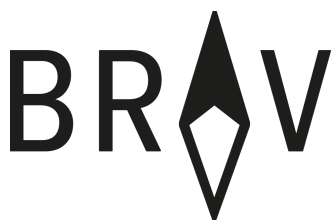




Report on

Responsible Business Conduct 2019

for BRAV Norway AS



SUSTAINABLE DEVELOPMENT GOALS



To Readers Of The Report

Business is key for the achievement of the Sustainable Development Goals (SDGs). A well-functioning and responsible business community contributes to sustainable development through job creation and innovative solutions to global challenges. However, business operations can also have a negative impact on people, the planet and the society. Members of Ethical Trade Norway have committed themselves to work with due diligence for a more sustainable business practice.

The basis of this work is Ethical Trade Norway's Declaration of Principles, which covers the decent work agenda, human rights, environment/climate, anti-corruption and animal welfare. Members are obliged to report annually on challenges they face and on measures carried out to address these. The reporting template is this year for the first time based on the OECD due diligence model. It is new for us and new for our members. It is this report you are currently holding in your hands. The report is publicly available on our website.

The template seeks to respond to the expectations concerning due diligence for responsible business conduct as described in the UN Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises. Ethical Trade Norway's report covers essential elements of the Global Report Initiative (GRI) reporting framework and can be used as a progress report for the Global Compact.

Heidi Furustøl

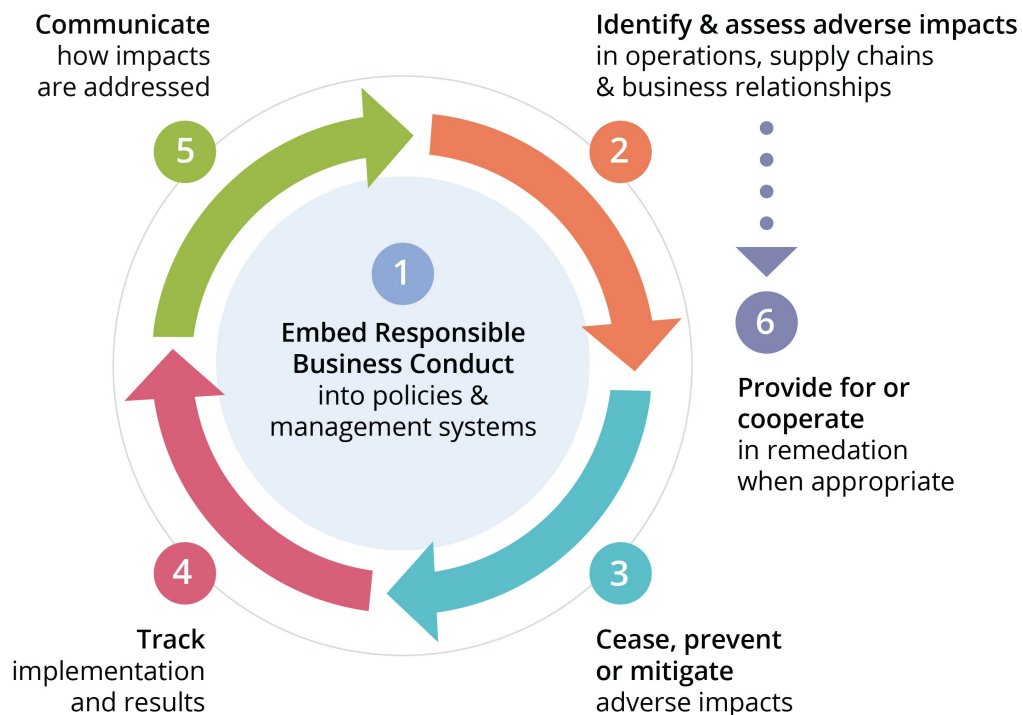
Executive Director

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

Brav develops, markets and sells the brands Swix, Ulvang, Toko, Lundhags, Brav Teamwear, Hard Rocx, Helsport and Skisporet in a total of 30 countries. Our vision is "turning dreams into memories" and our mission is "to improve our customers quality of life by providing innovative products and services, bringing together and developing talents, acting responsibly". Our cultural values "Teamwork", "Passion" and "Courage" reflect our fundamental beliefs and are the guiding principles that direct our behavior, and how we interact with each other and the world around us.

Corporate sustainability and responsible business conduct is essential for us. Our end users shall be able to use our products, knowing that they have been sourced and manufactured in a sustainable manner and under good working conditions. We are continuously improving all our processes.

Brav has been a member of the Ethical Trade Norway since 2007. By this membership we are committed to act responsible in all areas of our business.

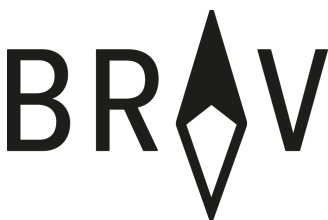
The work on responsible business conduct is centrally coordinated in the organization across all our brands and geographies. We had a sustainability kickoff in January 2020, with external and internal speakers. At the management group meetings, responsible business conduct is a common theme.

