



Due diligence for responsible business conduct with regards to people, animals, society and the environment

Account reporting year 2023

for AS Wilfa

*Ethical Trade Norway has assessed the report of AS Wilfa to meet the criteria of our Base Level. More information about our Base Level can be found **here**.*

SUSTAINABLE DEVELOPMENT GOALS



To Readers Of The Report

Enterprises and the public sector have a great impact on people, society, the environment, climate, and animals and can both contribute positively to development, or negatively by causing harm. Enterprises therefore hold a central role in achieving UN's Sustainable Development Goals (SDGs) and the Paris Agreement's 1,5-degree target.

This report can be used as an account for the Transparency Act, but it has a broader scope with climate and the environment, circular economy, and anti-corruption indicators also being included. Our members are obligated to carry out due diligence and report annually on their work. Base level1 members also meet the Transparency Act's due diligence duty, and partially the Act's information duty.

Ethical Trade Norway's concept of responsible business conduct equals OECD's terminology and due diligence methodology. This is the systematic effort that enterprises do to identify, prevent, or mitigate adverse impacts and explain how they manage their risks of negative impact, as well as provide remediation to people, animals, society, and the environment where this is required – is called due diligence. Norwegian authorities expect all enterprises, regardless of their size, to carry out due diligence on society, the environment, and animals in accordance with the UN's Guiding Principles for Business and Human Rights (UNGPs) and OECD's Guidelines for Multinational Enterprises. This applies to enterprises, the public sector, and organisations.

Ethical Trade Norway's Declaration of Principles (our Code of Conduct) for Responsible Business Conduct covers the areas of decent work, human rights, environment/climate, anti-corruption, and animal welfare. This report is done in full transparency and in line with UNGPs and OECD's guidelines. The reports of all members are publicly accessible on Ethical Trade Norway's website.

Heidi Furustøl

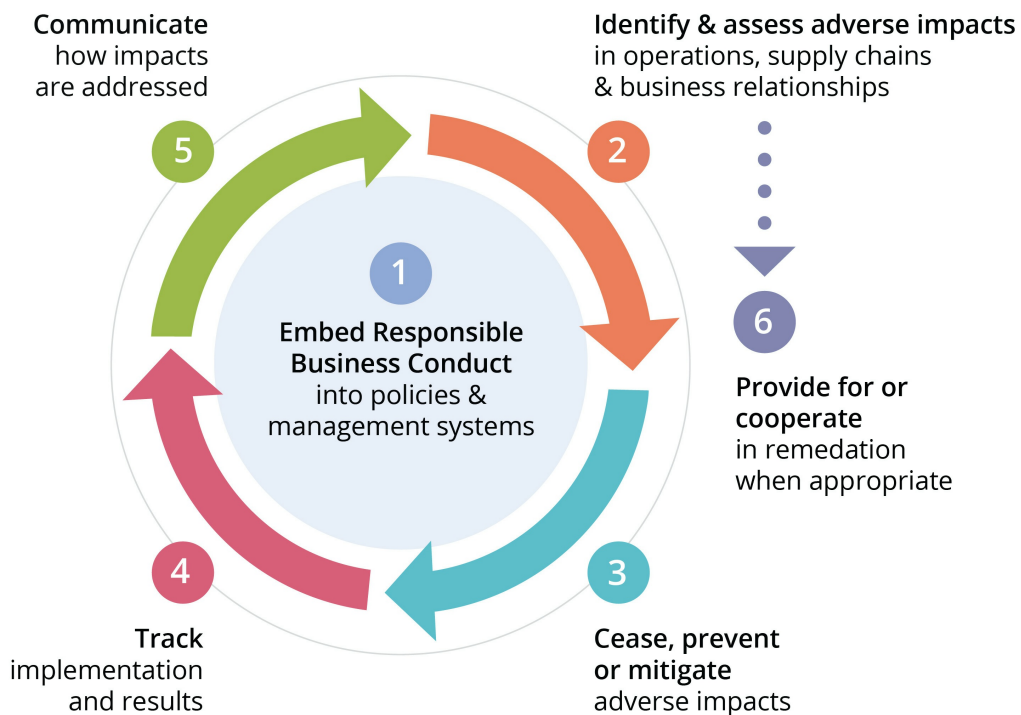
Executive Director

Ethical Trade Norway

Due diligence

This report is based on the UN Guiding Principles on Business and Human Rights and the OECD model for Due Diligence for Responsible Business Conduct.

The model has six steps that describe how companies can work for more responsible and sustainable business practice. However, being good at due diligence does not mean no negative impact on people, planet and the society. It means that the company is open and honest about challenges faced and shows how this is managed in the best possible way in collaboration with its stakeholders. This report is divided in chapters following the OECD model.



Preface From CEO

We want to deliver beyond expectations

Wilfa is a Norwegian company with subsidiaries in Sweden, Denmark, Finland and Germany. Our vision is to deliver beyond expectations. For us, this means not only in consumer experiences, product quality, but also within social responsibility and our environmental work.

Wilfa has through many years worked closely with our suppliers to improve the work environment for the factory workers and we follow up our suppliers minimum every 3rd year with inspections conducted by our own employees. All our suppliers need to pass this factory inspection and sign our code of conduct. In addition we are member of Amfori BSCI and most of our suppliers are also members.

Wilfa is proud to be a company with a great mix of women and men and from many cultures. Of our 57 great co-workers, we are 24 women and 9 nationalities.

