



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

Account reporting year 2023

for TRIMTEX SPORT AS

TRIMTEX

Ethical Trade Norway has assessed the report of TRIMTEX SPORT AS 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

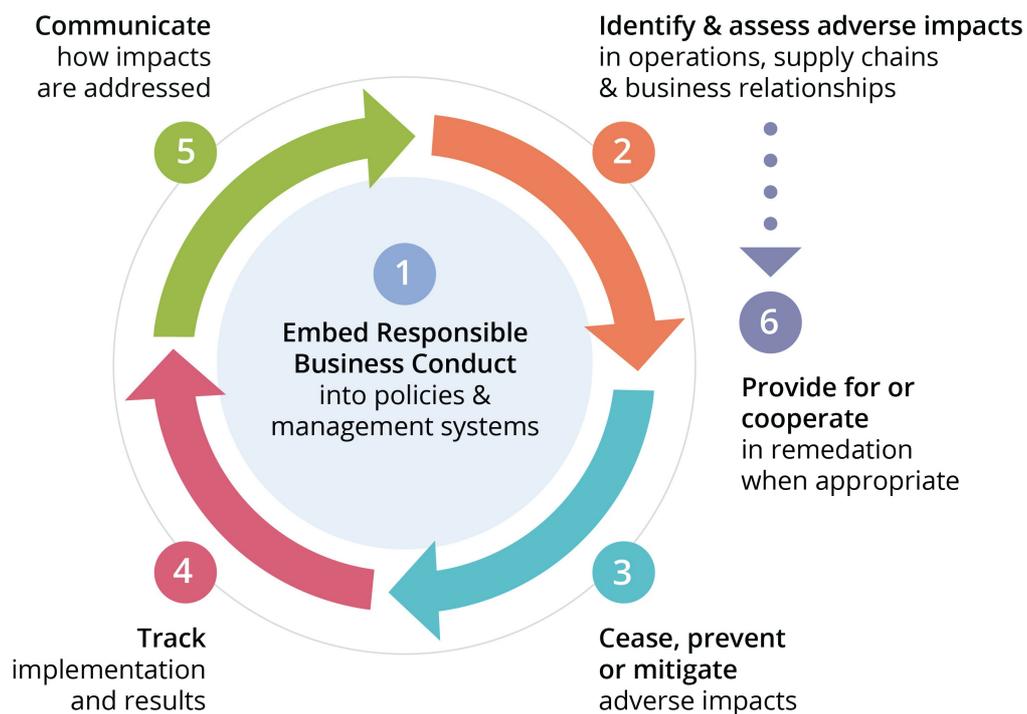
Executive Director

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

Since Trimtex was established in 1976, the company has made several strategically good choices. These have not only benefited for the company's development and growth, but they have also contributed to positioning the company well in terms of sustainable business conduct. From the beginning Trimtex has built its business model on quality, durability and low minimum quantity (customized products). The production has always been close to market, first in Norway (until 1996) and later mainly in Estonia with a fully owned operational centre. Having the production close to market enables us to have good control over most development and production processes, it also keeps our carbon footprint low in terms of transportation.

Trimtex has adapted and developed according to changes in the market and experienced financial growth sometimes also despite the same conditions. We have over the years also increased in volume and for this reason it has been necessary to move some of our production to bigger suppliers in other countries. The need for a good system that could also manage the potential risks that this move could represent, was necessary. We have, based on this new development, seen it necessary to update and adapt our policy to emphasize our stance on sustainable business conduct.

Trimtex considers responsible business conduct to be a prerequisite for sustainable development, meaning that today's generation get their needs covered without compromising the ability of future generations to meet their own needs. Trimtex' values are: Open, Agile, Bold and Responsible. We are of the belief that openness and transparency in our production processes is an essential part of sustainable business conduct. We are open about our challenges and always open for suggestions about how to do better. We will act responsibly towards the people enabling our business as well as the environment in general. We promise to always strive to reduce where we have a negative effect as well as increasing where we can do the most good. – Trimtex Sustainability Strategy 2025

We promise to make highly durable, quality products that are made to last. This is at the core of our business. Together with our responsibility to future generations and the world we all inhabit. Trimtex will produce genuine products and will not compromise on quality. Sustainability is, however, not only about the products that we develop and produce. It is also about the general mindset of our company. Trimtex will make products for the future, and we feel that in order to make the best product it also needs to be the best for the environment as well as the people enabling our business. Trimtex will strive to have as little negative effect as possible on the world.

This way we will do our best to contribute to the UNs sustainability goals for 2030 being reached and thus sustaining life and nature also for future generations.

" Shaped by nature and Nordic grit, Trimtex promises to deliver superior quality and long-lasting products while at the same time act responsibly towards people and the environment in general. "

Tor Eivind Augland
CEO / Owner

Board Signature

List of Signatures Page 1/1

Rapport Etisk Handel 2023 Trimtex-sport.pdf

Name	Method	Signed at
Augland, Ole Kristian	BANKID	2024-05-30 08:45 GMT+02
Eivind, Kallejorn	BANKID_MOBILE	2024-05-30 08:40 GMT+02
Bjergum, Jon Martin	BANKID	2024-05-29 17:11 GMT+02
Augland, Tor Eivind	BANKID	2024-05-29 13:47 GMT+02





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TRIMTEX



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External reference: 6FAE306FD02C4C738254D9801D76343E
Confidential, Augland, Tor Eivind, 04.06.2024 07:21:18

Signature board members
28.06.2023

Enterprise information and enterprise context

Key enterprise information

Enterprise name

TRIMTEX SPORT AS

Head office address

Sekkebekksletta 8

Main brands, products and services offered by the enterprise

Trimtex

Description of enterprise structure

Trimtex Sport AS is a trading group that consists of one head office with main governing elements, Trimtex Sport AS, five sales companies (Norway, Sweden, Europe, Finland, Denmark and Germany) and one production company (Trimtex Baltic in Estonia). All companies are 100% owned by Trimtex Sport AS.

