

# Centiro Group AB Communication on Progress 2021

2021-05-21  
Version 2.0



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## REVISIONS

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The following table shows the changes for each revision of this document. Other than editorial changes, this document has been revised as listed in Table 1 below.

Table 1: Document Revision List

VERSION	CHANGE DESCRIPTION	RESPONSIBLE	DATE
1.0	Document created	Sofia Malteby	2021-02-19
2.0	Introduction updated with sustainability vision, the description of Centiro's pandemic year, Centiro in short with stakeholder analysis, certificates and awards, and a description of SDG efforts.	Sofia Malteby	2021-05-21

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## STATEMENT OF CONTINUED SUPPORT BY THE CHIEF EXECUTIVE OFFICER

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2021-02-19

To our stakeholders,

I am pleased to confirm that Centiro Group AB reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of human rights, labor, environment, and anti-corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture, and daily operations. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours,

Niklas Hedin, CEO

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## 2 INTRODUCTION

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We believe businesses are a key driving force in striving towards a sustainable world. Businesses are as recognized and rewarded for their sustainability commitment as for their products, solutions, and financial achievements. We strive to make ourselves and our customers part of the solution for a better world. Our delivery management services play key roles in helping our customers and partners make smarter choices in their supply and demand chain.

We have offices, customers, and partners in most parts of the world, and we take responsibility to work for that our business and services do not adversely affect our planet, no matter where in the world it is and whether it is related to environmental, social, or personal issues. We want to bring about change and inspire and help others to do so.

Creating an annual Communication on Progress (CoP) is central to our company's commitment to the UN Global Compact and provides valuable information to our stakeholders.

This CoP includes

- a statement by Centiro's CEO expressing his continued support for the UN Global Compact and a renewing of our commitment to the initiative;
- a description of the actions the Centiro has taken or plans to take to implement the Ten Principles in the areas of human rights, labor, environment, and anti-corruption; and
- measurement of outcomes.

### 2.1 The Pandemic Year 2020

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2020 has been a year out of the ordinary for everyone. From the start of the pandemic, we have been in an active business continuity mode, closely following data, expert opinions, restrictions, and recommendations from official sources. Different restrictions have affected our lives differently depending on where in the world we are. In India and the US, our colleagues have to a large extent, been confined to their homes and we have tried to facilitate their work from home as much as possible. In Sweden, the office has been open and both work from home and from the office have been possible. Measures have been taken continuously, to ensure a safe and healthy work situation for all employees globally. Below are some examples of what we have done:

- We have ensured full health insurance support and free antibody testing for all employees in all our locations.
- We have promoted ways to take care and tips, guidance, and tools to facilitate wellbeing during this time of uncertainty.
- We have ensured continuous internal communication regarding the pandemic, our health, company results, and customer and project news.

- We have expanded our employee development portfolio to include more virtual learning modules and trainings.
- We have performed technical adjustments to further facilitate remote work, such as, improved solution for remote connection width and speed and provision of work tools such as screen, mouse, keyboard, and headphones to all employees.

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## 2.2 Brief Introduction to Centiro

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Centiro is a market leading innovator in cloud-based delivery management solutions and logistics collaboration. Centiro's products and solutions empower world leading brands and their supply chains in 135+ countries. Centiro combines a carrier network and data-driven innovation capability, using advanced analytics and artificial intelligence, to optimize service, performance, and cost.

Centiro offers unique solutions for delivery management that let companies think global yet offers consumers a consistent and personalized experience for first- and last-mile delivery and returns. The end-to-end solution ranges from complex delivery options at the customer frontend to straightforward shipping labelling solutions and carrier management, always with full visibility and control over events, cost, and customer promise.

### 2.2.1 Materiality and Stakeholders

Our strategic focus is formed in dialogue with relevant stakeholders, including our employees, customers, and partners. We also consider the planet itself a stakeholder. The material areas are based on

- where our impact is;
- how big it is socially, environmentally, and economically;
- where the risk for negative impacts is; and
- how it can be mitigated.