We are proud to be offering our customers a 5 years warranty. Something we believe is showing our commitment to supply long lasting products which will benefit our environmental impact. We also changed our gift boxes and instruction manuals to using FSC approved paper as one of the first in our industry. And we constantly improve our environmental impact by removing styropore from our products, change materials in our products to reduce our emissions and we compensate our CO2 emissions in scope 1 and 2.

Wilfa's vision is to deliver beyond expectations and our target is to do so in all aspects, also on social and environmental expectations.

" Delivering beyond expectations - Every day! "

Morten Hoff
CEO

Board Signature



Harald Bjerknes



Yngve Kristiansen



Morten Hoff

Oslo
26.04.2023

Enterprise information and enterprise context

Key enterprise information

Enterprise name

AS Wilfa

Head office address

SANDAKERVEIEN 114A

Main brands, products and services offered by the enterprise

Wilfa small electric appliances, EGO kitchen knives and pots and pans, E-way electric scooters

Description of enterprise structure

Wilfa's head quarter is situated in Sandakerveien 114A, Oslo. Here most of Wilfa's departments work together: Product development & design, Purchase, Brand and marketing, Sustainability, administration and IT. In addition we run the Norwegian sales organisation from our head quarter.

We have subsidiaries in Sweden, Denmark, Finland and Germany which is running our local sales in these countries. In addition we work with distributors in various countries, including Netherlands, Poland, UK, Spain, Switzerland and Austria.

We also have our own China office which is supporting our activities with factory inspections, Quality control on orders, dialogue with our suppliers and follow up on orders, technical quality, improvement points etc.

Turnover in reporting year (NOK)

580 000 000

Number of employees

57

Is the enterprise covered by the Transparency Act?

Yes

Major changes to the enterprise since last and current reporting period

Contact person for the report (name and title)

Morten Hoff, CEO

Email for contact person for the report

morten.hoff@wilfa.com

Supply chain information

General description of the enterprise's sourcing model and supply chain

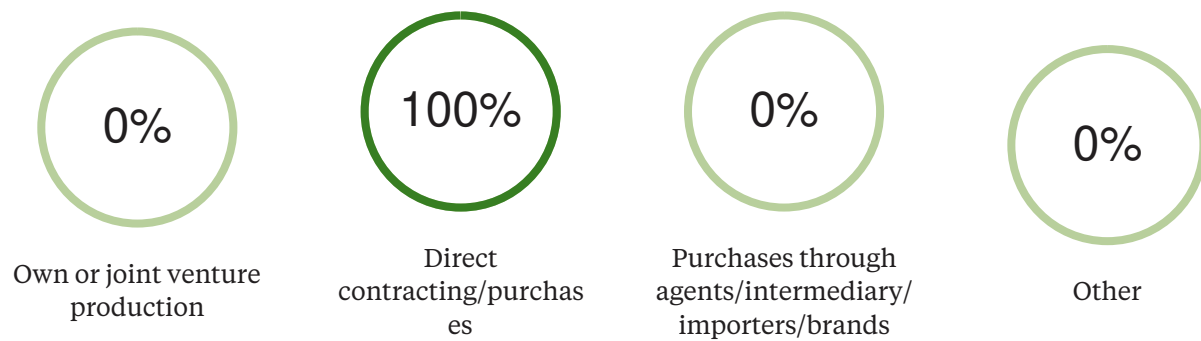
Wilfa does not own any factories by their own, but outsource production to relevant factories. In some cases we source ready products from the factory itself, while other in other cases, we develop part or the whole product at our HQ and develop tooling and sub suppliers together with the factory producing the product. We do not use any agents.

Number of suppliers with which the enterprise has had commercial relations in the reporting year

59

Comments

Type of purchasing/ suppliers relationships



List of first tier suppliers (producers) by country

China : 58

Turkey : 1

State the number of workers at first tier producers that the enterprise has an overview of, and the number of suppliers this overview is based on:

Number of workers

Number of suppliers this overview is based on

59

Comments to number of workers

Uncertain on how many workers in total

Key inputs/raw materials for products or services and associated geographies

Plastics	China
Steel	China
Glass	China
electronics	China
cables	China
Motor	China

Is the enterprise a supplier to the public sector?

No

Goals and progress

Process goals and progress for the reporting year

1

Goal: Calculate our CO2 emissions in scope 1,2 and 3 and set SBT targets and calculate upstream and downstream emissions on Scope 3.

Status: CO2 emissions on scope 1,2 and 3 is calculated. SBT targets is not yet set and upstream + downstream emissions calculation is started.

2

Goal: Analyze and understand which products use recycled materials and which materials can be changed to recycled material on all products. Start to implement recycled material.

