



Report on

Responsible Business Conduct 2021

for TRIMTEX SPORT AS

TRIMTEX



SUSTAINABLE DEVELOPMENT GOALS



To Readers Of The Report

Business has a major impact on people, society and the environment. It can make positive contributions to development but can also have negative impacts and cause harm. Companies therefore play a key role in achieving the UN's Sustainable Development Goals (SDGs). The Norwegian government expects all companies, regardless of size, to map, prevent, limit and communicate on how they handle risks for negative impact, as well as remediation mechanisms in cases of harm on people, societies or the environment. This is known as due diligence and applies to the private and public sector as well as organizations. As a consequence of the recently passed Transparency Act (åpenhetsloven), all larger corporations are obliged by law to conduct due diligence and show transparency in this work from 1 July 2022.

Members of Ethical Trade Norway have committed themselves to work with mandatory due diligence for responsible business practice. The foundation for this work is Ethical Trade Norway's Declaration of Principles (code of conduct) which covers the areas decent work, human rights, environment/climate, anti-corruption and animal welfare.

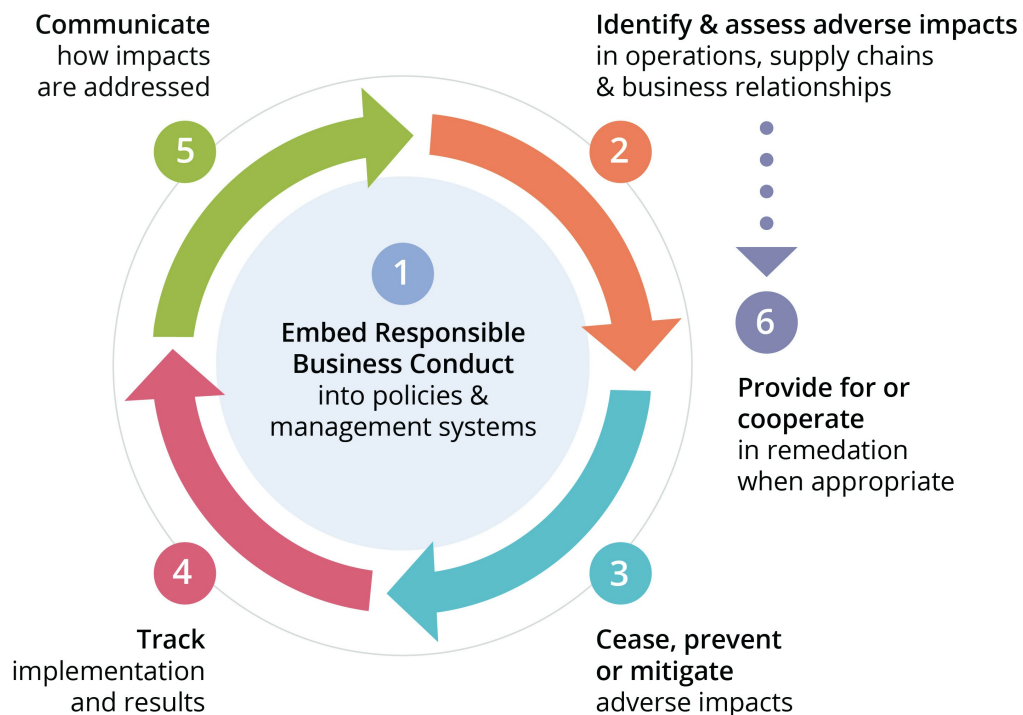
The reporting template is designed for the company to show transparency in their work on responsible and sustainable business practice, as described in the UN Guiding Principles (UNGP) and the OECD Guidelines for Multinational enterprises. The report should show how the company works with due diligence, and describe what challenges the company faces, which measures are being implemented to handle these challenges, as well as progress and results. All member reports are publicly available 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

Over the 45 years that Trimtex has been operational, 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 Policy for Sustainable Business Conduct 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

Company information and business context

Key company information

Company name

TRIMTEX SPORT AS

Head office address

Sekkebekksletta 8

Main brands, products and services offered by the company

Trimtex

Description of company 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 and Denmark) and one production company (Trimtex Baltic in Estonia). All companies are 100% owned by Trimtex Sport AS.