Our material areas of impact are with our services within supply and demand chain and transportation of goods, as well as in the role of employer in Europe, Asia, and North America.

We continuously engage with our stakeholders to find out what is important to them. We often cocreate the solutions with our customers and partners, and their requirements and expectations are naturally provided during that process together with opportunities for us to guide them to even better solutions and optimized flows and procedures.

We give the employees great possibilities to be heard and influence their work. The input from the employees is captured everywhere, in channels ranging from everyday work discussions to anonymous surveys.

### 2.2.2 Centiro's Management System

Centiro has integrated sustainability into the company group management system. The system encompasses all activities at Centiro and is based on operational standards and our environmental and sustainability policies,

“Centiro Code of Ethics”, the UN Global Compact, the UN Sustainability Development Goals (SDGs), ISO 45001, ISO 50001, and ISO 14001.

The management system provides guidelines for the ongoing cycle of planning, implementation, and evaluation, as well as the improvement of processes. Centiro also has routines and mechanisms in place to ensure compliance with applicable international and national legislation.

### 2.2.3 Certified and Awarded

We have three ISO certifications for all legal entities within Centiro Group AB within environment, work environment, and energy, certified by the certification body PECB:

- ISO 14001 Environment
- ISO 45001 Occupational Health and Safety
- ISO 50001 Energy

Centiro ranks high on the top lists of Great Places to Work®, in both Sweden and Europe, for our workplace culture. We have also received the prestigious title Great Place to Work Legend™ for our dedication and long-term approach in the area.

Centiro has a gold level EcoVadis sustainability rating. The EcoVadis assessment is evidence-based and covers business ethics, work environment, environment and energy footprint, procurement, and important social factors. Centiro ranks among the top five percent of companies assessed by EcoVadis.

## 2.3 UN Sustainable Development Goals

At Centiro, we have during 2020 started to explore how the Sustainable Development Goals (SDGs) could be a tool for us to structure our strategic sustainability agenda. In our work towards a sustainable future, we find touchpoints in many of the SDGs but six of them are more aligned with the sustainability agenda, as described in the following sections.



Figure 1: Centiro Progresses on Six SDGs

### **2.3.1 Goal 3: Ensure Healthy Lives and Promote Well-Being for All at All Ages**

Centiro ensures all employees has the possibility to healthy lives and promotes well-being and work–life balance (which we call life–life balance since work unarguable is part of life). We make sure all employees have good health and medical insurances. These insurances also cover employees’ family members in the regional parts of our operations where this is needed. We continuously assess employee health- and well-being risks to be able to work with them proactively. The health emergency of the corona pandemic has during 2020 tested and proved our crisis management and preparedness.

The Centiro services are used by our customers and partners to ensure the quality and precision of critical deliveries, such as of pharmaceuticals and medical equipment, to enable timely, accurate, and safe universal health-care coverage and access to medicines and vaccines worldwide. We have during 2020 further secured our processes involved in transportation of medical equipment by certifying to ISO 13485, which applies to quality management systems for medical devices.

### **2.3.2 Goal 9: Build Resilient Infrastructure, Promote Sustainable Industrialization and Foster Innovation**

SDG 9 is about building resilient infrastructure, promoting inclusive and sustainable industrialization, and fostering innovation. Centiro’s services enables robust, intelligent, and efficient transportation, reducing unnecessary and faulty transports, enabling easy found pain points and leakage by full visibility.

Centiro has a culture of innovation, currently designing, developing, and implementing new solutions utilizing data analytics, artificial intelligence, and machine learning that introduces and promotes new ways to build resilient infrastructure and sustainable industrialization with efficient use of resources, enabling affordable and equitable access for all and promoting inclusive and sustainable industrialization.

### **2.3.3 Goal 11: Make Cities Inclusive, Safe, Resilient, and Sustainable**

SDG 11 is about making cities and human settlements inclusive, safe, resilient, and sustainable. Centiro’s services enables robust, intelligent, and efficient transportation, empowering both the little carrier company and the large, enabling goods to be transported safely and accurately to all corners of the world. Following or stakeholder enquiries and requests, we have during 2020 begun to explore the possibility of developing our services to create a network of last-mile, urban delivery vendors where sustainability aspects can be a selection criterion.