Status: started

3

Goal: Manage to get all suppliers to be Amfori BSCI certified

Status: MIss 3 suppliers

4

Goal: Make life cycle overview on all products

Status: Started

Goal for coming years

1

Remove instruction manual and replace with app solution to reduce co2 emissions

2

Set SBT targets

3

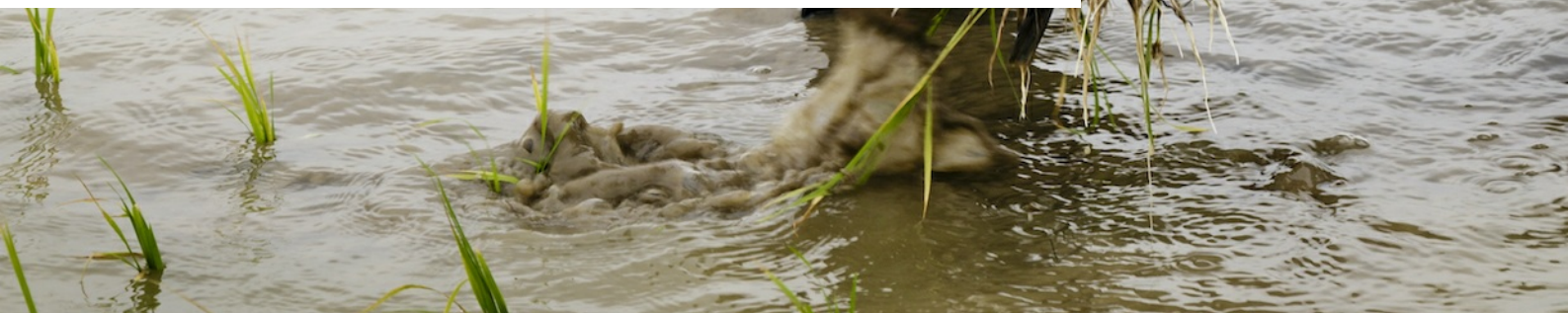
Calculate upstream and downstream emissions



1

Governance and commitment to responsible business conduct

Embedding responsible business conduct means that the enterprise should have strategies and plan, as well as relevant policies and guidelines for due diligence for responsible business conduct (hereafter due diligence) which are adopted by management. These should comprise the enterprise's own operations, its supply chain and other business relationships. Effective management systems for implementation are key to success, and due diligence should be an integrated element in enterprise operations. Clear expectations from senior management are crucial, as well as clearly assigned responsibilities within the enterprise, for the implementation of the steps in the due diligence process. Those involved need to know how to proceed. Transparency about commitments the enterprise has for itself, challenges they are facing, and how these are managed is fundamental



1.A Policy for own enterprise

1.A.1 Link to publicly accessible policy for own enterprise

<https://www.wilfa.com/no/miljo/miljotekster/>

1.A.2 What does the enterprise say publicly about its commitments to respect people, animals, society, the environment and climate?

AS Wilfa commits to follow all international rules and regulations in the markets we operate. We follow international goals by the UN and also our own goals. We will respect people in all aspects of our business and we work towards being as environmental friendly as possible with the opportunities we have.

1.A.3 How has the policy/commitment been developed and how is it embedded in the enterprise?

AS Wilfa has worked for many years to develop our focus on social and environmental sustainability. Although we have put in place many good aspects, we acknowledge that we can always become better. As a member of Ethical trade Norway, we have included their policy as our own since it contains most of our goals and targets and attitudes as well as improves aspects we have seen can be improved.

Our policy has been developed by the service and compliance manager in connection with the CEO. This policy has also been approved by the board of directors. In connection with our membership with Ethical trade, we see that their policy is covering our own policy, but is even more clear. we have therefore decided to move over to this. This has been approved by the CEO and the service and compliance manager

1.B Organisation and internal communication

1.B.1 How is the due diligence work organised within the enterprise, embedded in internal guidelines and routines, and why?

AS Wilfa's due diligence work is led by the CEO. As a strategic focus area, also the management group is included in their department areas and have separate projects to help to reach our targets. The daily work on due diligence is now gradually going over to our head of service and compliance which started in 2022.

Other employees which is important in this work is our category managers as well as our team in China which is conducting both factory inspections as well as inspecting each order before it is shipped.

AS Wilfa is itself Amfori BSCI approved and also working towards having all suppliers being Amfori BSCI approved which will give extra safety that our suppliers are following our requirements in good work conditions. Employees which need understanding of our due diligence work has been given training in this. Also all employees has received a basic training what Wilfa is doing in order to create a good understanding of what this work consists of. When we do updates in our due diligence work, the employees being affected is informed either through email or through internal meetings.

we also conduct our own factory inspections minimum every 3rd year where we assess the factories on various topics and if they score below average, we ask them to improve this until we do the next inspection report and also report back to us when they have improved. We also put projects mainly to factories which is scoring higher than average and don't have any red flags in their results.

1.B.2 How is the significance of the enterprise's due diligence work defined and clarified for the employees through their job description (or the like), work tasks and incentive structures?

Both internal and external communication and collaboration are key in order to engage and involve all co-workers in our sustainability journey. All new employees are informed about our targets within this field and the people being more directly involved in the due diligence work are being trained in compliance and sustainability competence. We regularly inform all employees about new sustainability and social responsibility topics and actions through presentations in global meetings and on our intranet. We also give clear directions on what needs to be in place before we will work with a factory and have a set up which makes sure we only work with factories which complies to our requirements.

1.B.3 How does the enterprise make sure employees have adequate competence to work on due diligence for responsible business conduct?

We train all involved employees in environmental and social responsibility competence. In addition we inform employees about new rules and regulations through common presentations and information meetings. We also do due diligence on our factories regularly where each responsible category manager and our compliance manager is going through the results.

1.C. Plans and resources

1.C.1 How are the enterprise's commitments to respect people, animals, society and the environment embedded in strategies and action plans?