Turnover in reporting year (NOK)

153 000 000

Number of employees

37

Is the enterprise covered by the Transparency Act?

Yes

Major changes to the enterprise since last and current reporting period

Established a sub-brand for the triathlon market called SURPAS.

Contact person for the report (name and title)

Hilde Hallandvik Pisani - Head of Development and Brand

Email for contact person for the report

hilde@trimtex.no

Supply chain information

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

Our main product is custom sportswear - which means that all product are customized (unique design) for each customer (club, company or event). Our own (sister) company in Estonia, Trimtex Baltic (which we will refer to as our "operational centre") handle 98,25 % of all that we produce. Our sister company, Trimtex Baltic, buy all fabrics and accessories from our assigned suppliers (tier 2) (most of which are from Italy, Taiwan and China - but also some from France and Sweden). We do all the planning (patternmaking, plotting, cutting and printing ourselves) - but we outsource the assembling/sewing to two-three main companies in Estonia (one of which is located within our own facility). In addition we have some externally produced garments which is developed by us (Trimtex Norway and Trimtex Baltic) and made in Asia. All garments are shipped from Estonia directly to the customer.

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

7

Comments

Trimtex Sport AS has had direct commercial relations to the above suppliers (NB! suppliers that we purchased for less than 500Euro from in 2023 are not taken into account in this report). Trimtex Baltic is viewed as Tier 1 Supplier (Main/sister business). Suppliers to Trimtex Baltic are viewed as Tier 2 suppliers.

Type of purchasing/ suppliers relationships



99,5% of our purchases are from our sister-company Trimtex Baltic OU in Estonia. In this report we treat Trimtex Baltic (from now on called TB) as our Tier 1 supplier, however, since TB is very much integrated with our, Trimtex Sport, operations we have also made a complete risk analysis over our tier 2 and tier 3 suppliers and sent out COC to all Trimtex Baltic's direct suppliers.

List of first tier suppliers (producers) by country

Estonia :	1
Sweden :	3
Finland :	1
China :	1
Norway :	1

Apart from our main supplier in Estonia (Trimtex Baltic), the additional suppliers in the above list are mostly finished products/sub brands.

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

1 000

Number of suppliers this overview is based on

5

Numbers of workers per supplier (calculated average)

200

Comments to number of workers

We have a complete overview over our top 5 suppliers, Trimtex Baltic plus 2 more in Estonia (99,5% is produced and/or purchased through them) and our 2 biggest Chinese suppliers (Down and base-layer mostly)

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

Polyester	East Asia South Europe
paper	Austria Netherlands
ink	Switzerland
spandex	East Asia South Europe

We make print-on-demand products using sublimation print. In order to achieve the best colourfastness combined with durability and technical features for top-athletes, polyester is by far the best quality for our purpose and therefore difficult to replace at this time.

Is the enterprise a supplier to the public sector?

Yes

Goals and progress

Process goals and progress for the reporting year

1

Goal: 55% of the fabrics used for production is recycled

Status: Due to unforeseen events and increased cost we did not manage this 100% but we still landed on 51% in 2023.

2

Goal: On labour rights in China, we are participating in the "Responsible Purchasing Practices Learning and Implementation Community (LIC)". To educate ourselves on responsible purchasing and how to implement routines in our relevant departments to make sure we act in accord with this standard.

Status: One more year participating and learning through this group. Trimtex Baltic is also participating in this learning community. We are now halfway and starting to implement to our updated routines based on the gained knowledge.

3

Goal: PFC free by 2025.

Status: We have little development on this project in 2023 unfortunately. This is due to conflict of interest. A change on the remaining articles would today have too much of an impact on revenue and is therefore put on hold.

4

Goal: Reduce factory waste with -3% (median number for all types of waste)

Status: Unfortunately, this year we cannot report to much reduction in waste for the following reasons. We changed the weighting system so it is difficult to compare 100% with previous levels and we had big orders (Swedish Army) coming in this year that we did not have in 2022. This year we increased waste on plastic with 11%, cardboard and paper 27%, Cardboard Coils with 65% and Textile waste with 4% - but we reduced Contaminated packages with -15%, Waste of INK with -11% and Production paper with -16%.

5

Goal: Trimtex Baltic to use 100% Green Energy

Status: implemented.

6

Goal: Evaluate and update our Sustainability Strategy

Status: Project postponed due to lack of resources and will be started in Q1 2024

7

Goal : Key people at Trimtex Baltic started 4 months ESG training at end of 2023 and will continue this training in 2024.

Status : Started

Goal for coming years

1

Evaluate and update our Sustainability Strategy

2

Trimtex Baltic will continue their ESG training and will implement activities/KPIs based on this.