We have decided to make a four-year sustainability roadmap with clear measurable KPI's within workers rights, water consumption, carbon footprint and animal welfare. We will promote traceability and transparency throughout the value chain as tools to improve both environmental and working conditions, and to fight corruption.

The work on phasing out fluorinated ski wax continues at full speed. 70% of Swix and Toko ski wax products 2019 are fluoro free and Brav is one of the main driving forces in this research and development working towards a goal to be 100% fluoro free to consumer market by winter 2021/22.

In collaboration with the national ski federation and institute of health, we have launched safety guidelines and waste management rules for racing organizers. Swix have in addition actively supported the ban of fluorinated substances in ski wax. We work here with the interest organization "Tøffest uten Fluor" and the Norwegian Ski Federation, and supported the introduction of a fluoro ban in ski competitions with participants under 16 years.

Brav has been proactive in relation to restrictions on fluoro use in large mass competitions such as the Vasaloppet. We worked closely with FIS before, during and after the introduction of a total ban on fluoro in FIS competitions from the 20/21 season. The introduction of ski waxing guidelines has also been an important part of this work. Brav is the main industrial partner for the Nano2Glide project supported by the Research Council. Brav is also part of the Swedish Popfree project. Both projects are pioneers in research on sustainable alternatives to fluorinated materials in ski wax.



Espen Falck Engelstad
CEO

Company information and business context

Key company information

Company name

BRAV Norway AS

Head office address

P.O. Box 814, N-2626 Lillehammer, Norway. Tlf: (47) 61 22 21 00

Main brands, products and services offered by the company

Brav is a house of brands covering several international brands: Swix, Lundhags, Toko, Ulvang, Helsport, Hard Rocx, Skisporet and Original.

Description of company structure

Brav has offices and own companies in Norway, Sweden, Finland, Lithuania, Germany, Switzerland, Russia, Japan and the United States. In addition, our premium brands are distributed in more than 30 countries worldwide. We sell mainly through sporting goods chains and specialty retailers in the sporting goods industry, and directly to consumers through brand stores/outlets and e-commerce.

The majority of the goods we sell is sourced from vendors in Asia and Europe. In addition we own production facilities in Norway (ski wax and plastic parts), Lithuania (ski poles and roller skis) and Sweden (boots).

Brav has an operating model where each brand is given significant opportunities to develop its own unique identity and culture, but with strong common functions in areas where synergies can be realized.

Brav is 100% owned by Ferd Capital.

Turnover in reporting year (NOK)

1 229 194 238

Number of employees

330

Major changes to the company since last reporting period (mergers, acquisitions etc.)

None

Contact person for the report (name and title)

Hanne Haslum. Sourcing manager

Email for contact person for the report

h.haslum@brav.com

Supply chain information

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

Most of our finished goods and raw materials are sourced from external vendors in Asia and Europe. For the most part, we source directly from the vendors, but in some cases we buy our goods through agents or trading companies. Our brands and category product managers source materials and products suitable for their collections, whereas our supply chain organization is responsible for following up production, purchase orders and code of conduct through social audits. In most cases we are one of several customers sourcing from and producing in the same factory, using their capacity and skills. In addition to sourcing goods, we operate our own factories where we produce ski wax and plastic parts (Lillehammer, Norway), ski poles and roller skis (Ukmerge, Lithuania) and a boots/shoes (Järpen, Sweden).

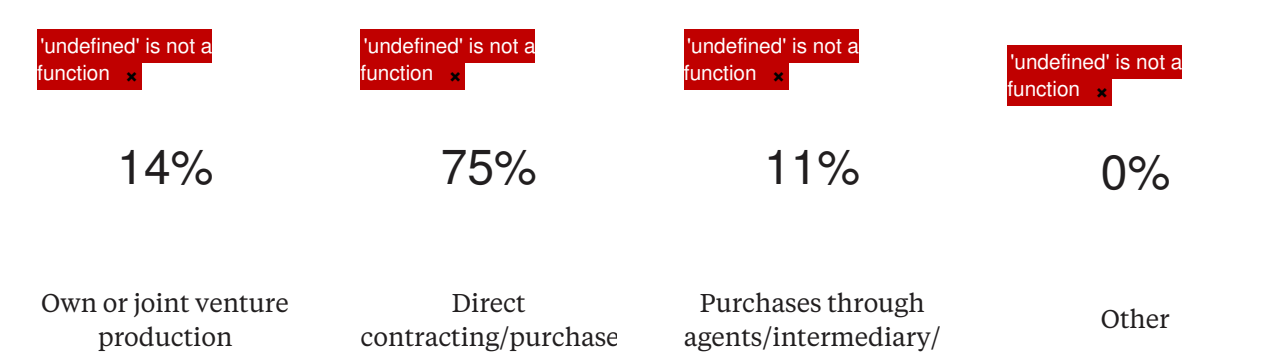
Number of suppliers with which the company had commercial relations in the reporting year