All our suppliers need to sign our code of conduct. We also conduct factory inspections to secure that they follow this and we are working towards having all our suppliers being approved by BSCI or other similar approvals. We are yearly summarizing the results from factory inspection reports to see if we have improvements on points from last inspection and also to make comparisons between factories so we can stop working with factories we don't see improve and who has low scores on certain elements.

During our factory inspections, we check the following (among other things): social management system, workers involvement and protection, the rights of freedom of association and collective bargaining, no discrimination, fair remuneration, decent working hours, occupational health and safety, no child labour, special protection for young workers, no precarious employment, no bonded labour, protection of the environment and ethical business behaviour.

1.C.2 How is the enterprise's strategies and action plans to work towards being responsible and sustainable followed up by senior management and the board?

The managing director is the main responsible for social and environmental work. it is also reported yearly to the board of directors

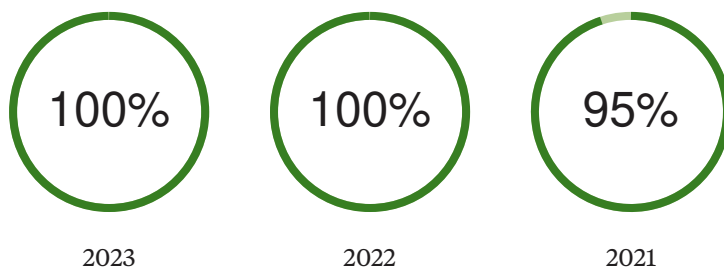
1.D Partnerships and collaboration with business relationships, suppliers in particular

1.D.1 How does the enterprise emphasise the importance of responsible and sustainable business conduct in its business relationships, particularly in the supply chain?

Wilfa is always performing factory inspections, checking BSCI documents and reports, checking that they comply with our code of conduct. Our factory inspections are performed by our own team and sent the category managers for approval before we start business with any suppliers. We check both production facilities, routines, that the workers are having healthy work conditions, that they have work agreements, checking overtime files etc. based on the inspection report, the supplier gets a score which makes them either approved with improvements, approved or preferred partner status. We inform our suppliers that we work more closely with factories which scores high on all elements and that we don't work with factories which can't pass our requirements. We have also asked suppliers to give us access to employee representatives during our factory inspections

Indicator

Percentage of the company's suppliers that have accepted guidelines for suppliers



Both code of conduct and factory inspections

BSCI approvals on suppliers



We have 55 of 58 suppliers approved by BSCI. we check both certificate, but also the test report with photo report before accepting the result. We also have suppliers with BSCI which has improved their score vs. last year which is important to us.

1.E Experiences and changes

1.E.1 What experiences have the enterprise encountered during the reporting period concerning responsible business conduct, and what has changed as a result of this?

Most suppliers understand the need to comply with this, but we do face issues with suppliers having to pay for extra external approvals like BSCI.



2

Defining the focus for reporting

Identify and assess the enterprise's impact on people, animals, society and the environment

“Identify and assess” is about identifying the enterprises's risk for, and actual negative impact on, people, animals, society and the environment, including in the supply chain and through business relationships. As a first step the enterprise should get an overall risk picture, before subsequently prioritising further mapping and measures where the risk of negative impact is the greatest, i.e. salient issues. The enterprises's involvement in the negative impact on people, animals, society and the environment is central to determine which measures the enterprise should implement in the next step of the due diligence model. Involvement of stakeholders, especially those affected, is central when assessing risks. It is also important to consult with stakeholders when implementing measures to manage the negative impact.

2.A Mapping and prioritising

PRIORITISED ACTUAL OR POTENTIAL NEGATIVE IMPACT ON PEOPLE, ANIMALS, SOCIETY, AND THE ENVIRONMENT

Prioritising one or more risk areas on the basis of severity does not mean that some risks are more important than others, or that the company should not take action on other risks, but that risks with the greatest negative impact are prioritised first. Mapping and prioritisation are a continuous process.

2.A.1 List the enterprises's actual negative impacts and/or prioritized significant risks of negative impact/harm on people, animals, society and the environment. Take note that the prioritized risk that you list in the table below will be exported to step 3 of this report, where you will be asked to answer how you work with stopping, preventing, or reducing the negative impact.

Salient issue	Related topic	Geography
Environmental impact from our products	Environment Use of materials	Global
Environmental impact from transportation	Environment	Global
Impact from our gift box, instruction manuals etc	Environment	Global
Employees beeing exploited at factories	Child labour Working hours	China

JUSTIFICATION FOR THE PRIORITISATION OF RISKS OF NEGATIVE IMPACT ON PEOPLE, ANIMALS, SOCIETY, AND THE ENVIRONMENT

2.A.2 Describe: a) the enterprise's routines for mapping and identifying risk and show how the negative impact was identified and prioritised in this period: b) eventual aspects of the enterprise that have not been covered in this report (product groups, own products, departments etc.) and why you not chose to prioritize these in the continued work: c) how information was gathered, what sources were used, and which stakeholders have been involved/consulted: d) whether you have identified areas where information is lacking in order to get an overview, and how you are planning to proceed to collect more information/handle this.

Wilfa has more than 70 years experience in the field of SDA. Based on our experience, we have decided to hire our own employees in China to perform factory inspections. We are also working towards getting all our suppliers approved by BSCI. In order to evaluate the risk on environmental and social impact, we have used a traditional risk matrix where we estimate the probability, the consequence and also the ability for us to make changes or an impact. This matrix becomes the basis of where we put our focus.

