



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

Account reporting year 2024

for Pierre Robert Group AS



*Ethical Trade Norway has assessed the report of Pierre Robert Group 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 UNGP and OECD's guidelines. The reports of all members are publicly accessible on Ethical Trade Norway's website.

Heidi Furustøl

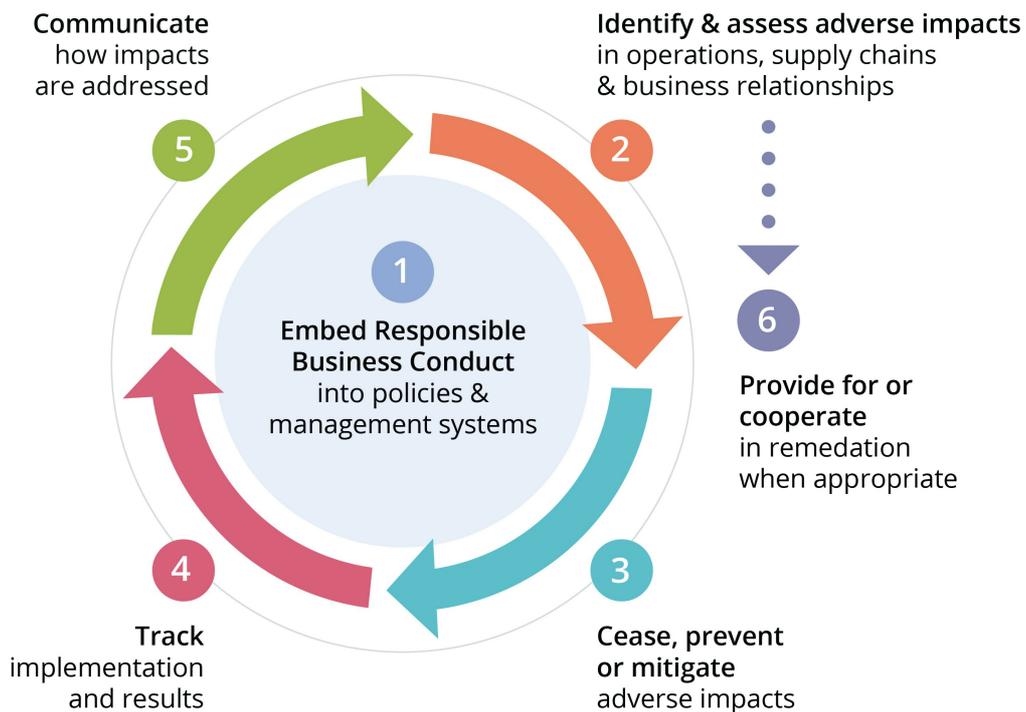
Executive Director

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

As we close another year at Pierre Robert Group, I am filled with pride and optimism about our ongoing commitment to ethical trade. Our membership in Ethical Trade Norway has been instrumental in guiding us through the complexities of the clothing and textile industry.

This year, the significance of our ETN membership has been more apparent than ever. The enforcement of the Transparency Act has highlighted the strength of our established risk assessment and compliance routines. With ETN's support, we have navigated these regulatory changes smoothly, maintaining our dedication to transparency and ethical practices.

Our focus on collaboration and openness remains steadfast. We believe that protecting workers' rights in garment manufacturing is a collective responsibility. We encourage our industry peers to join Ethical Trade Norway, as the benefits extend beyond individual companies to the entire industry and society.

Ethical trade is a shared journey, and we are committed to advancing together. As we look to the future, we invite more companies to join us in this mission. By working together, we can create a more sustainable and equitable industry for all.

Let's continue to elevate our standards and achieve great things together.



Maiken Skirstad Mo
CEO

Board Signature

This report is electronically signed. See last page for verification.



Enterprise information and enterprise context

Key enterprise information

Lars Olav Olaussen
Enterprise name
Styreleder
Pierre Robert Group AS

Head office address

Drammensveien 149, Oslo

Main brands, products and services offered by the enterprise

Pierre Robert Group designs, buys and sells basic textiles such as socks, tights, underwear, wool and sports garments under the brands Pierre Robert, La Mote, Black Horse, Norlyn and Finnwear.

Description of enterprise structure

Pierre Robert Group AS (PRG) is owned by the Orkla Group. Our main distribution channel is grocery stores and supermarkets in Norway and Finland, and own webshop. Pierre Robert Group's head office is in Oslo, with additional sales and marketing departments in Helsinki, Finland.

Our sustainable strategy & commitments are set for 2030. The annual report for 2024 describes the goals and actions done during 2024.

PRG's mission statement is "We commit to creating quality basics – made with care and beloved for their comfort and style."

Revenue in reporting year (NOK)

535 000 000

Number of employees

118

Is the enterprise covered by the Transparency Act?

Yes

Major changes to the enterprise since last and current reporting period

535 MNOK is the turnover for 2024 for Pierre Robert Group AS Norge, Orkla Trading AS og Pierre Robert Oy Finland.

Contact person for the report (name and title)

Hege Bjørnholm

Email for contact person for the report

hege.bjornholm@pierrerobert.no



Supply chain information

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

Design, development and sourcing for all PRG brands are handled by the PRG head office in Oslo. We have two additional Chinese sourcing representatives in Shanghai assisting the Oslo office in the following-up of suppliers on sourcing, quality in production and social- and working conditions. We communicate our code of conduct, run risk assessments, follow up and engage in improvement projects with our suppliers depending on needs and scope. As we do not own our own factories, it is extremely important to us to source from suppliers that prioritise good and safe working conditions and environmental responsibility. In addition, we find it necessary that they see the added value of certifying their facility to preferred production or product standards. We collaborate both with traders* and with factories directly. We see our suppliers as long-term business partners and have close collaboration and dialogue with them.

PRG sources cotton from China and India, wool from South Africa, recycled and virgin synthetic materials globally and Tencel from licensees in China and Europe. Majority of our products are manufactured in China and Italy, but we also have some production in other European countries as well as South East Asia.

*Traders are local companies in close relation to the factories. Traders play an important role in developing and sourcing products in close collaboration with PRG and the factories.

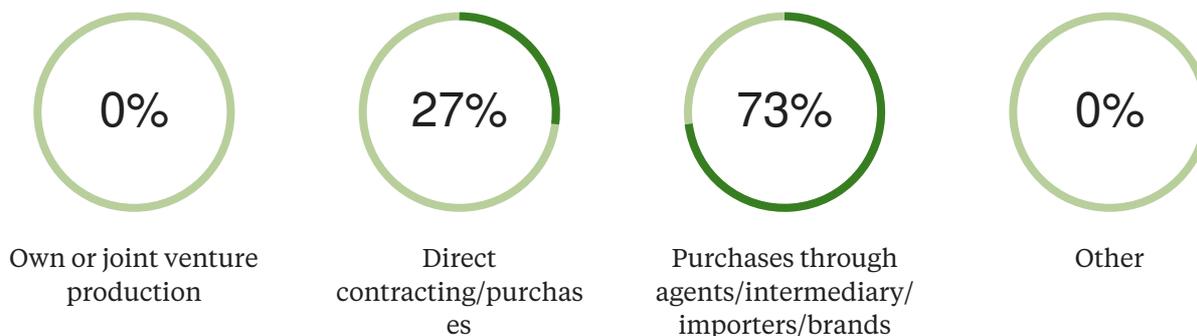
Number of suppliers with which the enterprise has had commercial relations in the reporting year

20

Comments

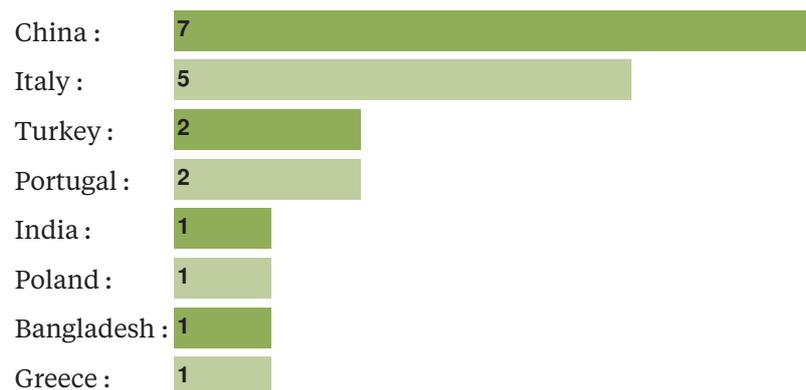
PRG bought products from 20 suppliers producing textiles/garments at totally 29 producers/factories in 2024.

