

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# PROFILGRUPPEN EXTRUSIONS AB

CERTIFICATE  
NUMBER

167

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK  
LTD.

DATE OF ISSUE

16 DECEMBER 2021

DATE OF EXPIRY

15 DECEMBER 2024

CERTIFIED SINCE

16 DECEMBER 2021

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall', written over a white background.

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*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

CERTIFICATION SCOPE

ProfilGruppen develops and manufactures customized aluminium extrusions and components. The manufacturing of extrusions takes place in Åseda (Sweden) exclusively and includes:

- Extrusion of aluminium profiles in 4 production lines
- Anodizing facility for surface treatment
- Further processing of aluminium extrusions in the form of cutting processing, bending and stamping

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	ProfilGruppen Extrusions AB
ENTITY NAME	ProfilGruppen Extrusions AB
CERTIFICATION SCOPE	<p>ProfilGruppen develops and manufactures customized aluminium extrusions and components. The manufacturing of extrusions takes place in Åseda (Sweden) exclusively and includes:</p> <ul style="list-style-type: none"><li>• Extrusion of aluminium profiles in 4 production lines</li><li>• Anodizing facility for surface treatment</li><li>• Further processing of aluminium extrusions in the form of cutting processing, bending and stamping</li></ul>
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Semi-Fabrication</li><li>• Material Conversion (Production and Transformation)</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>• Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>• Initial Certification Audit</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	5 – 6 October 2021
AUDIT REPORT SUBMISSION	18 November 2021
AUDIT SCOPE	<p>The audit scope covers the manufacturing of extrusions in ProfilGruppen Åseda (Sweden), and includes:</p> <ul style="list-style-type: none"><li>• Extrusion of aluminium profiles in 4 production lines</li><li>• Anodizing facility for surface treatment</li><li>• Further processing of aluminium extrusions in the form of cutting processing, bending and stamping</li></ul> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>• Semi-Fabrication</li><li>• Material Conversion (Production and Transformation)</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

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AUDIT OUTCOME	Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li><li><input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.</li><li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul>
CERTIFICATION PERIOD	16 December 2021 – 15 December 2024
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DUE DATE	15 June 2023
CERTIFICATE NUMBER	167

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established procedures and processes to apply to Applicable Law. Procedures have been established to demonstrate awareness and ensure compliance, i.e. by subscription services. The Entity holds valid ISO 14001 and 45001 certificates.
1.2 Anti-Corruption	Conformance	The Entity has established a Code of Conduct for all employees which is part of employee onboarding and training. The Code of Conduct includes Anti-Corruption guidelines.
1.3 Code of Conduct	Conformance	The Entity has established a Code of Conduct which includes principles relevant to environmental, social and governance performance. The Code of Conduct is mandatory as part of onboarding of new employees as well as regular employee training.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity holds valid certificates for ISO 14001 and 45001, documenting that it has established Policies consistent with the environmental, social and governance practices included in the ASI Performance Standard.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity holds valid certificates for ISO 4001 and 45001, documenting that it has established Policies consistent with the environmental, social and governance practices included in the ASI Performance Standard. Senior management develops and regularly review the Policies.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity holds valid certificates for ISO 4001 and 45001, documenting that it has established Policies consistent with the environmental, social and governance practices included in the ASI Performance Standard. This information is publicly available for on the Entity's intranet page: <a href="https://www.profilgruppen.se/varfor-profilgruppen/kvalitet-miljo/">https://www.profilgruppen.se/varfor-profilgruppen/kvalitet-miljo/</a>
2.2 Leadership	Conformance	The CEO has overall responsibility and authority for ensuring conformance with the ASI Performance Standard. The Quality Manager is the deputy.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity holds a valid certificate for ISO 14001, documenting that it has established Policies consistent with the environmental practices included in the ASI Performance Standard.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity holds a valid certificate for ISO 45001, documenting that it has established Policies consistent with the social practices included in the ASI Performance Standard.
2.4 Responsible Sourcing	Conformance	The Entity has established a Responsible Sourcing Policy covering environmental, social and governance issues as well as a Code of Conduct for Suppliers.
2.5 Impact Assessments	Conformance	The Entity has established procedures for Impact Assessments that include baseline conditions, design options and potential environmental and social impacts. Impact Assessment of press "Tor" was specifically reviewed during the audit.
2.6 Emergency Response Plan	Conformance	The Entity has established an Emergency Response Plan and performs evacuation and fire drills regularly.
2.7 Mergers and Acquisitions	Conformance	The Entity has developed a procedure for a Due Diligence process for mergers and acquisitions. The process includes revision of environmental, social and governance issues.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has developed a procedure with a checklist for closure, decommissioning and divestment. The procedure also takes into account the provisions in the permit issued by Länsstyrelsen (The Country Administrative Board). The procedure states that a review of environmental, social and governance issues shall be performed in the planning process for closure, decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity's Annual Report is publicly available at the Entity's website. The Annual Report reveals the Entity's Sustainability Performance: <a href="https://www.profilgruppen.se/wp-content/uploads/2021/03/ProfilGruppen_Arsredovisning_2020.pdf">https://www.profilgruppen.se/wp-content/uploads/2021/03/ProfilGruppen_Arsredovisning_2020.pdf</a>
3.2 Non-compliance and liabilities	Conformance	The Entity has established procedures to reveal any fines, judgments, penalties or non-monetary sanctions. Any issues will be handled according to