3

60% percent of our products are made from recycled materials

4

On labour rights in China, we are participating in the "Responsible Purchasing Practices Learning and Implementation Community (LIC)". To educate ourselves on responsible purchasing and how to implement routines in our relevant departments to make sure we act in accord with this standard.

5

Reduce factory waste with -3% (median number for all types of waste)

6

PFC free by 2025.



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://trimtexstore.com/pages/sustainability> - and link direct to file: https://indd.adobe.com/view/bde8ec63-10c7-4661-9267-b28d1da0cac6?_gl=1*dzp3ze*_gcl_au*Nzg3MzA0Mzg5LjE3MDA2NTc4OTU.

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

Trimtex' values are: Open, Agile, Bold and Responsible. We are of the belief that openness and transparency in our production processes is an essential part of sustainable business conduct. We are open about our challenges and ready for suggestions about how to do better. We will act responsibly towards the people enabling our business as well as the environment in general. We promise to always strive for reducing where we have a negative effect as well as increasing where we can do the most good.

The UN's sustainability goals are the worlds collective plan for action towards a sustainable future. At Trimtex we are working in sync with these goals with focus on #8 Decent work and Economic growth, #12 Responsible Consumption and Production and #13 Climate Action. We see it as our responsibility, as a part of an industry with grave impact on both people and environment, that we actively work to reduce our negative impact. Pls also see our Trimtex Policy for Sustainable Business Conduct available on our website.

We also say a lot about our commitment and focus on our website:<https://trimtexstore.com/pages/sustainability>

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

Our policy is developed in cooperation with and guidance from Ethical Trade Norway. The policy is approved by the board and is now publicly available on our website. We send our this policy to all new suppliers / business relations.

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?

The entire Trimtex group (all affiliates) is now ISO 9001 and ISO 14001 certified. Our operational centre in Estonia Trimtex Baltic OU is in addition to this also ISO 45001 certified. Through these certifications we have established routines for control and evaluation of current and potential suppliers. The suppliers are evaluated on a regular basis on their general performance (communication, delivery time, product quality etc) and country of origin (ITUC). We also evaluate our high risk suppliers based on their country/geographical position, financial risk (are they of great importance to our core business) and the type of supplier (is this a supplier of finished garments/assembly or a supplier electricity) - based on these three factors the suppliers are given a score to determine their risk level. In addition to this we do a more in-depth Risk analysis on our "high risk" suppliers every 2 years or so, making sure that all certificates and recent audits are updated.

We do these evaluations to make sure that quality of product is taken care of as well as to make sure that we take care of the people enabling our business.

We have one responsible person for reporting on sustainability in-house: Hilde Pisani our Head of Brand and Development in Trimtex Norway and Maiu Antsmaa, COO and general manager for Trimtex Baltic in Trimtex Baltic.

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?

Key people in the following departments; product department, purchasing dept. and development dept as well as our director of Product and Brand, our COO and our CEO are involved and have all been given additional tasks in order to make sure we reach our overall goals on sustainability.

All employees are given updated information on our progress two times a year in addition to providing them updated information on our website and our intranet year-round.

All new employees are also given an introduction to our sustainability programme, which we have called "Clean Grit", within a few weeks of their start date.

Our Director of Product and Brand - he has a key role in the company (owner) with the power to make real changes. Head of Brand and Development is in charge of reporting and keeping on top of progress here. Our COO has been given the responsibility from the operational side to make sure that we make the changes requested and also report on them (make sure that there is a system in place to do so and that people in key roles have the necessary info and routines to do the job). We have several KPI implemented here. Our purchasing / planning departments have tasks to evaluate the suppliers as well as assess products and deliveries for opportunities to improve. ex: packaging waste.

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

Key people have been to several talks, tutorials and workshops at Etisk Handel Norge as well as other summits on sustainability and environmental issues. Now that clear tasks and routines have been established we have started inviting more people to attend these workshops/tutorials. We also keep our salesforce updated on a seasonally basis so they can easily and with confidence forward and promote both our policy and progress. Trimtex, represented by: Head of Brand and Development, COO and Purchasing Manager, is part of the Learning and Implementation Community programme for Responsible Purchasing Practices. This is a 2-year long process where we exchange best practice within the industry where at the end we have implemented this practice in our organization.

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?

Our commitment to sustainable business conduct and reducing our negative impact on the environment is clearly stated in Trimtex business strategy for 2025. The topic is one of three focus areas. We have also followed up with developing a Sustainability strategy for the same period - building on our main strategy promise.

" ..we make sportswear developed for the future. At Trimtex we are of the opinion that in order to make the best product for the market, we need to make the best product for the future with the goal of having as little negative affect on the world as possible. Considering both the human and environmental aspects. " - Trimtex Business Strategy 2025.

We are continuously working to replace our virgin polyester materials with equally high level and technical recycled polyester material.

We are participating in an international learning and Implementation group on Responsible Purchasing Practice to learn and implement actions to improve the power-balance between buyer and supplier within our industry.

We are monitoring general waste carefully and reducing/reusing where we can and in addition we have installed monitoring on our technical equipment (Trimtex Baltic) to make sure that we optimize efficiency.

Key people in Trimtex Baltic is currently participating in a 4 month ESG Masterclass training arranged by Estonian Business and Innovation Agency andSustinere (ESG and sustainability agency)

- <https://sustinere.ee/en>.

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?

Director of Product and Brand reports to the board quarterly on status of our work and progress. By setting smart goals and adding KPIs to various departments the management will track the progress as well as evaluate the effect of these. Everyone in the company have been introduced to the Sustainability Strategy and are encouraged to do what they can towards achieving these goals in within their departments.