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### 2.3.4 Goal 12: Ensure Sustainable Consumption and Production Patterns

In relation to SDG 12, we have the responsibility to affect worldwide consumption and production use of the natural environment and resources in a sustainable way. Centiro works continuously with product development and efficiency improvements in order to reduce its negative climate and environmental impacts. For example, we enable the supply chain accurate and optimized transportation of goods safeguarding its timely delivery and hence quality, thus reducing waste.

During 2020, we have developed our procurement practices and supplier due diligence routines in the ethics and climate impact areas to be even more sustainable.

### 2.3.5 Goal 13: Take Urgent Action to Combat Climate Change and Its Impacts

Climate change is affecting everyone everywhere. To help customers and partners work towards their climate goals, we are developing new technology frameworks to enable them to measure and report on their carbon footprint, providing mechanisms for raising capacity for effective climate change-related planning and management. We aim to offer the possibility to create quality CO2 reports, developed from the latest models and research, in our services before 2023.

Centiro works proactively to combat climate change by focusing on sustainability in the company group strategic goals the coming three years. We have also introduced the planet as stakeholder to be considered in all business projects moving forward.

### 2.3.6 Goal 17: Revitalize the Global Partnership for Sustainable Development

The SDGs can only be realized with strong global partnerships and cooperation. We recognize a successful development agenda requires inclusive partnerships at the global, regional, national, and local levels, built upon principles and values, and upon a shared vision and shared goals placing people and the planet at the center.

Strong international cooperation is needed now more than ever to ensure the means to recover from the pandemic, build back better and achieve sustainable development. We want to support this by setting aside one percent of the company group profit for corporate social responsibility (CSR) initiatives, locally and globally. Please visit the [Centiro website](#) for information on current CSR initiatives.

Over the years, Centiro has several times invested in partnerships where the planet is the first stakeholder. And as we conclude one successful partnership, creating a safer world for people in exceptionally affected, violence-struck areas, we engage in another partnership for sustainable development. In 2020, Centiro started a collaboration with a company at the very forefront of green innovation to enable the transition to a clean, carbon-

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neutral energy future. The collaboration partner intends to set a new benchmark for sustainable manufacturing, and Centiro will assist by creating the delivery chain that meets these intentions.

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## 3 HUMAN RIGHTS PRINCIPLES

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- **Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and
- **Principle 2:** make sure that they are not complicit in human rights abuses.

### 3.1 Assessment, Policy, and Goals

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Centiro is committed to influence our employees and business partners to respect the Universal Declaration of Human Rights. In our code of ethics, we make our position in the matter clear to employees, customers, suppliers, and partners and address the specific human rights issues and risks relevant to the company group.

Centiro policies, such as the code of ethics, the code of AI ethics, the procurement policy, and the speaking-up policy, set the direction to, wherever we operate, ensure people are provided safe, suitable, and sanitary work facilities, protection from workplace harassment, including physical, verbal, sexual, or psychological harassment, abuse or threats, and take measures to eliminate components that could harm or threaten human life and health during manufacturing, usage, or disposal in products used in our business.

Employees shall have the right to freely associate, organize, and bargain collectively in accordance with the laws of the countries in which they are employed. In the Centiro spirit, open communication and direct engagement between employees and management are encouraged.

The aims of Centiro's procurement policy are to ensure that the procurement process is secure and systematic, suppliers are aware of Centiro's sustainability goals, and Centiro examines products and services not only from price, but also from information security, sustainability, ethics, and CSR aspects and risks.

### 3.2 Implementation

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Centiro has taken the following measures to prevent human rights violations in its work locations:

- Training and awareness on Centiro's code of ethics is part of the onboarding program for employees, consultants, and service suppliers applicable as identified in the company group risk and vendor assessments.
- A whistleblower (speaking-up) mechanism is implemented, enabling employees to submit complaints and grievances anonymously and with protection from retaliation for immediate handling and board attention.
- Systematic audits and improvement. We work systematically for continuity and continual improvement. We are annually audited by external auditors and certified to the ISO 45001 standard for occupational health and safety management and ISO/IEC 27701

standard for privacy information management. We are EcoVadis rated on gold level.