Wilfa's risk assessment is covering both the value chain as well as on our products. Our products are all being assessed by the highest standards and we always control all certificates, including test reports like LVD (Low voltage directive), EMC (electromagnetic directive), ROHS / Reach (chemical directives), Food grade directives like LFGB and other relevant directives. This way we can assure that the products follow all regulations and are safe to use. We also perform life cycle tests on all products to ensure safe use and also a long lifespan of our products. This way, we can offer a 5 years guarantee on our products as well.

All our factories are being controlled in many ways. All factories need to be approved by our factory inspection team every 3rd year. In addition, they all have to go through our code of conduct and follow our requirements in this. We are working on having all factories approved by external approval agencies like Amfori BSCI and Smeta (we have all but 3 factories approved by now). These approvals covers also the safety of the workers as well as social compliance. Wilfa not only asks for the BSCI certificate, but also photoreports to be sure that these reports are valid and performed in a proper way. All suppliers must re-certify themselves minimum every 3rd year. In our risk assessment, we have dialogue with both the management, but also workers in the factories to understand how they work with the points in our factory inspection. All this info is gathered together to get a full assessment of how the factory is approaching social compliance.

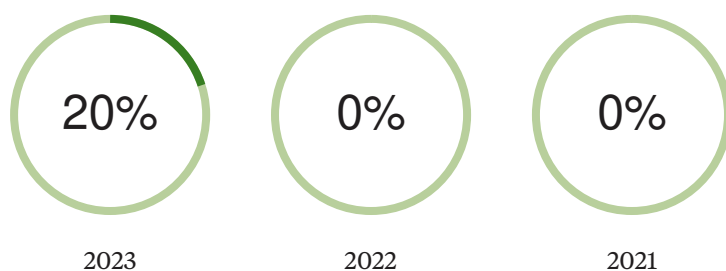
Indicator

Percentage of suppliers in high risk supply chains that have been mapped



All suppliers have been mapped during the last 3 years. we rely on reports from 2023, 2022 and 2021, but we also recertify factories before the 3 year period has been in order to see if they have improved when necessary.

Percentage of mapped suppliers where workers' views have been part of the mapping



We have started doing factory inspections where we ask the factories to also let us talk to the employee representative. we have a target of achieving 100% of this during next 2-3 years

ADDITIONAL SEVERE IMPACTS

2.A.3 Describe any other negative impacts on people, animals, society and the environment that were identified in the mapping of the enterprise, supply chain or other business relationships during the reporting period and how these have been handled.

Wilfa is continuously developing our risk matrix to identify potential risks on people, socialty and environmental implications. When we find a potential risk, we put it into our risk matrix and evaluate the potential effect of the risk, how likely it is to happen and also how much we can influence the risk. This becomes our evaluation on which risks we can adress. When this is done, we decide wheter an action is required or not. If an action is required, the service and compliance manager will contact the relevant persons and ask for a CAP (Correction action plan). Then when the risk is adressed and improvement points are made, the responsible people will report back to the service and compliance manager to update the risk matrix.

we have seen that the biggest negative impacts we see, is working hours for employees in the factories. The negative consequence of child labour could have been more severe, but since these has not shown during our inspections, we believe we have managed to avoid these. therefor work hours is chosen as the biggest negative impact. These are reveiled during our inspections and we are adressing them with the factories asking for action plans on how to improve. Then we follow up during next factory inspection to see that it has been improved. If the breach is severe, we will ask for an immediate recertification when they have made improvements. If the breach is less severe, we will inspect this during next planned inspection.

A woman in a blue surgical cap and gown is shown in profile, looking down. She is in a hospital operating room, with other staff members in similar attire visible in the background. The room is brightly lit with overhead surgical lights.

3

Management of salient issues

Cease, prevent or mitigate negative impacts

“Cease, prevent and mitigate” is about managing findings from the risk assessment in a good way. The most salient negative impact on people, animals, society and the environment should be prioritised first. This does not mean that other risks are insignificant or that they are not handled. The way the enterprise is involved in the negative impact is key to taking the appropriate action. Negative impact that the enterprise causes or contributes to must cease, be prevented and be reduced. To address negative impact directly linked to the enterprise, e.g. in the supply chain, the business must use its leverage to influence the entity causing the negative impact to cease, prevent or mitigate it. This involves developing and implementing plans and routines to manage risk and may require changes to the enterprise's own policy documents and management systems. Effective management of the negative impact on people, animals, society, and the environment is a major contribution to the achievement of the Sustainable Development Goals (SDGs).

3. A Cease, prevent or mitigate

3.A.1 For each salient risk, add a goal, progress status and describe the measures you have implemented to handle the enterprise’s prioritized negative impact on people, animals, society, and the environment

Salient issue	Environmental impact from our products
Goal :	Reduce amount of virgin plastic and other materials which has high impact (such as non stick coating, REACH components etc)
Status :	All products have been structured with Bill of materials analysis and sent to external company for evaluation. analysis is now ready and we have started to discuss with suppliers how we can change materials. this work will take some time, but we will have the foundation for the discussions.
Goals in reporting year :	100% of products being analyzed. Starting process of changing materials

Describe already implemented or planned measures to cease, prevent or mitigate negative impacts and reasoning behind the selected measures :

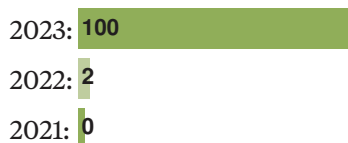
BOM lists gathered and structured so we could calculate emissions. An external company (Eivee) has put the input on BOM lists, freight information etc. into databases to get a full CO2 emission on each product. Discussions with suppliers are started to see which parts are virgin plastics, which is recycled plastic etc.