Type of purchasing/ suppliers relationships



As Intermediary we collaborate with traders who are all local companies in close relation to the factories. The traders play an important role in developing, sourcing and assuring ethical and quality requirements of the production and products in close collaboration with PRG.

List of first tier suppliers (producers) by country



State the number of workers at first tier producers

Number of workers

5 645

Comments to number of workers

Number of workers are manually collected data from the 29 first tier factories handled by 20 suppliers.

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

Organic cotton / BCI cotton	China India
Merino wool mulesing free	South Africa
Recycled and virgin polyamide and polyester, elastane, lycra	Global
Lyocell (Tencel) and Viscose (Modal) from Lenzing licensees	Global

The list above displays the majority of raw materials used in our products.

Organic cotton is certified by the Global Organic Textile Standard (GOTS), or bought through BCI. Recycled polyester and polyamide are mainly GRS certified from yarn mill or garment factory.

100% share of the merino wool sourced for our garments (except socks and tights) is product certified by the Nordic Swan Ecolabel (Svanemerket).

100% of PRG's merino wool is sourced from non-mulesing farms.

Is the enterprise a supplier to the public sector?

No



Goals and progress

Process goals and progress for the reporting year

1

01 SLOW FASHION

We enable our consumers to buy less. We will not push fast fashion trends but offer timeless, well thought through and curated collections. Our clothes are made to last, to be loved, worn, washed, repaired and recycled.

Goal :

1.1 Avoid fast fashion trends and reduce surplus.

- a) 85% Carry overs.
- b) 0% airfreight in 2024.

1.1

Status :

a) For the Pierre Robert brand, we have adopted a strategic approach that avoids altering our product assortment in ways that would necessitate price reductions or the removal of items from stores. Starting in 2024, we will ensure our product assortment remains consistent without requiring price reductions or the removal of items from stores. Our updates will focus on quality and innovation, rather than following fleeting trends or market pressures. This strategy allows us to maintain the integrity and reliability of our products while minimizing the strain on the world's resources.

b) Below 0% of our orders were transported by air in 2024.

2

02 CARE FOR ALL

Our suppliers are our partners, we cooperate, communicate, support, respect and care for our supply chain. We protect human rights and animal welfare. We are transparent. We are inclusive, fair and treat all equally.

Goal :

2.1 Work actively towards gender equality.

a) Map share of female supervisors vs gender share in workforce in our tier 1 supplier factories for top ten suppliers.

2.2 Increase transparency.

- a) Conduct yearly salary review for top ten suppliers.
- b) Map complete tier two mills.

2.3 Actively hiring people with disadvantages in our organization.

a) Strive to hire 1-2 persons with different disadvantages in our organization.

2.1

a) In 2024, we began mapping our 10 largest suppliers. We will continue updating this mapping in the future to monitor whether the trend is increasing or decreasing.

2.2

a) We have completed the yearly salary review for 2024 and will continue this process in the coming years to achieve a comprehensive overview.

Status :

b) We have completed the mapping of Tier 2 suppliers and will publish these on our website to enhance transparency.

2.3

a) In 2024, we hired only one person, actively ensuring it was a male to address the gender imbalance in our predominantly female organization.

3

03 MINDFUL

We practice mindful use of resources, every detail is carefully considered to put less impact on the environment, from product to packaging. We design for circularity.

3.1 Achieve zero waste from production.

a) Implement 3D design.

Goal :

3.2 Reduce emissions at Tier 1 level.

a) Map energy source of 1st tier factories. Map factories with rainwater collecting facilities, map factories with on-site coal boilers.

3.3 Scope 3 emissions.

a) Get a total overview over Scope 3 emissions, set baseline and target.

3.1 a) The implementation of 3D design was put on hold due to capacity challenges in the design department. Learning and implementing 3D design is a time-consuming effort that was not prioritized.

Status :

3.2 a) We have mapped the energy sources of all Tier 1 factories.

3.3 a) We mapped CO2 emissions and established baselines and plans.

Process goals for coming year

1

01 SLOW FASHION

We enable our consumers to buy less. We will not push fast fashion trends but offer timeless, well thought through and curated collections. Our clothes are made to last, to be loved, worn, washed, repaired and recycled.

1.1 Avoid using more resources than necessary.

a) Implement a new Sales and Operations Planning (S&OP) process to prevent overstock.

1.2 We are committed to maintaining a consistent selection of products in our assortment. Rather than shifting our inventory to follow fleeting trends, we focus on providing quality items that last.

a) Keep complete assortment running for Pierre Robert brand.

2

02 CARE FOR ALL

Our suppliers are our partners, we cooperate, communicate, support, respect and care for our supply chain. We protect human rights and animal welfare.

We are transparent. We are inclusive, fair and treat all equally.

2.1 Increase transparency.

a) Conduct yearly salary review for top ten suppliers.

b) Publish Tier 2 suppliers.

3

03 MINDFUL

We practice mindful use of resources, every detail is carefully considered to put less impact on the environment, from product to packaging. We design for circularity.

3.1 Achieve zero waste from production of in store sales material.

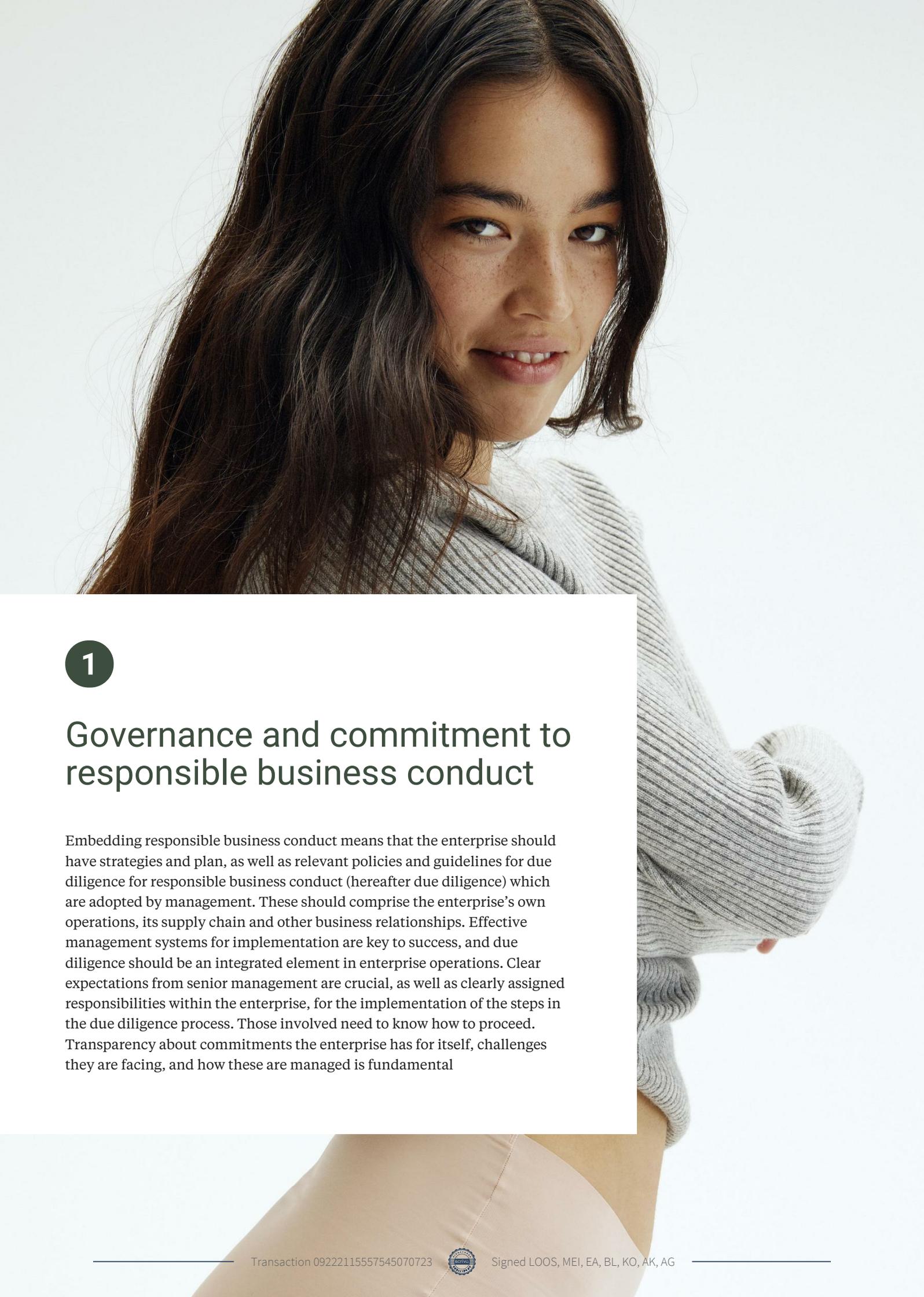
a) Implement a process to prevent overstock.

