



## English Summary of decision 2015:3 by the IMM Ethics Committee

Stockholm 2015-01-15

### The matter

An organizer of bus travels offer different types of packages for organizations travelling with the organizer. Within each travel group that chooses to book their journey through the organizer, the person in charge of bookings has been offered two free tickets to use for trips with the organizer.

The purpose of providing the free tickets, as described to the ethics committee, has been to motivate the person in charge of bookings to select the current organizer.

It has not been communicated to other passengers, who have paid for their participation in the bus travels, that the person in charge of bookings has been given two free tickets.

### The questions in the matter is the following;

Is it in line with the Code of Business Conduct to offer free tickets to the person in charge of bookings, outside the frame of the agreement with the organizer and without other passengers being informed about the agreement?

The Ethics Committee bases its assessment on the description given to the Committee.

### Considerations

The Ethics Committee concludes that the offer is a benefit covered by the Code of Business Conduct as described in point A 1. For the Code of Business Conduct to be applicable, both the giver and the employee of those who are provided the offer, needs to be a company covered by the Code of Business Conduct as described in point A 2. The Ethics Committee assumes that this is so in the present case.

What the Ethics Committee has to decide is whether the offer of the two free tickets to those who book bus travel is compatible with point B 7 of the Code of Business Conduct. Point B7 covers benefits for employees or contractors of private companies.



According to B 7, Companies may provide, promise or offer a benefit to employees or Contractors of privately owned companies if it is done overtly, the benefit is moderate, and the benefit is not otherwise of such nature that it could be deemed to influence behavior, i.e. influences or risks influencing the recipient's decision or the manner in which he/she carries out his/her work tasks.

The factors to be considered especially in this assessment are as follows;

#### Overtness

The requirement of overtness means that a benefit normally should be directed to the other company, be approved by the company or comply with that company's established policies on benefits. In this specific case the benefit has not been provided overtly.

#### Moderate

The requirement that the benefit shall be moderate means that the benefit must not appear to be influencing the recipient's behavior.

In this case, the purpose of the benefit has been to affect those booking travels to use the current organizer. It seems obvious that the benefit is influencing behavior.

#### Overall Assessment

The Ethics Committees overall assessment is that the offer of free tickets - as it is described- is not compatible with the Code of Business Conduct.

#### THE DECISION BY THE ETHICS COMMITTEE

The offer of the two free tickets to the person who is responsible for booking bus tours, as it has been described for the Ethics Committee, is not compatible with Code of Business Conduct.