86

Comments to number of suppliers

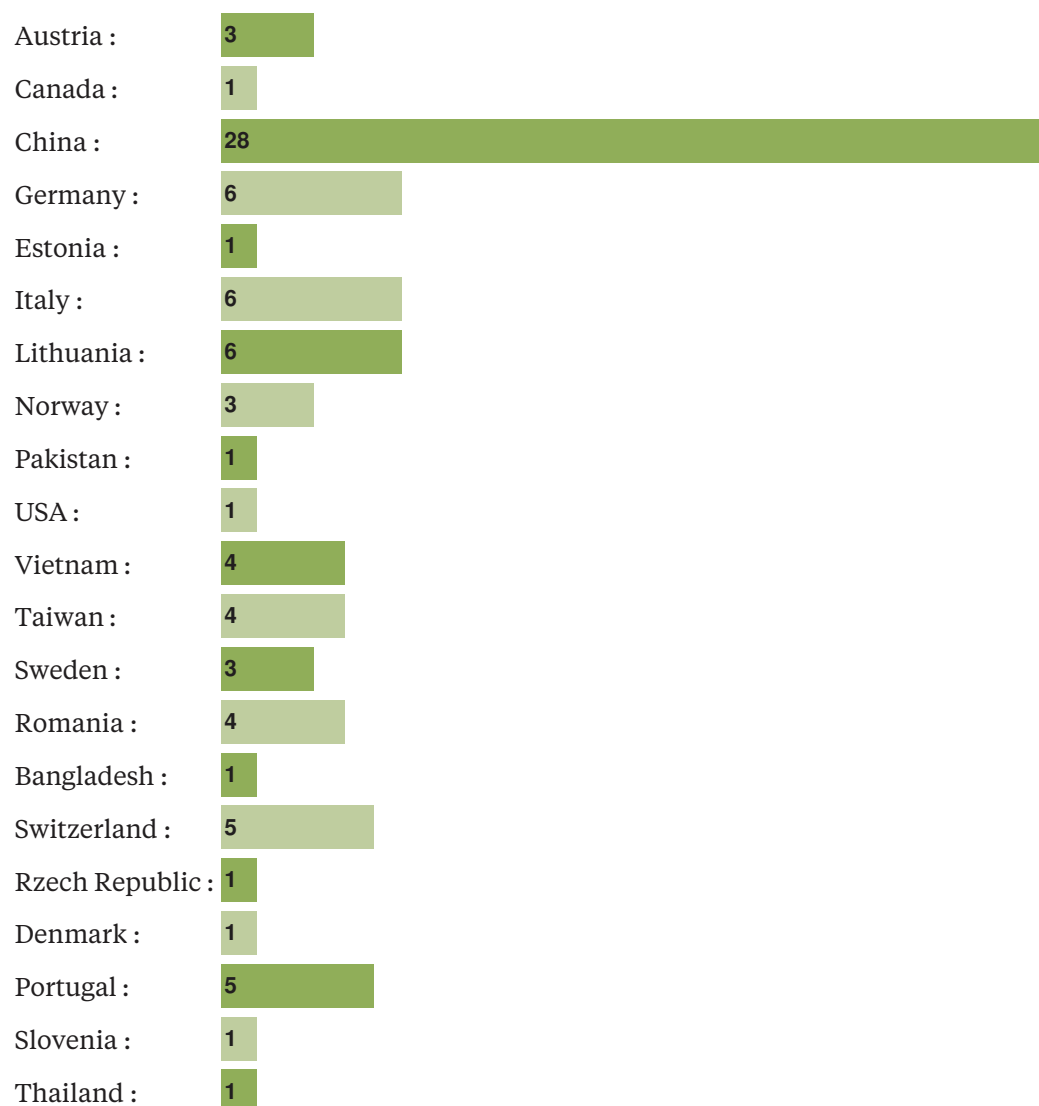
The number is based on external vendors for the whole Brav group. Both vendors for raw materials and finished goods are included.

Approximate ratio by sourcing options



We have included purchases from trading companies together with agents. The numbers are based on the same 86 vendors as explained above. In addition, we have added volume from own production at Lillehammer and in Lithuania on a comparable level.

List of first tier suppliers (producers) by country



Only external vendors with a buying volume of more than 500 thousand NOKs during 2019 are considered. We have also included raw material vendors for our fully owned production facilities in these numbers.

