



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

Account reporting year 2023

for Hamax AS



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

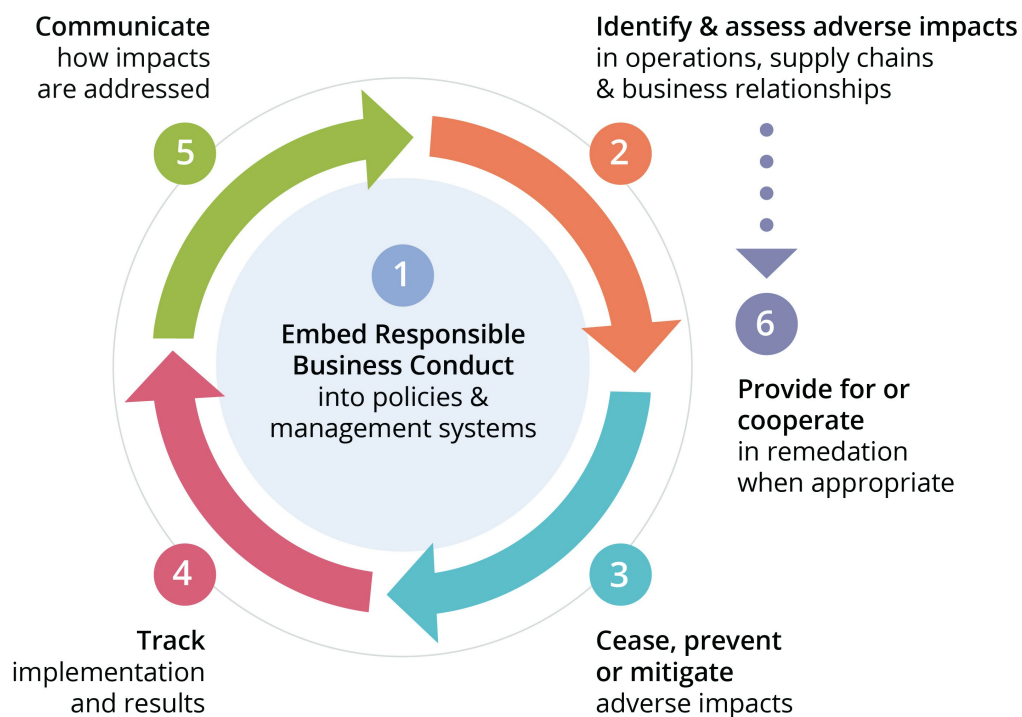
Executive Director

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.



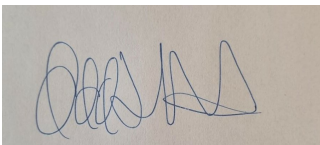
Preface From CEO

Hamax AS is a leading producer of child bike seats, bicycle trailers, helmets and sleds. For more than 60 years Hamax has created high quality products which encourage families to lead an active outdoor life. For the last decades, we have focused on green, bicycle based transportation solutions.

Hamax' long term strategy supports sustainability as well as initiatives that encourage the green shift and minimize the negative impact on the global environment. Our vision is to create safe products for movement on foot, by bike and on snow, for the joy and with care for both users, society, and the environment. This is also expressed through our values; Committed – Ambitious – Responsible – Enthusiastic.

In our strategic plan covering the next 3 years, the work on responsible business practices has particular focus, and we have further committed ourselves to continuously improve on matters related to sustainability through our membership in Ethical Trade Norway. We aim to draw up a clear action plan in the period 2023-2025 which will result in clear measurable KPI's related to human rights, labor rights, anti-corruption and the environment. We will promote traceability and transparency throughout the value chain as well as tools to improve.

" Move with care "

A handwritten signature in blue ink on a light brown background. The signature is stylized and appears to read 'Odd Sverre Mathisen'.

