



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

# Account reporting year 2023

for Granqvist Sportartiklar AB

***lillSport***

*Ethical Trade Norway has assessed the report of Granqvist Sportartiklar AB 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**

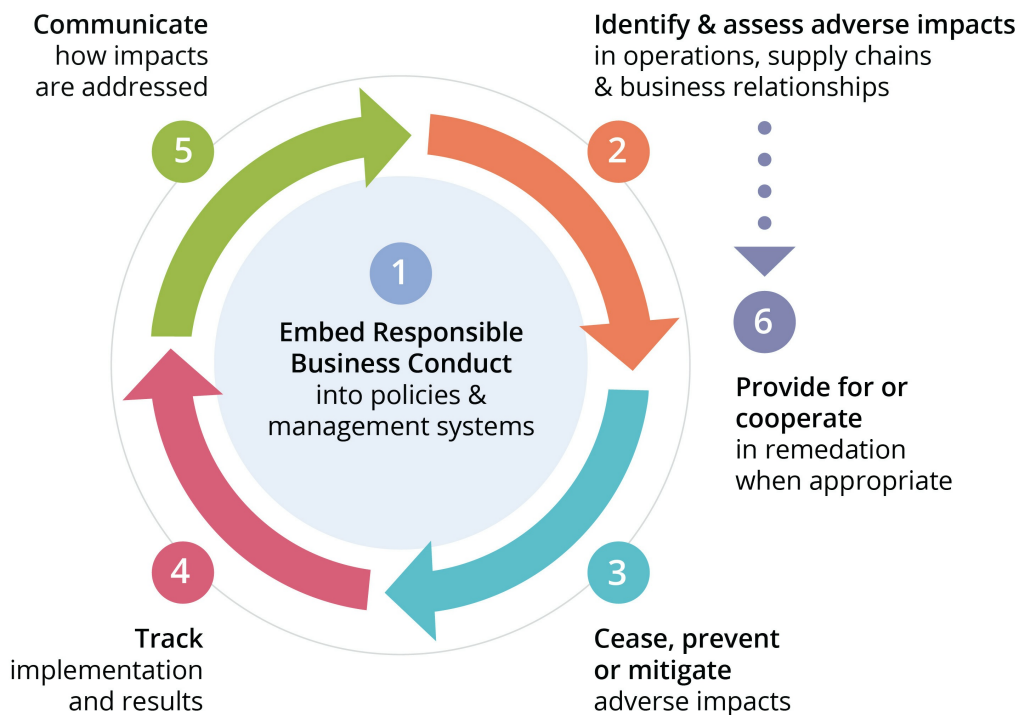
*Executive Director*

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

I could never sell my used bike in my youth; I was too afraid of hidden failures. Additionally, I consider myself a lousy salesperson as I can't convince people to buy things I don't truly believe in.

With this said, in our company we always aim to offer long lasting products with good quality.

Granqvist Sportartiklar AB was founded in 1984 in Karlstad by Lars Granqvist. The vision was to create the world's best ski glove under the brand name LillSport®. Today, almost 40 years later, LillSport is a well-established brand visible on everyone from the everyday skier to elite athletes at championships. In addition to ski gloves, we also manufacture gloves for military, fire, and police under the brand name Granqvist®. While LillSport may be seen as the company's public face, the majority of the turnover occurs through Granqvists.

The company is built only on products and production that we run ourselves to have full insight into the process. Of course, we have sub-suppliers for raw materials - we are not "spinning the yarn". We are proud to own and control our own manufacturing unit in Poland, Europe. This enable us to solve potential issues when they arise. We are also able to ensure the good quality in our products due to incredibly competent staff and a very close cooperation between head office in Sweden and production unit in Poland. We are one of the biggest employers in the city of Zlotow, where the production unit is located, and it's of the highest importance to us that our staff is happy and wants to stay with us.

We actively work with due diligence for responsible business conduct in our company and in our supply chain. It's very important for us to respect people, society, and the environment in our own organization, and it's also very important that our suppliers share this commitment with us. We work with long-lasting relationships, both with customers and suppliers and this has been a key factor in our company. As part of Granqvists' sustainability work, a glove manufacturing unit has also been built in Ethiopia. The unit was established through a cooperation between Granqvist Sportartiklar AB, a local tannery that is our biggest supplier, and Development Finance Institution of the Swedish state, Swedfund. There are now about 50 operators.

In 2023, we did our first climate accounting for the previous year for the business. This undertaking involved measuring and understanding the environmental impact caused by the company, encompassing greenhouse gas emissions and resource utilization. By quantifying the impact, areas where the company can reduce its negative environmental footprint have been identified. By comprehending these risks, our company can develop strategies to manage them and enhance long-term sustainability.

Thanks to a partnership with Ethical Trade Norway, we have received tools to describe the functions of existing routines in our company and manufacturing unit. It is a collaboration that helps us continue our work on the social, environmental, and economic aspects and how we can operate in the future in a more sustainable manner. In relations to sub-supplier of raw material we are on the journey to the source of everything used in our gloves and with that the hunt of not wanted materials, chemical substance or unethical working conditions, everything for a better tomorrow.