State the number of workers at first tier suppliers (producers) that the company has an overview of and the number of suppliers this overview is based on

Number of workers

3 048

Number of suppliers

16

Comments to number of workers

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

Key inputs/raw materials and associated geographies

Wool (merino and other)	Australia Spain Norway South America
Down (duck and goose)	China
Cotton (organic)	Turkey
Polyester (recycled and virgin)	China South Korea
Aluminium	China The European Union
Steel	Italy
Carbon fibre	China Japan
Paraffines	Germany South Africa
Leather	Germany
Plastic granulates	Norway
Tencel	China
Nylon (regenerated and virgin)	Japan Taiwan
Cork	Austria Portugal
EVA foam	China
Polyethylene (PE)	Germany France Romania
Polypropylene (PP)	Germany France Romania

Resin	The European Union
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Raw material input is based on an estimated largest consolidated value of purchase across brands.

Is the company a supplier to the public sector?

Yes

Goals and progress

Goals and progress for the reporting year

1

Goal : Eliminating fluorocarbons from our ski wax

* 70% of Swix and Toko ski wax products 2019 are fluoro free and Brav is one of the main driving forces in this research and development, working towards a goal to be 100% fluoro free by winter 2021/22.

* Swix and Toko has through the years been compliant with applicable ECHA REACH regulations, and are compliant with EU regulations effective as from 4/7 2020.

Status :

For fast glide in most, especially wet, ski conditions it has been challenging to find efficient and easy-to-apply sustainable replacements to fluorocarbons (similar challenge as finding alternatives to teflon water-repellent finish in cooking pans etc).

Brav has since 2013 worked intensively on identifying sustainable replacement materials with initiatives supported by Swedish and Norwegian research authorities (2013-2019 LowFriMat (SINTEF), 2017-2020 POPFREE (RI.SE), 2019-2021 GoGlobal (Vinnova) and 2019-2023 Nano2Glide (NTNU/SINTEF)).

For 2021 Swix and Toko are working towards a possible environmental-friendly Eco-label certified skiwax line and Care line.

2

Goal : Traceability and animal welfare certifications on down (RDS) and wool (RWS) in our products

* Our down is Responsible Down Standard (RDS). Work on the traceability started 2019 and will continue 2020 and onward.

* Our wool is both some Responsible Wool Standard (RWS) certified and some Deloitte non-mulesing certified. Work on the traceability started 2019 and will continue 2020 and onward.

Status :

* We are mapping and doublechecking the situation in these areas in our supply chain to have a clear overview where to further improve traceability and transparency on the sourcing of animal fibres.

* It is important to raise awareness and work to prevent the risk of corruption also in connection with certifications and audits.

3

Goal : Using environmental friendly alternatives where available and possible

Status :

This work is actively ongoing in all our brands on different levels. Also increased used of tencel in our products.

4

Goal : Improving the transparency in our supply chain, working more directly with the suppliers all the way to the raw material suppliers

Status :

This work has started and parts of our supply chain is transparent, will be focus the next years to work directly all the way to the raw material suppliers in all possible cases.

5

Goal : Decreasing our carbon footprint

Status : This work has started with LCA and the mapping our supply chain with the focus to decrease our carbon footprint. Focus the next years to decrease our carbon footprint by focus on improved production processes with less coal energy, less water consumption and less air traffic.

6

Goal : Repairs of old Brav products

Status : * Helsingørsk has repaired their products for generations and is truly a pioneer brand regarding repair and long lasting functional quality.
* It is a goal to us to continue and this good work and to implement where possible this good practice in also our other brands

7

Goal : Ethical trade capacity building internally in the company

Status : Started 2019, continuing 2020 and onward

8

Goal : Communicate knowledge about our work with ethical trade in day to day work

Status : Started January 2020.

9

Goal : Implement program for dilemma training regarding anti-corruption

Status : Started 2019, continuing 2020 and onward

10

Goal : Present our work on sustainability including ethical trade during our international sales meeting in October.

Status : This was completed during the first part of January this year during our sustainability kick-off.

11

Goal : Life Cycle Assessment (LCA) to map where in our valuechain it is most urgent to do changes.

Status : Achieved. Important to use the results to improve the right places.

12

Goal : Designing/developing and producing high quality long lasting functional products people need as an alternative to fast fashion/overconsumption society

Status : Continuing

Goal for coming years

1

Bring all countries and brands/categories up the wanted group standard. This involves to follow the decided annual process for sustainability, as well as to make local action plans for each brand/country. Secure implementation of the new operating model.

2

Prepare a risk analysis for each brand, each country as well as on the group level, performed by each brand. The result to be analyzed for making priority and follow up of actions.

3

Implement program for dilemma training locally regarding anti corruption.

4

Working towards a goal to be 100% fluoro free by winter 2021/22

5

Working to secure the chemicals in our products are produced safely and to no harm for people or planet.

6

For 2021 Swix and Toko is working towards a possible environmental-friendly Eco-label certified skiwax line and care line.

7

All down in our products to be Responsible Down Standard (RDS) and traceable to nominated duck farm and goose farm.

8

All wool in our products (all brands) to be Responsible Wool Standard (RWS) and traceable to nominated sheep farm.