- We continuously assess sustainability risks and opportunities using a precautionary risk management approach where we focus on preventing and minimizing sustainability-related risks as well as exploring opportunities. The risks and opportunities are assessed and strategically dealt with within the management system.
- We systematically perform activities such as equality and diversity assessment and plan, yearly review of our work environment management, and physical safety inspections.

### 3.3 Measurement of Outcomes

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Centiro has below measurements and monitoring in the area to be able to continually follow up, monitor, and take appropriate action. The results are at least annually reviewed by the board or top management, as applicable.

- Breaches of our code of ethics. We have a zero tolerance regarding breaches of our code of ethics.
- High set occupational health and safety and physical work environment goals. In our global operations, we strive for the goals of zero employees with longer sickness leave due to work-related stress symptoms, zero employees that terminate their job based on an unhealthy work environment, and zero confirmed discriminations to anyone.
- Company group covering onboarding training in the code of ethics. 100 percent of employees globally are to have signed the code of ethics during recruitment process.
- Company group covering awareness training in harassment and discrimination. 100 percent of employees globally are to have participated in the training on harassment and discrimination.
- Company group covering HR education. 100 percent of employees globally are to be offered the opportunity to participate in the HR training, including but not limited to, information on equality and diversity, discrimination, benefits, labor practices, and our human rights commitment.
- Employee engagement. Centiro is not content with less than being an extraordinarily good workplace – a workplace where employees are committed to and proud of their work and the company's goals. We follow the engagement level as indicated by the response rate of the Great Place to Work Trust Index survey in which we aim for at least 95 percent participation.
- Monitoring of indicators to measure outcomes. We have various indicators that we follow, for example, staff turnover, employee sickness leave, the staff distribution of men and women, the number of reported work accidents and near accidents, and the number of full-time employees covered by private medical- and travel insurance.
- Partner and supplier evaluation. We regularly audit and evaluate our partners and suppliers against defined principles, policies, and guidelines.

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- Monitoring of applicable laws and legislation. We commit to following laws and regulations in all the jurisdictions in which we operate. We have set goals of zero significant fines and non-monetary sanctions for non-compliance with socioeconomic laws and regulations.

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## 4 LABOR PRINCIPLES

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- **Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- **Principle 4:** the elimination of all forms of forced and compulsory labor;
- **Principle 5:** the effective abolition of child labor; and
- **Principle 6:** the elimination of discrimination in respect of employment and occupation.

### 4.1 Assessment, Policy, and Goals

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In Centiro's code of ethics, we make clear to all suppliers, employees, and partners globally where we stand in the labor practices issues. Centiro does not tolerate any form of child labor or exploitation. We do not support or use any form of forced, compulsory, or illegal labor. We comply with applicable laws and industry standards on working hours. Our employees have the right to freely associate, organize, and bargain collectively in accordance with the laws of the countries in which they are employed. In the Centiro spirit, open communication and direct engagement between employees and management are encouraged.

Employees are informed of their employment conditions, including rights and obligations, in the employees' native language or a language they understand, for example in a written labor contract.

We comply with, at a minimum, all laws and regulations relating to wages, including minimum wages, overtime wages, and other elements of compensation, and provide legally mandated benefits, including social insurance.

### 4.2 Implementation

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Centiro has taken the following measures to implement labor policies, reduce labor risks, and respond to labor violations in our global operation:

- Training and awareness on Centiro's code of ethics, which includes our labor principles, is part of the onboarding program for employees, consultants, and service suppliers applicable as identified in the company group risk and vendor assessments.
- As part of the company group's onboarding program, all new employees globally are offered the HR training that includes information on equality and diversity, discrimination, benefits, labor practices, among other topics.
- A whistleblower (speaking-up) mechanism is implemented, enabling employees to submit complaints and grievances anonymously and with protection from retaliation for immediate handling and board attention.
- We work systematically with occupational health and safety for continuity and continual improvement. We are annually audited by

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external auditors and certified to the ISO 45001 standard and EcoVadis rated on gold level.