3.2 More sustainable in store material.

a) Map and change to certified or recycled paper and cardboard for in store sales material.

3.3 More sustainable packaging.

a) Investigate alternatives, test and shift from PP coating to a more sustainable coating like Hydrovarnish.



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.orkla.no/retningslinjer/>



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

Pierre Robert Group acknowledges that our business conduct can potentially have negative impact on people, society, and the environment. At the same time, we see the potential to contribute to positive development in the supply chain. With this in mind, we have compiled the following principles and criteria guiding our own business:

Pierre Robert Group shall conduct due diligence for responsible business practices. This involves; conducting risk assessments to identify potential negative impact on people, society, and the environment and to stop, prevent and reduce such impact. The measures put in place are monitored and their effect evaluated. The measures are communicated to those affected by our actions. 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 remedies. If our supplier is responsible for the negative impact, the supplier is responsible for providing remedies.

Pierre Robert Group considers responsible purchasing practices to be one of our most important tools for responsible business conduct. Pierre Robert Group shall adapt our purchasing practices to strengthen, and not undermine, our suppliers' ability to deliver on our requirements related to people, society, and the environment. We strive towards lasting supplier relationships with suppliers who show a particular willingness and ability to create positive developments in the supply chain.

Pierre Robert Group supports the right to freedom of association and other forms of democratically elected worker representation. We shall involve worker representatives and other relevant stakeholders in our work with responsible business conduct.

In dialogue with suppliers we will consider, if needed, to contribute with capacity building or resources that enable our suppliers to comply with Pierre Robert Group's requirements related to responsible business conduct. This way we lay the foundation for collaboration with suppliers that show the willingness and ability to work on positive development for people, society, and the environment in the supply chain.

Pierre Robert Group, including all employees, shall never offer or receive illegal or inappropriate monetary gifts or other remuneration to achieve private or business benefits in their own interest or in the interest of customers, agents, or suppliers.

Pierre Robert Group including all our suppliers and partners, shall avoid trading with partners that have activities in countries where a trade boycott is imposed by the UN and/or Norwegian Government authorities.

Link to Policies and documents for own business:

<https://www.orkla.no/mennesker-og-samfunn/>

<https://www.orkla.no/retningslinjer/>

<https://www.orkla.no/wp-content/uploads/sites/2/2022/03/Orkla-Human-and-Labour-Rights-Policy.pdf>

<https://www.orkla.com/orklas-sustainability-ambition/protecting-the-environment/>

<https://www.orkla.com/orklas-sustainability-ambition/empowering-people/>

<https://www.orkla.com/orklas-sustainability-ambition/governance-ethics-in-business/>

<https://www.orkla.com/wp-content/uploads/sites/3/2023/03/Orkla-Supplier-Code-of-Conduct.pdf>

<https://www.orkla.com/our-sustainability-goals-towards-2025/>

https://www.pierreroberobert.no/no_NO/lp/slik-jobber-vi-med-leverandoerene/Responsible_sourcing.html

https://www.pierreroberobert.no/no_NO/aapenhet/1-22-Transparency+law+Norway.html

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

Ethical trade and corporate social responsibility are important and high-priority areas of Orkla, and demands and expectations are set for each company to have implemented ethical trade and sustainability in their business processes. Orkla has a pronounced sustainability strategy that provides guidance to the companies, including PRG. The board of PRG is well informed about the work on ethical trade and supports ethical trade as a fundamental part of the business platform for PRG. PRG has set clear targets for sustainability work towards 2030.

The overall policy for sustainable business is developed by Orkla and anchored with all portfolio companies. The policy for sustainable sourcing and operations is anchored with the board, management group and all employees.



1.B Organisation and internal communication

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

Responsibilities for responsible business practice in PRG:
CEO, Maiken Skirstad Mo

Links:

https://www.pierrerober.t.no/no_NO/vaart-univers-vaart-baerekraftsarbeid

https://www.pierrerober.t.no/no_NO/aapenhet/1-22-Transparency+law+Norway.html

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?

All decision makers in PRG have sustainability as part of the framework for decision making, all based in our sustainability commitments. Ethical trade and sustainability topics are regularly on the agenda for internal meetings for all employees.

CEO and management have sustainability, diversity and inclusion as elements in their bonus agreements.

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

All new employees get an introduction to sustainability in PRG and the topic is frequently on the agenda in internal meetings. All employees are also given regular updates and news on the companies' sustainability work. It is compulsory for all new product managers at PRG to attend training on ETN's basic and advanced courses in ethical trade. Practical training and follow-up of new product managers are carried out.

All product managers have an active role in securing ethical trade towards suppliers and products and attend various seminars and network meetings related to ethical trade. The product department is also an internal driver for training and raising awareness in other departments in order to better safeguard and support the work done in ethical trade.

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?

Ethical trade and corporate social responsibility are important and high-priority areas of Orkla and demands and expectations are set for each company to have implemented ethical trade and sustainability in their business processes. Orkla has a sustainability strategy that provides guidance to the companies, including PRG. The board of PRG is well informed about the work on ethical trade and supports ethical trade as a fundamental part of the business platform for PRG.

PRG has set clear targets for sustainability work towards 2025, and specific measures have been defined up to 2030. The commitments are anchored with the management team.

Our goal is to be "The Nordic Favorite for Sustainable Comfort" and the sustainability strategy up to 2030 is based on our main commitment, "We commit to promoting a sustainable textile industry."

Our Sustainability Strategy is based on three pillars:

01 SLOW FASHION

We enable our consumers to buy less. We will not push fast fashion trends but offer timeless, well thought through and curated collections. Our clothes are made to last, to be loved, worn, washed, repaired and recycled.

02 CARE FOR ALL

Our suppliers are our partners, we cooperate, communicate, support, respect and care for our supply chain. We protect human rights and animal welfare.

We are transparent. We are inclusive, fair and treat all equally.

03 MINDFUL

We practice mindful use of resources, every detail is well thought through to put less impact on the environment, from product to packaging. We design for circularity.

Based on these commitments, we have set specific goals that are linked to activities in the short and long term from 2024-2030. The work is part of our business strategy and is anchored throughout the company.

Link to website:

https://www.pierrerobert.no/no_NO/vaart-univers-vaart-baerekraftsarbeid

1.C.2 How are the strategies and action plans for sustainable business conduct followed up by senior management and the board?

Updates are given to the management team and board through regular meetings and business reviews. Typical topics are:

- status and priorities on sustainability projects, actions, collaborations etc.
- communication plans for sustainable products and sustainability work in PRG.
- strategy and plans for our future sustainability work and anchoring of decisions and priorities.

1.D Partnerships and collaboration with business relationships

1.D.1 How does the enterprise communicate the importance of responsible business conduct in its business relationships?

Pierre Robert Group strives towards responsible business conduct that respects people, society and the environment. To exercise responsible business conduct we wish to work in close partnership with our suppliers and business partners.

Pierre Robert Group considers collaboration to be a prerequisite for responsible business conduct, and key to the achievement of the UN Sustainable Development Goals.

Our suppliers and partners can expect from Pierre Robert Group that our purchasing practices strengthen, and do not undermine their opportunity to deliver on our requirements related to people, society and the environment. Pierre Robert Group always seeks collaboration in order to achieve responsible business conduct. However, we will end business relationships or other forms of collaboration if our supplier or partner does not meet our expectations for responsible business conduct.