**" Production is the heart of our company "**



Lasse Granqvist  
*Founder and CEO*

# Board Signature

**Granqvists® | lillSport®**


**GRANQVIST SPORTARTIKLAR AB**

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Board members signature for Ethical Trade Norway:

  
Lasse Granqvist

  
Linnea Granqvist

  
Ulla Granqvist

  
Erika Granqvist Rosendahl

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Hynboholm 342, 65591 Karlstad, Sweden  
08.01.2024

# Enterprise information and enterprise context

## Key enterprise information

### Enterprise name

Granqvist Sportartiklar AB

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### Head office address

Hynboholm 342, 65591 Karlstad, Sweden

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### Main brands, products and services offered by the enterprise

LillSport- Gloves for cross-country skiing. Granqvists- Gloves for military, police and firefighting.

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### Description of enterprise structure

Granqvist Sportartiklar AB (GSAB) is a company that specializes in developing and selling gloves. Our fully-owned subsidiary, Granqvists Manufacturing, is responsible for producing most of our gloves. We oversee all aspects of production, purchasing, supplier contacts, and important decisions for our daughter company in Poland. Additionally, we provide sewing services to other companies from our production facility in Poland.

Our production facility in Poland has over 360 employees who focus on creating special gloves for military (50%), firefighting (20%), cross-country skiing (20%), and police (10%). In the past few decades, we have manufactured approximately 80% of the military gloves for FLO (Norway), FMV (Sweden), and Puolustusvoimien logistiikkalaitos (Finland) through this production unit.

GSAB, in partnership with the Swedish government (Swedfund), has undertaken a project to assist our leather supplier in building a glove factory in Ethiopia. Our aim is to export a finished product, rather than just raw materials. We have provided education and knowledge in glove factory management to the sewing ladies, and this project has been ongoing since 2010, finished in the fall of 2019. Although the project is now complete, we maintain good cooperation and continue to help each other when needed.

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### Turnover in reporting year (NOK)

190 613 000

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### Number of employees

360

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### Is the enterprise covered by the Transparency Act?

No

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**Major changes to the enterprise since last and current reporting period**

There have not been any major changes to the company this year.

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**Contact person for the report (name and title)**

Malin Skystedt CSR responsible and administrator and Linnéa Granqvist CSR responsible and member of the board

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**Email for contact person for the report**

malin@granqvists.se and linnea@granqvists.se

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## Supply chain information

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

GSAB has extensive expertise in purchasing and manages it through our production unit in Poland. Most of our raw material suppliers are based in Europe because it provides us with greater insight into their operations. However, we also make important purchases in Ethiopia due to the exceptional quality of their leather. We have long-standing relationships with most of our suppliers, which has resulted in better collaboration and stronger partnerships.

Given our special focus on technical gloves, particularly for firefighting, military, and police applications, we are committed to ensuring the quality of materials and how they are handled. This is not only to minimize risks to workers but also to promote sustainability throughout our supply chain.

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

46

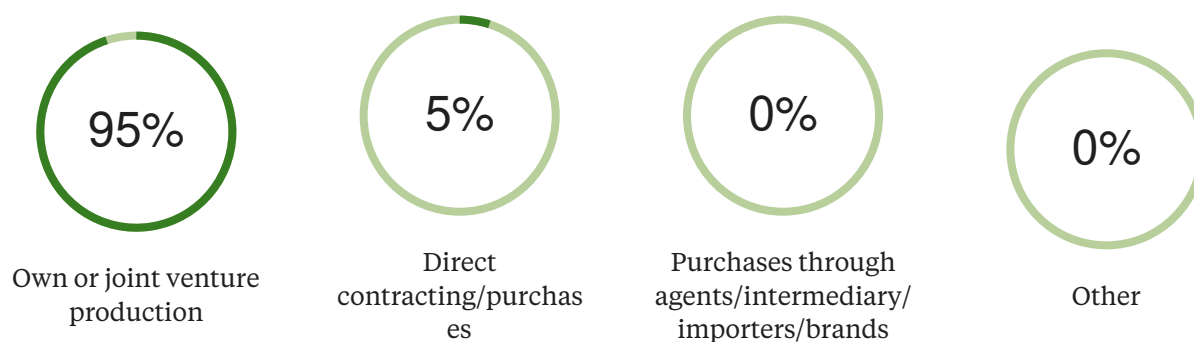
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### Comments

This is all about raw material suppliers. About 40 of them is important/big for us and them we have frequently contact with.

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### Type of purchasing/ suppliers relationships



This 5% we buy from Blue Nile Glove factory in Ethiopia, a production unit that we have helped to build up with help from Swedish government (Swedfund). If we buy something direct from other producer we always do the finish, control and pack it in our own production unit in Poland. We have also bought a small amount of gloves from a supplier in Pakistan, Swisso Sports, this reporting year. This is included in those 5%.



**List of first tier suppliers (producers) by country**

Poland : 1

Ethiopia : 1

We have our own production unit in Poland. We also buy gloves from Blue Nile Glove factory in Ethiopia, that is a production unit that we helped to build up with help from the Swedish government (Swedfund).

**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**

410

**Number of suppliers this overview is based on**

2

**Numbers of workers per supplier (calculated average)**

205

**Comments to number of workers**

360 in our own production unit in Poland. 50 in the production unit in Ethiopia.

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

<b>Leather</b>	Ethiopia Poland
<b>Technical textile</b>	China Germany France South Korea Poland
<b>Insert technical membrane (fire)</b>	China United Kingdom

Technical textile - only a minor part of our raw material comes from China or other countries outside Europe. Mainly material comes from Europe.

**Is the enterprise a supplier to the public sector?**

Yes

## Goals and progress

### Process goals and progress for the reporting year

1

Goal: To promote sustainable consumption, particularly to our sports customers.