Turnover in reporting year (NOK)

134

Number of employees

26

Major changes to the company since last reporting period

No major changes the previous year.

Contact person for the report (name and title)

Hilde Hallandvik Pisani - Development and Design Manager

Email for contact person for the report

hilde@trimtex.no

Supply chain information

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

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 refer to as our "operational centre") handle 99,2 % 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 and Taiwan - but also some from China, Switzerland, 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.

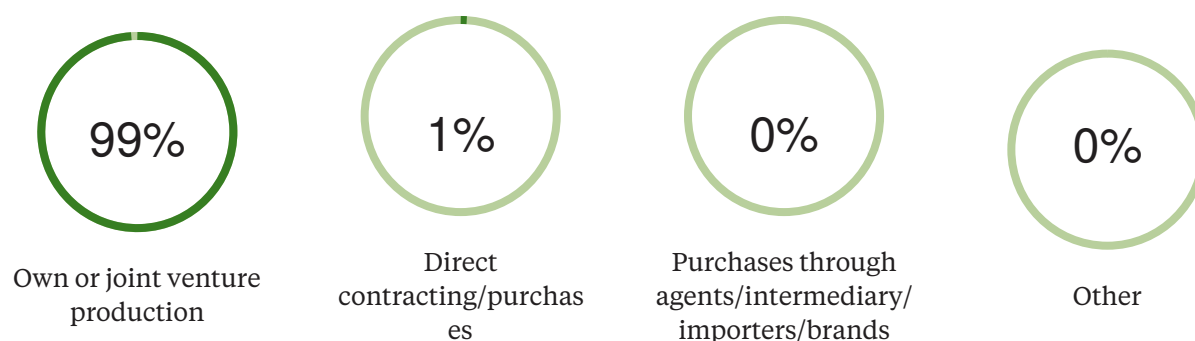
Number of suppliers with which the company had commercial relations in the reporting year

13

Comments

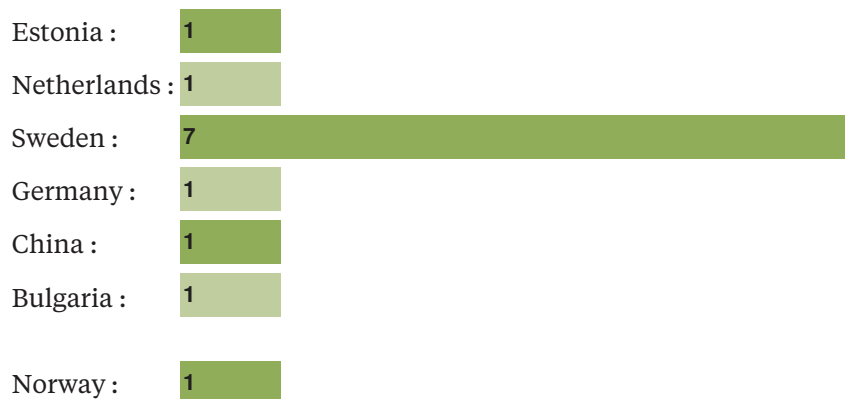
Trimtex Sport AS has had direct commercial relations to the above 13 suppliers (NB! suppliers that we purchased for less than 500Euro from in 2021 are not taken into account in this report). Suppliers to Trimtex Baltic are viewed as Tier 2 suppliers just

Approximate ratio by sourcing options



99,21% of our purchases are from our sister-company Trimtex Baltic OU in Estonia. We have also made a complete risk analysis over our tier 2 suppliers (Tier 1 for Trimtex Baltic OU) and sent out COC to all high risk suppliers at this level as well.

List of first tier suppliers (producers) by country



Apart from our 1 main supplier in Estonia (Trimtex Baltic), these suppliers are mostly finished products/sub brands. List is included in the document list.

State the number of workers at first tier producers that the company 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 (99,2% is produced here) and 2 in China (Down and base-layer mostly)

Key inputs/raw materials 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 colorfastness 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 company a supplier to the public sector?