9

Sustainable biodegradable alternatives to plastic wrapping.

10

Increasing our use of recycled materials where it is functional and not decreasing durability/product lifetime.

11

Focusing on decreasing production waste and working on reuse of leftover production fabric.

12

Reducing water consumption by choice of raw materials and dyeing/washing methods in the production line. Starting 2020 by mapping which of our suppliers have modern water-saving machinery/processes and which of our suppliers have old water-wasting machinery. Next step will be adding reduced/low water-consumption as a requirement for new suppliers, and working to have current suppliers with old water-wasting machinery updating to modern water-saving machinery and processes.

13

Focusing on renewable energy in the production line. Starting 2020 by mapping energy sources in our supply chain, exact which of our suppliers use renewable energy and which suppliers use fossile/coal energy and adding this in our Life Cycle Assessment. Next step will be adding renewable energy source as a requirement for new suppliers, and working to have current suppliers with coal energy updating their energy source to sustainable energy.

14

Working on environmental friendly and ethical transport solutions in our supply chain.

15

Continuing repair service, implementing it in all the brands, and communicating it to our customers.

16

Environmental Product Declaration (EPD) and sustainable focus on sourcing all materials in all our clothing, and sourcing for new developments to reduce Green House Gas (GHG) emission in the production line.

17

Mapping how many of our running orders can be placed in low season to avoid overtime and secure more even workflow. After mapping the current situation we will be able to set a clear KPI on amount of orders placed in low season.

18

Continue strengthening the competence internally in the organization for responsible business throughout all of our business activities.



1

Governance and commitment to responsible business conduct

Commitment to sustainability means that the business should have relevant policies and codes of conducts in place, as well as effective management systems for implementing them. Central to this is the company's work with due diligence. This means, among other things, the business need strategies and action plans for how the company identifies and manages its risk of negative impact on people, society and the environment, including through business relationships and in the supply chain. Systematic management of such risks will strengthen the company's contribution to the Sustainable Development Goals. Strong commitment from top-management, and clear division of the responsibility for conducting due diligence is key. Those involved need to know how to proceed. Sustainability should be an integral part of business operations. Essential to this is transparency on the company's commitments, challenges faced and measures undertaken to manage those challenges.

1.A Policy commitment

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

We are communicating our sustainability work and commitment on our website

<https://www.brav.com/se/sustainability/>. There we also have our supplier factory list.

As a supplier of sporting goods and equipment for outdoor use, we are committed to taking good care of our customers, securing a safe and healthy working environment for the people developing and producing our products, as well as having a minimal impact on the natural environment.

Brav is revising and updating its internal policy and will have it ready and implemented during 2020.

Brav supplier Code of Conduct describes what we expect from our suppliers and factories

<https://www.brav.com/en/sustainability/code-of-conduct/>. Brav also have an additional anti corruption policy.

1.A.2 How is the commitment/policy developed and how is it anchored in the company?

Brav company policy will be updated and public in 2020 after being presented to all departments and approved by the board.

1.B Organisation and internal communication

1.B.1 How is the work with responsible business conduct organised within the company and why in this particular way?

Supply chain is from 2020 organized as a separate strong central unit which works close with the brands and is in charge of the suppliers.

The responsibility for sustainable business conduct lies in the Supply Chain which is managed by the Supply Chain Director.

Sourcing Manager has the day-to-day responsibility for responsible business conduct in the company.

Brav ended up having this organizational structure to improve control of CSR in the supply chain, and to be able to act directly and efficient. By combining CSR in the Sourcing Manager role, we consider the three P's People, Planet and Profit when actively screening, implementing due diligence, selecting, approving and improving our suppliers, and when negotiating prices and quantities.

1.B.2 How are employees made aware of the ways in which responsible business conduct should inform their decisions and actions?

Job descriptions /contract, KPI and information meetings, company strategies. Informed in job advertisements and job interviews to ensure that those employed are aware of our values and our focus on sustainable operations.

1.B.3 How does the company make sure employees have adequate competencies to work towards implementing responsible business conduct?

Through internal information, courses and meetings.

We choose to lean on external expert competence like Ethical Trade Norway and RISEin training selected staff.

A new system to implement relevant training specified for relevant functions will be ready during 2020.

1.C. Plans and resources

1.C.1 How is the company's commitment to respect people, society and the environment rooted in strategies and action plans?

It is rooted through the 2020 goals which is in this report.

There is increased focus on raw materials to manage risk at the beginning of the value chain.

Strategy and action plans will be updated 2020.

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

Execution of implemented strategies is done through action plans.

Implemented action plans, status and progress on these are followed up in leadership meetings and status is annually reported to the Brav board of directors.

1.D Partnerships and collaboration with business associates, such as suppliers

1.D.1 How does the company make clear in its business relationships (in particular in the supply chain) the importance it places on responsible business conduct?