- We continuously assess sustainability risks and opportunities using a precautionary risk management approach where we focus on preventing and minimizing sustainability-related risks as well as exploring opportunities. The risks and opportunities are assessed and strategically dealt with within the management system.
- The occupational health and safety management is conducted together with employee representatives, the health and safety representatives. These are appointed by the employees and have full insight into company work conditions and the planning of changes affecting the work environment. The health and safety representatives have the mandate to demand measures to be taken by the employer if needed to achieve a satisfactory working environment.
- We regularly and systematically perform work environment activities such as equality and diversity assessment and plan, yearly review of our work environment management, and physical safety inspections.
- We continually work with the psychosocial work environment to ensure health and safety of all employees, promoting health and preventing stress. This is for example to prevent longer sickness leave due to work-related stress symptoms, which is considered one of our highest occupational health and safety risks.
- All full-time employees are covered by medical- and travel insurances.
- Centiro does not tolerate discrimination and makes this clear in everything from top policy to company culture. All employees are made aware of our zero discriminations policy in a company group covering awareness training in harassment and discrimination.
- We ensure all Centiro employees comparable pay for comparable work. All employees get a yearly salary review and revision. In between, salary adjustments are performed as part of skills development revisions. We perform an annual salary survey and review statistics, looking at benchmarks in the industry as well as gender equality.
- At Centiro, everyone has the right to development, education, and career. All employees have dialogues (appraisals) with their closest leader at a minimum twice a year. These dialogues cover areas such as development, performance, personal growth, team collaboration, work environment, and health.
- We have a recruitment process that is fair, open, and transparent, where all information on the process is available to all stakeholders. The applicants are made aware of the requirements of each step of the process and get feedback in each step. To prevent discrimination in the recruitment process, we use second opinions, profiles, and cases.
- Centiro is rated a great place to work by Great Place to Work® Institute, with top five rating in Sweden for eleven consecutive years.

### 4.3 Measurement of Outcomes

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Centiro has below measurements and monitoring in the area to be able to continually follow up, monitor, and take appropriate action. The results are at least annually reviewed by the board or top management, as applicable.

- Breaches of our code of ethics. We have a zero tolerance regarding breaches of our code of ethics.
- High set occupational health and safety and physical work environment goals. In our global operations, we strive for the goals of zero employees with longer sickness leave due to work-related stress symptoms, zero employees who terminate their job based on an unhealthy work environment, and zero confirmed discriminations to anyone.
- Company group covering onboarding training in the code of ethics. 100 percent of employees globally are to have signed the code of ethics during recruitment process.
- Company group covering awareness training in harassment and discrimination. 100 percent of employees globally are to have participated in the training on harassment and discrimination.
- Company group covering HR education. 100 percent of employees globally are to have had the opportunity to attend the HR training within 90 days from start of employment. The training includes, but is not limited to, information on equality and diversity, discrimination, benefits, labor practices, and our human rights commitment.
- Monitoring of indicators to measure outcomes. We have various indicators to follow, for example, staff turnover, the percentage of employee sickness leave, the distribution percentage of men and women, the number of reported work accidents and near accidents, and the number of full-time employees covered by private medical- and travel insurance.
- Equality and diversity plan. We yearly create an equality and diversity plan where we look at the company global current situation, evaluate risks, and plan measures as appropriate. The equality and diversity plan action points are continuously worked with and followed up yearly.
- Monitoring of applicable laws and legislation. We commit to following laws and regulations in all the jurisdictions in which we operate. We have the goals of zero significant fines and non-monetary sanctions for non-compliance with socioeconomic laws and regulations.
- Systematic audits and improvement. We work systematically for continuity and continual improvement. We are annually audited by external auditors and certified to the ISO 45001 standard and EcoVadis rated on gold level.