Yes

Goals and progress

Goals and progress for the reporting year

1

Goal : All suppliers, both tier 1 and tier 2 will have signed our COC by 2021

Status : All our Tier 1 and 91% of all Tier 2 suppliers have signed our COC.

2

Goal : Increase of total ammount recycled fibres used in collection year-on-year. 100% recycled by 2030.

Status : We changed the way we measure the recycled level/ammount of recycled amterials used. In 2021 38% of the fabrics used were recycled (measured in meters).

3

Goal : All our products will be Bluesign certified by 2030

Status : We have started the discussions with Bluesign and have initiated a preliminary project inhouse to get complete overview over all materials used and where certification is needed. Also we are considering other cetrificates to make sure we chose the best suited for our business/products.

4

Goal : Complete overview over PFC coatings in our products. Initiating the facing out of C6 DWR coating. 100% PFC free by 2025.

Status : In 2021 we started a project with the intention of gaining deeper knowledge about all our materials. All our materials ar Oeko Tex 100 certified today, but we want more info in order to plan for even cleaner products.

5

Goal : Collect information on Energy use in our supply chain - are they using renewable energy or not. And also how much energy is used.

Status : We have started collection this info from our high risk suppliers. However we are still searching to find the best way to collect and in future measure our actual footprint.

Goal for coming years

1

Research the best way to measure/trace our product footprint

2

Certification. Continuing mapping the need and possibilities for certifying our products

3

Labour Rights in China. Follow up suppliers, post pandemic.

4

50% of the fabrics used for production is recycled

5

Reducing factory waste. In 2022 we will reduce packaging waste on supplied goods with new standard on packaging.

6

Update our sustainability page at our website



1

Governance and commitment to responsible business conduct

Embedding responsible business conduct means that the company should have strategies and plan, as well as relevant policies* and guidelines for 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 succeeding, and due diligence should be an integrated element in company operations. Clear expectations from senior management are crucial, as well as clearly assigned responsibilities within the company, for the implementation of the steps in the due diligence process. Those involved need to know how to proceed.

1.A Policy* for own business

1.A.1 Link to publicly available policy for own business

<https://trimtex.no/no/production/Production.html>

1.A.2 What does the company say publicly about its commitment to respect people, society and the environment?

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.

We also say a lot about our commitment and focus on our website:

<https://trimtex.no/no/sustainability/Sustainability.html>

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

Our policy is developed in cooperation with/ with guidenace from Ethical Trade Norway. The policy is approved by the board and is now publicaly 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 company, and why?

Our operational centre in Estonia Trimtex Baltic OU is ISO 9001, ISO 14001 and 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 do a more in-depth Risk analysis on our "high risk" suppliers every 2 years ca, 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 sustainability in-house: Hilde Pisani our Design and Development Manager.

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

Key people in the following departments; product department, purchasing dept. and development dept as well as CSR manager, our COO manager 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 CSR manager is both owner and Director of Product and Brand - he has a key role in the company with the power to make real changes. Our Design and Development Manager 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). Our purchasing / planning departments have tasks to evaluate the suppliers as well as assess deliveries for opportunities to improve. ex: packaging waste.

1.B.3 How does the company 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 seasonal basis so they can easily and with confidence forward and promote our policy and progress.

1.C. Plans and resources

1.C.1 How are the company's commitments to respect people, society and the environment rooted 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.

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

CSR manager reports to the board quarterly (4 times a year) on the status of our work with becoming more sustainable. 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 associates, such as suppliers

1.D.1 How does the company 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 criterias (see above) we decide which supplier to proceed with.

Link to our Code of Conduct:

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

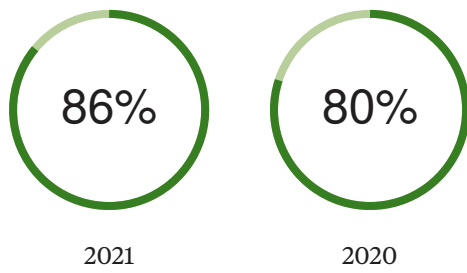
Indicator

Percentage of company Tier 1 suppliers that have signed the CoC.



