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Human Rights Charter

Document No.: SWS-B-001

Effective Date: January 1, 2025

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1. Overview

A. Purpose of the Human Rights Charter

Sweco Inc. respects human rights and establishes this Human Rights Charter to prevent potential human rights violations in all business activities and to mitigate related risks. Sweco Inc. complies with international standards such as the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the ILO Core Conventions. Through responsible corporate activities, the company contributes to the protection and promotion of human rights.

B. Scope of Application

This Human Rights Charter applies to all executives and employees of Sweco Inc. following the laws and regulations of the countries and regions in which the company operates. Key stakeholders, such as suppliers, partners, and subcontractors, are encouraged to respect this Charter.

- Where national laws conflict with this Charter, applicable laws shall take precedence.
- Sweco Inc. may establish detailed policies tailored to the characteristics of each country or industry based on this Charter.

C. Human Rights Risk Management System

- 1) Human Rights Due Diligence Policy
 - Conduct regular assessments of human rights risks and establish improvement measures to prevent and mitigate them.
 - Share the results transparently with employees and key stakeholders.
- 2) Work Environment and Supply Chain Management
 - Provide a safe and non-discriminatory work environment for all employees.
 - Monitor human rights risks within the supply chain and actively address related issues.
- 3) Remediation Procedures
 - Operate remediation procedures to minimize harm in the event of human rights violations and to resolve issues promptly.
 - Ensure whistleblower protection and maintain systems to receive external stakeholder feedback.

2. Fundamental Principles

Article 1. Prohibition of Child Labor and Forced Labor

- Sweco Inc. prohibits child labor and forced labor in all business activities.
- Protect minors' right to education and prevent coercion or retention of IDs/visas.

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- In the event of termination of the employment contract or expiration of the lawful period of stay, physical and financial support shall be provided in accordance with applicable laws and regulations.
- Such support shall not be used as a means of forced labor.
- No persons under 18 are employed. Verified by official registration documents.

Article 2. Prohibition of Discrimination and Workplace Harassment

- Non-discrimination based on gender, race, nationality, religion, disability, age, political opinion, or other grounds.
- Prohibit coercive orders, verbal abuse, and harassment.

Article 3. Compliance with Working Conditions

- Comply with statutory working hours and provide fair compensation.
- Do not charge recruitment-related fees and provide training for employee development.
- Comply with labor-related laws, regulations during the recruitment process, regardless of the worker's nationality or employment type.
- During the recruitment process, eliminate any elements that may infringe upon human rights, including the demand for illegal fees, coercion, provision of false information, or discrimination.

Article 4. Humane Treatment

- Respect employee privacy and protect personal information.
- Prohibit all forms of mental/physical abuse or coercion.

Article 5. Freedom of Association and Collective Bargaining

- Respect freedom of association and provide communication opportunities.

Article 6. Industrial Safety Assurance

- Regularly inspect facilities, equipment, and tools to ensure safety.

Article 7. Protection of Local Communities and Vulnerable Groups

- Avoid infringing on rights of local residents or vulnerable groups.

Article 8. Customer Human Rights Protection

- Protect customers' lives, health, property, and personal information.

Article 9. Responsible Supply Chain Management

- Build a sustainable supply chain and improve ESG risks with partners.

Article 10. Guarantee of Environmental Rights

- Minimize environmental impacts that may affect human rights.

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Article 10. Living Wage

- Sweco Inc. understands the concept of a living wage and its relationship to the minimum wage.
- The company is committed to providing fair and adequate wages for all employees with the support of senior management.
- Wage levels are reviewed in consideration of local conditions, and efforts are made to reduce any gaps where necessary.
- Relevant stakeholders may participate in the process.
- Wage trends are monitored on a regular basis.
- Full wages are paid after the three-month probationary period.

3. Human Rights Program

A. Establishment of Governance Structure

- 1) Human Rights Management Responsibility

Establish a Human Rights Management Committee, comprising top decision-makers and department heads.