As a manufacturing company, it can be challenging to balance the need to sell products with the desire to avoid promoting unsustainable consumption. However, we are committed to promoting sustainable consumption and hope to help our customers extend the life of our products.

**Goal :**

To achieve this goal, we plan to launch a "series" of smart tips on our social media platform, focusing on our sports range under the brand name Lillsport. These tips will provide our customers with useful information on how to take care of our gloves to increase their lifetime and encourage longer use.

Our goal to promote sustainable consumption led us to launch an initiative focused on our sports range, specifically the Lillsport brand. Understanding the importance of extending the life of our products, we have created a "film" of smart tips designed to guide our customers in caring for their leather gloves.

**Status :**

This series, which we have shared on our social media platforms, aims to provide valuable insights and practical advice on maintaining and caring for Lillsport gloves. By sharing these tips, we hope to empower our customers with the knowledge and tools needed to increase the lifespan of their gloves, fostering a culture of sustainable use.

2

Goal: To promote a sustainable value chain with a focus on suppliers and sub-suppliers.

We are committed to enhancing knowledge and transparency throughout our value chain and among our suppliers and sub-suppliers. To identify potential risks even further down the supply chain, we plan to use risk-analysis tools. We aim to investigate our suppliers risks by requesting certificates and/or other audits. This will enable us to take necessary action and prevent any potential risks.

**Goal :**

In coming year, we will attend courses in Ethical Trade Norway's regime to improve our responsible purchasing practices. Our primary focus will be on our three largest raw material suppliers. We aim to strengthen our partnerships by having better forecasts.

Over the past year, we have made efforts to improve our work and strengthen relationships within the supply chain. One of our focus areas is to intensify our engagement with suppliers and their subcontractors to create a more sustainable and transparent work environment. Over the past year, we have had more contact and gained a better grasp of where our subcontractors' suppliers are located. This has enabled us to adapt our strategy and identify any risks that exist. For example, we have had suppliers whose subcontractor has not been able to develop material in the direction we wanted, to exclude C6. This strategy aims to identify and understand potential risk areas in order to take action and ensure a continued responsible and sustainable supply chain.

**Status :**

3

Goal: To minimize our environmental footprint. To achieve this, we have identified and divided the goal into several themes: preventing pollution, promoting circular solutions and sustainable resources, and preserving the climate.

**Goal :**

Given the increasing interest from stakeholders in these themes, we aim to engage in more discussions with suppliers regarding the use of sustainable materials. We will also aim to better utilize and reuse waste materials. Throughout the year, we plan to document greenhouse gas emissions and make a climate accounting across three different scopes: Scope 1 - Production, Scope 2 - Energy Consumption, and Scope 3 - Indirect Emissions. This will help us track our organization's climate impact and enable us to develop clear strategies for reducing them.

**Status :**

As part of our commitment to transparency and accountability, we have completed our first climate accounting. This comprehensive assessment covered three essential scopes:

Scope 1:

- Transports in the business with own/rented company vehicles.
- Other greenhouse gas emissions from own operations

Scope 2:

- Electricity
- District heating
- Other purchases of energy

Scope 3:

- Missions
- Staff commuting
- Inbound transports
- Outbound shipments

By documenting greenhouse gas emissions and undertaking this climate accounting, we now have a clearer understanding of our organization's climate impact. This crucial step will guide the development of strategic initiatives aimed at reducing our environmental footprint.

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**Goal for coming years**

1

We will always strive to create secure employment, promote healthy working conditions, and pursue continuous improvement throughout our entire supply chain.

**Goal:**

- During visit to Ethiopia in the spring of 2024, examine the number of trade union members and conduct surveys on working conditions and labour rights.

## 2

We intend to intensify our focus on climate-related issues in the upcoming years. With the initiation of our climate accounting, we have internally addressed this matter and delved deeper into exploring ways to enhance our performance in this particular category. We have, out from the climate accounting, seen that we need to make changes to try to reduce our environmental footprint. Therefore some of the goals below is a result of what we found out from the report.

Goals:

- Lillsport's gloves must have CO by 2025.
- Our beige goat leather with the properties of water repellency and fire retardant will be Ökotex certified in 2024.
- Make a climate calculation for 2023 and get started with the climate calculation for 2024, which will be a rolling work from September 2024.
- In 2024, investigate whether we have alternative heating sources than oil in the production unit in Poland.
- In 2024, see if we can switch to a producer with a higher share of green electricity in the energy mix in the production unit in Poland.
- In 2024, find concrete information about digital product passes and in 2025 have implemented it in our sports segment.

## 3

We continue to work on raising awareness among our customers and consumers about how to care for their gloves. We always strive to ensure the quality of our products and provide the best possible service.

Goals:

- Within the next 12 months, increase awareness of glove care among other customer segments (fire, military and police). We will be able to offer a guide on how to take care of our gloves to increase the lifespan of the products. And we should be able to offer our fire customers a customized leather conditioner.
- Throughout the year, create informational materials (such as videos, graphics, or posts) to appeal to different audiences and ensure that the information reaches out in a varied and engaging way.

## 4

We want, to the extent possible, to work towards making a positive impact in our value chain. We aim to contribute with the knowledge we possess. Therefore, during the spring, we will visit Ethiopia with seamstresses and cutters to share knowledge and enhance work processes.

Goals:

- In 2024, invest in building the capacity of the tannery and production in Ethiopia to meet sustainability standards and develop ways of working.