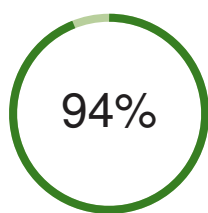
All our Tier 1 suppliers have complied with our CoC in 2020.

Percentage of Tier 2 FABRIC suppliers that have signed our CoC.



We have received signed CoC from 86% of all our tier 2 FABRIC suppliers. 12 out of 14 suppliers have signed.

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



17 out of 18 accessories suppliers have signed.

1.E Lessons learned and changes in the reporting period

1.E.1 What lessons has the company learned 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 2021 we have been affected by the Covid situation and not been able to travel at all. We have not been able to meet with any of our suppliers, face to face. However, we do have our sister company in Estonia who have daily dialogue with our main suppliers there still. We have mainly had our focus on the products, how can we make better products, replace virgin polyester with re-cycled polyester, reduce the packaging (especially from Asian suppliers) etc. We have also been working on finding the right partners to help us with reaching our goals. We have been in dialogue with several Certification companies (Bluesign, Vesta Consulting EDP, Bureau Veritas (ISO) and we are looking for an ideal organisation that we want to contribute to. We will continue the preparations for certification in 2022. In addition we are in dialogue with NF&TA, on some of their projects on circularity and waste management.

A man with a slight smile, wearing a white hairnet and a dark blue long-sleeved shirt, is looking towards the camera. He is in a factory or industrial setting, with blurred machinery and structures in the background. The lighting is soft, highlighting his face.

2

Defining the focus for reporting

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

“Identify and assess” is about identifying the company's risk for, and actual negative impact on, people, society and the environment, including in the supply chain and through business relations. As a first step the company should get an overall risk picture, before subsequently prioritising measures where the risk of negative impact is the greatest, i.e. salient issues. How the company is involved in the negative impact is central to determine the right actions to take. 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

STATEMENT ON SALIENT ISSUES

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 company's prioritised risk of negative impact on people, society and environment.

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

In addition to our own quality and communication analysis.

DETERMINATION OF SALIENT ISSUES

2.A.2 Describe in short the company's routines for mapping and identifying risk and show how the negative impact was identified and prioritised in this period. Describe how information was gathered, what sources were used, and which stakeholders have been involved/consulted. Further, describe 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.

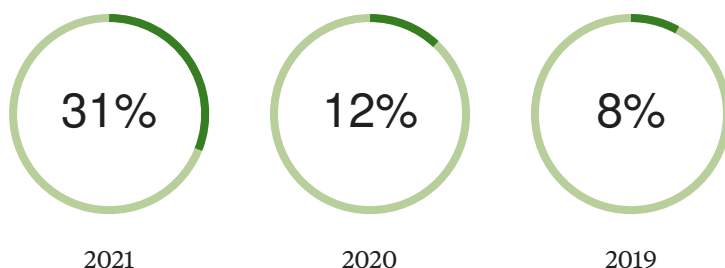
We are doing a yearly risk-check both through our ISO certifications (every November) done by Trimtex Baltic and our CEO Maiu Antsmaa, and in connection with our report to Ethical Trade Norway every February, done by Design and Development Manager (and responsible for reporting to ETN) Hilde Pisani.

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?).

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).