CRITERION	RATING	COMMENT
		Swedish law for listed public companies and will be publicized on the Entity's home page: <a href="https://www.profilgruppen.se/nyheter/pressreleaser">https://www.profilgruppen.se/nyheter/pressreleaser</a>
3.3a Payments to governments (legal and contractual)	Conformance	Payments are regulated by Swedish law and are only performed according to received invoices based on contracts. All payments are checked by financial auditors. See the Annual Report: <a href="https://www.profilgruppen.se/wp-content/uploads/2021/03/ProfilGruppen_Arsredovisning_2020.pdf">https://www.profilgruppen.se/wp-content/uploads/2021/03/ProfilGruppen_Arsredovisning_2020.pdf</a>
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	A procedure to handle any stakeholder complaints, grievances and requests for information has been established according to ISO 14001 and ASI Performance Standard. Any complaints or grievances shall be directed to the Entity. Contact information is published on the Entity's webpage: <a href="https://www.profilgruppen.se/kontakt">https://www.profilgruppen.se/kontakt</a>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Minor Non-Conformance	The Entity has developed an Environmental Product Declaration (EPD) for its aluminium profiles which includes the product stage and estimated transport to consumers. The EPD is available to customers upon request. However, the EPD has not yet been verified by a third party.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has developed an EPD for its Aluminium profiles which includes the product stage and estimated transport to consumers. The EPD is available to customers upon request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has developed an EPD for its Aluminium profiles which includes the product stage and estimated transport to consumers. The EPD is shared with customers upon request and will be publicly available on the Entity's webpage following completion of the third party verification process.
4.2 Product design	Conformance	The Entity has developed procedures documenting how sustainability and environmental life cycle performance and objectives are incorporated into the design and development process of Aluminium profiles. The design of profiles is conducted in close cooperation with customers.

CRITERION	RATING	COMMENT
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity demonstrated a high focus on materials efficiency and resource efficiency in the production process. The Entity aims to reduce scrap generation by 3% annually, compared to the preceding year. All generated scrap is recycled.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity separates Aluminium Process Scrap according to alloy specification and grades for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity implements a recycling strategy, which outlines that all scrap generated at the Entity is recycled. Anodized Aluminium scrap from the Entity's customers is also recycled and re-used by the Entity.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity engages with national and regional recycling systems. The Entity recycles all the process scrap and waste from its own production. Aluminium Scrap is remelted at a local remelting plant. All waste fractions are collected and treated according to national systems and regulations.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	GHG emissions and energy use are disclosed in the Annual Report, pages 17 and 20: <a href="https://www.profilgruppen.se/wp-content/uploads/2021/03/ProfilGruppen_Arsredovisning_2020.pdf">https://www.profilgruppen.se/wp-content/uploads/2021/03/ProfilGruppen_Arsredovisning_2020.pdf</a>
5.2 GHG emissions reductions	Minor Non-Conformance	GHG emission are disclosed in the Annual Report (in Swedish): <a href="https://www.profilgruppen.se/wp-content/uploads/2021/03/ProfilGruppen_Arsredovisning_2020.pdf">https://www.profilgruppen.se/wp-content/uploads/2021/03/ProfilGruppen_Arsredovisning_2020.pdf</a> GHG emission reduction targets have been established with objectives for 2025 and 2030. However, these have not yet been published. Energy use is closely monitored with an annual reduction target of 3% per ton of aluminium profile.
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		

