

Human Rights Statement

This Human Rights Statement outlines AFRY's Policy on Human Rights and describes how we have operationalized respect for human rights in our key areas of impact.

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 19,000 devoted experts in infrastructure, industry, energy and digitalisation, creating sustainable solutions for generations to come.

Our parent company AFRY 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 50 countries and projects across 100 countries.

AFRY's six divisions i.e., Infrastructure, Industrial & Digital Solutions, Process Industries, Energy, Management Consulting and AFRY X, offer engineering, design and advisory services to accelerate the sustainability transition mainly in four main segments: Infrastructure, Food & Life Science, Clean Energy and Bioindustry.

Our approach

AFRY's [Code of Conduct](#) (CoC) cements our commitment to follow the principles set out in internationally recognized Human Rights instruments set out in United Nations conventions on human rights, ILO conventions for labour rights and OECD's guidelines for multinational enterprises. We recognize that human rights are interrelated, interdependent and indivisible. Our CoC is supported by a mandatory e-learning and other targeted training programs.

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 ("UNGPs").

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.

We recognise the diversity of laws in the countries where we operate and strive to respect domestic laws. When faced with conflicts between domestic laws and human rights commitments we seek to honour the principles of internationally recognized human rights to the greatest extent possible.

Key areas of impact

We apply the framework set out in the OECD Due Diligence Guidance for Responsible Business Conduct to identify & assess adverse impacts and seek here to communicate how we address our key impacts.

- Operations

One of the most fundamental responsibilities of a company is to ensure a safe, healthy and fulfilling 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 employee wellbeing and 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 drive creativity and innovation. AFRY engages Inclusion &

Diversity Managers who proactively work with inclusion efforts and promote diversity, both with global initiatives to increase inclusion, for example AFRYs target to reach 40% female leaders by 2030, with local initiatives, for example the Swedish Immigrated Competence Program.

- Business Relationships

AFRY promotes sustainable solutions and 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 offerings in line with the global challenges and the best available techniques. Human Rights Due Diligence forms part of our CoC Assessment process, which is mandatory for all high-risk projects. If there is a risk that AFRY will contribute, cause or be linked to negative environmental or social impacts when engaging in a project, an adequate assessment must be carried out and preventative measures must be agreed upon. We endeavour to use the leverage from our business relationship to facilitate effective remediation if adverse impact occurs during projects.

- 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. Human Rights Due Diligences in accordance with OECD's guidelines for multinational enterprises forms part of our CoC Assessment process and includes the entire value chain, both upstream and downstream. 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 we remain vigilant.

- Technology

Digitalisation is a critical driver for sustainable development. For AFRY, digitalisation is both a 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 use of sustainable energy resources and responsible development and use of new technologies, including Trustworthy Artificial

Intelligence (AI) with respect for human dignity and individuals rights to data privacy and data protection.

Accountability and Tracking

The CEO of AFRY is accountable for how AFRY ensures responsible business conduct with respect for human rights. The Group Executive Management of AFRY assumes a shared responsibility to govern practices of responsible business conduct 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 human rights grievances or other violations in their own language, without fear of retaliation. Our Chief Compliance & Ethics Officer has been tasked to oversee the tracking and response to any reports submitted through this mechanism. We endeavour to assume accountability for cases where we have caused or contributed to human rights violations and ensure appropriate remediation and feedback is provided for.

We seek to 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 chain.

Moreover, all AFRY divisions have representation in Norway. AFRY Group Norway is subject to the Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (Transparency Act). This statement reflects AFRY Group Norway's responsibility to perform Human Rights Due Diligences in accordance with OECD's guidelines for multinational enterprises due to this act.