Describe actual or expected results of measures mentioned above, as well as goals and activities for the coming reporting year :

Change material from virgin to recycled on top 20 products where possible.

Indicator

analysis of products



All products are now analyzed on its CO2 emissions based on Bill of materials

Salient issue	Environmental impact from transportation
Goal :	Reduce co2 emissions as much as possible from transportation
Status :	CO2 emissions from transportation is calculated. offers on biofuel has been sent over, but is still not economical viable.
Goals in reporting year :	Optimize delivery planning so we can maximize container loading. Change gift boxes to be smaller to optimize container loading. Replace instruction manuals with digital solution to reduce weight

Describe already implemented or planned measures to cease, prevent or mitigate negative impacts and reasoning behind the selected measures :

Started project on digitalizing instruction manuals to be able to remove instruction manuals. New developed items are planned more in detail on gift box to have smaller boxes.

Describe actual or expected results of measures mentioned above, as well as goals and activities for the coming reporting year :

Top 20 products to be changed instruction manual to digital solution

Salient issue	Impact from our gift box, instruction manuals etc
Goal :	Change all gift box, instruction manuals, mastercartons to FSC. Remove styropor where possible. Remove plastic bag around products
Status :	All gift boxes, master cartons and instruction manuals changed to FSC. We are now exploring opportunities to remove the plastic bag around products to see which options exist. Styropor removed from several products, which has lead to 18 tonn less styropore.
Goals in reporting year :	Find alternative for plastic bag. Explore options for alternatives to styropore. Change top 20 products to have digital instruction manual

Describe already implemented or planned measures to cease, prevent or mitigate negative impacts and reasoning behind the selected measures :

Changed all gift boxes, master cartons and instruction manuals to have FSC gift box. Changed from styropor to carton on products where this is possible. Signed agreement with external company do develop app in order to remove instruction manual

Describe actual or expected results of measures mentioned above, as well as goals and activities for the coming reporting year :

topp 20 products to have digital instruction manual. Find alternative to plastic bag and styropore

<p>Salient issue</p>	<p>Employees beeing exploited at factories</p>
<p>Goal :</p>	<p>All employees at all factories we use shall follow regulations and follow our terms in our code of conduct. All suppliers to be BSCI or similar approved. Since almost all our factories are BSCI approved, we get information from these certifications where each factory is in regards to social compliance. BSCI is reporting on the following points which is checked during inspection:</p> <ul style="list-style-type: none"> Social management system Workers involvement and protection Right for collective bargaining and association No discrimination Fair remuneration Decent working hours Occupational health and safety No child labour Special protection for young workers No precarious employment No bonded labour Protection of the environment Ethical business behaviour <p>All these points are being graded from A (Best) to E (Worst). When we receive the reports, we have dialogue with our factories on how to improve points which is graded D or E to make sure they work on these issues. If they score NONE, we will not accept the factory.</p> <p>In addition to the BSCI report, we check many of the same points during our own factory inspections so we can work with the factory to improve the points. We also communicate with our factories that those who score well on our factory inspection, will be prioritized partners for future projects, so they have a economical motivation to improve.</p>
<p>Status :</p>	<p>All suppliers have signed our code of conduct. All suppliers are having factory inspections minimum every 3rd year to check and follow up. All suppliers except 3 is BSCI approved</p>
<p>Goals in reporting year :</p>	<p>All suppliers to be BSCI approved</p>

Describe already implemented or planned measures to cease, prevent or mitigate negative impacts and reasoning behind the selected measures :

Dialogue with suppliers on BSCI is started. Regularly checks on BSCI status to make sure the BSCI certificate and test reports are up to date.

Describe actual or expected results of measures mentioned above, as well as goals and activities for the coming reporting year :

All suppliers to have BSCI approval with complete set of certificate and test report

Indicator

no use of child labour

2023: 100

2022: 100

We perform factory inspections where this is checked. so far we have seen that none of our factories use child labour. This is also confirmed by Amfori BSCI reports.

3.B OTHER ACTIONS RELATED TO MANAGEMENT OF NEGATIVE IMPACTS

Describe the enterprise's general measures to cease, prevent or mitigate negative impacts, including in the supply chain.

3.B.1 Reduction of nature- and environmental impact

Wilfa has already removed 18 ton of styropor with carton. in addition, we have changed all gift boxes, instruction manuals, mastercartons to use FSC approved paper. We are currently doing LCA analysis on all our products to see how we can reduce further our climate impact.

Wilfa is also co2 offsetting emissions from scope 1 and 2. We have now calculated our Scope 3 emissions and are working on understanding both upstream and downstream emissions. This analysis will be the basis to understand how we can reduce the impact on scope 3 and see how we can move towards a lower CO2 impact.

Wilfa is also following closely products which is using components on the REACH SVHC list and working to reduce these to a minimum.