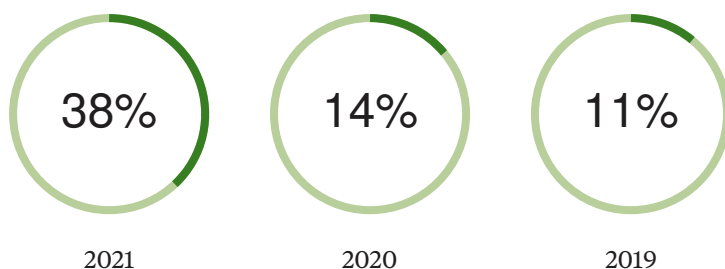
Indicator

Models in collection, recycled content \geq 50%



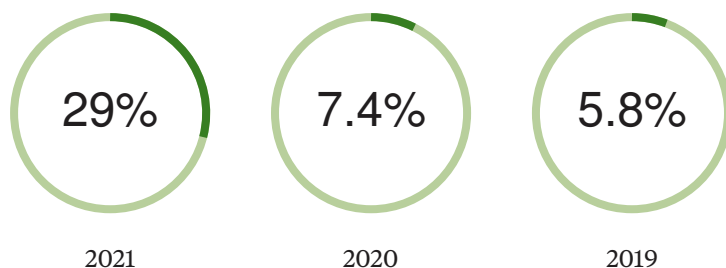
Our goal is to have all our garments contain recycled material within the year 2025, and to be 100% recycled by the year 2030.

Amount of recycled fabrics (articals) used in collection



We have increased the number of fabrics/articals in our collection to 38% of total. This is an increase from 2020 to 2021 of 63%.

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. We increased with 74,4% from 2021 level.

ADDITIONAL SEVERE IMPACTS

2.A.3 Describe any other severe impacts on people, society and the environment that were identified in the mapping of the business, 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 likely to occur in our supply chain than the ones mentioned above. Having said this, we will of course continue to keep these in mind when doing the yearly risk analysis of our supplychain.

In addition we are also looking at our supplychain when it comes to Energy consumption, water consumption and CO2. Our goal here is to determine our general footprint and also know where we should work to improve.

A woman in a blue surgical cap and gown, looking down, in a hospital setting. The background is blurred, showing other people in similar attire and bright overhead lights.

3

Management of salient issues

Cease, prevent or mitigate negative impacts

“Cease, prevent and mitigate” is about managing findings from the risk assessment in a good way. The most salient negative impact on people, 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 company is involved in the negative impact is key to taking the appropriate action. Negative impact that the company causes or contributes to must cease, be prevented and be reduced. To address negative impact directly linked to the company, 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 company's own policy documents and management systems. Effective management of the negative impact on people, 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 company's prioritized negative impact on people, 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
Objectives in reporting year :	Increase volume of recycled materials in collection as much as possible without reducing quality and durability. KPIs are determined and implemented.

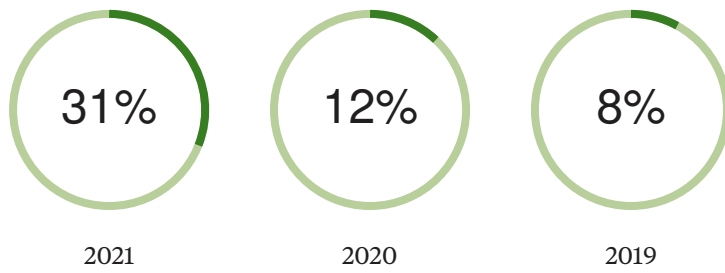
Actions :

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 only recycled material in 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 longlasting 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%. In 2021, 29% of all products produced were recycled (over 50% recycled fibres) compared with the year before (7,4%), this is an increase of 314%.

Indicator

Percentage of items with 50% or more recycled materials in collection



Of our total collection, 50% contain some recycled material.

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 91% of the tier 2 suppliers have received and are in agreement with our COC.
Objectives in reporting year :	Object for this year was that all tier 1 and tier 2 suppliers are in compliance with our CoC. Goal for this year is to meet with suppliers again and get better status from them.

Actions :

We have done a complete mapping of all our tier 1 and tier 2 suppliers and are close to having all sign our CoC. 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 tier 1 level, and most at tier 2 level.

We are aware, through previous audits, that there is a risk for excess overtime at our suppliers, we have made some adjustments to our timeline to try and give enough time for the development and production. We have also purchased a new PLM system in order to have a better overview over products as well as to make better and more complete Teck-Packs for our suppliers which help them to make better samples the first time around. More efficient.

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 :	Started
Objectives in reporting year :	Become 100% PFC free

Actions :

Changed to C0 (PFC free) on several products, on the rest of our products with DWR (Durable Water Repellency) treatment we currently use C6 (Short chained perfluorooctanoic acid). Within 2022 we aim to be 100% PFC free.