We communicate in written form and in meetings with the suppliers that we emphasize the importance of responsible business conduct as part of the collaboration with PRG. We collect and evaluate social and environmental information from the factory as a part of the sourcing process. All suppliers must sign and accept our Code of Conduct before orders are placed.

Feedback to the factories is provided in the form of written feedback, through supplier meetings, our own factory visits and continuous dialogue with the suppliers on areas of improvement and follow-up improvement measures from audits and our own visits.

All suppliers are requested to communicate our CoC to their suppliers. This is emphasized in the further dialogue with the supplier and is reinforced by the fact that selected sub-suppliers are asked to fill in SAQ and / or are visited by us. This is the standard follow-up routine for all new suppliers and existing big or strategic suppliers.

We expect our suppliers and partners to work focused and systematically to comply with our Guidelines for Suppliers, hereunder our Code of Conduct which covers fundamental requirements on human rights, labour rights, anti-corruption, animal welfare and the environment. Our suppliers shall:

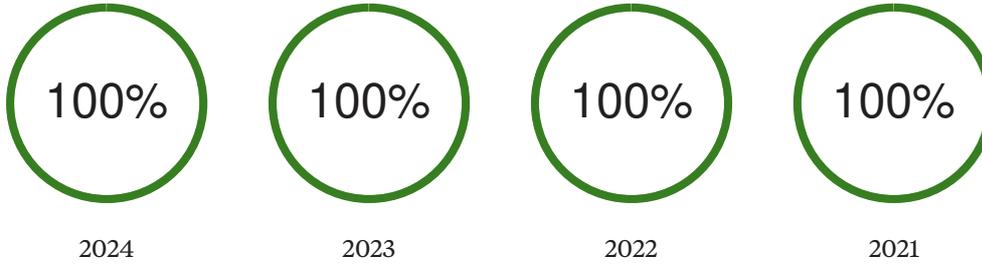
- Follow our guidelines for suppliers, hereunder the code of conduct.
- Conduct due diligence for responsible business conduct. This involves; conducting risk assessments to identify potential negative impacts on people, society and the environment and to stop, prevent and reduce such impacts. The measures put in place must be monitored and their effect evaluated. The measures taken must be communicated to those affected by our actions. If the supplier is responsible for the negative impact/damage, they are responsible for providing remedies.
- Show willingness and ability to continuous improvement for people, society and the environment through collaboration.
- At the request of Pierre Robert be able to document how they, and potential subcontractors, work to comply with the guidelines.
- If the supplier, after several requests by Pierre Robert, does not show the willingness or ability to comply with the guidelines for suppliers, the contract may be cancelled.
- Have a system in place to manage complaints related to human rights, labour rights, the environment and corruption.
- Avoid trading with partners that have activities in countries where a trade boycott is imposed by the UN and/or Norwegian Government authorities.

At the request of Pierre Robert Group, the supplier must be able to document how they, and any potential subcontractors, work to comply with the Guidelines for Suppliers. This may be done through follow-up meetings and/or mapping of conditions in the supply chain. Should Pierre Robert Group request an assessment of subcontractors' compliance with the Guidelines, the supplier is required to provide the name and contact details of subcontractors.

Link to our ethical guidelines: <https://www.orkla.com/sustainability/>

Indicator

Share of suppliers which have signed and accepted ethical guidelines CoC.

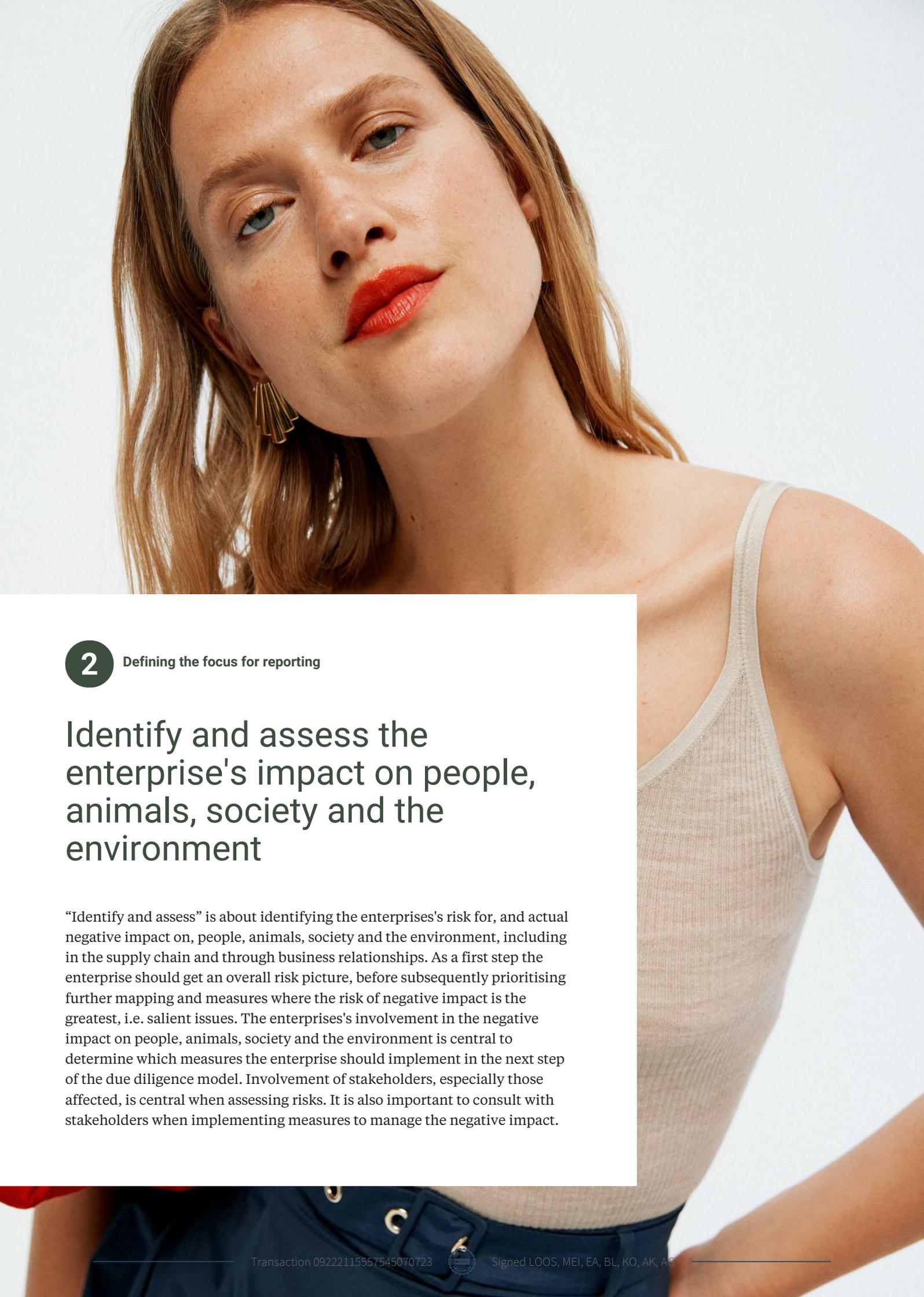


1.E Experiences and changes

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?

The textile industry continues to face significant challenges, including geopolitical conflicts, currency fluctuations, and transportation disruptions. Despite these obstacles, PRG remains dedicated to ensuring a reliable and robust supply chain. We consistently collaborate with our suppliers to promote an ethical and sustainable textile industry. Our commitment to transparency and trustworthiness has been unwavering, even under margin pressures.





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 prioritized significant risks and/or actual negative impacts on people, animals, society and the environment.

Salient issue	Related topic	Geography
Overtime and low participation in social security scheme at garment factories, origin of cotton sourced in China (Xinjiang), forced labour of Uighur minorities.	Forced labour	China
Risk of harmful substances in polyester, risk of human rights violations in oil production, utilizing non renewable material sources, microplastics release.	Environment	Global

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 prioritized b) activities or sections of the enterprise not covered in this report , if any (product groups, own products, departments etc.), and why c) how the information was gathered, what sources were used, and which stakeholders have been involved d) whether you have identified areas where information is lacking, and how you are planning to proceed to collect more information about this.