All suppliers must sign Brav Code of Conduct and Brav anti-corruption policy every year.
<https://www.brav.com/en/sustainability/code-of-conduct/>

Our suppliers are audited regularly to see to that working conditions and environmental criterias are followed.

Company representatives visit the factories frequently and price negotiations and our expectations our suppliers respect people, society and environment are discussed together.

If factories are not approved or there are issues which are not accepted, these issues are discussed at visits and meetings with the supplier or representatives/agents.

1.E Lessons learned and changes

1.E.1 What lessons has the company learned during the reporting period concerning sustainability, and what has changed as a result?

We have learned that most of our suppliers work more focused on sustainability and that many of our suppliers are on a high level qualitywise, and that it is easier to source sustainable alternatives.

On the other hand, we have learned we need to focus on raw materials to manage risk at the beginning of the value chain.

We are planning and working on a new working methodology with more thorough preparatory work, screening and due diligence per country considering working conditions, environment and risk for corruption.

We must in addition to high quality and precision demand from our suppliers increased renewable energy, lower water consumption, sustainable materials and living wages as a main criteria for approved suppliers, and work on their reporting system and transparency as priority. We will also focus on training of our existing suppliers where this is needed.

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 In the table below state the salient issues associated with the company's activities and business relationships, particularly in the supply chain and during the reporting period

Salient issue	Related topic	Geography
Workers safety, marginalized populations, child labor	Forced labour Child labour Discrimination Harsh and inhumane treatment Occupational Health and safety Marginalized populations	Bangladesh China Myanmar/ Burma Pakistan Turkey
Workers rights, freedom of association and collective bargaining	Freedom of association and collective bargaining	China Turkey
Working hours, use of overtime, decent wages in our supply chain	Wages Working hours Regular employment	Bangladesh China Pakistan Turkey
Chemical production control	Wages Working hours Regular employment Emission Waste Water Use of materials	Global
Anti-corruption	Corruption	Global
Animal welfare	Animal welfare	Australia China
Water scarcity/drought, water consumption in the supply chain	Emission Water Use of materials	Australia Bangladesh China Pakistan

Greenhouse Gas (GHG) emission, Carbon footprint	Emission Greenhouse gas emission	Global
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DETERMINATION OF SALIENT ISSUES

2.A.2 Describe how the salient issues were determined, in terms of processes and sources of information, including any input from stakeholders

* Workers safety: We are producing at many factories in different areas of the world with different both environmental, cultural and political landscape, and we need to focus on workers occupational health, safety and environment (HSE) as one of our most salient issues.

* Workers' rights and the right to collective bargaining is in our Code of Conduct which all our suppliers must read, sign and return every year. We discuss this with our suppliers by mail, meetings and at visits.

* Working hours and use of overtime is a constant issue in supply chain. This we can address by giving the suppliers forecasts to prepare, respect their leadtimes and to, when possible, place running/repeat orders in low season to keep the workflow more even. Living wages as a standard is necessary for any responsible business.

* Chemical production: To prevent negative impact on people, society and the environment, we need to go through which chemicals in our products comes from which raw supplier and doublecheck not only that the chemicals are approved, but that they are produced responsibly and stored and disposed safely.

* Anti-corruption work in our value chain is a focus to us. This is done by screening per country and area, by focusing on transparency throughout the entire value chain, and constant dialogue, cross-checking and following up. It is important to raise awareness and work to prevent the risk of corruption also in connection with certifications and audits.

* Animal welfare is of high priority to Brav. The animal fibres Goose and Duck down and Merino wool and other sheep wool are important qualities for the brands. Any animal fibre runs the risk of breach on animal welfare regulations. We are mapping how the situation is in these areas of our supply chain. To make sure we do our very best to buy responsible animal fibre, we have Responsible Down Standard (RDS) certified down and our merino wool is non-mulesing certified, both by Deloitte transaction certificates and by Responsible Wool Standard (RWS). These standards have a third party checking farms and cutting, to make sure the five freedoms are followed. We also have traceable wool in most of our wool products, and the goal is to have all our wool products traceable. It is important to raise awareness and work to prevent the risk of corruption also in connection with certifications and audits.

* Water scarcity/drought, water consumption in the supply chain and the choice of raw material and method of production has started to be addressed and will be more thoroughly addressed with KPI's from 2020 and onward, by going through our suppliers' production process, especially the wet processes, ensuring that where it is possible the suppliers use new machinery which use a fraction of the water amount which old machinery does, that their water cleaning plants are modern and in use.

* Reducing GHG emissions/reducing carbon footprint: We have conducted LCA, and are starting to get a better overview where to start the improvement. GHG and renewable energy will be more thoroughly addressed with KPI's from 2020 and onward.

ADDITIONAL SEVERE IMPACTS

2.A.3 Identify any severe impacts on people, society and the environment that occurred or were still being addressed during the reporting period, but which fall outside of the salient issues, and explain how they have been addressed.