Odd Sverre Mathisen
Managing Director

Enterprise information and enterprise context

Key enterprise information

Enterprise name

Hamax AS

Head office address

Vålerveien 159, 1599 Moss

Main brands, products and services offered by the enterprise

Hamax bike trailers, child bike seats, helmets, accessories and snow sleds

Description of enterprise structure

Hamax is a leading, global supplier of children's products with main office located in Moss, Norway. Hamax products are distributed worldwide. The company is 100 % owned by HTS Hans Torgersen & Sønn AS and part of a group with a total of 12 companies. The majority of Hamax goods are produced by external suppliers and the group's own production facilities in China as well as in Poland, Europe.

Turnover in reporting year (NOK)

216 667 502

Number of employees

14

Is the enterprise covered by the Transparency Act?

Yes

Major changes to the enterprise since last and current reporting period

During 2023, Hamax AS has moved the production of Caress bicycle seats from China to Poland. This means that all production of bicycle seats now takes place in Poland.

Contact person for the report (name and title)

Tone Aga

Email for contact person for the report

tone.aga@hamax.no



Supply chain information

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

Most of our finished goods and raw materials are sourced from external suppliers in Asia and Europe. We collect finished goods directly from the suppliers.

Our product manager ensures the quality of materials and products included in our range, while our supply chain manager is responsible for approving suppliers, following up production, purchase orders.

For all our suppliers, we are one of several customers who source from and manufacture in the same factory using their capacity and skills.

In addition to sourcing goods, the group runs its own factory in China where we produce bicycle trailers.

We prioritize long-term relationships with suppliers. We value consistency and reliability, which allows for better collaboration and mutual growth. We frequently visit supplier factories to assess their operations firsthand.

In China, the company has its own representative who visits and follows up all production facilities. In Poland we have a hired representative who follows up the factory. This, in combination with our own visits help build trust and provide insights into the supplier's practices.

Hamax seeks to identify and mitigate risks associated with suppliers. This includes diversifying sources, having contingency plans, and monitoring geopolitical and economic factors.

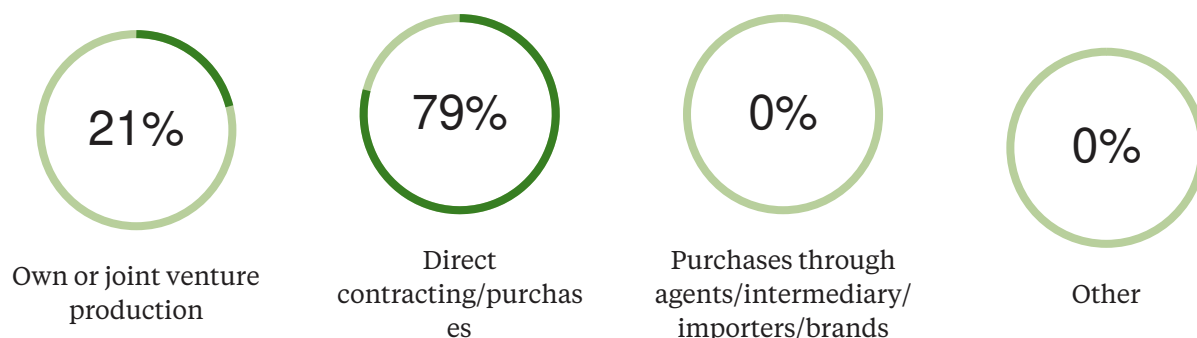
Number of suppliers with which the enterprise has had commercial relations in the reporting year

200

Comments

Hamax AS has had contact with approx 200 business partners and suppliers in 2023. This figure includes all business associates and suppliers from whom we have purchased goods or services. Hamax exclusively purchases finished goods from own production in Poland and China. In our due diligence assessments, we have included the 7 largest suppliers from whom we purchase manufactured goods, warehouse- and logistics services. We have included all suppliers that exceed 1 % of the companies total purchases.

Type of purchasing/ suppliers relationships



Production at the group's production facility in China is classified as own production.

List of first tier suppliers (producers) by country



In China, Hamax does not hold the position of the primary purchaser for any supplier. Our purchases constitute 2-10% of the individual supplier's total turnover.

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

7

Comments to number of workers

We are currently working on obtaining the key figures for all our vendors.