3.B.2 Reduction of greenhouse gas emissions

Wilfa is CO2 offsetting scope 1 and 2. we also track our emissions through Environmental lighthouse reporting and have set targets on how to reduce transportation etc. We have managed to calculate Scope 3 emissions and we are now working on getting upstream and downstream estimated. This way we can better understand where to put focus to reduce our emissions.

3.B.3 Adapting own purchasing practices (sourcing)

Wilfa has made routines to secure that we always do factory inspections, that our suppliers must comply with our COC, we always get and check all certificates and test reports and new suppliers must comply with BSCI. in addition we have a purchase agreement to control that they follow our requirements.

3.B.4 Choice of products and certifications

Wilfa chooses to work with suppliers and products which has BSCI approval. This means we don't work with new factories who is not BSCI approved and who will not pass our factory inspection. we are also reporting to both Ecovadis (we are Silver level), environmental lighthouse and now ethical trade. We also push our suppliers and our product development department to make products which should be easy to repair and we always make sure we have access to spareparts to be able to repair the products. We are now exploring the opportunity to join Science based targets (SBTI) and also to finish our ISO14001 approval.

3.B.5 Actively support free trade union organisation and collective bargaining, or where the law does not allow it, actively support other forms of democratically elected worker representation

Wilfa is pushing our suppliers to comply with this through our code of conduct, our factory inspections and also through BSCI.

3.B.6 Contribution to development, capacity building and training internally and of suppliers and workers in the supply chain

Wilfa is always informing our suppliers on new trends and new requirements. We also help suppliers to get access to suppliers on for example FSC paper which they not always know how to handle. we also inform our suppliers about new regulations, and new requirements and we help them with information on where they can find more information, we connect them with other parties which can help them to improve and we give them suppliers they can use to get better sustainability material

3.B.7 Combatting corruption and bribery in own enterprise and supply chain.

This is done through our code of conduct as well as factory inspections. Also, all our employees must follow our personell handbook which says that we don't accept corruption and bribes. Since we use our own china office, we have more control on bribery on quality controls and we also follow up results on QC reports with our actual feedback from the market. if we have discrepancies, we talk to our china office which will check why we have discrepancies and if these can come from bribes to our QC people.

3.B.8 Other relevant information concerning the enterprise's work to reduce, prevent, and manage negative impact on people, animals, society and the environment



4

Track implementation and results

Tracking implementation of actions and results relates to measuring the effects of the systematic approach and own work in each step of the due diligence process, showing whether the enterprise conducts sound due diligence work. The enterprise needs to have procedures and routines in place in order to uncover and critically assess own conclusions, prioritizations and measures that have been made as part of the due diligence process. For example, is mapping and prioritisation of salient issues done in a scientifically sound and credible way? Does it reflect the actual conditions in the supply chain? Do measures aimed at ceasing, preventing and reducing the enterprise's negative impact work as intended? Is negative impact remediated where relevant? This may apply to measures taken by the enterprise alone or carried out in collaboration with others. The enterprise's experiences from working on due diligence should be used to improve procedures and routines in the future.

4.A. Track and assess

4.A.1 Describe the a) assignment of responsibility for tracking the effect and result of measures implemented to cease/prevent/mitigate salient risks of negative impact on people, animals, society and the environment, as well as how the tracking is done in practice, b) who is responsible for evaluating the enterprise's implementation and work with due diligence, and how the evaluation is done in practice.

Product / category managers are responsible for doing due diligence assessments together with our China office on new products. In case of risk, then this should be reported back to Service and compliance manager who will follow up actions required.

Product managers are responsible for following up the improvement points which is identified during BSCI inspections as well as our own factory inspections. Since Wilfa China is the ones who has the daily contact with the factories, they are following up the improvement points with the factory and reporting back to the product managers. Wilfa china in connection with the product managers are also responsible to check new BSCI reports on factories to see that there are improvements from last report if we have worked with the factories over time. We have now started the work of comparing each factories results both on BSCI and our own factory inspections to see where each factory needs to improve vs. other factories. Also this comparison will help us see change on each factory over time.

4.A.2 Describe how the enterprise ensures that measures taken to identify, prevent and reduce negative impact actually work

Wilfa always performs a factory inspection which gives a score. this score is shared with the supplier so they know which points to improve. Next factory inspection will be checked against the previous inspection and improvement points will be positive reported back and supplier can move from supplier to being preferred supplier. When we find negative things, we address them with the factory and if the case found is severe or of high importance, we ask them to fix and we will come back for a new inspection. If we don't see improvement on the topics, we will have dialogue with the management firstly and if they still don't improve, we will start to seek new factory for this product.



5

Communicate how negative impacts are addressed

A prerequisite for good external communication on due diligence for responsible business conduct is that it builds on concrete activities and results. Enterprises should make relevant documents concerning due diligence publicly accessible, i.e. policies, codes of conduct, guidelines, processes and activities related to identifying and handling the enterprise's actual and potential negative impacts on people, animals, society and environment. Communication should include information about how the risks have been identified and handled, as well as the effect of the measures/activities. The Transparency Act (Åpenhetsloven) §5 requires companies to publicly account for their human rights due diligence on an annual basis.