PRG is mapping the textile industry's salient issues through various reports and information we get from independent sources, stakeholders and organisations. It is a continuous and dynamic process to evaluate the inherent risks of the industry and factors like country or region and raw material and production processes are important factors to consider. The salient issues described above are the risks PRG have identified using Ethical Trade`s Risk Mapping Tool alongside common risks connected to the textile industry. PRGs actions to reduce the impact of salient issues are taken through our goals and commitments up to 2030.

a) Here follows a short description of how risk evaluation during sourcing process is done in PRG:

When sourcing for new suppliers there is a set of minimum criteria the suppliers must meet in addition to how they perform in a risk assessment. To identify risk for both new and existing suppliers, we have implemented a method in the procurement process that consists of a mapping and evaluation that includes a three-step process.

1. An initial risk assessment is made based on parameters such as:

- Country of origin
- Inherent risk in the product

- Environmental impact
 - Supplier's and management's awareness and attitude towards ethical trade, CoC, sustainability and the environment
 - The total value and total volume of the product / order
 - Duration of the business relationship between PRG and the supplier
 - Previous social audits and PRG representatives' visits at the factory
2. A total risk assessment is then performed based on the weighted parameters mentioned, as well as other criteria related to the product's standard and quality, production capacity and production quality control, price, etc.
3. To systematize the risk assessment, an Orkla Responsible Sourcing risk matrix has been established in which the forementioned parameters are graded and evaluated. In addition, PRG's internal checklists, SEDEX or BSCI systems are used for SAQ, verification of relevant certificates, meetings and / or own visits with the supplier.
4. The product team does regular follow ups on producing factories and CSR is always part of the agenda at supplier visits or meetings.

b. All areas have been covered in this report.

c. External stakeholder dialogue included our suppliers, our customer and consumers, and internal stakeholder dialogue include our Centre of Excellence Sustainability in Orkla ASA as well as our Board of Directors.

d. We work with a narrow supplier portfolio and a narrow list of raw material, together with systematic work over many years, we believe we have good enough overview to prioritize correctly.

Sources of information we use for mapping risk per country / sector:

Ethical trade Norway's risk assessment tool

Sustainable Sourcing Map (risk analysis published by MCL Global)

Maplecroft risk index

Country reports on Human rights practices

Country Information ILO.org

The Ministry of Foreign Affairs' country notes on community response

Business and Human rights

Transparency international - corruption index

Information and resources from Ethical trade Norway

Other publicly available information and own / others' experiences

Reports from Amnesty International and other public reports within textile industry challenges like RISE: mistra future fashion, McKinsey and other

NF&TA

Local representatives in the respective countries

3rd party social audits at the suppliers

ADDITIONAL SEVERE IMPACTS

2.A.3 Describe other risks of negative impacts on people, animals, society and the environment that were identified but not prioritized, and how these have been handled.

Based on the 2025 risk analysis, we identified several risks but did not prioritize them for the following reasons:

Tights

Risks: Price pressure on raw materials, availability of raw materials.

Reason for Not Prioritizing: PRG is already working closely with suppliers and exploring alternative yarns to address these issues.

Wool Underwear and Garments:

Risks: Overtime at factories, low participation in social security schemes, volatile wool prices, animal welfare of sheep, traceability of wool to farm level, standard of production facilities in communal farming.

Reason for Not Prioritizing: PRG sources 100% of its wool from South Africa. There is no standard to track wool after sales to the exporter in South Africa.

Cotton Socks:

Risks: Work related to linking of socks, human rights issues in cotton production (particularly in Gujarat with child and bonded labor/sharecropping), water and pesticide use.

Reason for Not Prioritizing: PRG does not use handlinking and sources only cotton that sets strict criteria for production and human rights issues. BCI has requirements for sharecropping practices.

Wool Socks:

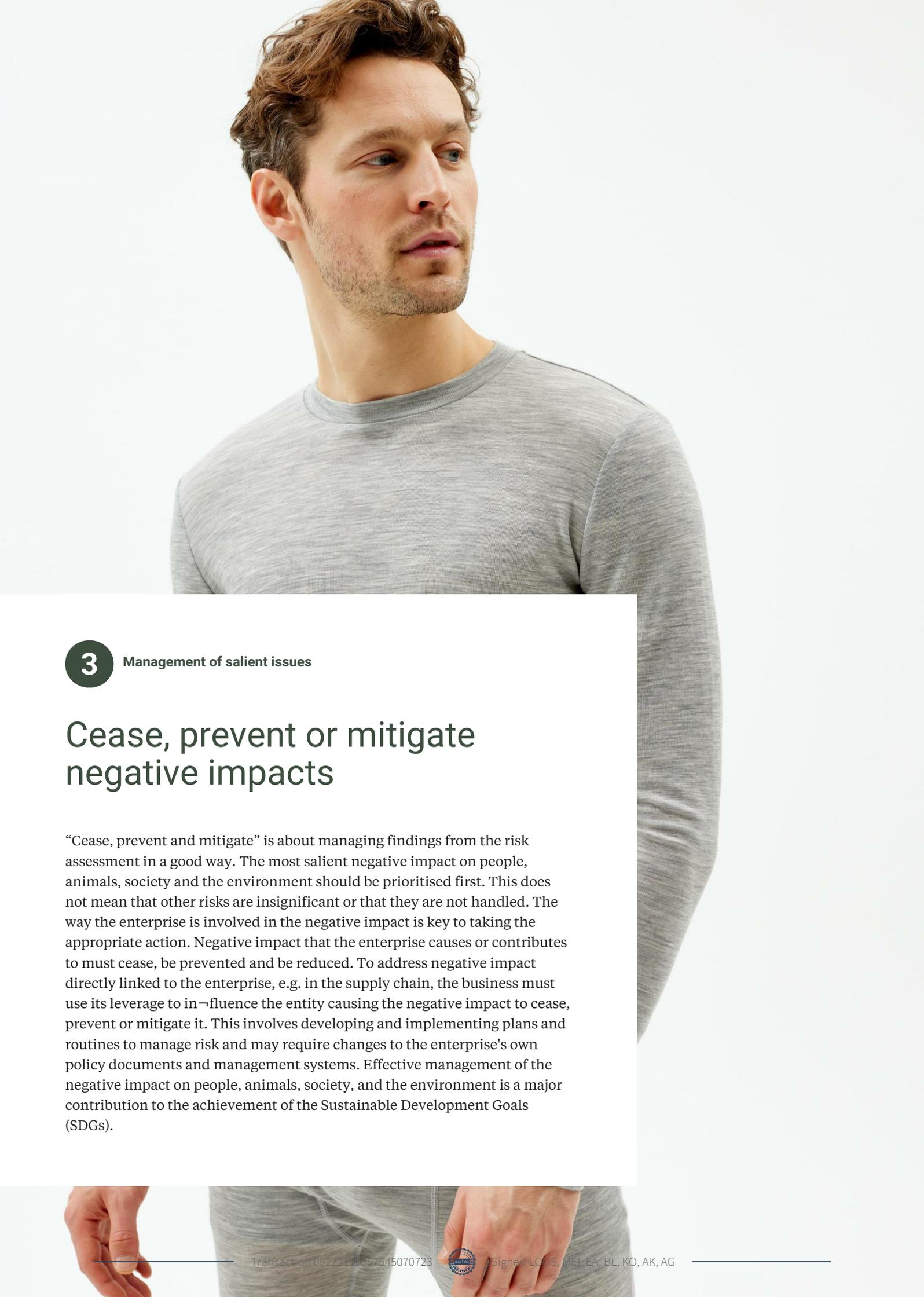
Risks: Work related to linking of socks, volatile wool prices, animal welfare of sheep, traceability of wool to farm level, overtime at factories, low participation in social security schemes, standard of production facilities in communal farming.

Reason for Not Prioritizing: Wool production issues are covered under the segment of wool underwear and garments, so no additional prioritization is needed for wool socks specifically.

It may seem contradictory for a clothing brand to ask consumers to buy fewer clothes, but we believe this is a necessary step to change the way we as a society make and use clothing. On our part, we have narrowed our focus to quality materials, finding the perfect fit, and designing for versatility and timelessness. We focus on producing clothing that is hard to or cannot be bought second-hand, such as underwear, a product everyone needs and cannot buy used.

