

Human Rights and Modern Slavery Statement

This Human Rights and Modern Slavery Statement outlines our approach to business and human rights.

AFRY is a European leader in sustainable engineering, design and advisory services with a global reach. We accelerate the transition towards a more sustainable society. We are 17,000 devoted experts in infrastructure, industry, energy and digitalisation, creating sustainable solutions for generations to come.

In year 2020 we celebrated 125 years as a company. Our parent company ÅF Pöyry AB is a Swedish public limited liability company listed on the Nasdaq Stockholm exchange with its registered office in Stockholm. AFRY applies the Swedish Corporate Governance Code and complies with the Nasdaq Stockholm Rule Book for Issuers.

The group has offices in more than 40 countries and projects across 100 countries and we speak more than 50 languages.

AFRY's five divisions, Infrastructure, Industrial & Digital Solutions, Process Industries, Energy, and Management Consulting, offer engineering, design and advisory services across three main sectors: infrastructure, industry and energy.

Our approach

AFRY's [Code of Conduct](#) (CoC) cements our commitment to follow the principles set out in internationally recognized Human Rights standards, including United Nations Declaration of Human Rights, International Bill of Human Rights and ILO Declaration on fundamental rights and principles at work. The Code of Conduct is supported by a mandatory e-learning and other targeted training programs where necessary.

We internalize our duty to respect human rights throughout our operations by applying the principles set

out in the UN Guiding Principles on Business & Human Rights ("UNGP").

Our compliance & ethics framework enables systematic and effective prevention, detection and management of violation risks. The framework is supported by a top level commitment to ensure consistent application and awareness of human rights principles throughout the organisation as well as in our activities and business relationships.

Key areas of impact

This statement describes how we have operationalized respect for human rights in our key areas of impact.

- Sales

Human rights due diligence has been integrated in the sales process to help us assess, prevent and mitigate potential negative impacts on human rights through our activities. This precautionary approach forms part of a CoC Assessment, which is mandatory for all high-risk projects. If there is a risk that AFRY will contribute, cause or be linked to negative human rights impacts when engaging in a project, an adequate assessment must be carried out and preventative measures must be agreed. We endeavor to use the leverage from our business relationship to facilitate effective remediation if adverse human rights impact occurs during projects.

- People

One of the most fundamental responsibilities of a company is to ensure the privacy and a safe and healthy workplace for its employees and others performing work for it. We are committed to respect the rights of our employees set out in internationally recognized human rights standards and regularly engage in dialogue with our employees and union representatives to ensure fair working conditions. Processes to safeguard occupational health and safety

are intrinsic in our management system. All employees must be treated with dignity and respect and we are convinced that diversity and inclusion drives creativity and innovation. AFRY employs Inclusion & Diversity Managers to promote inclusion & diversity.

- Technology

Digitalisation is a critical driver for sustainable development. For AFRY, digitalisation is both key component of our group strategy as well as a key interest of our customers. We encourage clients to adopt solutions that promote sustainable development. Sustainable digitalisation requires trustworthy and responsible development and use of new technologies, including Artificial Intelligence (AI). This means that AI systems that we develop or use must be robust, lawful and incorporate the ethical principles of fairness and respect for human rights and provide for transparency and auditability.

- Supply Chain

AFRY's responsibility to respect human rights extends to the selection of our business partners and our expectations are set out in AFRY's [Business Partner Criteria](#). We seek to act as a role model and source of inspiration to our partners. We promote continuous improvement and seek to follow up where necessary with training and audits. AFRY prohibits forced, bonded or compulsory labour, human trafficking and child labour. It is important to emphasize that given the nature of our business, we typically employ professional expert engineers and consultants; while it is highly unlikely that AFRY or our suppliers would be engaged in modern slavery and human trafficking we remain vigilant.

- Societal development

AFRY promotes sustainable solutions for transforming segments within infrastructure, food & life science, clean energy and bioindustry. We stand for a holistic view on sustainability (environment, society and economy) based on the United Nations 2030 Agenda.

We strive to pioneer a more sustainable future through transforming our company and offering in line with the global challenges and the best available techniques and share our expertise through cooperation and an investment in partnerships. We have entered a long-term collaboration with [Gapminder Foundation](#) to identify, highlight and counteract misconceptions and promote a more fact-based world view.

Accountability

The Chief Executive Officer of AFRY is accountable for how AFRY respects human rights. The Group Executive Management of AFRY assumes a shared responsibility to govern practices that respect human rights throughout the organization.

Key functions, including Compliance & Ethics, Sustainability, Quality and Human Resources, support with the implementation of relevant policies and procedures.

AFRY has made available a confidential reporting line, [Listen Up](#), to employees and external parties for reporting grievances or human rights violations and ensure appropriate remediation. With this we endeavour to assume accountability for cases where we have caused or contributed to human rights violations and continuously improve how we are fulfilling our obligations to respect human rights.

We account for our approach, track its effectiveness and provide transparency in our reporting according to the principles set out by the Global Reporting Initiative.

AFRY Management Consulting Division, Energy Division and Lighting Design businesses have offices in the United Kingdom. This statement has been published in accordance with section 54 of the Modern Slavery Act 2015. It sets out the steps AFRY has taken to ensure that slavery and human trafficking is not taking place in any part of its business or in its supply chains.