Salient issue	Supplychain pollution (Packaging/transport)
Goal :	Net zero / Carbon neutral
Status :	Started reducing
Objectives in reporting year :	In 2022 we will determine scope of project for measuring product footprint.

Actions :

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. We will also continue this work with our Asian suppliers - reducing packaging and waste.

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

Actions :

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 selfreliant on input/fibres for new products. This is a long term goal but we want to get started in 2022.

OTHER ACTIONS RELATED TO MANAGEMENT OF NEGATIVE IMPACTS

Describe cross-cutting actions to cease, prevent or mitigate negative impacts, including in your supply chain

3.B.1 Reduction of environmental and climate footprint

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, 58% are of Non-EU origin and 42% 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 packagings (plastic, card and paper as well as wooden pallets) are recycled - only contaminated packagings (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 of 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: Plastic was reduced with 42%, Cardboard and paper we reduced 72%, Cardboard coils - 45%, Contaminated packaging - 64%, Paint Waste - 10%, Production paper -9% and Textile waste - 20%.

For 2022 we are we will choose a certification for our products/ company that will help us to reduce our negative environmental impact further. Also we will find a collaborative partner or organisation working with reducing negative impact on the planet, that we will work with or support in the future.

3.B.2 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 practice 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 are hoping to give us and our suppliers more predictability and hopefully contribute to less strain on workers (working hours etc.). We became aware of the risk of overtime at supplier level through an Audit that we did at one of our suppliers.

3.B.3 Choice of product design and raw materials

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 technical, durable and also printable fabrics (polyester being the material that meets all these criteria in the best way). We are however, changing to re-cycled polyester - our goal is to be 100% re-cycled by year 2030. We are now in the process of evaluating different certifications at product level. Trimtex Baltic already have the ISO9001, ISO 14001 and ISO 45001 at company level.

3.B.4 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.

We have updated our COC where this is included. This has been sent to all suppliers tier 1 and most tier 2 suppliers. Close to all have complied. Also recent audits done show that workers rights are taken care of in accordance with our COC. While we have very good routines in our own facilities and good overview of our tier 1 suppliers, we have also made a risk analysis of all our tier 2 suppliers and got COC approved by all high risk suppliers also at tier 2 level.. 2021 was similar to 2020, a challenging year without any possibility for traveling or meeting any of our suppliers so we have therefore not been able to physically visit any of our high risk suppliers this year either. For 2022 we hope to be able to meet more of our suppliers face to face again.

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 and ISO 14001 certificate. All certificates were renewed in November 2021.

3.B.5 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 have learnt something on how to reduce plastic waste in packaging from suppliers this reporting hyear, and will consequently share this knowledge with all our suppliers and encourage them to do suggest the same for all customers.

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.6 Other relevant information concerning the company's work to cease, reduce and handle negative impact on people, society and 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, wearhouse 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 company conducts sound due diligence work. The company 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 company's negative impact work as intended? Is negative impact remediated where relevant? This may apply to measures taken by the company alone or carried out in collaboration with others. The company'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 assignment of responsibility for tracking the effect of measures implemented to cease/prevent/mitigate salient risks of negative impact on people, society and the environment, as well as how the tracking 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 as the ones indirect impact (Ex: Management, Sales).

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

But we are more people working with sustainable business conduct through tasks added to their departments. Development dept. searches for new material to replace virgin material all year round. They are also searching for new coatings and way to improve products in a sustainable way. Important for us is also to make as clear product request as possible to reduce resources used. 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. Our logistics dept takes care of the waste and make sure to reduce, reuse and recycle everything.

We have added KPIs to many 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 company 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. Currently we rate the communication with our suppliers as well as their financial details. 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.

A woman with dark hair tied back, wearing a light blue button-down shirt and a brown leather apron, is looking down at something out of frame. She is in a kitchen setting, with a gas stove visible in the foreground. The background is slightly blurred, showing kitchen shelves and equipment.