# 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://granqvists.se/corporate-social-responsibility/> <https://lillsport.com/en/socialt-ansvar-och-miljo/>

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

Granqvist AB use to emphasize that our production is the heart of the company, and it is crucial that our workers feel well, safe, and are treated in the best possible way. Our objective is to minimize our impact on the environment, and we are actively searching for solutions to reduce any negative effects. We are committed to working towards sustainable development, and we are continuously striving to achieve this goal.

See more information on our website:

<https://granqvists.se/corporate-social-responsibility/>

<https://granqvists.se/about-us/>

<https://lillsport.com/en/socialt-ansvar-och-miljo/>

<https://lillsport.com/en/var-handskfabrik/>

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

The working with Ethical Trade is a wish from the board. It is the board that leads the work with ethical trade and has developed the policy together with the tools from Ethical Trade Norway. We work to communicate the work with a sustainable development to everyone in the organization, but also to external stakeholders.

We communicate our work by showcasing various aspects on our websites. This applies not only to those we at the head office in Sweden are responsible for but also the website they have in Poland for production unit. We have ensured that documents, such as the Responsible Business Conduct Policy, are translated into Polish and Amharic, and displayed in both production units.

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## 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?

Granqvist Sportartiklar is a family-owned business where 35% of the employees in Sweden are family members. We have a total of 9 employees, so the team itself is not large. However, we also have buyers in Poland who need to be involved in these matters, which we ensure through ongoing weekly dialogues where we discuss purchases and order planning. Responsible buyers in Sweden handle relationships with suppliers and business partners, even though the fixed orders usually go through buyers in Poland. We have two individuals, Linnea and Malin, responsible for sustainability issues, but everyone has the responsibility to convey our commitments to suppliers and customers.

We discuss new suppliers in weekly meetings and hold internal meetings as needed, such as for upcoming factory visits or new suppliers. The board, which includes three operational family members, is responsible for setting the long-term sustainability goals and is also responsible for communicating this to the rest of the staff. The sustainability manager is a member of the board.

We own and manage our production in Poland, where our CEO/Owner Lasse is ultimately responsible for due diligence, but the work is carried out by HR on-site in production, along with the sustainability team in Sweden. We have a person, Erika, who is also responsible for communication with our major supplier in Ethiopia. She is well-versed in due diligence matters and conveys information to the sustainability team and the CEO.

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### 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?

We engage in regular dialogues and meetings to ensure that all employees at the Swedish office understand the work and expectations related to sustainability. New employees receive a detailed explanation of their responsibilities and goals, so that everyone shares a common objective towards promoting sustainability. We also have a written routine for due diligence where it is written how we work at our company to make it easier to familiarize ourselves with the work. It is important that all employees are aware of the work related to due diligence, and we take steps to ensure that new employees are informed and educated about the expectations in this regard.

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

We take care to educate not only those directly involved in due diligence tasks, but also ensure that everyone in the company has knowledge of the work. We maintain contact with our advisor in Ethical Trade Norway and participate in their training programs to stay updated and gain more knowledge. We have also sought the assistance of external stakeholders to help us learn more about topics such as the ILO agenda for sustainable development by 2030 as well as new EU proposals on chemicals. Malin also possesses relevant education from university in this regard. During this reporting year, we have also made our first climate accounting with the help of a company called Green Goat. They have also trained us so that we will be able to make the report ourselves in the future.

## 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?**

We are passionate about making improvements and challenging ourselves to work more sustainably. This permeates the entire organization, starting from the board, and creates a natural work ethic in the workplace. For example, we aim to reduce our environmental footprint. We want to increase awareness among our customers about how to take care of our products to extend their lifetime and promote sustainable consumption. We are committed to continuing to improve working conditions and promoting freedom of association in both Poland and Ethiopia. In 2023 we have done our first climate accounting and out of this we have set goals how to improve this reporting year for reducing and improving our environmental footprint.

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### **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?**

Ethical trade is a standing agenda item at every board meeting, and we also hold monthly organizational meetings with employees in Sweden, where ethical trade is discussed. With more people working on this initiative, we are able to have more in-depth discussions and continually evolve our approach. We have identified the most effective working methods for our team, which includes open communication and the sharing of ideas for improvement. Additionally, we actively seek out information and attend meetings and courses with various stakeholders to learn new things.

During board meetings, we discuss the most pressing issues at hand. This could include individual risks or general progress on our ethical trade initiatives.

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## 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?

We have a checklist that we use when starting to work with a new supplier, which includes important information we need to know. For example, ISO 9001, ISO 14001, Reach, Oekotech etc, we seek audits to substantiate this. We also send out an SAQ (Supplier Assessment Questionnaire) to our suppliers annually. We have been able to meet many of our suppliers in person this year, both on exhibitons and visits in our production unit in Poland. We also have minimum criteria for our suppliers that include the items in the checklist. In addition, they should also be able to provide us with a contact person for sustainability issues and show us that they have a system for these issues. They must also be able to answer questions about traceability.

As part of our routine, new suppliers are required to read and sign our Policy on Responsible Business Conduct. We have also mapped our suppliers to assess any potential risks, including country and product risks. We aim to foster close relationships with our suppliers as much as possible, as we believe this leads to better collaboration and longer-lasting relationships.

Sustainability has become increasingly important to our customers and external stakeholders, making it a top priority when meeting with suppliers.

<https://lillsport.com/sv/socialt-ansvar-och-miljo/>  
<https://granqvists.se/ethical-trade-initiative-2020/>

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## 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?**

This year has seen a persistent high inflation rate, particularly in Poland where our factory is located. Ongoing global uncertainties have resulted in continued price increases. The minimum wage in Poland has also seen an increase, a factor we have naturally taken into account and adjusted for.