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

Plastic granulates	Austria Belgium China Germany Egypt United Kingdom Netherlands Poland Saudi Arabia USA
Polyester	China Poland
Nylon	China Poland
Steel	China Poland Taiwan
Aluminium	China
Polyurethane	China
Cardboard (cellulose)	China Poland
Spandex	China

The list includes all raw material sources from the production facilities included in the overview, not just from first-tier suppliers directly. Our ongoing work involves mapping the entire supply chain to identify the origin of all raw materials.

Is the enterprise a supplier to the public sector?

No

Goals and progress

Process goals and progress for the reporting year

1

Goal : Reduce our eco footprint by reducing our carbon footprint and waste in our value chain: Implement principles for circular product life cycle. Measuring/KPI carbon footprint

Status : We have investigated various tools and methods for LCA and calculation of the CO2 footprint per product. Based on this, we have made a decision on which tools/methods to use, and will start calculations for all our products in 2024.

We have also started the development of a new product with focus on repairability, possibility of exchanging parts and reusing the product.

2

Goal : Utilize suppliers, materials and transportation with minimal impact on people, nature and animals: Report our sustainability impact based on a recognized reporting standard. Measuring/KPI publicly communicate progress and results.

Status : During the reporting year, the group has chosen a software system/supplier for climate reporting. Planned start for implementation from the 1st quarter of 2024.

We have moved parts of our production from China to Europe, with positive effect on emissions in connection with transport.

3

Goal : Integrate responsible business practice end-to-end in the value chain: Establish sales and purchase processes which assures responsible ordering to manufacturers. Measuring/KPI score by manufacturer

Status : We have defined and secured management support for persons/functions responsible for further follow-up of our suppliers.

Goal for coming years

1

Implement software for climate reporting by 2025 in order to find the current status and be able to set concrete targets for climate reduction by 2030.

2

Visit all production facilities/main suppliers at least once by the end of 2025 with the aim of promoting open and transparent communication and to exchange necessary information. During the visits, suppliers will be presented with our supplier checklist and the Hamax Code of Conduct.

3

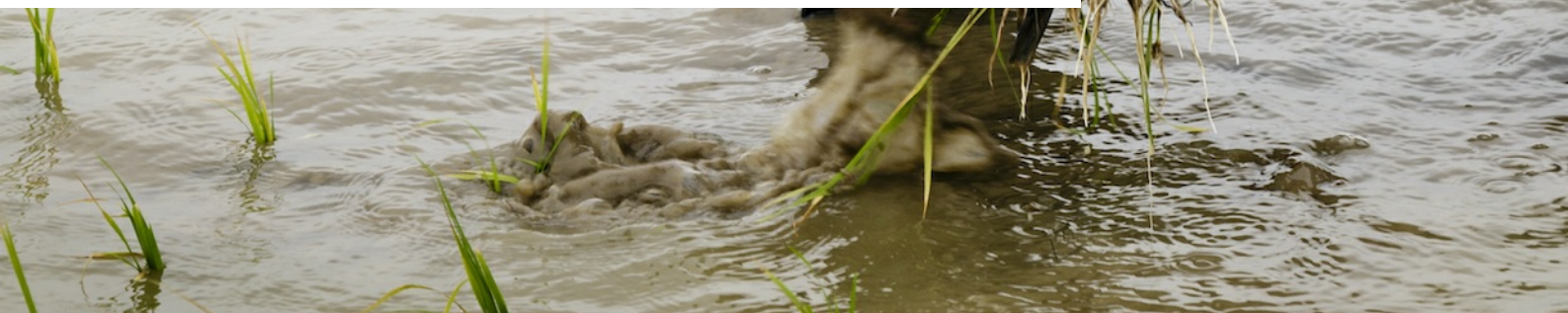
A system/tool for calculating the CO2 footprint per product shall be in place by 2025, including a system for monitoring and updating the values in the calculations.



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.hamax.com/esg/>

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

The Hamax policy for sustainability and ethical trade is posted on our website www.hamax.com/esg. So is our Code of Conduct with a description of how this is implemented in the supply chain.

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

The document is anchored by the CEO and the company's board of directors. Code of Conduct has been sent to all our producers with instructions to implement these.