CRITERION	RATING	COMMENT
6.1 Emissions to Air	Conformance	The Emissions to Air are regulated by the government permit from Länsstyrelsen, and are being monitored to measure if emissions are in accordance with the permit. The Entity holds a valid ISO 14001 certificate.
6.2 Discharges to Water	Conformance	The Entity's Discharges to Water are regulated by the government permit from Länsstyrelsen. Monthly samples are analysed by a certified laboratory. The Entity holds a valid ISO 14001 certificate.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has assessed the risks for Spills and Leakages from all production processes and has identified major risk areas.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has established systems and controls for detecting and monitoring Spills and Leakages in all production processes, including the four presses, the anodizing plant and the water treatment plant. Compliance controls and a monitoring programme has been established to prevent and detect Spills and Leakage in accordance with ISO 14001.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity reports all Spills, Leakages and incidents to the regional authority and to the municipality according to Swedish law and the Entity's discharge permit. News on incidents are also published on the Entity's website: <a href="https://www.profilgruppen.se">https://www.profilgruppen.se</a>
6.4b Reporting of Spills (regular reporting)	Minor Non-Conformance	All Spills, Leakages and other types of incidents with a possible impact on environment are reported to the authorities according to the provisions of the permit. This information is available to the public from Länsstyrelsen. However, the Entity does not disclose this information to the public according to ASI requirements.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has established a Waste Management Strategy. All Waste is handled according to the Waste Mitigation Hierarchy. All Aluminium Scrap is recycled.
6.5b Waste management and reporting (disclosure)	Minor Non-Conformance	The Entity keeps an inventory of all Waste streams by nature (Hazardous or Non-Hazardous), source, classification, storage and disposal methodology. Waste generated at the Entity is reported annually to the regional authorities, however Waste

CRITERION	RATING	COMMENT
		generation and methods of disposal are not publicly disclosed by the Entity.
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>PRINCIPLE 7 WATER STEWARDSHIP</b>		
7.1a Water assessment (mapping)	Conformance	The Entity has established processes to monitor its water use by source.
7.1b Water assessment (risk assessment)	Conformance	Water-related risks have been assessed and are considered low. Water is sourced from the Entity's own water well and from the municipal supply. The

CRITERION	RATING	COMMENT
		region has, according to World Resources Institute, a risk level for water scarcity of 0-1 on a 5-degree scale.
7.2a Water management (management plans)	Conformance	Water-related risks have been assessed and are considered low. Water is sourced from the Entity's own water well and from the municipal supply. The region has, according to World Resources Institute, a risk level for water scarcity of 0-1 on a 5-degree scale. Although considered a low risk, the Entity's water use is monitored and mitigating actions have been implemented for two of the presses.
7.2b Water management (monitoring)	Conformance	Water use is closely monitored. Water is sourced from the Entity's own water well and the municipal supply. Plans to reduce water use have been established and implemented for the two oldest presses.
7.3 Disclosure of water usage and risks	Minor Non-Conformance	Water use by the Entity is monitored and reported in the annual environmental report to the regional authority and the annual water use data is available from Länsstyrelsen. The water use by the Entity should however be publicly disclosed in the Entity's Annual Report according to ASI provisions. Water-related risks in the region and connected to the Entity's water use are considered low.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risks and materiality of the impacts on biodiversity from the land use and activities in its nearby area through cooperation and communication with regional and local authorities. The municipality's Biodiversity Risk Assessment concluded that the site has no material impacts on biodiversity values.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	The municipality's Biodiversity Risk Assessment concluded that the site has no material impacts on biodiversity values.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	The municipality's Biodiversity Risk Assessment concluded that the site has no material impacts on biodiversity values.
8.2c Biodiversity management (reporting)	Not Applicable	The municipality's Biodiversity Risk Assessment has been shared with stakeholders and made publicly available. The risk assessment concluded that the site has no material impacts on local biodiversity values.