The EU has introduced stringent proposals to ban PFAS from 2025, a decision that has already been implemented in certain countries such as the USA. This development has intensified our efforts to eliminate PFAS from all our products. Engaging in dialogues with our suppliers, we have replaced numerous textiles. There has also been increased pressure from our customers regarding the disclosure of PFAS presence in the products they purchase.

The proposal regarding product passports has prompted us to explore solutions in response.

We have completed our first climate accounting for 2022, providing us with valuable insights and goals to work towards in the future.



## 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
PFOS/PFOA impregnations	Occupational Health and safety Environment	China Germany South Korea Poland
Chemicals in leather	Occupational Health and safety Environment	Ethiopia Poland
Freedom of association and collective bargaining	Freedom of association and collective bargaining	Ethiopia Poland
Reduce transport pollution	Environment Emission Greenhouse gas emission	Ethiopia Poland
Waste disposal in textile and leather	Environment Energy Water	Ethiopia Poland

### 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.**

a) When assessing risks and creating a risk map, we primarily use Ethical Trade's own risk tool called "Risiko" as a starting point. This tool gives us an overall picture of any potential risk factors. Unfortunately, the risk level in our industry is quite high. Many of the risks are typical in factories and manufacturing countries, such as managing chemicals, water resources, and emissions. The most crucial action we have taken is to build a more direct sourcing model and establish our own production in Europe, which gives us better control and more influence. This means that we can focus more on the risks related to raw materials. We have conducted a general analysis of our industry and the countries where we operate. Our employees and CEO regularly visit our production unit in Poland every month, and our contact person for Ethiopia visits the tannery and glove factory every six months.

Our priority lies with Ethiopia and Poland because they are our main production countries.

As mentioned before, the textile industry is a major contributing sector to climate emissions. Therefore, we have chosen to prioritize PFOS/PFOA impregnations, chemicals, and waste disposal as a starting point to reduce our environmental impact. We have also started with climat accounting for the company.

We have also delimited our focus on 'Freedom of association and collective bargaining' to primarily concern Ethiopia in this report. Even though Poland can be a "risk-country" in this matter, our company has been addressing these issues in our production unit there for a long time. Currently, we have chosen to put our main focus on Ethiopia as we observe that our efforts can be progressed more in that location at the moment. Of course, we continue to ensure that the work is progressing as intended in Poland by following it up.

b) As of now, we have not yet mapped our raw material sub-suppliers down to the "cotton flower" level. We need to focus more on suppliers and their sub-suppliers going forward. We have insight into the supply chain down to the textile and leather producer, but there is still room for improvement.

We seldom purchase goods from other productions. During the year though, we have bought a few items from another production unit and production country than Poland and Ethiopia where we are aware that risks such as chemicals and labor rights may be a concern. This year, we have chosen not to focus on the potential risk due to such a small purchase. If there is any change in the future, we would, of course, evaluate any new potential risk for both the production and country. But currently, it is not applicable.

c) We have received support from SwedFund, a part of SIDA (Swedish International Development Agency), to establish the glove factory and organization in Ethiopia based on ethical principles. This project included a well-documented analysis of all risks in all areas, including ethical, human, environmental, and economic risks. You can find the complete documentation under Swedfund project 1-16-25 (in Swedish). When visiting Ethiopia, we always have a checklist of what to look for and which issues to address. We have also contacted the embassy in Ethiopia to get answers on how countries generally handle certain issues, such as collective bargaining. Additionally, we have consulted online sources like Difi, which allows us to search for high-risk products, such as leather due to its chemicals. We have also used various online sources to identify risks by country.

<https://www.mvorisicochecker.nl/en/risk-check>

<https://www.anskaffelser.no/samfunnsansvar/sosialt-ansvar/hoyrisikoproduktlisten/tekstiler-arbeidsklaer-og-fottoy>

<https://www.state.gov/reports-bureau-of-democracy-human-rights-and-labor/country-reports-on-human-rights-practices/>

<https://www.ituc-csi.org/ituc-global-rights-index-2018?lang=en>

<https://wageindicator.org/salary/wages-in-context>

d) We have received audits that looks "too good to be true" when comparing to country risks etc. In this situation we have collected all information regarding risk of country and product to be able to ask the correct question to the supplier.

## 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.**

Our partner in Ethiopia is still facing cash flow issues due to the Ethiopian government's shortage of dollars and restrictions on the amount of dollars that companies can hold. To support them, we have offered prepayment and maintained close communication with them. We aim to assist them in sustaining their business and maintaining a steady supply of leather to our glove factory, ensuring that employees have a continuous workload. This approach aims to prevent employees from being laid off due to a lack of work.

As previously mentioned, we have completed our first climate accounting during 2023 for the fiscal year 2022. This has provided us with insights into more tangible and measurable emissions, significantly increasing our awareness. Although we were already aware that certain deliveries we have are major contributors to emissions, it was beneficial for us to see it in a more concrete manner. We will implement a methodology to continue working on mapping our emissions as part of our daily operations.