As a concrete step to move away from over-consumption and overproduction, we have achieved our goal of having more running items in our portfolios. This will reduce complexity throughout the value chain, minimize stockpile issues related to dated items, and for the consumer – place less emphasis on short-lived fast fashion trends. We believe this will also help our suppliers plan ahead and reduce the amount of overtime and wastage from production. Fewer samples will need to be developed and shipped by air, reducing unnecessary pollution. We will continue to communicate our timelines to our suppliers and expand frequent ordering for more products.

These decisions reflect the company's strategic focus on addressing the most critical and impactful issues while leveraging existing initiatives and supplier relationships to manage other concerns. This approach ensures that PRG can effectively allocate resources and efforts to areas where they can make the most significant positive impact.



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 Describe goals and progress status for the measures you have implemented to reduce the enterprise's prioritized negative impact

	Overtime and low participation in social security scheme at garment factories, origin of cotton sourced in China (Xinjiang), forced labour of Uighur minorities.
Goal :	Mitigate risk of forced labour in cotton production.
Status :	PRG exclusively sources cotton through GOTS or BCI and has a strict policy against sourcing cotton from Xinjiang province. We have previously mapped the origins of our cotton to ensure compliance.
Goals in reporting year :	We will implement annual reporting on the sources of cotton from our suppliers and integrate this into our routines. This ensures adherence to our policy and emphasizes to our suppliers the importance we place on this issue.

Describe already implemented or planned measures :

We have not found any breaches of our policy banning the sourcing of cotton from Xinjiang province, nor any indications of forced labor in our supply chain. While we have previously mapped the origins of our cotton and imposed bans, we recognize the need to intensify our efforts. This issue remains a continuous challenge in China, where most of our cotton is sourced.

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

Annual reporting on the sources of cotton can significantly mitigate forced labor by enhancing transparency, as regular reporting ensures that the origins of cotton are clearly documented and accessible, making it harder for forced labor practices to go unnoticed. It strengthens accountability, as suppliers are aware that their sourcing practices are being monitored and reported, which encourages them to adhere to ethical standards. Continuous monitoring allows for the early detection of any deviations from ethical sourcing practices, enabling prompt corrective actions. Demonstrating a commitment to ethical sourcing through transparent reporting builds trust with consumers, stakeholders, and advocacy groups. Regular scrutiny and reporting can pressure suppliers to maintain high ethical standards, reducing the likelihood of forced labor in their operations.



	Risk of harmful substances in polyester, risk of human rights violations in oil production, utilizing non renewable material sources, microplastics release.
Goal :	Gain a deeper understanding of the environmental and health impacts of polyester production.
Status :	While we have conducted some research on this matter previously, we recognize the need to deepen our knowledge and understanding.
Goals in reporting year :	Research on harmful substances in polyester production; NO2 and antimony under GRS in particular, research on difference of harmful substances between polyester and polyamide, investigate test methods to identify release of microfiber from our underwear and tights.

Describe already implemented or planned measures :

We have been using GRS-certified materials for our microfiber underwear range and have not developed new items with virgin synthetic materials. We will conduct research on harmful substances in polyester production, focusing on NO2 and antimony under GRS standards. Additionally, we will investigate the differences in harmful substances between polyester and polyamide, and explore test methods to identify microfiber release from our underwear. Moving forward, our assortment strategy will place less emphasis on polyamide underwear.

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

By gaining more knowledge, we can make better decisions, as well as our assortment strategy will lead to a reduced use of synthetic materials in 2025.



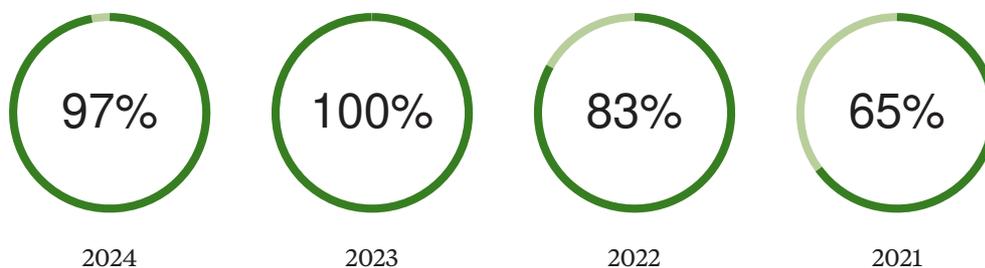
3.B Other actions related to management of negative impact

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

Reduce the use of energy, water, and chemicals in our supply chain by implementing environmental certifications and communicating with suppliers to address these issues. These standards set strict requirements for the use and handling of chemicals in production, as well as chemical residue in final products. Increase the share of eco-certified factories and use textile fibers with less environmental impact. Work towards achieving net zero by 2045, with baselines and goals set in 2024.

Indicator

Share of factories with eco or environmental certifications like ISO 14001, GOTS, Nordic Swan Ecolabel, OCS, GRS



Several of the factories have more than one certification. We were not able to verify one of our suppliers' eco certificates within timeframe, hence the number is 97%.

3.B.2 Reduction of greenhouse gas emissions

Most of our emissions come from sourcing and production, so our main efforts are focused on these areas. We ensure that a significant portion of our products meet stringent environmental standards throughout all stages of textile production, including fiber production, spinning, knitting, dyeing, and finishing.

We are working on eliminating all unnecessary packaging and avoiding the transportation of air. We are in dialogue with our freight forwarder to use more environmentally friendly carriers. Additionally, we are committed to designing for circularity and promoting care, repair, and reuse among our consumers. In 2024, we mapped our CO2 emissions and set targets for reductions.

3.B.3 Improvements in own purchasing practices

Pierre Robert Group considers responsible purchasing practices to be one of our most important tools for responsible business conduct. Pierre Robert Group uses our purchasing practices to strengthen, and not undermine, our suppliers' ability to deliver on our requirements related to people, society, and the environment. We strive towards lasting supplier relationships with suppliers who show a particular willingness and ability to create positive developments in the supply chain, we look at our suppliers as partners. PRG has upheld predictable purchasing practises over the past ten to fifteen years. This means that we communicate our schedule and timeline for placing orders. The leadtimes are set in collaboration with our suppliers, and are not pushed as a means of negotiation when placing orders. Our collections are made out of mostly running products, which helps our suppliers in their production planning.

PRG has a high focus on not asking for unnecessary samples and in many cases pay for samples where needed, e.g in case of small order quantities or expensive products.

Indicator

Converted from plastic consumer packaging to paper packaging for Pierre Robert products.



We are still dependent on plastic bags to a certain degree to protect goods during transport. We have by 2021 converted from virgin plastic to recycled plastic for this purpose in the majority of polybags.

3.B.4 Choice of products and certifications

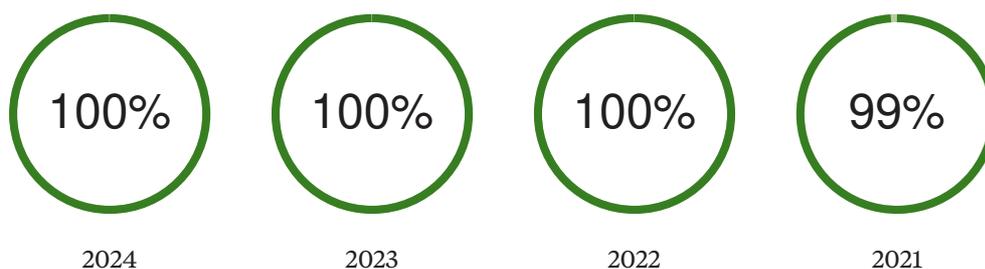
We are dedicated to reducing our environmental impact through thoughtful decision-making and sustainable practices. We adhere to a circular design guide, which emphasizes designing products with their entire lifecycle in mind. This approach encourages the use of sustainable materials, promotes durability, and facilitates recycling and reuse. By designing for circularity, we aim to extend the life of our products and reduce waste.

In addition to broader strategies such as choosing more sustainable materials like Better Cotton and GRS, we focus on the smaller details that can make a significant difference. For example, we have eliminated unnecessary components like plastic pins used to hold socks together. By removing these non-essential items, we reduce plastic waste and simplify our packaging, making it more environmentally friendly.

Overall, our efforts to choose environmentally certified factories, use green electricity for our warehouse, implement circular design principles, and adopt more sustainable materials reflect our dedication to sustainability. We believe that every choice we make, no matter how small, contributes to a healthier planet and a more sustainable future.