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## 5 ENVIRONMENTAL PRINCIPLES

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- **Principle 7:** Businesses should support a precautionary approach to environmental challenges;
- **Principle 8:** undertake initiatives to promote greater environmental responsibility; and
- **Principle 9:** encourage the development and diffusion of environmentally friendly technologies

### 5.1 Assessment, Policy, and Goals

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We think it is self-evident that our services and operations should have the lowest possible adverse impact on the environment. We even want to take this one step further – we want to, with our services, reduce the negative impacts of the transportation industry on the environment.

In Centiro's code of ethics, we make clear to all suppliers, employees, and partners globally that we make sustainable choices in the workplace and in our business operations, and that we expect everyone to work together to identify areas for improvement and continuously work towards a better environment and healthier planet.

Environmental care has been a corporate core value for Centiro since the company was founded in 1998, and it is an integrated part of daily business throughout the value chain. We design our processes and products in such a way that energy, natural resources, and raw material are used efficiently. We aim to avoid materials and methods posing environmental and health risks.

Centiro's environmental and energy stance is outlined in our sustainability policy and on a more granular level in our environment and energy policy.

### 5.2 Implementation

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Centiro has taken the following measures to enhance ecological awareness and minimize the adverse environmental impact in our operation:

- Training and awareness on Centiro's code of ethics, covering our environmental stance, is part of the onboarding program for employees, consultants, and service suppliers applicable as identified in the company group risk and vendor assessments.
- Our services create efficient transportation. With our services, positive environmental impact comes from that transportation flows are optimized, consolidated, and controlled so that optimal loads are achieved, optimal routes are chosen, less transports are needed, and goods are correctly delivered and invoiced, to name a selection.
- Green building. Creating and maintaining safe, healthy, and functional workspace and data center buildings is part of Centiro's sustainability idea. For example, we have taken measures to use energy, water, and other resources efficiently, protecting occupant health and improving employee productivity, and reducing waste, pollution, and environmental degradation.

- Green culture. All Centiro employees can with the right mindset help protect the environment by following environmentally sustainable work practices to reduce harm on the environment and reduce wastage of resources. Examples of work practices we employ are reduce waste, recycle, sustainable purchases, awareness, environmental risk and business impact assessments.
- Green IT. We have designed our data centers to function efficiently with minimal impact on the environment in reducing the use of hazardous materials, maximize energy efficiency during the equipment's lifetime, and promote the recyclability or biodegradability of retired equipment. Examples of initiatives are data centers run on 100 percent renewable energy, hot aisle/cold aisle layout design, reuse of the excess heat produced by the equipment in the data center, and the use of server virtualization. Centiro uses a service for reuse and recycle of retired IT products. Most of obsolete devices can be reused and the rest are recycled in a controlled manner.
- Green travel. We aim to travel with as low negative impact on the environment as possible. Centiro policy sets the guidelines for safe and cost-effective travel that considers the environmental aspects.
- Systematic audits and improvement. We work systematically for continuity and continual improvement. We are annually audited by external auditors and certified to the ISO 14001 and ISO 50001 standard and EcoVadis rated on gold level.
- We continuously assess sustainability risks and opportunities using a precautionary risk management approach where we focus on preventing and minimizing sustainability-related risks as well as exploring opportunities. The risks and opportunities are assessed and strategically dealt with within the management system.

### 5.3 Measurement of Outcomes

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Centiro has below measurements and monitoring in the area to be able to continually follow up, monitor, and take appropriate action. The results are at least annually reviewed by the board or management, as applicable.

- Breaches of our code of ethics. We have a zero tolerance regarding breaches of our code of ethics.
- Company group covering onboarding training in the environmental goals. 80 percent of employees globally are to have attended the internal environmental awareness education.
- Partner and supplier evaluation. We regularly audit and evaluate all partners and suppliers against defined principles, policies, and guidelines.
- Monitoring of applicable laws and legislation. We commit to following laws and regulations in all the jurisdictions in which we operate. We have the goals of zero significant fines and non-monetary sanctions for non-compliance with environmental laws and regulations.
- Sustainable procurement. Major suppliers that cover environmental aspects in a structured way should be at least 50 percent of the suppliers that we hire. The percentage of purchasers of internal IT

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equipment trained on sustainable procurement per year should be at least 80 percent.