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 a first step, our Product Manager has evaluated the manufacturers of the Hamax products. The evaluations are based on a close cooperation through several years, incl. personal visits as well as regular quality follow-ups performed by a local Hamax employed quality engineer.

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?

At Hamax, sustainability is not seen as a function, but as a way of working. The sustainability team is not part of management, but a function of all departments, responsible for initiating new actions and projects in their work areas.

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

All relevant employees receive continuous training in sustainability and social responsibility issues that apply to their functions and work areas.

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?

In our strategy and action plans for the coming years, there is a clear increased focus on managing risk throughout the value chain (both people/working conditions and the environment).

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?

Responsibility and compliance was requested by the board to be on the agenda as a separate topic in 2022.

Implementation of strategies for sustainable business practices is done through game plans/action plans. Implemented action plans, status and progress on these is followed up in senior management meetings and the status is regularly reported to the board.

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?

All suppliers must sign Hamax Code of Conduct https://www.hamax.com/wp-content/uploads/2023/02/Code-of-Conduct_Hamax.pdf

Company representatives visit the factories frequently. Hamax is committed to having a long-term supplier relationship and most suppliers have been with us for many years, which means that we have got to know them quite well and are confident in their seriousness in the work.

We strive to be fair and balanced in our approach when it comes to price, volume, quantity and capacity utilization, and we are having the responsibility focus with us in all our purchasing decisions and supplier dialogue.

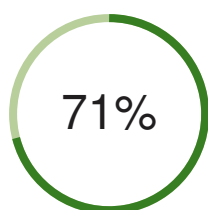
When sourcing for new suppliers we also have the same intention of a long-term supplier relationship. The Hamax Supplier Code of Conduct and Restricted Substances List are distributed to relevant suppliers when initiating a business relationship.

Hamax performs regular chemical and quality tests of our products at our factories in the production processes. We communicate our expectations clearly and continuously throughout the cooperation with our suppliers. No supplier can produce for us unless the factories have been approved by the sourcing department.

Hamax focuses on transparency and fair play in dialogue with all suppliers and believe this is key to enable improvements. We will support our suppliers in doing the required improvements.

Indicator

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



2023

During 2023, we have redefined who shall sign our Code of Conduct. In 2022, we considered only production facilities to be relevant, but have redefined this to include all main suppliers. Figures between 2022 and 2023 are therefore not comparable.

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?

During the reporting period, we have seen the need to formalize more processes and are working to establish routines for this. Hamax continues its work to make ESG work an integrated part of all departments in the company by clearly separating functions and areas of responsibility, establishing routines, acquiring knowledge and implementing new tools.



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 pollution with risk to animal and human health and welfare	Environment	Poland
Violations of labour rights (working hours, payments etc.)	Wages Working hours Regular employment	Poland
Prolonged high noise levels for production workers	Occupational Health and safety	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.

We acknowledge that there may be human rights and working condition challenges with our suppliers in China, which we might not be fully aware of. Having said that, our extensive and longstanding collaboration with these suppliers provides us with a comprehensive understanding of the conditions at each individual manufacturer. This insight is derived from numerous factory visits and our own on-site representatives.

Given that Hamax is a relatively small player with most suppliers, with limited influence, we have decided to concentrate our efforts on investigating potential breaches at our supplier in Poland, where our impact is greater. Our focus lies on the supplier where our share of total production carries the most weight.

The company's salient risk assessment is based on the resources and tools made available through Ethical Trade Norway, including the CSR Risk Check tool developed and administered by MVO Nederland, information on raw materials used in production of our goods and knowledge of our own suppliers.

We continue to gather information to enhance our understanding of any negative impact areas.

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.

A woman in a blue surgical cap and gown is shown in profile, looking down, in a brightly lit operating room. Other staff members in similar attire are visible in the background, working at a surgical table. The scene is clean and professional, with overhead surgical lights providing illumination.

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 pollution with risk to animal and human health and welfare
Goal :	Through acknowledged and reliable calculation methods, arrive at concrete figures that show the current situation regarding our negative impact on the environment, both at company- and product level.
Status :	The methods and tools to be used have been determined.
Goals in reporting year :	Implement systems and tools with the aim of enabling us to measure the impact of our business on the environment at various stages and areas in the supply chain. Collecting data to map our impact on the environment is a crucial first step. In doing so, we seek to gain insight into our environmental footprint that will not enable us to make informed decisions.

