform 学习平台



- Ethical Dilemma Training Portal offers relatable scenarios. 道德困境培训门户提供相关业务场景
- Empowers leaders to coach team members on integrity. 赋予领导者指导团队成员提升诚信决策能力
- Facilitates dialogue on resolution, critical thinking, and integrity-based decisions. 促进关于解决方案、批判性思维和基于诚信的决策的对话

Job Role Specific Training 特定职位培训



Specific trainings developed for different job roles, including:为不同岗位的员工设计的特定培训内容，包括：

- Third Party Management第三方管理
- Internal Controls 内部控制
- Business Owners 业务责任人
- Executive Assistants行政助理
- Local Admin Services 行政管理服务部门
- Gatekeeper Training “守门员”培训
- Conflict of Interest Reviewer training利益冲突审查人员培训

Example: Training videos shot like movies
示例：像拍电影一样拍摄培训视频

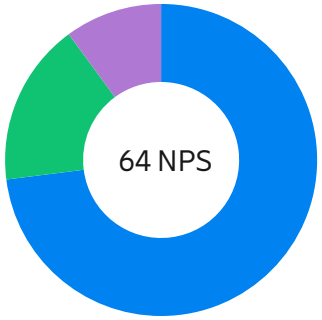




Watch parties观看聚会

Employee interest and recognition员工兴趣和认可

Measuring both training velocity and feedback (including NPS – Net Promoter Score)衡量完成培训速度和反馈（包括NPS——净推荐值）



From required to desired – Our revamped compliance training program
从必需到期望——我们改进合规培训计划

- Utilizes film production and user-experience design. 利用电影制作和用户体验设计
- Aims to create engaging learning experiences. 旨在创造引人入胜的学习体验
- Focuses on generating positive behavioral change. 专注于产生积极的行为改变
- Transforms training from mandatory to desirable for all.将培训从强制性转变为所有人都渴望



Industry recognition行业认可

We have been winning industry awards for our anti-corruption trainings since 2021. 自2021年以来，我们的反腐败培训已多次获得行业奖项

Rewards, Remediation & Sanctioning
奖励、补救与惩戒

Integrity Goal & Executive Compensation诚信目标与高管薪酬



- Incorporated "Behaving with Integrity" as a goal for all employees.将“诚信行为”作为所有员工的目标
- Executive compensation is influenced by integrity indicators.高管薪酬受诚信指标影响
- Aligned integrity with rewards for senior executives, embedding it into the culture.将诚信与高管奖励相结合，将其融入文化中

Remediation & Sanctioning补救与惩戒



- Increased focus on consistent, effective remediation and consequence management.关注一致、有效的补救和后果管理
- Addressing issues transparently and fairly to foster accountability throughout the organization. 透明地解决问题，公平地促进整个组织的问责制
- Learn from each case to enhance compliance frameworks and promote ethical standards. 从每个案例中学习，以改进合规体系并促进道德标准贯彻

Executive & High-Risk Vetting高管与高风险审查



- Strengthened commitment to integrity and ethical behavior through vetting.通过招聘环节审查、加强对诚信和道德行为的承诺
- Conducting vetting during recruitment or assignments for executive and high-risk positions. • 在招聘或任命高管/高风险职位时进行审查
- Ensure reliability and identify potential vulnerabilities to maintain high security and compliance standards. 确保可信任并识别潜在风险，以维护高合规标准

Rewards & Recognition奖励与认可



- Global program recognizes colleagues for demonstrating core values, including integrity. 全球认可项目，展示反映核心价值观的行为，包括诚信。
- "Impact Awards" are given to those who show exceptional integrity and contribute to cultural evolution. “影响奖”授予那些表现出卓越诚信并促进文化发展的人员

Key Elements of Ericsson's Third Party Management (TPM) Program第三方管理（TPM）要素

Risk-Based Third-Party Due Diligence风险导向的第三方尽职调查

- **Risk-based due diligence** to ensure Third Parties meet our high ethical standards. 基于风险导向的尽职调查，确保第三方符合我们的高道德标准
- **Enhanced procedures** for Third Parties posing higher ABC risk, including **tailored approval conditions to mitigate identified risks**. 对具有更高ABC风险的第三方加强管控，包括特定审批条件以减轻识别出的风险。

Embedding TPM Compliance into Operations 将TPM嵌入运营

- **Embedding of compliance into our operational fabric** via Business Partner Review Boards (BPRBs). 通过业务伙伴审查委员会（BPRBs）的运作，将合规嵌入我们的运营
- BPRBs consist of **senior business leaders who**, in consultation with Compliance, **review and approve High Risk Third Parties.** In evaluating red flags, BPRBs seek **to balance opportunity / risk to ensure approval decisions are in line with our values**. BPRBs由高级业务领导组成，他们向合规部门咨询，审查并批准高风险第三方。在评估风险警示信号（red flags)时，BPRBs寻求平衡机会和风险，以确保审批决策符合我们的价值观

TPM by the NumbersTPM数据统计

28,500+ Third Parties overall, including **28,500+**第三方，包括:

- **325+** High Risk approvals325+ 高风险审批案件
- **2,200+** Medium Risk approvals2,200+ 中等风险审批案件
- **125+** Global Approvals (covering over 3,650 entities worldwide) 125+ 全球审批案件（覆盖全球3,650法律实体）

