



Approved by: The Group Board  
Applies to: The Assemblin Group  
Document type: Group policy

Approved/Reviewed: 27 September 2023  
Version 2.1 (2023)  
Person responsible: Head of Sustainability

## Sustainability Policy

The purpose of this policy is to establish the overall ambitions of Assemblin Group AB and its subsidiaries (“Assemblin”) in the field of sustainability, which includes, among other things, work environment, ethics, environment and quality.

The Sustainability Policy serves as a broad framework for all operations within the Group and sets a minimum standard.

### Contents

1	Introduction.....	2
1.1	Material sustainability aspects .....	2
2	Our sustainability strategies and principles .....	3
2.1	Sustainability strategy and principles primarily aimed at customers.....	3
2.2	Sustainability strategy and principles aimed primarily at employees.....	3
2.3	Sustainability strategy and principles aimed primarily at investors.....	4
2.4	Sustainability strategy and principles aimed primarily at society in general .....	4
2.5	Other important sustainability aspects in areas not of material importance for Assemblin.....	5
3	Positions on international agreements and standards .....	6
4	Stakeholder dialogue and business intelligence.....	6
5	Responsibility and governance .....	6
6	Monitoring and reporting.....	6
7	Revision and dissemination .....	7
8	References .....	7

# 1 Introduction

Assemblin’s ambition is to conduct responsible and value-adding operations without compromising the opportunities to continue doing so in the future. This means that Assemblin assumes a far-reaching responsibility for the operations it conducts and for how they impact people, the environment and society in general.

The natural basis for our sustainability activities is to conduct profitable and sound operations that respect the external environment and to manage our own resources, and those of others, efficiently. We shall act as a responsible player in the broadest sense and one that adds value for our customers, employees and investors as well as for society in general. We have chosen to base our sustainability work on the stakeholder perspective and, based on this, we have formulated ambitions, strategies and principles that are explained further in this policy.



## 1.1 Material sustainability aspects

Based on our geographical spread, operations, and our impact on the external community, Assemblin has identified thirteen material sustainability aspects considered most material for us to work with. These aspects are presented in the table below. Our material aspects are tested on an ongoing basis by means of a materiality analysis, so that we can prioritise our initiatives to those areas that have the most impact and generate the greatest benefit. Beyond our thirteen sustainability aspects there are a number of other important areas where our impact on sustainability is deemed to be very limited, meaning that it is immaterial for us to work on them (see more chapter 2.5).

Stakeholder group	Ambition	Overarching sustainability strategies	Material sustainability aspects
Customers	<b>Best for customers.</b> We shall be a responsible and value-adding business partner	We shall be the customer’s first choice of installation partner by delivering innovative, smart, and sustainable installations that make buildings work and people feel comfortable. This is achieved by high competence, wise and safe material handling as well as through efficient and structured processes.	<ol style="list-style-type: none"> <li>Energy-efficient and sustainable installation solutions</li> <li>Efficient and safe methods</li> <li>Waste management and re-use</li> </ol>
Employees	<b>Best for employees.</b> We shall be a responsible and value-adding employer	We shall be the industry’s most attractive employer by being inspiring and responsible, offering exciting assignments in a beneficial, secure, and non-discriminatory work environment.	<ol style="list-style-type: none"> <li>Health and safety (working environment)</li> <li>Employee development and working conditions.</li> <li>Diversity and equality</li> </ol>
Investors	<b>Best for investors.</b> We shall be a responsible and value-adding investment object	We shall generate financially stable and profitable growth through disciplined entrepreneurship combined with controlled risks and sound business ethics, producing strong cash flows and favourable earnings.	<ol style="list-style-type: none"> <li>Financial performance and taxation</li> <li>Business ethics</li> <li>Active corporate governance, risk management and information</li> </ol>
Society	<b>Best for society.</b> We shall be a responsible and value-adding societal actor	We shall conduct operations with minimal negative impact on the environment and society, both in our own operations and in the value chain.	<ol style="list-style-type: none"> <li>Carbon dioxide emissions</li> <li>Responsible procurement</li> <li>Chemical handling</li> <li>Community involvement</li> </ol>

## 2 Our sustainability strategies and principles

Sustainability is a broad area, covering quality, the work environment, the environment, ethics, human rights, financial performance, information and social commitment. Although complying with legislation and practices in the countries where we operate and protecting natural resources and a prosperous society is a natural starting point, we have higher ambitions for our operations. To clarify our objectives in the broad field of sustainability, we have formulated sustainability strategies targeted our main stakeholders and thirteen principles (linked to our material sustainability aspects) to which we are committed.