- Promoted green commuting. The total number of environmentally friendly (as defined by [Worldwide Harmonised Light Vehicle Test Procedure \(WLTP\)](#)) company cars and company staff cars should increase compared to the previous year with a minimum of five percent. The environmentally friendly company cars and company staff cars should comprise at least 40 percent of all staff and company cars by 2021.
- Use of green energy. The energy consumption of the Centiro private cloud SaaS delivery in relation to the number of customer shipments should decrease with at least five percent compared to the previous year.
- The energy type used within Centiro global hub facilities including the SaaS delivery data center should be 100 percent green and renewable.
- Green buildings. The office global hub facilities shall maintain the Swedish Green Building Council certifications (GreenBuilding and Svensk Miljöbyggnad Guld).
- Travel habits. The amount of carbon dioxide (CO<sub>2</sub>) emission during business travel per employee and year must not be more than one metric ton per employee.

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## 6 ANTI-CORRUPTION PRINCIPLES

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- **Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

### 6.1 Assessment, Policy, and Goals

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Centiro has a zero tolerance for any type of corruption. We strive towards meeting the highest standards of business ethics and integrity. This is a shared responsibility of all working at Centiro and we expect our suppliers and business partners to apply similar standards for themselves as well as in relation to their partners and suppliers. Centiro's stance on anticorruption is set out in the company's code of ethics and in "Centiro Group Fair Business Practices Policy".

We comply with local laws and international anti-corruption conventions and does not engage in any form of corrupt practices. We treat each other, our clients, our partners, and our other business relations with kindness, integrity, and respect. We comply with the laws and regulations in all jurisdictions where we do business. We do not offer or accept any rewards or benefits that violate any applicable legislation or Centiro code of ethics. We do not make decisions based on personal considerations or relationships. Centiro does not tolerate any illegal contributions, directly or indirectly, to any third parties or public officials. No Centiro employee may offer or provide, directly or indirectly, any undue advantage in exchange for personal gain of any kind.

### 6.2 Implementation

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Centiro has taken the following measures to prevent corruption in its operation:

- Training and awareness on Centiro's code of ethics is part of the onboarding program for employees, consultants, and service suppliers applicable as identified in the company group risk and vendor assessments.
- A whistleblower (speaking-up) mechanism is implemented, enabling employees to submit complaints and grievances anonymously and with protection from retaliation for immediate handling and board attention.
- "Centiro Group Fair Business Practices Policy" has been drafted, in which Centiro commits to performing business according to fair business practices.
- "Centiro Code of AI Ethics" has been drafted, in which we communicate our commitment to create fair and safe intelligent solutions.
- We have a recruitment process that is fair, open, and transparent, where all information on the process is available to all stakeholders. The applicants are made aware of the requirements of each step of the process and get feedback in each step.
- We continuously assess sustainability risks and opportunities using a precautionary risk management approach where we focus on

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preventing and minimizing sustainability-related risks as well as exploring opportunities. The risks and opportunities are assessed and strategically dealt with within the management system.

## 6.3 Measurement of Outcomes

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Centiro has below measurements and monitoring in the anti-corruption area to be able to continually follow up, monitor, and take appropriate action. The results are at least annually reviewed by the board or management, as applicable.

- Breaches of our code of ethics. We have a zero tolerance regarding breaches of our code of ethics.
- Company group covering onboarding training in the code of ethics. 100 percent of employees globally are to have signed the code of ethics during recruitment process.
- Partner and supplier evaluation. We regularly audit and evaluate all partners and suppliers against defined principles, policies, and guidelines, as well as a region-based corruption risk index.
- Monitoring of applicable laws and legislation. We commit to following laws and regulations in all the jurisdictions in which we operate. We have the goal of zero significant fines and non-monetary sanctions for non-compliance with laws and regulations.
- Systematic audits and improvement. We work systematically for continuity and continual improvement.