



Social & Human Rights Policy

Version: 0.1

Adopted: By The Board of Directors of Concentric AB on 18th April 2024

Applicable within: Concentric AB (publ) (hereinafter “Concentric”)

1 OUR COMMITMENT

Concentric is committed to respecting human rights in all our operations and to avoid causing or contributing to adverse human rights impacts, as well as always addressing adverse human rights impacts should they occur in our business operations.

Our commitment to social and human rights is in accordance with the UN Guiding Principles on Business and Human Rights. Accordingly, we adhere to the principles set forth in the International Bill of Human Rights, the International Labour Organizations’ (“ILO”) Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises and the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.

We carry out our business in accordance with this Social and Human Rights Policy and applicable laws and regulations in the country of business where we operate. If there is a conflict between local law and this Policy, the stricter of them shall prevail.

2 WHO IS THIS POLICY FOR?

This Policy applies to everyone at Concentric and is applicable in all our business operations. Accordingly, the Policy applies to every employee and representative of Concentric, including its subsidiaries, members of the Board of Directors as well as anyone working on behalf of Concentric (such as consultants and subcontractors).

Since several of our social and human rights risks are related to our value chain, all our suppliers are expected to abide by the same standards and adhere to our Supplier Code of Conduct.

3 OUR POLICY STATEMENTS

3.1 We respect all human rights and workers’ rights

3.1.1 *Fair employment conditions*

Concentric’s employees should, at least, be granted statutory or by any applicable collective bargaining agreement (a “CBA”) determined annual leave, sick leave and other applicable leave without any negative consequences. Each employee shall be provided written documentation including basic terms and conditions of their employment. Salary and terms shall be reasonable and comply with applicable law, CBA or industry standards. The normal work week shall on an ordinary basis not exceed a normal work week according to local rules.

3.1.2 *Denouncement of child labor and forced labor*

Concentric does not accept child labor, and we will see that minors are protected in a satisfactory manner and, as a basic principle, refrain from hiring children or supporting child labor unless it occurs in a government-approved training program for young people, e.g., practical work experience. If we discover the use of child labor within our operations, we will immediately take action.



Concentric does not accept any form of forced labor. Forced labor according to this Policy includes, but is not limited to, deposit payment or demand to deposit personal belongings, confiscation of identity papers and personal documents, recruitment fees, mental and physical punishment.

Concentric shall take all reasonable steps to ensure that modern slavery and human trafficking does not take place within any part of our business, including our supply chain.

3.1.3 *Freedom of association and the right to organize*

Concentric respects our employees' right to join, or not to join, an association of their choice, to organize and bargain collectively in accordance with applicable law. No employee shall be subjected to harassment or retaliation for exercising such right.

In situations where the right to freedom of association and collective bargaining is limited by applicable laws and regulations, we expect suppliers and partners to allow alternative and independent forms of worker representation.

3.1.4 *Equal opportunity and ethical recruiting*

Concentric offers all employees equal opportunities, and refrains from discriminating on the basis of ethnicity or national origin, religion or other religious belief, caste, disability, gender, transgender identity or expression, age, sexual orientation, union affiliation or membership in any political organization. Our recruitment processes shall always be carried out in an ethical manner and with respect for the applicant throughout the process.

3.1.5 *Women's rights*

Concentric considers it essential to promote women's and girls' equal enjoyment of all human rights, including freedom from violence, sexual and reproductive rights, access to justice, socio-economic equality, and participation in decision-making.

3.1.6 *Rights of minorities, indigenous peoples and communities*

Concentric respects the rights, interests and developmental aspirations of minorities, indigenous peoples and other vulnerable groups and communities affected by our operations. We shall always uphold respect for land, forest, and water rights and do not accept forced evictions. We will work together with stakeholders and authorities in this regard and engage in transparent, open, and honest dialogue.

3.1.7 *Use of Private or Public Security Forces*

Where security forces, whether private or public, are involved in our operations we are committed to ensuring that all security personnel and providers respect human rights and the dignity of all people and in case of threats always use only reasonable force proportionate to the threat.

3.2 We always prioritize health and safety

3.2.1 *Zero incidents as our objective*

Our objective is zero incidents. To meet this goal, we offer a safe work environment at all our workplaces and take measures to prevent accidents and occupational injuries by minimizing the risks in the work environment to the greatest possible extent.

3.2.2 *An equal opportunity work environment free from any form of harassment*

Concentric is committed to providing a healthy and safe work environment, at worksites as well as accommodations provided by us. Therefore, health and safety for our employees are top priorities and a prerequisite for our business.



All employees shall be treated fair and just. No discrimination, harassment or victimization of any kind is accepted. This includes but is not limited to, discrimination based on sex or gender, transgender identity or expression, sexual orientation, ethnicity, religion or other religious belief, disability, age, membership of trade unions or any other grounds for discrimination.

We have zero tolerance for all forms of harassment and bullying, whether physical or verbal, against employees, customers, contractors, suppliers and other stakeholders.

3.3 We engage with stakeholders and contribute actively to society

The views of our stakeholders are important to us, and we listen to and engage in dialogue with stakeholders in several ways. We are committed to contributing to improving economic, environmental and social conditions through open dialogue with relevant interest groups in the societies where Concentric operates.

4 HOW WE UPHOLD THIS POLICY

We take the following measures:

- **Undertake risk-based due diligence** to identify, prevent and mitigate actual or potential adverse impact in our operations, supply chain or other business relations, as well as how such adverse impact can be addressed.
- **Implement policies and procedures** including internal reporting structures to ensure that the principles in this Policy forms part of all our operations.
- **Communicate internally and externally and provide training** to our employees and, where relevant, business partners on the content of this Policy.
- **Undertake risk-based due diligence on suppliers** to assess and choose suppliers and ensuring that all our suppliers are obliged to follow our Supplier Code of Conduct.
- **Periodically conduct audits and reviews** within our own operations as well as with our suppliers to ensure adherence to this Policy and our Supplier Code of Conduct.

5 GRIEVANCE MECHANISM AND REMEDIATION

It is the responsibility of everyone to uphold the principles in this Social and Human Rights Policy, including speaking up if we witness any breach of this Policy, or applicable laws or regulations. We also provide for other stakeholders to report perceived irregularities. We will handle all reports seriously and follow up any potential misconduct in an appropriate manner.

Anyone who reports in good faith shall be protected from any form of retaliation.

More information on how to report suspicions of misconduct, and how such reports are handled are outlined in Concentric's Whistleblower Policy.

Where it can be established that Concentric has directly caused or contributed to a negative human rights impact, we commit to provide appropriate remediation.

6 WHAT HAPPENS IN CASE OF VIOLATIONS AGAINST THIS POLICY?

Violations of this Policy may result in disciplinary actions, up to and including dismissal. Concentric will report violations of legislation and regulations to relevant authorities.

Apart from legal consequences, breaches of this Policy may also be detrimental to Concentric's future abilities to conduct business and cause negative effects on our brand and reputation.



7 QUESTIONS?

Questions regarding this Social and Human Rights Policy itself or its interpretation may be directed to your manager or Human Resources.