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

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

We expect during the coming reporting year to be able to convert raw data into meaningful indicators that reflect the company's ecological footprint and thereby produce quantified targets using calculations such as greenhouse gas emissions (CO₂, CH₄, N₂O) water usage, land degradation, and biodiversity loss.

Salient issue	Violations of labour rights (working hours, payments etc.)
Goal :	We acknowledge that we do not have reliable and verifiable information about working hours, employee representation and wages at our supplier.
Status :	We are collecting information/data
Goals in reporting year :	We will revise our supplier checklist to include all areas related to human rights and working conditions that we wish to gain insight into. Our aim is to carry out site visits to the factory, to present and review the supplier checklist, focusing on the working conditions of employees and general workplace conditions.

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

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

Salient issue	Prolonged high noise levels for production workers
Goal :	There is initially no cause for concern regarding any breaches in this domain, as our supplier holds an an ISO certification. The certification serves as a testament to their adherence to established standards and practices. Our objective is to follow up the certification's continuous validity and renewal (every three years).
Status :	Documentation on renewal is not available
Goals in reporting year :	Obtain documentation on the continued validity of the iso certificate. Make our own assessment of ongoing compliance through factory visits.

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

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

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

Hamax has established routines for control of hazardous substances in our products. Materials, components and finished goods are checked by accredited laboratories on a regular basis. Only approved materials are used in the manufacturing of Hamax products.

Hamax has chosen to move the manufacturing of bicycle child seat Caress from China to Poland. All Hamax child seats are now produced in Europe, where the majority of customers are located.

3.B.2 Reduction of greenhouse gas emissions

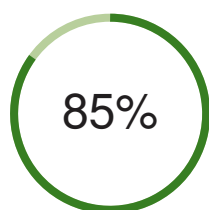
Hamax has so far not identified objectives in this area. We are in the process of obtaining knowledge from our current partners regarding sustainable transportation.

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

Materials and specifications are prepared by the product and/or development departments. Based on approved specifications, the suppliers or the Hamax purchasing dept. evaluate transportation, prices and delivery time before ordering.

Indicator

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



2023

3.B.4 Choice of products and certifications

Where possible, we implement recycled and environmentally friendly material, like trailer tires. However, being a supplier of safety products, any change in material needs to be tested and approved by certifying bodies. In the reporting year, no specific actions have been undertaken concerning the recycled tires. However, there are plans to incorporate these into production by 2027.

Decisions/routines on purchasing materials with certifications, has not yet been established.

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 those countries where collective bargaining is not allowed, Hamax is keen to see active internal workers' unions and groups are built. Their leaders shall not be members of the management teams and they are chosen by the workers through votes.

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

Language training (English) has been initiated in one of our production units in China. Some training on materials/plastics has also been executed, as well as training on chemical compliance regulations.

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

No routines exist in this area.

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

Hamax aims at continuously increase the possibilities of re-use of our products, by

- constructing the products in a way that facilitates the exchange of parts as well as repairs
- extending the spare part offering



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.

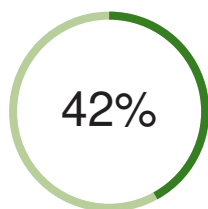
4.A. Track and assess

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.

Hamax supply chain management and product management is responsible to follow up and measure actions with regards to Social and environmental governance. For the time being we are working to establish a set of key performance indicators that can be used in this evaluation. The CEO is responsible to follow up on corrective action plans and report status to the board of Hamax on a regular basis.

Indicator

Supplier visits



2023

Personal visits. However, not necessarily with the main focus on sustainable business practices with regard to human rights, working conditions and climate.

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

Hamax performs a supplier assessment including factory visit whenever possible before placing first orders. Existing and new suppliers need to sign our RSL compliance document. Hamax occasionally does follow up audits at the production facilities in order to be able to identify and prevent repeat of weaknesses. We aim to improve on the regularity of the factory inspections and formalize a set of a reporting standards, in order to measure if the actual Improvements have been done at the factories.