CRITERION	RATING	COMMENT
8.3 Alien Species	Conformance	Swedish law has provisions on heat treatment of packaging materials and wooden pallets and the Entity has established procedures to follow applicable law. Packaging can only be purchased from approved suppliers. The Entity has performed a risk assessment and established measures to proactively prevent accidental or deliberate introduction of Alien Species,
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established Policy documents that define rules and expectations for employees, suppliers, business partners and all other interested parties. The Policy documents refer to the UN Guiding Principles on Business and Human Rights, the ILO Conventions on Labour Rights and the IEH (Ethical Trade Initiative) guidelines on Ethical Trade Principles.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has established Policy documents documenting its rules and expectations to employees, suppliers, business partners and all other interested parties. The Policy documents refer to the UN Guiding Principles on Business and Human Rights, the ILO conventions on labour rights and the IEH (Ethical Trade Initiative) guidelines on ethical trade principles.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established a complaints remediation action where any stakeholder can raise concerns and complaints, please see: <a href="https://www.profilgruppen.se/kontakt">https://www.profilgruppen.se/kontakt</a>
9.2 Women’s Rights	Conformance	The Entity has implemented Policies and processes to ensure respect for the rights and interests of all employees, regardless of gender, race, ethnic background, religious belief,

CRITERION	RATING	COMMENT
		disabilities, sexual orientation or age.
9.3 Indigenous Peoples	Not Applicable	There are no Indigenous Minority Groups in this part of Sweden.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are no Indigenous Minority Groups in this part of Sweden
9.5 Cultural and sacred heritage	Not Applicable	There are no Indigenous Minority Groups in this part of Sweden
9.6a Resettlements (avoid or minimise)	Not Applicable	There are no Indigenous Minority Groups in this part of Sweden
9.6b Resettlements (where unavoidable)	Not Applicable	There are no Indigenous Minority Groups in this part of Sweden
9.7a Local Communities (rights and interests)	Conformance	The Entity has established an open and well-functioning cooperation with the municipality, local schools, neighbours, and other interested parties. The Code of Conduct describes provisions for the Entity's respect for and cooperation with the local Community.
9.7b Local Communities (impacts)	Conformance	The Entity has established an open and well-functioning cooperation with the municipality, local schools, neighbours, and other interested parties. The Code of Conduct describes provisions for the entity's respect for and cooperation with the local Community. The Entity monitors and mitigates noise, emissions and discharges from its production processes.
9.7c Local Communities (livelihoods)	Conformance	The Entity describes an open and well-functioning cooperation with the municipality, local schools, neighbours, and other interested parties. This was also confirmed by local Community representatives interviewed.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity's Code of Conduct and Code of Conduct for Suppliers both refer to the UN Declaration on Human Rights and the ILO Convention on Labour Rights. The Entity explicitly states that it shall not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas, and also expect its Suppliers to actively take measures to avoid such direct or indirect contribution.
9.9 Security practice	Conformance	The Entity's Code of Conduct and Supplier Code of Conduct both refer to the UN declaration on Human Rights and the ILO convention on Labour

CRITERION	RATING	COMMENT
		Rights. All employees at the Entity use entry identification cards.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	Freedom of Association and Right to Collective Bargaining is well organised under Swedish Law. The Entity has implemented a Code of Conduct committing to Freedom of Association and Right to Collective Bargaining. Trade Unions present at the Entity have agreed a Collective Bargaining Agreement.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Freedom of Association and Right to Collective Bargaining is well organised under Swedish Law. The Entity has implemented a Code of Conduct committing to Freedom of Association and Right to Collective Bargaining. Trade Unions present at the Entity have agreed a Collective Bargaining Agreement.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	Swedish law ensures the right to freely associate and to Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	The Entity does not use nor support the use of Child Labour as defined in ILO Conventions and complies with related national and international law of a basic minimum working age of 15 years. This is clearly stated in the Code of Conduct and the Code of Conduct for Suppliers. The minimum working age at the Entity is 18 years.
10.2b Child Labour (hazardous)	Conformance	The Entity does not engage in or support Hazardous Child Labour. Apprenticeships and related safety measures are strictly implemented following Swedish law requirements.
10.2c Child Labour (worst forms)	Conformance	The Entity does not engage in or support the Worst Forms of Child Labour. This aspect is addressed via the Entity's Code of Conduct, Code of Conduct for Suppliers and Health and Safety Management System.
10.3a Forced Labour (human trafficking)	Conformance	The Collective Bargaining Agreement and internal human resources practices ensure that the Entity meets its obligations to protect its Workers from Forced Labour. All Workers must have a Swedish social security number to be able to undertake work on-site.
10.3b Forced Labour (deposits, fees,	Conformance	Collective Bargaining Agreement and local