5

Communicate how 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. Companies should make relevant documents concerning due diligence publicly available, i.e. policies, codes of conduct, guidelines, processes and activities related to identifying and handling the company's actual and potential negative impacts on people, 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 company communicates with affected stakeholders when managing negative impact

Re-Cycled Polyester:

1. The general ammount of waste that the Apparell 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 pricing and we ask for realistic delivery dates. We also try to arrange meetings with our suppliers yearly (either at fairs or by visiting them). However, 2021 has not been good for meetings due to Covid-19 situation.

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 C0 (PFC free) coating to most of our garments - by end of 2022 we aim to be 100% PFC free.

2. We are in dialogue with our suppliers continously and work together with them to find alternative and better solutions.

5.A.2 Describe how the company communicates publicly about its own work on identifying and managing salient risks

We have a sustainability focus on our website: <https://trimtex.no/no/sustainability/Sustainability.html> - where we introduce and elaborate on what we do and what our goals are.

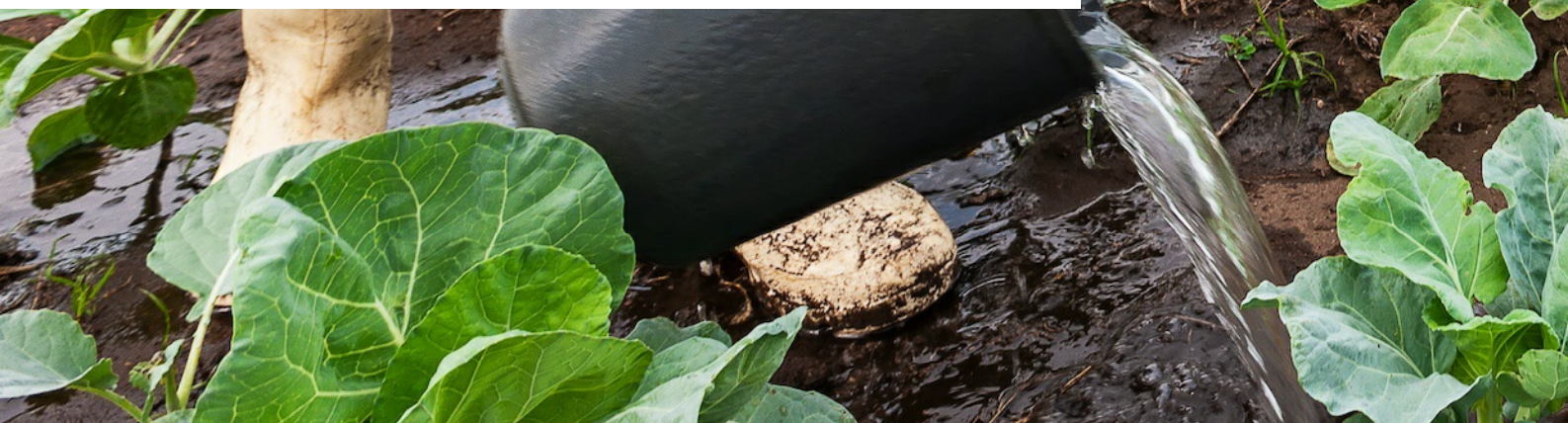
On this page we now have available our Policy for Sustainable Business Conduct and CoC. We have made a FAQ (frequently asked questions) on sustainability issues which is also here. In addition we have made our yearly report to Ethical Trade Norway available here. We also have monthly focus on sustainability in our marketing channels - as a minimum. In 2022 we are set to update our Sustainability page.



6

Provide for or cooperate to ensure remediation when appropriate

Once a company has identified that it has caused or contributed to negative impact on people, society or the environment, the company 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 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 company's policy for remediation of negative impacts on people, 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 redemiatioin in the reporting year.

6.B. Ensure access to grievance mechanisms mechanisms

6.B.1 Describe what the company does to ensure that workers and local communities have access to effective grievance mechanisms when this is appropriate

Through risk analysis done by using ETNs risk assessments tools/linkes. We are mostly focusing on our high risk suppliers to make sure that these are good. WE

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