110+ Rejections since January 2022；自2022年1月以来，110+ 拒绝案件

1,000+ Monitoring Events (e.g., audits, red flags, plausibility checks) since June 2022；自2022年6月以来，1,000+ 监控事件（例如审计、警示红旗、合理性检查）

Managing TPM Risk via Monitoring & Oversight 通过监控和监督管理TPM风险

- **Emphasis on continuous oversight of Third Parties** following their initial due diligence approval. 强调对第三方的持续监督，确保其遵循初步尽职调查审批要求。
- **TPM team coordinates a range of monitoring activities**, systematically collecting and analyzing key data **to identify and manage new risks**. TPM团队协调一系列监控活动，系统地收集和分析关键数据，以识别和管理新风险。

Evolving Ericsson's TPM Program 爱立信TPM计划的演变

- **Continual improvement of our TPM program** to address evolving risks. 持续改进我们的TPM计划，以应对不断变化的风险。
- Focus on **making TPM processes simpler and more efficient** by streamlining workflows and exploring AI and **predictive analytics to anticipate future risks**.简化TPM流程，提高效率。简化工作流程并探索AI和预测分析来预测未来风险。

Allegation Management
举报管理

Assessment评估

- Evaluation of plausibility of ethics/compliance violation评估商业伦理/违规可能性
- Certain matters referred to the Corporate & Government Investigations team for investigations某些事项转交给公司调查团队进行调查
- Non-compliance issues redirected to relevant Ericsson Unit for handling according to their processes违反流程问题转交给相关部门，根据其关规定进行处理

Remediation整改

- Line manager handles personnel remediation with advice from Compliance, People, and Legal teams直线经理在合规、人力资源和法律团队的建议与支持下处理人员整改
- Process/Business owners manage process and third-party remediation流程/业务负责人管理流程和第三方整改
- Remediation Committees ensure appropriateness and consistency of remediation actions“整改委员会”确保整改的适当性和一致性

1 2 3 4 5

Intake 接受

Our Allegation Management Office receives a potential compliance concern指控管理办公室负责接收潜在的合规问题

Investigation调查

Investigations determine whether there is factual support to substantiate an allegation, whether there are organizational issues, and whether there is remediation needed调查确定是否有事实支持指控，是否存在组织问题，以及是否需要整改

Monitoring 监控

Allegation Management Office tracks and documents closure of remedial actions in our automated case-management system指控管理办公室在案件管理系统中跟踪和记录整改进展

改进、测试与审查

Corporate Audit公司审计

Confirms the **effectiveness and efficiency of Ericsson processes**, including risk management评估爱立信流程的有效性和效率，包括风险管理

Internal Controls内部控制

Maintains the ABC Risk & Control Matrix over process risks and controls together with Process Owners. Control Monitoring Center (CMC) tests effectiveness of the controls and related processes based on a quarterly testing cycle负责反贿赂、发腐败风险（“ABC”）和控制矩阵，涵盖流程风险和控制，与流程负责人共同进行。控制监测中心（CMC）根据季度测试周期测试控制和相关流程的有效性

Risk Assessment风险评估

Anti-Bribery and Corruption (ABC) risk assessments, including transaction testing, are **conducted to identify and evaluate potential ABC risks**反贿赂和腐败（ABC）风险评估，包括交易测试，旨在识别和评估潜在的ABC风险

Payment Control Unit支付控制

Transactional monitoring of outgoing payments includes both **standard and non-standard entities through data analytics (post-payment),** based on selection criteria and red flag scenarios
对外支付的交易监控包括标准和非标准实体，通过数据分析（支付后），基于选择标准和红旗场景

测试

交易监控

Self Assessments自我评估

Market and business areas, along with relevant Group functions, conduct self-assessments. These assessments help **evaluate whether processes and controls** are operating effectively in critical business areas
业务部门以及相关集团职能部门进行自我评估。这些评估有助于评估流程和控制在关键业务领域是否有效运作

Sourcing Compliance采购合规

Performs ad hoc sample checks to verify commercial rationale, mitigate risks and check adherence to sourcing processes
样本检查以验证商业合理性，减轻和管控风险并检查采购流程的遵守情况

T&E Auditors 差旅和费用审计

Monitor Travel & Expense claims through data analytics (pre- and post-payment monitoring)
差旅和费用审计员 通过数据分析（事前和事后监控）监控差旅和费用索赔

Mergers & Acquisitions
并购合规

Mergers & Acquisition (M&A) Compliance provides ethics and compliance guidance and support for Ericsson's M&A activities by identifying and mitigating compliance risks related to M&A transactions and non-wholly owned companies in which Ericsson has an ownership interest.
并购合规为爱立信的收并购活动提供合规指导与支持，识别和减轻收并购交易以及爱立信拥有权益的非全资公司相关的合规风险



Conducting risk-based corruption due diligence on potential M&A deals (including joint ventures)
针对潜在并购交易开展基于风险的腐败尽职调查

Timely and orderly integration of the acquired entity into Ericsson compliance program structures
支持并购后合规整合

Supporting management of ongoing relationships with non-wholly owned companies
支持与非全资公司持续关系的管理

Providing corruption training to Ericsson representatives on non-wholly owned companies' boards为非全资公司董事会成员提供腐败培训

Compliance Office Strategic Focus Areas
合规战略重点领域



Summing up: Lessons learned
总结：经验教训

Cultural Evolution
文化演变



Business Ownership
业务主导



Process Excellence
流程优化



Communication
沟通



Tone from the Top
高层态度



Simplification and Digitalization
简化与数字化

