

Human Rights Statement

This Human Rights Statement outlines AFRY's human rights policy and describes how we have integrated respect for human rights in our operations and supply chain.

Business activities and structure

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 about 18,000 devoted experts in infrastructure, industry, energy, and digitalization, creating sustainable solutions for generations to come.

The 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 about 40 countries and projects across 100 countries.

AFRY's three divisions, i.e., Energy, Industry and Transportation & Places, offer engineering, design, and advisory services to accelerate the sustainability transition.

Our largest markets include Sweden, Finland, Norway, Denmark, Brazil, Switzerland, and Czech Republic.

AFRY prohibits forced, bonded or compulsory labor, human trafficking and child labor and discrimination based on sexual orientation or gender identity. Given the professional nature of our business, with a workforce mainly composed of engineers and consultants, the risk of modern slavery within AFRY or our suppliers is considered low, although we remain vigilant.

Human rights policy

At AFRY, we acknowledge we have a responsibility not only to respect human rights but to identify, prevent, mitigate, and remedy potential and actual negative impacts on human rights throughout our whole value chain. We recognize that human rights are interrelated, interdependent and indivisible.

We base our policy on the principles set out in internationally recognized Human Rights instruments including United Nations conventions on human rights, ILO conventions for labor rights and Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy ("MNE Declaration") and OECD's guidelines for multinational enterprises.

We internalize our duty to respect human rights throughout our operations and supply chain by applying the principles set out in the UN Guiding Principles on Business & Human Rights ("UNGPs"). This duty is embedded in key policies as well as the AFRY's Code of Conduct and Supplier Code of Conduct (formerly known as the Business Partner Criteria).

The policy applies to 100% of AFRY's global operations and all employees, ensuring consistent expectations and standards across all projects and geographies. This full-scope applicability reflects AFRY's commitment to embed human-rights considerations throughout the organization and aligns with international frameworks.

Human Rights Due Diligence

Human Rights Due Diligence forms part of our Responsible Business Due Diligence process in accordance with OECD's guidelines for multinational enterprises including the entire value chain, both upstream and downstream.

AFRY recognizes that its engineering and advisory services may have downstream human rights impacts on the communities and individuals affected by AFRY projects. We therefore consider these downstream impacts as part of our project selection processes.

Responsible Business Due Diligence is mandatory for all high-risk projects, where the risk that AFRY will contribute to, cause or be linked to adverse environmental or social impacts is a key risk that must be assessed and addressed when applicable. We endeavor to use the leverage from our business relationships to facilitate effective remediation if adverse impacts occur during projects.

AFRY tracks the effectiveness of its human rights' due diligence through the following indicators: number of high-risk projects subject to enhanced due diligence, number of human rights grievances received, investigated, remedied, and resolved. These indicators are reported annually.

Affected communities, including those living in areas where AFRY's projects are located, may submit grievances or concerns through AFRY's Listen Up platform. AFRY will acknowledge, investigate, and respond to all community grievances and provide feedback on the outcomes.

Processes to identify risks

Our Compliance & Ethics framework enables systematic and effective prevention, detection and management of violations. The framework is supported by a top-level commitment to ensure consistent application and awareness of human rights principles throughout the organization as well as in our activities and business relationships.

Processes to safeguard employee well-being, health and safety are embedded in our management system. All employees must be treated with dignity and respect, and we are convinced that inclusion and diversity drive creativity and innovation. AFRY employs Inclusion and Diversity Managers who proactively promote inclusion, globally through initiatives such as our target of 40% female leaders by 2030, and locally through efforts such as the Swedish Immigrated Competence Program.

AFRY's Country Risk Database supports informed assessment of human rights risks through the human rights performance index. The index includes sub-indices such as decent wages, freedom of opinion and

expression, child and forced labor, indigenous peoples' rights, migrant workers' rights, rule of law, and individual safety in all countries where AFRY operates. This database underpins the RBDD process.

Furthermore, our Double Materiality Assessment process which is aligned with the CSRD/ESRS supports our efforts to identify and assess adverse impacts in our value chain.

Capacity and Training

AFRY's Executive Team assumes a shared responsibility to govern practices of responsible business conduct throughout the organization. This statement and related policies are approved by the Board of Directors of AFRY, demonstrating commitment at the highest level.

Key functions, including Risk and Compliance, Sustainability, and Human Resources, support the implementation of relevant policies and procedures.

Awareness of human rights risks in the supply chain, including risks of modern slavery and human trafficking, is ensured by AFRY's mandatory group-wide Code of Conduct training, which all employees must complete. AFRY has a 95% completion target for employees, with progress monitored and reported annually.

Additionally, targeted human rights risk awareness is conveyed when required as part of the Responsible Business Due Diligence process.

Our Supplier Code of Conduct describes our expectations on our business partners. 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 Annual and Sustainability report.

AFRY has made available a confidential reporting line, Listen Up, for employees and external parties to report human rights grievances or other violations in their preferred language without fear of retaliation. Listen Up incorporates explicit guarantees of confidentiality, non-retaliation, and accessible reporting channels to ensure safe and effective grievance management.

The Chief Compliance & Ethics Officer oversees the tracking and response to 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.

Country alignment

This is a joint statement made by AFRY on behalf of its subsidiaries. A full list of subsidiaries and countries of operations can be found on afry.com.

AFRY's subsidiaries operating in the UK

All AFRY's divisions have representation in the United Kingdom. This Modern Slavery Act Transparency Statement has been published in accordance with section 54, Part 6 of the Modern Slavery Act 2015 with a view to set out the steps AFRY has taken to ensure that modern slavery and human trafficking is not taking place in any part of its business or in its supply chain.

AFRY's subsidiaries operating in Norway

All AFRY divisions have representation in Norway. AFRY is subject to the Transparency Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions. This Statement reflects AFRY's responsibility to perform Human Rights Due Diligences in accordance with OECD's Guidelines for Multinational Enterprises due to this Act. Detailed Due Diligence findings are presented annually in the "Rapport Åpenhetsloven".