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?

Today we send out our Code of Conduct together with an engagement letter to better explain why this is important to our company. We follow up our suppliers to make sure they understand how this will effect them. We also discuss this topic and the importance of it with our businesspartners when we meet in person. Our minimum criterias for working with a supplier are:

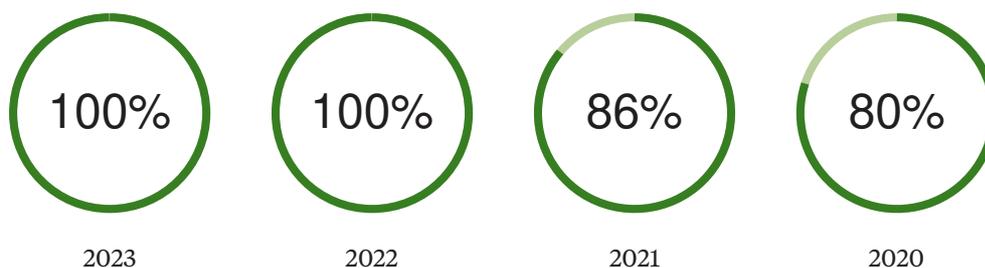
1. The supplier has signed our Code of Conduct or sent own equivalent code in writing.
2. Outsourcing only allowed upon agreement.
3. Supplier needs to have routines to manage breaches of the COC.
4. Supplier knows and shares information about where all parts of the product are being produced and where the raw materials are coming from.
5. Supplier gives us access to the production facility and any facility that is attached to the production and the workers (cantina, sleeping dorms etc.)
6. «Gut feeling» - must be easy to communicate with, suit us in size..
7. All materials used must be either Oeko-Tex or Bluesign approved.
8. Use only approved recruitment agents / agencies.
9. Must have collective bargaining agreements and/or well-functioning trade unions or other forms of worker representation.

When we have potential suppliers, we have a package that we send out containing three documents: "General purchasing conditions", "Purchasing Policy" and "Supplier Evaluation Form". Based on these and our minimum criteria (see above) we decide which supplier to proceed with.

<https://indd.adobe.com/view/3c30553e-0581-4e89-b650-c01b52c7c62f>

Indicator

Percentage of Tier 2 FABRIC suppliers that have signed our CoC



All our Tier 1 suppliers have signed our CoC.

We have received signed CoC from 100% of all our tier 2 FABRIC suppliers.

Percentage of out Tier 2 Accessories suppliers (incl. Retailers) have signed our COC



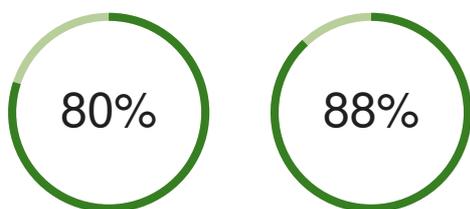
2023

2022

2021

100% accessories suppliers have signed.

Percentage of all suppliers of finished goods (purchased items)



2023

2022

These are ready-made goods that we do not make our selves but we need to complete our collection. All have signed our CoC, except one European supplier.

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?

We have learned that the topic of sustainability is ever evolving and changing. However, we have seen that this work is extremely beneficial in many ways.

In 2023 our main goal has been to overcome a number of challenges. Bad currency and inflation issues has hit us hard and effected our bottom line. This has of course taken some focus and resources temporarily away from some sustainability issues, however, as we have good routines we have continued the work. Educating ourselves and planning for future goals.



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
Use of non-degradable fabrics (Polyester/ Spandex)	Environment Waste	Global
Labour rights in China	Freedom of association and collective bargaining Working hours	China
PFC Chemicals (Long-chained perfluorooctanoic acid- C8 and short-chained perfluorooctanoic acid- C6) often used in DWR (Durable Water repellency) treatments on outer-garments.	Occupational Health and safety Environment Water	Global
Supplychain pollution (Packaging/transport)	Environment Emission Greenhouse gas emission Waste Use of materials	Global
Factory waste	Environment Waste	Global

Sources used for our risk analysis are:

1. Ethical Trade Norway's own database,
2. International Trade Union Confederation (ITUC) - Annual Survey of Violations of Trade Union Rights,
3. Transparency International corruption index,
4. Environmental Performance Index (EPI),
5. CSR Risk Check Tool (Land <https://www.mvorisicochecker.nl/en/risk-check>)
6. The US Department of Labour; List of Goods Produced by Child Labor or Forced Labour
7. IDH benchmark finder - Living wages

In addition to this, purchasing dept. do their own quality and communication analysis regularly.

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.

Based on resources from Ethical Trade Norway and also through discussing with stakeholders/suppliers and through audits, we determined our most salient risks.

We are doing a yearly risk-check both through our ISO certifications (every November) done by Trimtex Baltic and our CEO Maiu Antsmaa - and now also of Trimtex Sport AS by CEO Tor Eivind Augland in Norway, and in connection with our report to Ethical Trade Norway every February, done by Head of Brand and Development (and responsible for reporting to ETN) Hilde Hallandvik Pisani.

Primarily we did an evaluation of the business as a whole - evaluating all suppliers including also suppliers of office equipment and services. However based on the OECDs risk assessment tool we evaluated our main risk to lie with the product and its development and have decided to focus on these suppliers. This is where we can have the most impact - both positive and negative.