### 2.1 Sustainability strategy and principles primarily aimed at customers

Assemblin shall offer smart, energy efficient and sustainable installations that make buildings work and people feel comfortable. This is to be achieved through high competence, wise and safe material handling as well as through efficient and structured processes adapted to our customers' requirements and wishes. This is accomplished by committing to the following principles:

- 1. Offer smart, energy efficient and sustainable installation solutions**  
Our products and services must always be delivered in the right way, at the right time, and at the quality and price agreed. At the same time, our ambition is to create value-adding and long-term sustainable installation solutions in each assignment that contribute to a cost-effective project but also minimise the buildings life cycle costs, energy use and environmental impact.
- 2. Apply efficient and safe methods**  
We take a structured approach and our deliveries must always meet to our customers' requirements and relevant industry standards. All assignments must be performed by authorised personnel, and we have the certifications required for the services we perform and products we manufacture.
- 3. Active waste management and evaluation of re-use**  
We shall actively reduce the amount of waste and residual products through recycling and prudent waste management. Where it is economically justifiable and possible, we should evaluate the possibility of using recycling and re-use where customers so desire.

### 2.2 Sustainability strategy and principles aimed primarily at employees

Assemblin shall be the industry's most attractive employer by being inspiring and responsible, offering exciting assignments in a beneficial, safe, inclusive and non-discriminatory working environment. This is accomplished by committing to the following principles:

- 4. Active employee development and good working conditions**  
We shall offer all employees and managers development opportunities through a comprehensive training system, a structured apprenticeship system and a clear career ladder. Our organisation is highly decentralised, and we believe in freedom under responsibility, which contributes to meaningful personal development. We apply market-based and fair compensation, and we involve our employees and their union representatives in decisions regarding compensation and the company's affairs. Assemblin does not tolerate any form of child labour, forced labour or human trafficking, which also is prohibited by law in the countries where Assemblin operates. Our responsibilities as an employer is described in Assemblin's joint HR Policy, and we also act in accordance with the principles set out in the collective agreements, legislation in the Nordics.

5. **Focus on health and safety in the working environment**

We must work actively for prosperous employees and a safe, ergonomic work environment with the goal that our employees will thrive and not be injured at work. Our employees shall have appropriate conditions for being able to perform their duties safely, which includes relevant training, appropriate equipment, and the correct tools. In all operations there must be well-documented risk assessment processes, routines for incident reporting and mapping of risks before each assignment, which includes work at high heights, hot work, fire risks, machine safety and other work environmental risks. We apply a clear zero-vision regarding workplace accidents, as further detailed in our HR Policy and Code of Conduct.

6. **Active promotion of diversity, inclusion, and equality**

We fully support the UN human rights and freedoms, and work for greater diversity and inclusion. We do not accept any form of discrimination or harassment. This is detailed further in our joint HR Policy and Code of Conduct.

### 2.3 Sustainability strategy and principles aimed primarily at investors

We shall generate a stable and profitable growth as well as producing strong cash flows through focus on results as well as a disciplined entrepreneurship combined with controlled risks and sound business ethics. This is accomplished by committing to the following principles:

7. **Focus on financial performance and taxation**

We shall safeguard stable and strong financial development by focusing on profitability and by managing our financial resources correctly. With regard to taxation, applicable tax law and prevailing practices are applied. Assemblin also strives for an open dialogue with the tax authorities in the countries in which Assemblin operates.

8. **Active corporate governance and risk management, as well as correct information**

We shall take advantage of the opportunities that exist in the market through active external monitoring while, at the same time, limiting our risks through good corporate governance and structured risk management, in accordance with clear and well-documented procedures. Our corporate communications shall be correct and reliable. All data and information processing shall be conducted securely and in accordance with the requirements specified in our Communication Policy, IT Security Policy and Privacy Policy.

9. **Sound business ethics**

Our operations shall be characterised by a healthy ethical approach in accordance with our Code of Conduct and other associated policies. Suspected violations of our Code of Conduct must be reported anonymously and without risk of negative reprisals. We have a specific Code of Conduct for our suppliers.

### 2.4 Sustainability strategy and principles aimed primarily at society in general

As a responsible member of society, Assemblin also endeavours to contribute to positive societal development outside of its own operations. This means that we strive to minimize the negative effects of our operations on the environment and society, both in our own operations and in the value chain. Regarding our own operations, we undertake to optimize the use of resources and energy as well as to reduce carbon dioxide emissions in our daily operations. The starting point is that we must conduct our operations in an environmentally sustainable way and that we must comply with or exceed the requirements found in laws, regulations, and international agreements regarding the reduction of emissions and discharges into air, soil and water. This is accomplished by applying the following principles:

10. **Reduced carbon dioxide emissions (in our own operations and throughout the value chain)**  
We shall strive to reduce emissions and discharges by reducing our energy consumption and through good planning. In the long term, we also strive to phase out fossil fuels and to increase the proportion of renewable energy (and other fossil-free energy). In our assignments, we shall strive to use raw materials, other materials and methods that reduce the burden on the climate in a building from a life cycle perspective.
11. **Responsible procurement (Environment and human rights in the supplier chain)**  
By integrating environmental, ethical and social requirements (primarily workplace safety and human rights) into the purchasing process, the compliance of suppliers and goods purchased with Assemblin's requirements and expectations is verified. Important tools in the supplier management are Assemblin's joint Code of Conduct for Suppliers, guidelines in our joint Procurement Policy and a good supplier dialogue. In all assignments, we must avoid raw materials, other materials and methods that entail risks for the environment and for society. Purchases are steered towards previously approved products through Assemblin Best Choice.
12. **Safe handling of chemicals**  
In all of our assignments, we must avoid chemicals that entail risks for the environment and for society. To be able to control existing chemical risks, all operations shall maintain a chemical management system.
13. **Community involvement**  
We will contribute to social development through local community involvement, mainly in activities connected to our operations and/or the locations where we conduct operations.