During 2023 and 2024 Hamax will also establish a carbon footprint accounting in order to quantify our greenhouse gas emissions. The aim of this assessment is to identify and priority activities that has a significant negative or positive impact.



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

Hamax actively engages in ongoing communication with stakeholders across our supply chain. Should we identify any adverse impacts, our commitment is to collaboratively seek solutions to mitigate or minimize these effects. By working closely with those affected, we aim to foster positive change and uphold responsible practices.

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

Currently, we lack established procedures for external communication regarding detected deviations. Internally, our key stakeholders include employees and the board of directors. The CEO bears the responsibility of informing relevant stakeholders about any significant matters.

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

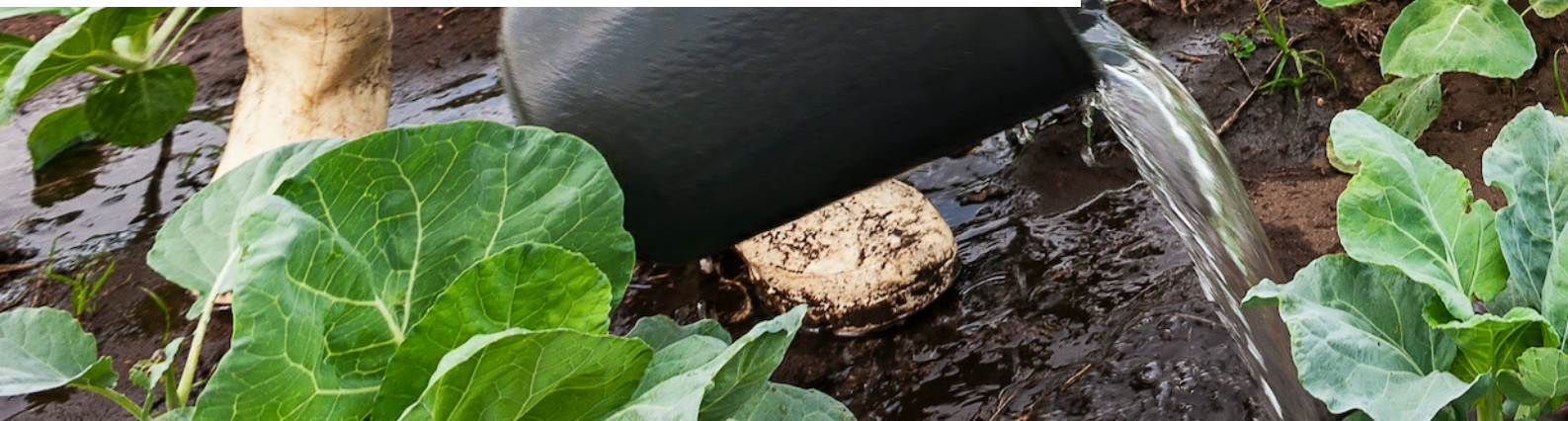
Our Product Manager and our ESG Coordinator are currently jointly responsible for managing and responding to all external communications.



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

By being a member of Ethical Trade Norway, we are committed to working for sustainable business practices that respect people, society and the environment.

We aim to work actively with our suppliers and in the screening process of new suppliers, to track, monitor and make improvements regarding working conditions and environmental in our supply chain.

Should circumstances arise where Hamax's operations are directly or indirectly linked to negative impact or damage to people, society or the environment, we will do our best to contribute to improvements being made. We will follow up any situation closely and provide assistance where possible to resolve any issue that may arise. If remedial support is necessary, we aim to identify (in collaboration with relevant stakeholders) the most appropriate way to deal with the problem.

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

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

In order to prevent different routine requirements being addressed to the same facility, Hamax considers whether there is an opportunity to collaborate across brands/purchasers to ensure one strong process at each facility instead of several routines from different partners. We fear that different demands from different brands will dilute the importance of a complaint mechanism and make it difficult for the individual value chain partner to follow up.

Contact details:

Hamax AS
Tone Aga
tone.aga@hamax.no