Then we determine our risk through firstly checking our product against the country in which it is produced using the following tools: CSR Risk Check Tool, ITUC, US dept of Labour and more. With this in mind, we determine the urgency of the risk in terms of gravity and remediability and also finally our potential impact (- can we make a difference here?).

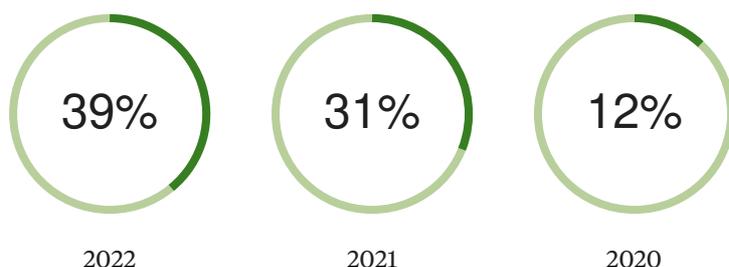
Our suppliers are scored based on three factors: Geographical placement (country/county), financial risk to Trimtex and type of supplier (product or admin).

In addition to, our purchasers continually evaluate our suppliers based on product quality and dialogue (frequency and general feeling through information shared by long term partners).

Regarding replacing virgin polyester with recycled polyester, we also further need to evaluate the risk of recycled polyester. Most of our recycled material today comes from factory waste, and we see no obvious risks related to collection and assembly of this material as opposed to post consumer polyester material that might/could be related to child labour. It is in the re-claiming and collection process of plastic on landfills that we find the highest potential risk of child labour in post-consumer plastic materials. We are aware that this might also be a risk for us when moving to recycled polyester material and will keep track of this in the future.

Indicator

Models in collection, recycled content ≥ 50%



Our goal is to have all our garments contain recycled material within the year 2025, and to be 100% recycled by the year 2030. We see that due to a number of reasons, both internal and external, we have not managed to increase the amount of recycled models as much as we have hoped the previous year. This might affect our timeline some. We are not stopping this push to become 100% recycled, however we need to make sure that the quality level, technical level and availability is there in order to make the change.

Amount of recycled fabrics (articles) used in collection



We have increased the number of fabrics/articles in our collection to 51% of total.

Amount of recycled garments produced.



The percentage of total production that are recycled garments. Recycled garments are defined with containing 50% or more recycled fibres.

This year, due to the state of the world and unforeseen events, the focus of the customer shifted more towards the less expensive products and the amount of recycled garments sold unfortunately went down from 2022 level.

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.

Modern slavery, forced Labour and discrimination are issues that are also addressed by us due to the severe

impact these have on people effected- however these were determined as less salient due to it being unlikely to occur in our supply chain. Having said this, we will of course continue to keep these in mind when doing the yearly risk analysis of our supply chain.

In addition we are also looking at our supply chain when it comes to Energy consumption, water consumption and CO2. This is a project that we started in 2022 and will continue in 2024. Pls see report from Trimtex Baltic (Operational Center) - TB use now 100% green energy.

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

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	Use of non-degradable fabrics (Polyester/ Spandex)
Goal :	100% re-cycled materials in collection by year 2030
Status :	ongoing and at 51% in 2023
Goals in reporting year :	Increase volume of recycled materials in collection as much as possible without reducing quality and durability. KPIs are determined and implemented.

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

The problem with using non-degradable products is the general risk for the environment. The problem with plastic is becoming more and more apparent through research, it is also clear that there are numerous ways in which plastic and non-degradable materials are harmful. We have decided to start by doing what we can to reduce the development of virgin non-degradable materials by using as much recycled material we can in our future products.

On new product purchase we always source re-cycled materials. On existing products it is important for us to keep same quality and performance so we do not change the fabric until quality has reached the level we need them to be. To develop long-lasting and durable products is important to both Trimtex and the environment, and therefore something we take seriously when sourcing new materials and create new garments. We work closely with our tier 2 suppliers (trims and materials) in order to push for durable fabrics that have less negative impact on nature. We have specific KPIs on this progress and we have in 2021 increased amount of recycled materials from 14% to 38%, and from 2022 to 2023 we have further increased the usage of recycled material to 51% of total amount.

In 2021, 29% of all products produced were recycled (over50% recycled fibres) compared with the year before (7,4%), this is an increase of 314%. - In 2022 we continued to increase to 37% - However this year we unfortunately did not manage the same due to a shift in buyer behaviour and went down to 2021 levels of 29,5% of all garments produced were recycled.

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

The goal for the reporting year is to reach 60% re-cycled materials in collection.

Indicator

Recycled garments produced per year



Unfortunately there was a de-crease in recycled garments produced in 2023 due to a shift in buyer behaviour.

Salient issue	Labour rights in China
Goal :	Complete overview and make a risk assessment of Trimtex tier 1 and tier 2 suppliers.
Status :	All tier 1 suppliers and all tier 2 suppliers have received and are in agreement with our COC. All except one supplied goods suppliers (not our development) have signed our COC.
Goals in reporting year :	Object for this year is for all supplied goods to have signed and agreed with our CoC.

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

Based on this mapping/ risk assessment, we established our most salient risks. We have sent out COC and got compliance from all our suppliers at both tier 1 - and tier 2 level. We are currently looking over all our suppliers of "finished" goods (not our development) - here all except two suppliers have complied with our CoC.