5.A External communication

5.A.1 Describe how the enterprise communicates with affected stakeholders about managing negative impact

Wilfa is working close with our suppliers and informing about our requirements. we also communicate with them how they can improve and we follow up improvement points from time to time. Wilfa is conducting factory inspections where we control that the factories are following the requirements and we talk to both the management of the company, but also employee representatives and some employees. Also, BSCI is having discussions with both the management, but also with employee representatives during their certification procedures. Wilfa is also communicating towards consumers about our work on social work as well as our environmental work. Wilfa is now also working to build an app where we can easier communicate how to recycle the products, give tips on how to repair, which spareparts is available etc. We inform about which products are above the limits on SVHC (Reach directive) on our website and we inform about our work on climate and social responsibility on our website.

5.A.2 Describe how the enterprise publicly communicates its own work on identifying and managing negative impact/harm

Wilfa is communicating this through our web site as well as through industry magazines which is read by our retailers. We have also been invited to give speeches for others about our work which many feel is inspiring.

<https://www.wilfa.com/no/miljo>

5.A.3 Describe the enterprise's routines for maintaining and answering external inquiries related to the information requirement imposed by the Transparency Act

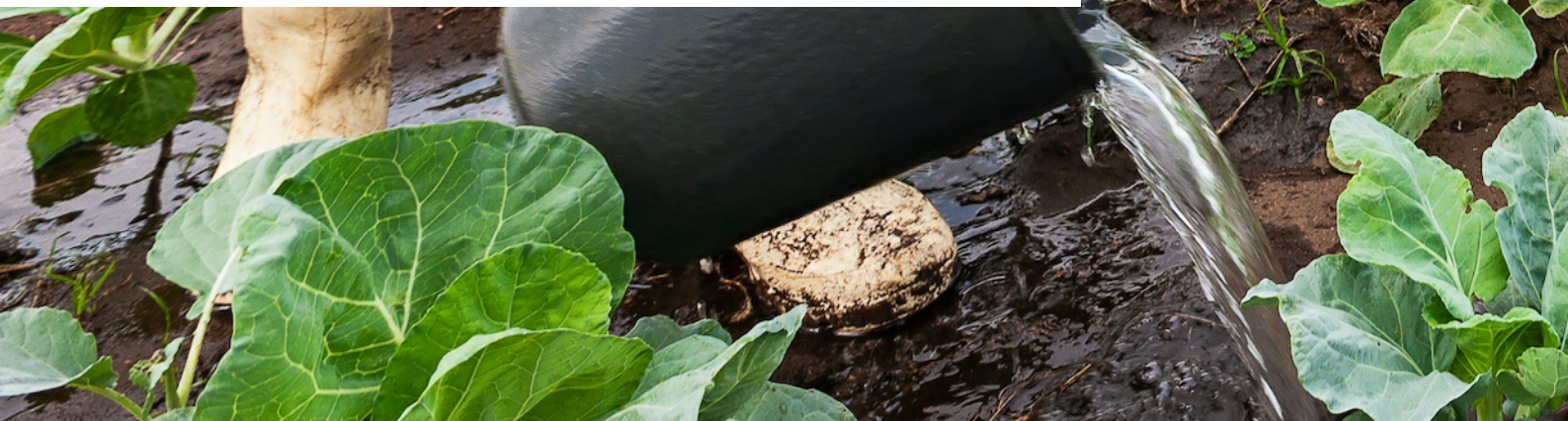
Wilfa has two main consumer contact emails. support@wilfa.com which is going to our support department and contact@wilfa.com which will go to the managing director. These emails will be answered directly to consumers for questions we have answers available. On questions where we need to analyze something, the service and compliance manager will be included and answered by him. You can also find basic information on our website.



6

Provide for or cooperate to ensure remediation when appropriate

Once an enterprise has identified that it has caused or contributed to negative impact on people, animals, society or the environment, the enterprise must provide for, or cooperate in, remediation. Remediation may involve financial compensation, a public apology or other ways to remediate the negative impact. Another aspect of remediation is that companies should provide for, or cooperate with legitimate complaint mechanisms, to ensure that workers and/or local communities can raise complaints and be heard.



6.A Remediation

6.A.1 Describe the enterprise's policy for remediation of negative impacts on people, animals, society and the environment

If any product or action from our business is impacting negatively, we will first work to improve the product or the process to avoid it from happening again. We also have a strict routine on call back on products which is representing a risk on this. Wilfa has also implemented a product insurance to make sure that large economical consequences will also be covered.

Our policy is also to compensate people affected negatively by actions and products. Also we will secure that we, our suppliers or our retailers are changing their routines if they are part of the negative impact.

Although difficult to get acceptance from suppliers, we have started the work of having dialogue not only with the management, but also the workers to get their viewpoints on how things work in the company.

6.A.2 If relevant, describe cases of remediation in the reporting year

We have some factories where we see overtime is too high. we have started dialogue with these factories already on how to improve.

6.B. Ensure access to grievance mechanisms

6.B.1 Describe what the enterprise does to ensure that employees in own enterprise and other stakeholders, especially impacted workers and local communities have access to whistleblowing systems and grievance mechanisms when this is needed

Wilfa has public contact information so everyone can contact us to inform about issues. When we receive complaints or issues which needs to be adressed, these are directed to people who has authority to make changes or to compensate. Also, we encourage employees to give feedback both from internally, but also through our partners. Internally we have a HMS responsible which employees can go to if they feel the need to whistleblow.

Indicator

Contacts which need actions



Most customer complaints is more on a guarantee level and is not affected by this point.

Contact details:

AS Wilfa
Morten Hoff, CEO
morten.hoff@wilfa.com