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 in a way that contributes to a sustainable and responsible business conduct. The most severe negative impact on people, society and the environment should be prioritised first. This does not mean that other risks are less important or that they are not handled. The way the company is involved in the negative impact is central to taking the right action. Negative impact that the company causes or contributes to must cease, and the business must work to prevent and mitigate such risk. 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 adverse 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 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 SDGs.

3. A Cease, prevent or mitigate

3.A.1 For each salient issue in your supply chain, add a goal, status and describe specific actions and progress made in the reporting year

Salient issue	Workers safety, marginalized populations, child labor
Goal :	Safe working environment for all workers in our supply chain. No workers should be exploited or discriminated.
Status :	More thorough due diligence screening work started 2019
Objectives in reporting year :	All our suppliers must follow our Code of Conduct and international laws and regulations. We need to screen our supply chain get a systematic updated overview of possible risk areas and production processes.

Actions :

Due diligence mapping our supply chain with the goal to get a systematic and updated knowledge/overview of possible risk areas to better understand where to start further actions or investigations. This is also being checked at audits.

Salient issue	Workers rights, freedom of association and collective bargaining
Goal :	Workers in our supply chain should be allowed to collective bargaining and able to speak their opinion
Status :	We are addressing the issue with our suppliers
Objectives in reporting year :	All our supplies must sign our CoC. But starting the process to find out how the situation actually is for our workers in the supply chain

Actions :

We are mapping our supply chain for understanding practices for workers' rights (focus China). This is also being checked at audits.

Salient issue	Working hours, use of overtime, decent wages in our supply chain
Goal :	Workers in our supply chain should be paid fairly, and have decent working hours
Status :	We are addressing the issue with our suppliers
Objectives in reporting year :	Continuing the process of finding out how the situation is for our workers in our supply chain

Actions :

We are continuously working on mapping our supply chain for understanding practices for living wages, and use of overtime. This is also being checked at audits.

We communicate that living wages should be discussed when negotiating the product prices. We are working on responsible buying practices, and communicate our forecasts/production plans and deadlines through our supply chain as soon as they are ready. Running orders are placed in low season where possible.

Salient issue	Chemical production control
Goal :	Responsible chemical use, storage and waste
Status :	We are addressing the issue with our suppliers
Objectives in reporting year :	All suppliers including raw material suppliers must follow REACH and Brav restricted substances list. We need to map to see they follow responsible chemical use, storage and waste, with no harm to workers or environment

Actions :

Mapping our wet process producers (dyers, washers, raw material producers) to see they have functioning protection equipment, water cleaning systems and routines. This is also being checked at audits.

Salient issue	Anti-corruption
Goal :	Transparency in our supply chain (as opposed to opaque suppliers) as a tool to limit corruption
Status :	We are working to have our supply chain transparent
Objectives in reporting year :	Using transparency and knowledge in our supply chain to work against and limit corruption, and continue to nominating spinners, weavers and accessories suppliers we have direct communication with.

Actions :

Seeking advice at Transparency International and Ethical Trade Norway. Having direct communication with spinners, weavers and accessories suppliers to be able to check and negotiate prices and free to place orders with the most suitable supplier with the best environmental and social criteria and at the correct price. Doublechecking manufacturers CMT prices when we know the materials cost. Checking local news and stakeholders whether there are any cases or issues on the factories. It is important to raise awareness and work to prevent the risk of corruption also in connection with certifications and audits.

Salient issue	Animal welfare
Goal :	All animal fibre for Brav products should be sourced responsibly and traceable
Status :	Achieved Responsible Down Standard (RDS) down, achieved non-mulesing wool for all wool, and traceability for most of the wool. Certified Deloitte non-mulesing transaction certificate and Responsible Wool Standard (RWS)
Objectives in reporting year :	Animal welfare focus, certificate and traceability in all our down and wool products.

Actions :

Making sure all our down is Responsible Down Standard (RDS), and start the work to request traceability by balenumber to farms on our products. Analyzing how much of our wool is Responsible Wool Standard (RWS), and how much is Deloitte non-mulesing transaction certificate, and start the work to request traceability by balenumber to farms on our products. It is important to raise awareness and work to prevent the risk of corruption also in connection with certifications and audits.

Salient issue	Water scarcity/drought, water consumption in the supply chain
Goal :	To use production processes and raw materials which are water saving
Status :	Started addressing 2019
Objectives in reporting year :	Identifying areas and processes open for improvement when it comes to saving water.

Actions :

Mapping the supply chain, addressing areas, raw materials and processes which are open for improvement when it comes to saving water.

Salient issue	Greenhouse Gas (GHG) emission, Carbon footprint
Goal :	Measurable reducing our Greenhouse Gas (GHG) emissions/our Carbon footprint.
Status :	LCA achieved.
Objectives in reporting year :	Start mapping our Greenhouse Gas (GHG) emissions/our Carbon footprint by conducting a life cycle assessment (LCA) to address focus areas for measurable improvement.