## 2.5 Other important sustainability aspects in areas not of material importance for Assemblin

In addition to the thirteen sustainability aspects that, based on our operations and their impacts on the external community, are perceived to be of material importance for Assemblin to work with, several other important sustainability aspects exist:

- **Protection of water resources**  
Our view is that the Earth's water resources should be protected, although Assemblin does not use any water in its own operations, no water extraction, water discharge or water consumption is made. Assemblin's emissions and impact on water therefore don't affect the society, which means this aspect of sustainability is considered as non-material for us.
- **Other atmospheric emissions (except for carbon emissions)**  
Our view is that all harmful atmospheric emissions should be minimised, but because Assemblin is mainly a service provider, its own operations generate no direct atmospheric emissions apart from emissions of CO<sub>2</sub>, NO<sub>x</sub> and SO<sub>x</sub> from transports of people and materials to and from our workplaces, as well as some heating and electricity for our own premises. Of these emissions, CO<sub>2</sub> emissions are perceived to have the greatest negative impact on the external community, meaning that other atmospheric emissions are judged to have a lesser impact on sustainability and are therefore considered as non-material for our operations. Assemblin's principles regarding CO<sub>2</sub> emissions are described under the essential sustainability principle *Carbon Emission*.
- **Biodiversity and animal rights**  
Although it is Assemblin's view that biological diversity and animal rights are important issues that must be protected, Assemblin's operations are not deemed to have any direct impact on these areas, these aspects are considered as non-material for our operations.

### 3 Positions on international agreements and standards

Assemblin supports the *UN's Global Development Goals (SDG)* for sustainable development and fully supports the *UN's Universal Declaration of Human Rights*, as well as its definition of a state governed by law. Assemblin has also chosen to adhere to the principles of the *UN Global Compact* (including the *ILO's conventions on a good working environment*) – a key basis for the contents of our Code of Conduct – even though a formal application is not in made. Above this, Assemblin sympathizes with the *Paris Climate Agreement*, the *UN's Convention against Corruption*, as well as the *OECD Guidelines for Multinational Enterprises*.

### 4 Stakeholder dialogue and business intelligence

To understand how the operations affect the external community and the expectations placed on Assemblin, it is important that Assemblin maintains a structured and active dialogue with key target groups. This enables Assemblin to identify, analyse and manage the expectations of the external community, as well as risks and opportunities. The external dialogue is summarised and discussed by the Company's Sustainability Committee, with risks and opportunities being handled by group management on an annual basis.

### 5 Responsibility and governance

Assemblin's CEO bears the ultimate responsibility for the sustainability work. To ensure that the aspects of sustainability involved in Assemblin's operations are met, a Head of Sustainability has been appointed who is responsible for coordinating, advancing and monitoring sustainability work throughout the Group. The Head of Sustainability also convenes Assemblin's Sustainability Committee, of which the Group's Chief Legal Counsel as well as representatives of each business area are also members. The Committee is tasked with monitoring legislation, reviewing joint sustainability initiatives, conducting an annual target group analysis and risk mapping, channelling and disseminating good ideas and preparing data on which Group Management can base decisions. In addition, the Head of Sustainability is responsible for reviewing Assemblin's sustainability work and preparing reports on this.

### 6 Monitoring and reporting

Assemblin monitors its sustainability work in a structured manner every six months, with selected sustainability indicators being reported via the Normative system, which is subsequently used to calculate relevant key sustainability figures. The results are presented to the Board of Directors, which is also continuously informed regarding ongoing development projects and major sustainability initiatives.

These are reported on an annual basis key figures externally in a special Sustainability Report.

## 7 Revision and dissemination

The Sustainability Policy shall be updated as necessary and reviewed annually by the Group Board.

The Sustainability Policy shall be communicated to and available to all personnel via Assemblin's intranet.

## 8 References

The Sustainability Policy serves as a broad framework for all operations within the Group and sets a minimum standard. Within Assemblin, supplementary and more ambitious governance documents may be in place for specific projects or service assignments. Other Group-wide governance documents touching on the area of sustainability are:

- Assemblin's Code of Conduct
- Assemblin's Code of Conduct for Suppliers
- Assemblin's Bribery and Corruption Policy
- Assemblin's Restriction of Competition Policy
- Assemblin's Procurement Policy
- Assemblin's HR Policy