### 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**

<b>Salient issue</b>	<b>PFOS/PFOA impregnations</b>
<b>Goal :</b>	Have all our products free from fluorocarbon impregnations.
<b>Status :</b>	<p>We have an overview of textile that consist PFOS/PFOA. We always strive to have C0 (free from flor) and in products that require special properties we use C6 which is approved in accordance with REACH.</p> <p>Now EU have as a suggestion that it should be forbidden to have even C6 in products from 2025. This intensify our work to get rid of all materials with C6. We have contacted all our suppliers and in sport segment it is easier, here we can switch to C0, but in firefighting and military gloves it does not exist anything else in the market right now.</p>
<b>Goals in reporting year :</b>	Reduce PFOS/PFOA in our products. All products in our LillSport collection should be free from C6.

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

This is a work in progress and it will remain until we no longer have it in our products. We try to reduce the content of fluorocarbones in our products constantly. We have changed textile in our LillSport collection, but in military and fire fighting it is harder because it dont exist anything else on the market that is fire retardant.

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

This is still an ongoing process for us and a part of discussion with our suppliers to find more sustainable solutions.



<b>Salient issue</b>	<b>Chemicals in leather</b>
<b>Goal :</b>	Every employed in our supply chain shall earn so much money so they can provide themselves and also be a part of providing the family.
<b>Status :</b>	We make sure that the employes get payed minimum wage or more in our production unit in Poland and Ethiopia. In Poland it has ben a high increase in the state minimumwage with 20 % this reporting year.
<b>Goals in reporting year :</b>	We will still work for higher wages in the tannery in Ethiopia. We also want to make sure that we are an attractive workplace and meet the needs of our employees. This is important for increasing confidence and stability in the region and among our employees.

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

We work continuously to develop the factory and above all develop the knowledge of the workers. We want to show appreciation and maintain continuous communication. For us, it is important to show appreciation of the work they do and that we can continue to offer them a workplace where they can continue to develop.

When the company has done a good result, as for this year, we include also all seamstresses in our production in Poland in the bonus system.

It has been an high inflation all over the world and in Poland they have increased the minimun wage with 20 %. We have adapted the increase and even those workers that have higher than minimun wage have of course seen an increased wage aswell.

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

We will work for higher wage in Ethiopia.

<b>Salient issue</b>	<b>Freedom of association and collective bargaining</b>
<b>Goal :</b>	We want to have a raw material that have as few chemicals as possible, this concerns both for people working with it but also for our customers health and safety.
<b>Status :</b>	We have leather free from Chrome 6 and with PH minimum 3,5 and maximum 9,5. All leather is according to EU regulations. We work for both Oeko-tex certification and membership in World Leather Group.
<b>Goals in reporting year :</b>	Investigate the chemicals and search for what is preferable and what we can do to minimize the use of chemicals.

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

Tannery in Ethiopia have started the process of being a member of Leather Working Group which is in line with our plan of action to be more sustainable. We have provided them with sulfide detectors which measures the chemicals in the air. This we hoped for to be finished within this reporting year but unfortunately it is still ungoing due to the critical situation in Ethiopia. We have also started the project to get some of the leather from Ethiopia Oeko-tex certified which we hope we will manage within next reporting year.

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

The goal for coming reporting year is that the Tannery in Ethiopia will become a member of Leather Working Group which is a community for responsible leather. We also want to certify some of the leather according to Oeko-tex.

<b>Salient issue</b>	<b>Reduce transport pollution</b>
<b>Goal :</b>	To have collective bargaining in glove manufacturing in Ethiopia.
<b>Status :</b>	Employers and employee have the right for the freedom of association in Ethiopia. The association have a right as an entity and can engage in collective bargaining. We have been in discussion with our partner regarding how this is working in practice.
<b>Goals in reporting year :</b>	To have more insight in collective bargagning in the glove manufacturing in Ethiopia.

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

We have been in contact with the Swedish embassy in Ethiopia to collect more information regarding freedom of association and collective bargaining in the country and what is restricted in law. Staff from the Swedih office will visit production in Ethiopia in spring 2024 to collect more informaiton.

The goal focuses primarily on Ethiopia.

In Poland we have progressed further by having a representative group that can be involved in influencing. This group is changed at regular intervals and gives opportunities to participate and influence.

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

Take this question further by new visit in Ethiopia in spring 2024

<b>Salient issue</b>	<b>Waste disposal in textile and leather</b>
<b>Goal :</b>	Continue to reduce transport pollution.
<b>Status :</b>	We go shorter turns with our own transport when it is possible. We have busses for employees in Poland so they do not need to take own car. We have done our first climate accounting in 2023 for the reporting year 2022. We will continue this work in the daily work.
<b>Goals in reporting year :</b>	Keep working with more sustainable transports ways. We want to minimize the pollution regarding air freight in 2024 and forward. Make climate accounting as a daily work task.

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

We strive to only deliver full shipments so that we maximize the transport that goes. We are also working more on shipping transport to choose a better alternative to aviation for longer shipment. We have done our first Climate accounting together with company Green Goat and we have set goals for coming year our from this result. We will continue to do climate accounting for year 2023 and further.

We have added another bus for people in in the country side in Poland so they can co-travel back and forth to work.

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

We try to reduce air transport even more by having better shipment planning.

## 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**

The tannery in Ethiopia have an advanced treatment plant according to European standards. The chemical water is cleaned before it goes back in the Blue Nile.

Chemical use is regulated by REACH. The tannery is also in an ongoing process to be a member of Leather Working Group which is an organization that works to reduce the environmental impact in leather production. We also try to be Oeko-tex certified in part of our leather.

In our production unit in Poland we try to sort the waste material as much as possible. We try to separate the clean fibers such as wool, leather and cotton, polyester.