We are aware, through previous audits and general risk assessment, that there is a risk for excess overtime at our suppliers, we have made adjustments to our timeline to try and give reasonable time for development and production. We are also educating ourselves through the Learning and Implementation Community for Responsible Purchasing Practices - where the aim is to improve our purchasing routines to make sure we do not, voluntary or involuntarily, act in a way that puts unnecessary pressure on workers.

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

Continue the work with LIC on Responsible Purchasing Practice - to assess current purchasing practice and make adjustments accordingly.

Salient issue	PFC Chemicals (Long-chained perfluorooctanoic acid- C8 and short-chained perfluorooctanoic acid- C6) often used in DWR (Durable Water repellency) treatments on outer-garments.
Goal :	Free from PFC Chemicals in our outer-garments by 2025.
Status :	Pending due to
Goals in reporting year :	Re-evaluate the possibility to change to PFC-free coating on all materials.

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

We have stopped using C6 on any new products. However the change from C6 to C0 has been a bit slow on a few styles so we are not quite PFC free yet. We were not able to replace the remaining C6 material as this change would have had too big of an impact on the bottom line this year.

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

Re-visit the risk- assessment and assess the importance of becoming 100% PFC Free and make plan accordingly.

Salient issue	Supplychain pollution (Packaging/transport)
Goal :	Net zero / Carbon neutral
Status :	Continue to reduce
Goals in reporting year :	Gather information from main tier 2 suppliers on energy type and consumption.

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

We have already started reducing and changing to recycled alternatives, reducing waste, changing to clean energy and measuring consumption. In 2021 we changed system for waste management and with this managed to reduce waste a lot. And in 2022 we have built a new energy efficient system that monitors all technical equipment and enables the best use of energy (KPIs Sustainability 2022). Our Operational Center in Estonia reduced with 15,8% on Kwh from 2022 to 2023 on electricity usage and reduced with 27,9% on MWh from 2022 to 2023 on heating. See link to our "Key Metrics - Environmental" Report for 2023 available on our website:
https://acrobat.adobe.com/id/urn:aaid:sc:EU:8038bfa0-985e-4cf3-a497-777d32048529?_gl=1*njda*_gcl_au*MTY5NzU1OTYwMC4xNzA5NjMwMDc0

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

Gather information from main tier 2 suppliers on energy type and consumption.

Salient issue	Factory waste
Goal :	Circular production
Status :	Preliminary phase
Goals in reporting year :	Searching for collaborative partners/ projects to help speed up this process.

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

To really make a difference, the apparel industry needs to tackle the issue of circularity. This is the industry's greatest negative impact on the environment today. However, there is also a great opportunity here for becoming self-reliant on input/fibres for new products. This is a long term goal.

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

Searching for collaborative partners / projects to help speed up this process.

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

Our main input is Polyester. The worst aspect of this material is that it is not degradable. We have as a short term goal to year-on-year reduce the usage of virgin material in our products. We will, by 2030 have only re-cycled materials in our products. Of the materials we use, 72,5% are of Non-EU origin and 27,5% of EU origin. For our other main inputs; paper and ink; these are of EU origin. Waste is recycled where possible. At our own facilities, all packaging (plastic, card and paper as well as wooden pallets) are recycled - only contaminated packaging (approx 3% of total packaging waste) are not. Also Production waste (Production paper) is recycled. All textile waste is currently stored /deposited due to the complexity of the procurement process. This is something we are working to find a better solution for in the future (circular options). Due to our closeness to market we transport most our products by road. Our target for transport is to have >1% sent by air by year 2025.

In 2021 we changed system for waste management and with this managed to reduce waste a lot. In 2023 we increased plastic waste by 11%, cardboard and paper by 27%, cardboard coils by 65% (?) and slightly increased our textile wastage with 4% - however reduced our contaminated packaging with -15%, our waste of ink with -11% and production paper with - 16% .

3.B.2 Reduction of greenhouse gas emissions

Trimtex Baltic have in 2022 started a new project on monitoring all technical equipment for best and most efficient usage of energy. Heating is now 99% renewable energy. We are closely monitoring our waste level and continue to make plans for reducing packaging material. in 2023 we reduced the energy usage with 15,8% and the consumption for heating with 27,9% from 2022.

In 2024 we will start working on our GHG accounting.

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

The approach to our own purchasing / sourcing is to review the necessity of new supplier thoroughly. If we can use existing suppliers we always will. However if the need is there, and none of our existing suppliers can deliver this to the required standard, then we will search for new. The way we find new potential suppliers varies from suggestions from existing suppliers to visit relevant fairs.

We have in the reporting year updated our purchasing practise by determining two timelines for purchase from external producers (Asian mostly) - we have also moved these dates 3-4months back in order to give more time for planning/production. By increasing the leadtime we want to give us and our suppliers more predictability, time to plan and hopefully in doing so contribute to a better and more balanced cooperation with supplier and consequently place less strain on the workers (workinghours etc.). We became aware of the risk of overtime at supplier level through an Audit that we did at one of our suppliers and we see that this is a general risk that comes with pushing Leadtime.

In 2022 we joined the Learning and Implementation Community on Responsible Purchasing Practices - a project that will go over 2 years 2022-2023.

