

# Group Policy Compliance & Ethics

Business ethics is fundamental to the culture of AFRY. The key guiding principles for ethical conduct are set out by our Code of Conduct.

## Purpose

This Policy describes how Compliance & Ethics shall be implemented throughout all our operations. It applies to all employees of subsidiaries and entities in which AFRY AB exercises decisive control and extends to contract workers and anyone conducting business on AFRY's behalf.

## Principles

AFRY's commitment to Compliance & Ethics is set out by the following principles:

### *Anti-Corruption*

- AFRY operates with honesty and integrity and has a zero tolerance policy for fraud, bribery and corruption. This includes transactions indirectly through a third party.

### *Trade compliance*

- AFRY complies with all applicable trade compliance, export control and sanctions regulations and proactively assesses and mitigates risks of violations.

### *Tax compliance*

- AFRY operates as a good corporate citizen and does not engage in nor abet others to engage in money laundering or tax evasion and maintains books and records that accurately reflects our business transactions to enable inspection.

### *Human Rights*

- AFRY respects internationally proclaimed Human Rights. We seek to identify, prevent, mitigate, remedy and account for adverse impacts on Human Rights in our operations.

### *Fair-competition*

- AFRY believes in fair play and competes honestly, and does not participate in anti-competitive practices.

### *Conflicts of Interest*

- We avoid conflicts of interest. If a risk of conflict of interest would arise, we take proactive responsibility to mitigate it.

### *Data Privacy*

- AFRY respects the personal integrity of employees, customers, partners and other stakeholders. We treat information with utmost care and process data in accordance with our responsibilities for Data Protection and applicable privacy laws.

### *Non-retaliation*

- AFRY prohibits retaliation against employees who raise their concerns in good faith.

These commitments are supported by relevant compliance procedures.

## Foundation



Our approach to driving compliance and ethics programs in support of our commitments is underpinned by a common framework that enables a systematic and effective way for managing compliance and ethics risks. The framework has a top level commitment to ensure consistent application and awareness throughout the organisation as well as in our activities and business relationships.

The framework provides a foundation to:

- Support all leaders to actively promote an ethical business culture where acting with integrity is a hallmark of brave leadership.
- Proactively identify compliance and ethics risks to enable timely mitigation of risks.
- Ensure that the organisation has adequate resources and oversight to manage compliance risks and establish a positive and sustainable ethical behaviour.
- Implement a management system with procedures for due diligence and internal controls that enables the organisation to promptly respond to the evolving risks landscape.
- Ensure that every employee knows how to conduct his or her job in compliance with law and ethical principles and recognize red flags of non-compliance.
- Manage our third party risks.
- Encourage employees to raise their concerns free from fear of retaliation, provide secure channels for doing so and oversee investigations into any compliance concerns.
- Continuously improve our ways of working by systematically remediating gaps and disciplining non-compliance.
- Proactively test our processes and systems, track our performance and provide transparency to enable others to evaluate our progress.
- Safeguard compliance to our customers' code of conducts, including maintaining transparency and sufficient documentation to support satisfactory third party audits.

## Roles and Responsibilities

The Group Executive Management of AFRY is responsible for ensuring consistent practices and implementing compliance & ethics throughout the organisation.

The Chief Compliance & Ethics Officer is responsible for designing relevant programs to manage compliance & ethics risk based on the compliance and ethics framework. She is also responsible for maintaining and updating this Policy, for ensuring that it is properly published and enforced and publishing guidance and directives to facilitate compliance.

Division Management is responsible for ensuring that all employees within his/her area of responsibility are able to comply with this Policy.

Managers at all levels are responsible to consider relevant compliance & ethics aspects, objectives, risks and opportunities as part of planning and monitoring their business or function. Managers are also responsible to ensure that their teams, including third parties working on our premises or at client sites, have awareness of this policy and applicable procedures.

All bid managers are responsible to consider the aspects of this policy and complete appropriate Code of Conduct assessments in the bid approval preparation process.

All project managers are responsible to consider and manage relevant compliance & ethics risks in the project planning and execution.

All employees are responsible to follow this Policy and related procedures. Employees are encouraged to ask questions and discuss compliance to this Policy with their managers and relevant support functions.

Anyone who witnesses violations to this Policy, our Code of Conduct or has ethical concerns should primarily raise it to their managers. AFRY has additionally made available a confidential reporting line, [Listen Up](#), to employees and external parties. Breaches will be investigated and appropriate disciplinary and remedial actions will be taken.

Group Internal Audit function reports to the Audit Committee and is tasked to assure whether actions of AFRY's senior managers, managers, employees, and contractors are in compliance with AFRY's policies, procedures, and applicable laws, regulations, and governance standards. This includes that the Divisions and Supporting functions have implemented group policies and steering documents and have local processes in place if required.