 - Responsibilities of Committee:
 - ① Review establishment/revision of Charter
 - ② Review internal regulations (HR systems, employment rules, audit standards)
 - ③ Evaluate human rights risks and recommend measures
 - ④ Investigate violations and review remedies
 - ⑤ Other necessary matters
- 2) Implementation of Human Rights Management
 - Dedicated department for:
 - ① Charter establishment/revision
 - ② Execution of human rights management plans
 - ③ Human rights due diligence and risk management
 - ④ Grievance procedures
 - ⑤ Education and communication

B. Grievance Handling Procedure

- 1) Reporting & Receiving Complaints
 - Multiple channels available for employees and stakeholders.
 - Grievance Reporting Channel
 - ☞ Responsible Department: HR & General Affairs
 - ☞ Address : #92, Nangnaegi-gil, Bongdam-eup, Hyohaeng-gu, Hwaseong-si, Gyeonggi-do, Korea

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- ☞ Email: ethics@swecomica.net
- ☞ Homepage : <http://www.swecomica.net>
- ☞ TEL : +82-31-227-2900(ext : 940)

- 2) Processing Reports
 - Address complaints considering laws, policies, and industry practices.
- 3) Whistleblower Protection
 - Protect identity and maintain confidentiality.
 - Prevent retaliation.

C. Education & Dissemination

- 1) Human Rights Management Training

Sweco Inc. provides regular training to help employees understand and practice the principles of human rights management.

Key training topics include:

 - Workplace harassment and sexual harassment prevention training
 - Safety, health, and accident prevention training
 - Personal information protection training
 - Ethics and human rights compliance training
- 2) Promotion of Human Rights Management

Sweco Inc. shares its human rights principles and policies with partners and stakeholders to promote responsible management.

Methods of sharing include:

- Regular meetings and workshops with domestic and international partners
- Email, written reports, or online portal
- Providing materials in multiple languages

4. Risk Management

A. Risk Identification and Assessment

- 1) Development of Assessment Indicators

Sweco Inc. develops and applies customized checklists and due diligence indicators to evaluate human rights risks related to working environment, labor conditions, occupational safety, local communities, and customers. These indicators are based on the UN Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidelines, and domestic guidelines on business and human rights.

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2) Operation of the Assessment Process

- ① Selection of Targets
 - Select organizations within the scope of this Charter (e.g., in-house plants, business partners) as assessment targets
- ② Written Assessment
 - Provide self-assessment checklists to targets, review human rights risks, and recommend improvement plans where needed.
- ③ On-site Due Diligence
 - Based on written assessment results, the internal human rights team or external experts conduct in-depth inspections, including interviews, system reviews, and workplace checks.
- ④ Third-Party Audits
 - An independent external agency objectively evaluates major human rights risks and high-risk cases.
- ⑤ Risk improvement and Improvement
 - Cases identified as “high risk” or “non-compliant” through due diligence require immediate correction or submission of an improvement plan.
- ⑥ Regular Review of Indicators and Processes
 - Assessment indicators and due diligence processes are reviewed and updated annually to reflect the latest trends and emerging risks.

B. Implementation of Risk Improvements

- 1) Deriving and Agreeing on Improvement Measures
 - Based on the results of human rights risk assessments, specific action items are identified and agreed upon with the relevant organization for development and implement of improvement measures
 - E.g., improvement of working conditions, compliance with working hours, reinforcement of safety training
- 2) Monitoring Implementation Status
 - Regularly monitor the implementation of improvements and cooperate to ensure timely completion of action items

C. Disclosure of Status and Results

- 1) Reporting to Key Decision-Makers
 - Report the results of human rights risk assessments and key improvement measures to management on a regular basis.
 - Share the reports with relevant departments to enhance the effectiveness of human rights management.
- 2) External Disclosure

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- Transparently disclose major human rights risks, corrective actions, and outcomes through the company website, sustainability reports, or a separate human rights report.
- Disclosures should be provided in an accessible and understandable format for employees, partners, and other stakeholders.

5. Appendix

A. References

- ① UN, Universal Declaration of Human Rights (1948)
- ② UNGC, A Human Rights Management Framework (2010)
- ③ UN, The UN Guiding Principles on Business and Human Rights (2011)
- ④ OECD, Guidelines for Multinational Enterprises (2011)
- ⑤ OECD, Due Diligence Guidance for Responsible Business Conduct (2018)
- ⑥ Constitution of the Republic of Korea
- ⑦ National Human Rights Commission of Korea, Public Institution Human Rights Management Manual (2018)
- ⑧ National Human Rights Commission of Korea, Human Rights Impact Assessment Checklist for Organizations (2018)
- ⑨ Ministry of Justice, Business and Human Rights Guide (2021)