3.B.4 Choice of products and certifications

All the fabrics that we use are either Oeko-Tex and/or Bluesign approved. This is one of our minimum standards. We are a polyester brand due to our reliance on highly technical, durable and also printable fabrics (polyester is today the material that meets all these criteria's in the best way). We are however, changing to re-cycled polyester - our goal is to be 100% re-cycled by year 2030. Trimtex Baltic already have the ISO9001, ISO 14001 and ISO 45001 at company level. In 2022 the remaining Trimtex affiliates also became ISO 9001 and ISO 14001 certified - so now entire Trimtex group is covered by these two certifications.

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 2022 all our tier 1 and tier 2 suppliers have complied with our COC. In Trimtex Baltic workers reps. play an active role for supporting the workers.

In 2020 Trimtex Baltic also obtained another ISO certificate, the ISO 45001 - which is standard for "Occupational health and safety management". This is in addition to our ISO 9001 certificate. All certificates were renewed in November 2021. In 2022 the remaining Trimtex affiliates also became ISO 9001 and ISO 14001 certified - so now entire Trimtex group is covered by these two certifications. We only work with long term suppliers. Suppliers we have met and visited, that we have collaborated with over many years.

Pls see our Code of Conduct, paragraph 2:

2.1. Workers, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively. The employer shall not interfere with, obstruct, the formation of unions or collective bargaining.

2.2 Workers' representatives shall not be discriminated and shall have access to carry out their representative functions in the workplace.

2.3 Where the right to freedom of association and/or collective bargaining is restricted under law, the employer shall facilitate, and not hinder, the development of alternative forms of independent and free workers representation and negotiations.

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

Trimtex work closely with our suppliers and what we see is that they are at a level where we are exchanging knowledge and building capacity together rather than having to train them. However, we also realize that further down the value chain (at tier 2 and 3 level) we might need/want to do more. Example: We did learn something on how to reduce plastic waste in packaging from suppliers last reporting year and continued the learning-curve this reporting year. We had to adjust the reduction of plastic somewhat because the packing solution put extra strain on supplier as it was. So we ended up, still reducing a lot but not as much as we first thought.

Internally we have scheduled updates 2 times a year for all employees on sustainability. All new employees are given a briefing of our Sustainability Strategy and status. Key people meet at least once every quarter for updates and discussions on progression and priority. The board is updated on progression and plans every quarter.

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

Our "Internal policies regarding corruption, extortion and bribery, money laundering and whistleblowing" we state clearly that:

"The following rules concerning corruption, extortion / bribes, money laundering and whistleblowing ("Rules") shall apply to all employees, directors, trade agents and distributors ("Employees") in Trimtex Sports ("Group"). Trimtex Sport AS is hereinafter called the "Parent Company".

Any violation of the rules can be a serious offense, and will normally lead to punishment and termination of the employee from the Group. A violation will significantly damage the Group's reputation, and may further result in criminal prosecution from the Group in the form of corporate penalties and compensation claims.

The Group has a clear policy to comply with all legislation in every country where the Group conducts its business. All employees in the Group will be aware of this at every interaction with the Group's contract partners and other third parties."

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

This work has forced us to look at many aspects of our business, and we have made some changes to workflow and added tasks, especially in the purchasing and planning dept. but also in the, warehouse as well as the product- and technical depts. The tasks are related to reviewing the purchasing routines, collecting and documenting data, putting a system in place for how this data is documented as well as implementing new routines so that working with these issues will become a natural part of our workday.



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.

We have assigned several additional tasks to key departments.

The key departments to address and handle salient issues concerning suppliers are the departments that have direct contact with these (Ex: Purchasing/Planning and Product/Development) and/or those with indirect impact on how these suppliers can do their jobs (Ex: Management, Sales). The departments that can have a direct impact on environmental issues such as, materials used, treatments added, waste, packaging, energy consumption - everything that has to do with the product itself (Ex: Development, Design, Warehouse and Logistics) as well the ones indirect impact (Ex: Management, Sales).

We have quarterly management meetings on Sustainability, attending is CEO, Director of Product and Brand, Head of Development (CSR). The board is updated on progress on the Sustainability Strategy on a yearly basis.

We make sure that we are doing what we say we are by:

We are more people working with sustainable business conduct through tasks added to their respective departments.

Development dept. searches for new material to replace virgin material all year round. They are also searching for new ways to improve products in a sustainable way. Important for us is also to make as clear a product request (Teck Pack) as possible to reduce resources used and misunderstandings - this also reduces numbers of samples made. The purchasing dept are in dialogue with suppliers on shipments and packaging. They look for the best mode of transportation as well as changing our packing instructions to more environmentally friendly alternatives. They are also the ones who ask for updated certificates, follow up and evaluate the suppliers. The most important job of the purchasing department is to have a good dialogue with supplier and not put unnecessary pressure on them. Our logistics dept takes care of the waste and make sure to reduce, reuse and recycle as much as possible.

We have added KPIs to these departments, which are evaluated on a yearly basis together with our risk analysis. These are updated in time for our yearly reporting to Ethical Trade Norway. Reporting is end of february.

Through reporting to ETN we see and evaluate the actions taken. Do we make a difference with the actions taken or do we have to make changes? Are we doing what we say and is what we say still the correct way to reach our ultimate goal?

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

Previously we have mostly looked at the quality of the garment ,which also is a good indicator to the general health of the supplier. However, today we rate the communication with our suppliers as well as their financial details in addition to the final product. We make sure to have updated /current certificates from all our suppliers such as ISO, Bluesign and Oeko-Tex etc... Now we have, in addition to our more in-depth risk analysis, we have developed a file where essential information from suppliers is placed and where we can generate a total score per supplier based on their overall performance. We are in close dialogue with our main suppliers throughout the year.