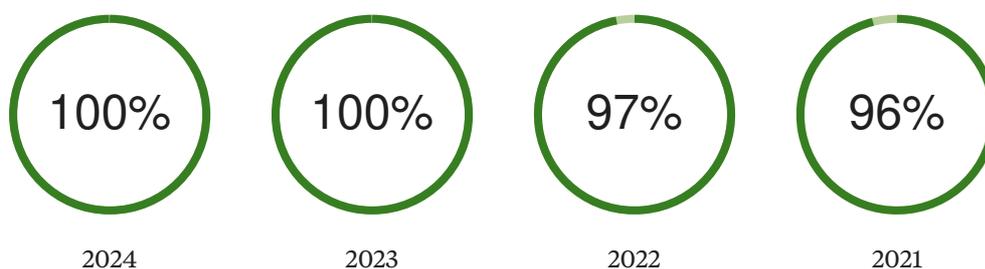
Indicator

Share of merino wool garments with Nordic Swan Ecolabel certification



These numbers are based on garments and do not include socks or tights that contain wool.

Share of cotton products with certified organic cotton or BCI



Share of packaging made from sustainable material FSC or FSC mix paper.



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

Pierre Robert Group supports the right to freedom of association and other forms of democratically elected worker representation. We shall involve worker representatives and other relevant stakeholders in our work with responsible business conduct.

Workers, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively. Workers' representatives shall not be discriminated and shall have access to carrying out their function of representation in the workplace.

Where the right to freedom of association and collective bargaining is restricted under law, the employer shall facilitate, and not hinder, the development of parallel means for independent and free association and bargaining.

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

PRG employees participate in courses on responsible business practices. Our product managers, who source and purchase our products, are highly skilled in ethical sourcing and have been with PRG for many years.

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

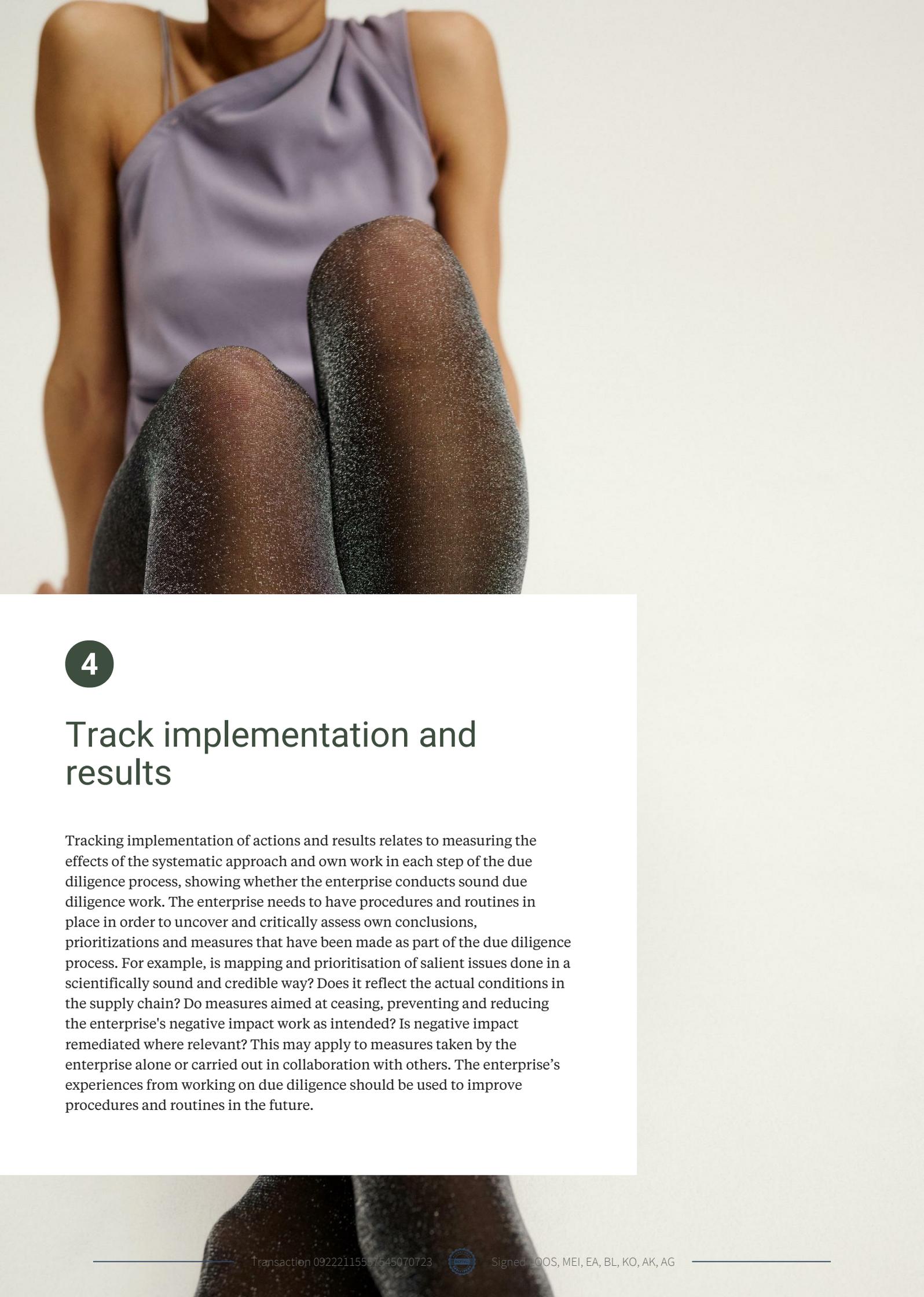
All PRG employees have received internal anti-corruption training, and key persons have received training from ETN.

As a part of Orkla we follow Orkla's Code of Conduct.

<https://www.orkla.com/wp-content/uploads/sites/3/2024/02/Orkla-Code-of-Conduct-Feb-23.pdf>

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

In 2024 we updated our Animal Welfare Policy and our Policy for Responsible Business Conduct.



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 a) assignment of responsibility for tracking the effect and result of implemented measures, as well as how the tracking is carried out in practice, b) who is responsible for evaluating the enterprise's implementation and work with due diligence, and how the evaluation is carried out in practice.

Activities and performance with respect to our due diligence activities in the supply chain are tracked on a regular basis by the product team and our resources in the local office in Shanghai. Data and information on each factory related to human rights, workers' rights and environmental issues are collected and reviewed. In addition, certifications have strict requirements and positive effects on working conditions and workers' rights.

Suppliers are evaluated annually based on the most important criteria: CSR performance, quality assurance performance, sustainability performance, production and delivery performance, communication skills and environmental certifications.

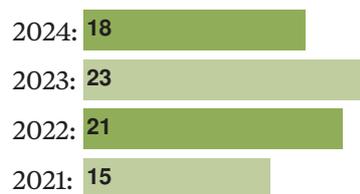
PRG is in dialogue with suppliers and factories on how the production has an impact on people and the environment. This is always a topic in supplier meetings and visits with the suppliers and factories.

We encourage suppliers and factories to improve any areas related to these topics. In social audits we encourage the factory to let the auditors perform interviews with the workers as part of the social audit.

The Director of Product Assortment oversees the ongoing due diligence process, ensuring consistent performance monitoring. This continuous evaluation of our practices is crucial for identifying and addressing risks swiftly. A formal assessment is conducted annually and reported directly to the leadergroup and Board of Directors, maintaining transparency and accountability within our operations.

Indicator

Number of suppliers monitored and assessed by own visits and third-party audits:



4.A.2 Describe how you track the effect, and/or demonstrate the probability of effect, of measures taken to reduce negative impact.

Collect information and dialogue with suppliers and stakeholders.

Sourcing coordinator in Shanghai is in close dialogue with the suppliers and textile industry in Asia.

Supplier visits.

Social Audits by 3rd party auditors.

Use indicators to measure the effects of our efforts.



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

PRG is in dialogue with suppliers and factories on how production has an impact on people and the environment. This is always a topic in meetings and visits with the suppliers and factories. We encourage suppliers and factories to improve any areas related to these topics. In social audits we encourage the factory to let the auditor perform interviews with the workers as part of the social audit.