CRITERION	RATING	COMMENT
advances)		employment Policies ensure any form of deposit, recruitment fee or equipment in advance from Workers is not required.
10.3c Forced Labour (migrant workers)	Conformance	Collective Bargaining Agreement, Code of Conduct and internal routines, instructions and practices ensure that the Entity meets its obligations to protect its Workers from Forced Labour in all aspects addressed in the ASI Performance Standard.
10.3d Forced Labour (debt bondage)	Conformance	Collective Bargaining Agreement and internal human resources practices ensure that the Entity meets its obligations to protect its Workers from Forced Labour. All Workers must have a Swedish social security number to be able to undertake work onsite.
10.3e Forced Labour (freedom of movement)	Conformance	The Collective Bargaining Agreement and internal HR practices ensure that the Entity meets its obligations to protect its Workers from Forced Labour. The Entity does not unreasonably restrict the freedom of movement of Workers.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Collective Bargaining Agreement and internal human resources practices ensure that the Entity meets its obligations to protect its Workers from Forced Labour. ProfilGruppen does not keep original copies of any Workers' identity papers, work permits, travel documents or training certificates.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Collective Bargaining Agreement and internal human resources practices ensure that the Entity meets its obligations to protect its Workers from Forced Labour. Notice period and conditions are governed by the Collective Bargaining Agreement and set out in employment contracts as per Swedish law.
10.4 Non-Discrimination	Conformance	The Entity ensures equal opportunities for all employees through its Equal Treatment Policy addressing zero tolerance to Discrimination. This is also addressed in the Code of Conduct.
10.5 Communication and engagement	Conformance	The Entity has a joint Health and Safety Committee where issues can be raised by Workers and discussed with senior management.
10.6 Disciplinary practices	Conformance	The Swedish Labour laws define disciplinary procedures which are mirrored in the local

CRITERION	RATING	COMMENT
		Collective Bargaining Agreement. The Entity's Policy documents show compliance with national law and best practice on this subject.
10.7a Remuneration (living wage)	Conformance	The Collective Bargaining Agreement together with strong Swedish law assure compliance with this Clause. All staff are under the Collective Bargaining Agreement which ensures that no pay is withheld and that all payments are made monthly directly to chosen bank accounts.
10.7b Remuneration (method of payment)	Conformance	Wage payments are made via bank transfers to Workers in a timely manner.
10.8 Working Time	Conformance	Swedish Law and the Collective Bargaining Agreement on site have resulted in a process for agreed Working Time. Shift patterns are agreed with the Collective Bargaining Agreement. Public holidays, Overtime hours, sick leave and annual leave are remunerated according to Swedish law.

#### PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY

11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has developed, implemented and communicated a Health and Safety Policy that is endorsed and supported by senior management. The Entity was recently certified according to ISO 45001. The Health and Safety Policy is included in the Annual Report 2020, which is publicly available at: <a href="https://www.profilgruppen.se/mfn_news_sv/profilgruppen-publicerar-arsredovisningen-for-2020">https://www.profilgruppen.se/mfn_news_sv/profilgruppen-publicerar-arsredovisningen-for-2020</a>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity was recently certified against ISO 45001. The Health and Safety Policy covers all Workers and Visitors (e.g. contractors) undertaking work on-site and in premises under the Entity's control.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has developed, implemented and communicated a Health and Safety Policy that is in line with Swedish law and applicable standards.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has developed, implemented and communicated a Health and Safety Policy endorsed and supported by senior management. The Policy is a part of induction and is posted throughout the site. The Entity's Policy includes a reference to the right of Workers to stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity's Health and Safety Management

CRITERION	RATING	COMMENT
		System is part of its overall Integrated Management System. Based on risk assessments, the operational instructions and processes for operators are updated. The Entity was recently certified against ISO 45001.
11.3 Employee engagement on health and safety	Conformance	The Entity engages Health and Safety Committees, regular joint meetings with all the Committees and Critical Controls Committee's. All employees are allowed to raise Health and Safety issues. Employee surveys support inclusion within Health and Safety issues.
11.4 OH&S performance	Conformance	The Entity's Health and Safety performance is regularly assessed. The Entity was recently (2021) certified against ISO 45001 and has implemented procedures to assess and discuss its Health and Safety Performance in the Annual Management Review. The Health and Safety Performance is disclosed in the Annual Report for 2020: <a href="https://www.profilgruppen.se/mfn_news_sv/profilgruppen-publicerar-arsredovisningen-for-2020">https://www.profilgruppen.se/mfn_news_sv/profilgruppen-publicerar-arsredovisningen-for-2020</a>

#### Document Control and Version History

Revision	Date	Notes
0	17 December 2021	Initial Certification Audit - Full Certification