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

Whenever we face a challenge with a supplier, we always seek to find a solution that works for both parties. To have an open and good dialogue with our suppliers is by us considered very important and something we always aim for. To understand each other challenges is important in order to make correct and good decisions. See the example in 3.B.6

Re-Cycled Polyester:

1. The general amount of waste that the Apparel industry is producing is critical, and we want to take part in changing this. We are in dialogue with our suppliers regularly about moving from virgin to re-cycled polyester and also discussing sustainable and circular solutions for the future.

Workers rights:

1. First through our governing documents, when sending them our Policy, Code of conduct and Engagement letters. Then later through our development, by asking for certificates etc. Finally through our purchasing. We do not do aggressive price negotiations and we ask for realistic delivery dates. We also try to arrange meetings with our suppliers yearly (either at fairs or by visiting them).

2. We include workers interviews in our audits. (Social audits)

DWR Coating:

1. This is a risk for the general public, however it is also a risk for those who are working with the toxins directly. We have started this work by implementing a CO (PFC free) coating to most of our garments - Our aim was to become PFC free in 2022 - we did not manage this unfortunately and we still have few styles with C6 DWR. This project is temporarily put on hold. We are, however, in dialogue with our suppliers continuously and work together with them to find alternative and better solutions.

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

We have a sustainability focus on our website: <https://trimtexstore.no/pages/barekraft/> / <https://trimtexstore.com/pages/sustainability> - where we introduce and elaborate on what we do and what our goals are.

On this page we now have available our Policy for Sustainable Business Conduct and CoC. We have made a FAQ (frequently asked questions) on sustainability issues which is also here. In addition we have made our yearly report to Ethical Trade Norway available.

We also have monthly focus on sustainability in our marketing channels.

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

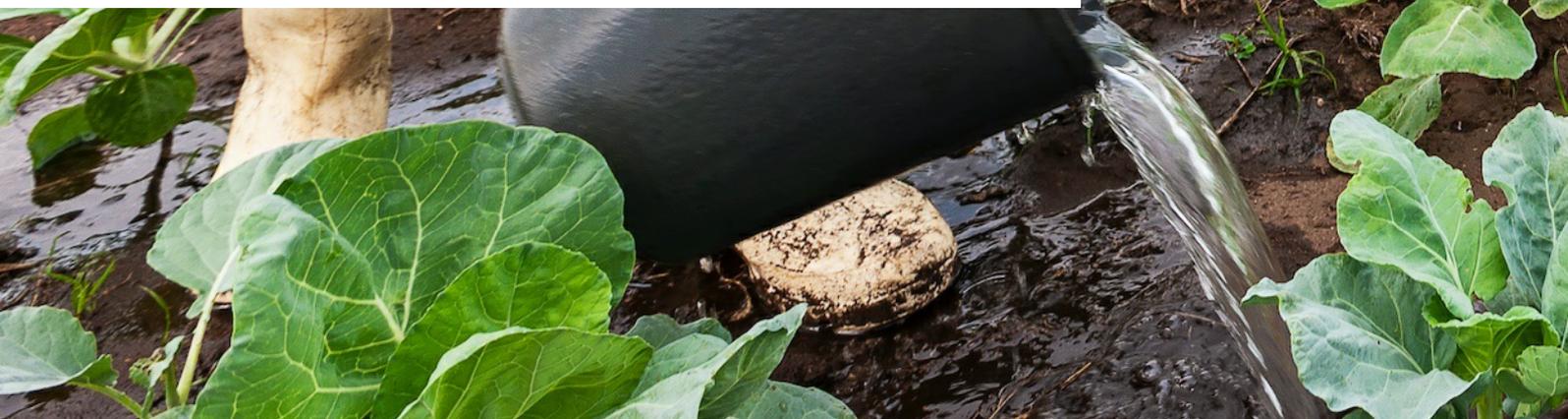
As of now any queries that are not answered by the information on our webpage are redirected to the person responsible for sustainability at Trimtex - Hilde Hallandvik Pisani. Each inquiry is treated separately and answered in the best way possible. We refer to this yearly report for (Ethical Trade Norway) where we cover all the topics related to the Transparency Act.



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

As described in our company Policy for Sustainable Business Conduct - "If our activities are found to cause or contribute to negative impact on people, society or the environment, we will stop the activities and seek to provide remedy. If our supplier is responsible for the negative impact, the supplier is responsible for providing remedy".

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

We have not experienced any 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

Through risk analysis done by using ETNs risk assessments tools/links we check the country, the area and the potential risks here. For new suppliers we avoid areas that are at high risk (China is in itself a high risk country - however there are areas that are worse and with an increased risk for workers not being treated right). We always work with existing suppliers (long term partners) that we know are good if this is possible. All our tier 1 and tier 2 suppliers have signed our Trimtex Code of Conduct. Quote from this document: "The supplier shall have an effective management system for handling complaints relating to human rights, workers' rights, environmental issues and corruption. The supplier shall ensure that both workers and external parties, such as local communities and civil society organisations, are able to submit complaints."

Contact details:

TRIMTEX SPORT AS

Hilde Hallandvik Pisani - Head of Development and Brand

hilde@trimtex.no