We strive to be transparent with all stakeholders about our sustainability work, and aim to include important information on our website, POS, in social media, press contact and as of 2019 – also in our advertising. If an issue does arise, we will of course also use any means of direct contact to communicate with our stakeholders, and the form of messaging may differ – but because we have an openness policy, the content of our messaging will be the same, regardless of stakeholder.

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

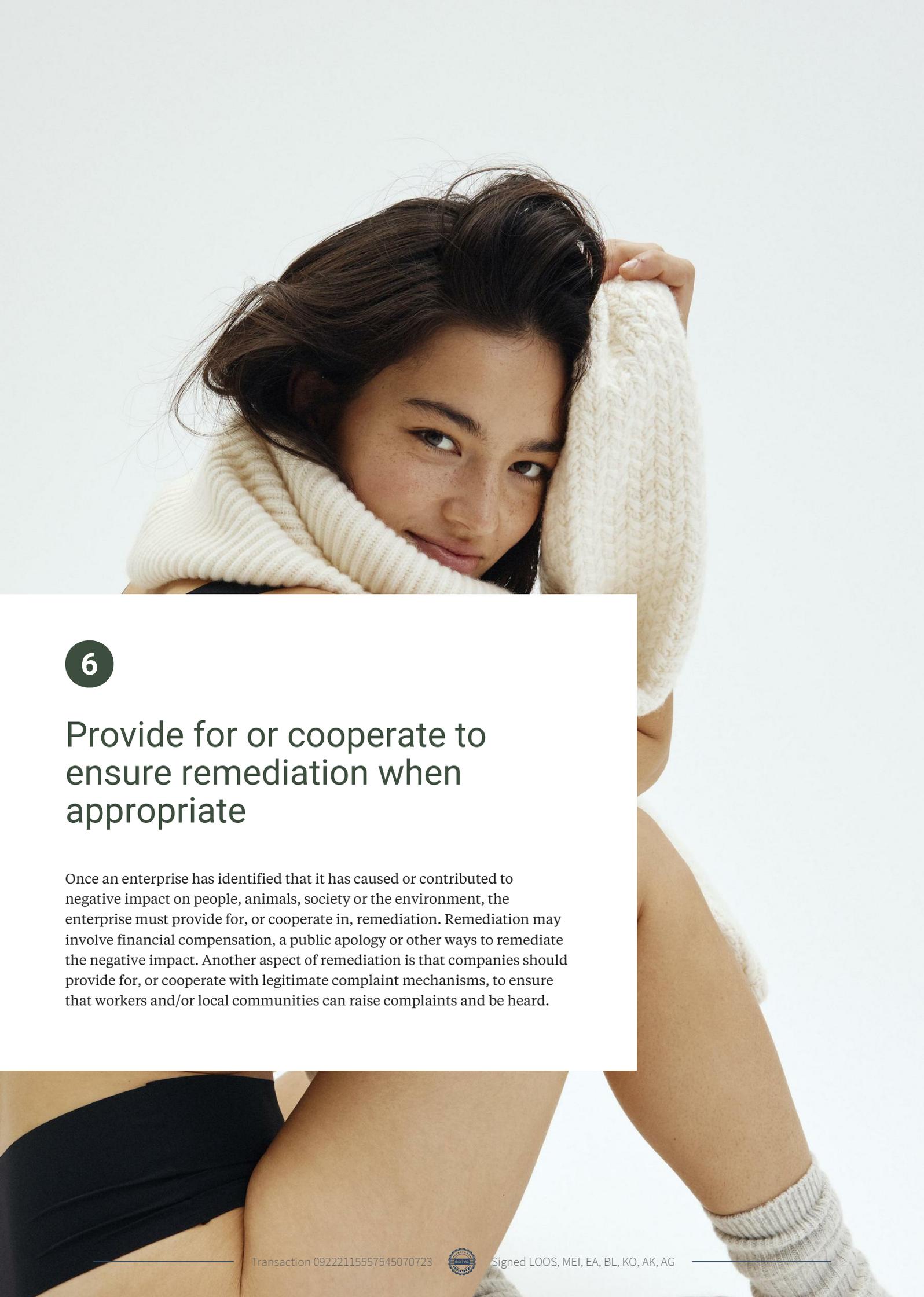
We provide information about our sustainability strategy, focus areas, challenges, choice of materials, factories and more on our website. All the products in our web shop are clearly marked with detailed sustainability information such as eco-labels, and we include sustainability information on our packaging.

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

Everyone who contacts PRG with questions regarding the Transparency Act, production or supplier list gets a reply within two working days. We inform them that we will get in touch regarding their specific inquiry and that until then they can find information about Transparency Act on our website:

https://www.pierrerober.no/no_NO/aapenhet/1-22-Transparency+law+Norway.html

Our customer service has received training in how to answer questions regarding the Transparency Act, our consumers can contact us at below mail adress:
nettbutikk@pierrerober.no and our customer service representatives will reply.



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 impact

Pierre Robert Group shall conduct due diligence for responsible business conduct. This involves; conducting risk assessments to identify potential negative impact on people, society, and the environment, and to stop, prevent and reduce such impact. The measures put in place are monitored and their effects evaluated. The measures are communicated to those affected by our actions. If our activities are found to cause or contribute to a 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

PRG has not had or been involved in any cases of remediation in 2024.

6.B. Ensure access to grievance mechanisms

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

Orkla encourages reporting on breaches, or possible breaches, of the Orkla Code of Conduct. The Whistleblowing policy is established to provide the organisation with a procedure on how to report, investigate and resolve breaches, or suspicion of breaches, of the Orkla Code of Conduct in a reliable, efficient, and confidential manner. The Whistleblowing policy is applicable for all Orkla group companies, as such Pierre Robert Group, and all leaders are responsible for making themselves acquaint with the content.

Orkla as an employer is responsible for handling whistleblowing cases in a safe and good manner for the reporting person, other implied individuals, and the business. Each company in the Group has a duty to inform about the possibility to blow the whistle, and to protect reporting persons against retaliation. A reporting person is protected against retaliation if (s)he had reasonable grounds for believing that the information provided was correct at the time of the notification and that such information was covered by the field of application, i.e., concerning breaches, or suspicion of breaches, of the Orkla Code of Conduct, in a work-related context. The central whistleblowing channel is available through here: <https://www.orkla.com/whistleblowing/> The central whistleblowing function in Orkla is administrated by the Internal Audit department in Orkla ASA, which reports functionally to the Orkla ASA Board of Directors' Audit Committee and is independent from the line organisation.

A "reporting person" could be any employees, consultants, trainees, work applicants, board members and shareholders actively working within the company and other people who are in corresponding work situations. Anyone in such a relation with Orkla has the right to report on malpractice in Orkla's business, either self experienced or conditions one has become aware of.

It is not required to have evidence for one's suspicion. A reporting person can select the most appropriate reporting channel for the circumstances of his/her case, without losing the protection against retaliation; this includes reporting to national or EU authorities or to the media.

Whistleblowing can be done openly or anonymously. Open whistleblowing is encouraged as this makes it easier to handle the case in an efficient and expedient manner. The whistleblowing function has the duty of confidentiality on the reporting person's identity and any third party mentioned in the reporting, as far as possible to resolve the case in a reliable manner. Established follow-up procedures prevent unauthorized employees' access to reports.

Acknowledgment of receipt of a report will be given within no more than 7 days. Feedback on progress on the case management will be provided when relevant for the specific case and at the latest within 3 months of the acknowledgement of receipt.

All documentation related to a case will be treated according to applicable rules for personal data and information security. Reports will not be kept on record longer than necessary and proportionate to the specific case.

Whistleblowing should be made at the lowest possible level, depending on the nature of the case. It is recommended to report internally, in the following order:

1. Immediate supervisor
2. The supervisor's leader, or a leader on the next level in the organisation
3. Relevant internal department (HR, HSE, Finance, etc.)
4. Employee representative
5. Chief executive officer in the company where you are employed
6. Chief executive officer in the Group
7. Orkla's whistleblowing channel: <https://report.whistleb.com/orkla>, administered by Internal Audit in Orkla ASA.

If in doubt on who to report to, or if response on a reported case is not properly provided, reporting should be made to the next level.

If one becomes aware of offences subject to “self-reporting duty” to local authorities, reporting should be made directly to Orkla’s whistleblowing channel.
Group Internal Audit can be approached regarding advice on whistleblowing.



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Pierre Robert Group AS

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