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### **3.B.2 Reduction of greenhouse gas emissions**

In recent years, we have installed solar cells in both Ethiopia and our factory in Poland. We believe that moving towards renewable energy is essential to reducing our environmental impact. We have also upgraded our lighting in the production unit to LED, resulting in a 50% reduction in electricity consumption.

In our production facility in Poland, we have offered our staff a shared commuting option instead of each employee driving their own car to work. We have accomplished this by deploying buses that follow different routes to and from the production site. A large bus and two minibuses have daily transported employees between their homes and the factory in Zlotow. The large bus has transported an average of 25 employees per day and covered a commuting distance of 9,480 km. The minibuses have transported an average of 9 employees per day, covering commuting distances of 14,126 km and 962 km, respectively.

This reporting year we have also made a climate accounting report to see where we are and set reasonable goals accordingly. One big goal for us is to minimize air transport from Ethiopia. This work is managed by CSR-team.

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

Since joining Ethical Trade Norway, we have made it a priority to ensure that ethical practices are always on the agenda when starting a collaboration with a new supplier. We require them to read and our Policy Responsible Business Conduct and Minimum Criteria for Suppliers or provide us with their own to ensure that they comply with the same guidelines as we do. Additionally, we actively seek out suppliers who offer environmentally friendly alternatives.

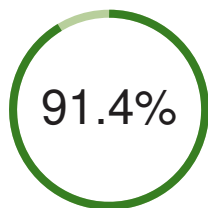
To ensure that new suppliers meet our requirements, we use a checklist of questions during the initial collaboration process.

As we have our own production unit in Poland we use the weekly transport if it is necessary to send some samples. We are in our production unit every month.

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## Indicator

**Percentage of the company's suppliers with whom the company has had a business relationship for more than three years**



2023

By 46 main suppliers, there are:

30 suppliers - 20 years or more (65,2%)

7 suppliers - 10-20 years (15,2%)

5 suppliers - 5-10 years (11%)

4 suppliers - 1-5 years (8,6%)

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### **3.B.4 Choice of products and certifications**

Our own production in Poland have both ISO 14001 and ISO 9001 and AQAP.

Tannery in Ethiopia have ISO 14001 and ISO 9001.

We have OEKOTEK of textile fabrics and thread.

Leather must be free from Crome 6 and Ph minimum 3,5 and maximum 9,5.

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### **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**

In our production unit in Poland we have our group of representative. This group have regular conversations with the management where they can tell their and their colleagues' opinions. In Poland they also have this box with suggestions that workers can put in anonymously or with name.

In Ethiopia employers and employee have the right of freedom of association. They have the right and can engage in collective bargaining. We have been in discussion with our partner how this is working in practice.

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

As written above we have, together with Swedish government (Swedfund), invested and helped our supplier of leather to build a glove factory. We educate the seamstresses in Ethiopia and we try help and give our knowledge of running a glove factory. Here we also try to influence by point out the importance of ethical trade. In spring 2024 we will go to Ethiopia together with our experieced seemstress and cutter from Poland to educate the workers in Ethiopia. Together with customers, we have also developed and gained knowledge and working methods to jointly develop our supply chain.

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

We know that certain countries have a higher risk of corruption, with facilitation payments and bribes often being required to maintain state-leased land in some places. It is therefore crucial for us to assess the current risk environment, which we do using risk-analysing tools and by maintaining open communication with our partners.

Our Responsible Business Conduct and Minimum Criteria for Suppliers include regulations that our suppliers must adhere to. Additionally, we routinely conduct risk analyses and maintain regular dialogue with our suppliers. We provide anonymous reporting options, such as anonymous boxes, to encourage reporting of suspicions of corruption or other unethical behavior.

If we detect any indication of corruption, we review our agreements and collaboration terms with the parties involved to ensure compliance with our ethical standards.

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### **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**

For quite some time now, we have been working on a solution for washing gloves, mainly for firefighting gloves, but also for other types of gloves. This is especially important for removing dangerous particles from firefighting gloves and extending the life of the products. We have collaborated with firefighting societies and chemical institutes to develop a special washing detergent and instructions for this purpose.

We are also trying to encourage our military and police customers to follow our washing instructions instead of buying new gloves, which helps to reduce waste and promotes sustainability.



## 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.**

In our organization, the responsibility for tracking the effect and results of measures implemented to cease, prevent or mitigate prominent risks of negative impact on humans, animals, society and the environment is primarily assigned to Linnea or Malin, who work primarily with Due Diligence. Depending on the risk, other colleagues are involved, such as management, the board or other departments, depending on the situation. We always work close together with colleagues.

In practice, the tracking process involves regular reviews of the Supplier Assessment Questionnaire (SAQ) responses. We analyze the data collected through the SAQ, identifying potential risks and assessing their severity. Our team actively engages with suppliers to seek clarification on any ambiguous or concerning responses, and we conduct thorough investigations where necessary. Additionally, employees that visiting our suppliers play a crucial role in on-site discussions regarding identified risks, enabling a firsthand evaluation of the measures in place.

To enhance our diligence, we also utilize external tools such as the risk assessment tool provided by Ethical Trade Norway. This tool aids us in evaluating risks at both the country and product levels, providing valuable insights into regional challenges and potential impacts on our supply chain.

By working with our "silent issues" that we have mapped from risks we have been able to get better control of them by working actively to reduce the issues. For example we have identified material containing PFOA/PFOS to be able to source new material and in that way reduce the risk more and more. And also by making sure that the workers in Poland and Ethiopia have the tools to adress their opinions in ways where they can be anonymous, or not, to increase "free speaking". This is two examples.

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

We actively engage with Ethical Trade Norway, attending relevant courses and reporting our progress to enhance our understanding of evolving industry standards. This not only keeps us informed but also contributes to the collective knowledge base within our industry. We show that we are open and honest by sharing a detailed report on our website every year. This helps make sure that everyone involved knows about the things we are working on.

As owners and operators of our production unit in Poland, we have direct and comprehensive insight into our operations. We prioritize a conducive working environment that encourages employees to freely express their thoughts. Regular interactions between our on site production managers and the production team ensure a continuous feedback loop. This approach not only helps us gauge employee satisfaction but also serves as an early warning system for identifying areas that may require additional attention or improvement.

We actively involve employees in decisions that impact them directly, such as vacations, working methods, and working hours. By involving our employees in decisions and encouraging them to share their thoughts, we make sure everyone in our team is interested and committed to the work place and the team spirit. We create a friendly environment where people feel important, and this helps our risk management strategies be more successful overall.

Concerning Ethiopia, we have a good understanding of what's working and what's not, and we always carry a checklist with us when we visit to ensure that we follow what we discuss and decide. This proactive on-site assessment helps us validate the effectiveness of implemented measures and identify areas for improvement.

With our raw material suppliers, we initiate the relationship with a Supplier Assessment Questionnaire (SAQ). Additionally, we use risk assessment tools for both country and product risks. Regular interactions, such as meetings at trade fairs or discussions with agents in Sweden or nearby countries, facilitate a deeper understanding of our suppliers' operations. Certificates and audits are routinely requested to validate the accuracy and reliability of the SAQ responses, ensuring that our suppliers are aligned with our commitment to ethical practices.



## 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

To ensure that workers are well-informed and engaged, we have established a communication channel with a group of worker representatives at our production unit in Poland. Regular updates are shared with these representatives, fostering a direct line of communication with the entire workforce. Additionally, close collaboration with the management in our production unit enables us to promptly address any significant issues that may arise. To encourage open dialogue, we have implemented a suggestion box where workers can submit feedback, whether anonymously or with their names attached. This empowers our workforce to voice concerns, provide suggestions, and actively participate in the decision-making process.

The tannery and glove factory in Ethiopia, we maintain consistent communication with. During the reporting year, we encountered challenges related to increased demand for leather in Poland. Recognizing the need for a proactive solution, we have improved our forecasting processes to anticipate the leather requirements for both Poland and Ethiopia. This has led to a more efficient distribution of resources, ensuring an adequate supply of leather to both locations when needed. The intensified collaboration has also resulted in a closer relationship between our contact person in the headquarters in Sweden and the on-site contact person in Ethiopia. This stronger connection helps us make decisions quickly, better understand the challenges in the local area, and work together to solve any problems that might affect workers or the local community.

When we identifies problems, like too much overtime or mistreatment at work, we make sure to talk directly with everyone involved. We want to solve these issues right away by having open conversations with the affected workers, suppliers, and others involved. This shows how committed we are to having a supply chain that's sustainable and ethical.

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

We values and aims to be open about how wecommunicating, identifying and manage negative impacts. Key information is made easily available on our websites, detailing comprehensive strategies and practices. We do also publish our Policy responsible business conduct together with this report from Ethical Trade Norway. We actively includes relevant documentation in public tenders, ensuring that potential partners are well-informed about its ethical approach. Participation in industry forums further extends the outreach, contributing to a collective understanding of responsible business practices.

<https://granqvists.se/corporate-social-responsibility/>

<https://granqvists.se/about-us/>

<https://lillsport.com/en/socialt-ansvar-och-miljo/>

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

We consistently attach our documentation along with public tenders. It is often a requirement in the tender to provide a risk analysis for the country and/or product. Our customers, including military, police, and firefighting organizations, ask us to complete their SAQ and responsible business conduct forms. We are accustomed to receiving these types of inquiries from our head office in Sweden, but we also have a designated person in Poland who can provide assistance as needed. If the questions are specific to a particular supplier, we also involve them in the communication.



## 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 there is a breach of the Responsible Business Conduct Policy, GSAB and the supplier will work together to develop a contingency plan to address the issue. The remediation process should be completed within a reasonable timeframe agreed upon by both parties. The supplier's unwillingness to remedy the breach after repeated requests is the only reason for ending the business relationship.

The supplier must have a robust management system for managing complaints regarding human rights, workers' rights, environmental issues, and corruption. The supplier must ensure that workers and external parties, such as local communities and civil society organizations, can submit complaints.

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

This reporting year we have not had any new remediation to report.

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## 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**

Our head office in Sweden has established a close and effective communication with our employees in Poland, which has been strengthened by our long-standing relationships and democratic work culture. We highly value creating a work environment where everyone feels comfortable expressing themselves. Therefore, we have a representative group that discusses both high and low-level matters and concerns from employees in the production line, as well as an anonymous suggestion box where employees can raise any issues that need attention.

However, despite having these communication channels in place, we have observed that employees also express themselves outside of these channels. Although management is always interested in hearing from everyone, given the large number of employees in production in Poland, we are exploring ways to improve communication. We are considering implementing a webpage or app that would enable management to communicate information to all employees and for employees to submit anonymous concerns. These concerns would then be addressed by both the site manager in Poland and the head office in Sweden.

We have learned that a similar representative group has been established in Ethiopia, and we plan to follow up on this during the head office's visit in the spring of 2024.

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