Actions :

We have conducted a life cycle assessment (LCA), and are starting to get a better overview where to start improving. This will be a supplier KPI and that as many as possible of our suppliers use renewable energy

Other actions related to management of negative impact:

Describe general actions to cease, prevent or mitigate negative impacts, including in your supply chain

3.B.1 Reduction of environmental and climate footprint

Brav phases out fluorocarbons in ski wax production. Swix and Toko are both working towards a goal to be 100% fluoro free by winter 2021/22.

For fast glide in most, especially wet, ski conditions it has been challenging to find efficient and easy-to-apply sustainable replacements to fluorocarbons (similar challenge as finding alternatives to teflon water-repellent finish in cooking pans etc).

Brav has since 2013 worked intensively on identifying sustainable replacement materials with initiatives supported by Swedish and Norwegian research authorities (2013-2019 LowFriMat (SINTEF), 2017-2020 POPFREE (RI.SE), 2019-2021 GoGlobal (Vinnova) and 2019-2023 Nano2Glide (NTNU/SINTEF)).

For 2021 Swix and Toko are working towards a possible environmental-friendly Eco-label certified skiwax line and Care line.

3.B.2 Adapting own purchasing practices (sourcing)

We supply our textile suppliers with forecasts for preparing coming seasons.

We follow up deliveries and orders each week, based on information from our suppliers reported in a documents called WIP (work in progress) Status of each order is reported, and in case of any issues it is reported here for follow up by our QC and any other relevant parties.

We supply early buy orders so suppliers can use low season to produce for us.

We use a model internally called "FLYT" where stock of NOS goods are evaluated regularly, resulting in orders being placed regularly throughout the year to even out production and capacity.

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

We source for environmental friendly yet functional materials and alternatives, and plan for the majority of our products to have some form of certification to ensure the origin or quality of the product and make it recognizable and measureable. Example OEKO-TEX, Bluesign, Responsible Down Standard (RDS), Responsible Wool Standard (RWS), FSC certified bamboo and tencel, Global Recycled Standard (GSR) polyester, Econyl nylon.

We are constantly following up on and requesting for new developments of sustainable fabrics and processes through our suppliers, spinners, media, visits to fairs etc.

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.

3.B.5 Contribute to development, capacity building and training of suppliers and workers in the supply chain:

When visit/auditing suppliers we explain the importance to have a good work environment such as;

Good sanitary conditions

Free portable water

Good dormitories and canteen (If applicable)

Working facilities to be clean, free of dust, organized and be provide with good light, individual protections and necessary air conditioner.

Send reports to suppliers with problems identified.

Keep training/ follow up suppliers in each visit, and in case of eventual problems identified, apply for a social audit.

3.B.6 Other plans and measures taken to deal with salient issue



4

Track implementation and results

Tracking implementation of actions and results is key to the company's due diligence process. For example, is the identifying and prioritisation of salient issues done in a scientifically sound and credible way? Does it reflect real 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 actions taken by the company alone or carried out in collaboration with others. Companies must have procedures and systems to track their implementation and results in order to assess them. The company's experience with due diligence is used to improve processes and results in the future.

4.A Monitoring and assessment

4.A.1 Describe responsibilities and procedures within the company for tracking performance with respect to due diligence activities

Monitoring is carried out through data collection and reporting. Sourcing manager has the responsibility for due diligence activities, and collects and systemizes the information.

Responsible business conduct is measured independently from business criteria such as price and profit, and is part of the big picture when suppliers are being evaluated.

4.A.2 Describe how the company evaluates the effect of its own efforts, or those made by suppliers (and other business relations), to identify, prevent and mitigate salient issues

We continuously evaluate the effect of our own efforts and the efforts taken by suppliers and factories.

After audit the reports are being analyzed and any breaches are being addressed and followed up.

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

A woman with dark hair tied back, wearing a light blue button-down shirt and a brown leather apron, is looking down at a large, round, metal tray with several circular indentations. The background is a blurred kitchen or industrial setting.

5

Communicate how impacts are addressed

Relevant external communication on company due diligence for responsible business conduct needs to build on specific activities and results. This include external communication of policies and codes of conduct, or processes and activities related to identifying and managing the company's actual and potential negative impact on people, society and the environment. Communication should also include findings, effects and results of concrete actions or activities.

5.A External communication

5.A.1 Describe how the company communicates with affected stakeholders when managing its salient issues

Internally, the work on ethical trade is firmly rooted in the company. Topics are discussed at various meetings. January this year, we had a sustainability strategy kickoff with internal and external speakers.

Externally, our work on sustainable business practices and our membership in Ethical Trade Norway is communicated through various communication channels and to various stakeholders.

5.A.2 Describe how the company communicates publicly about its own work on identifying and management of salient issues

We are working for transparency and have started informing on our website
<https://www.brav.com/en/sustainability/?epslanguage=en>

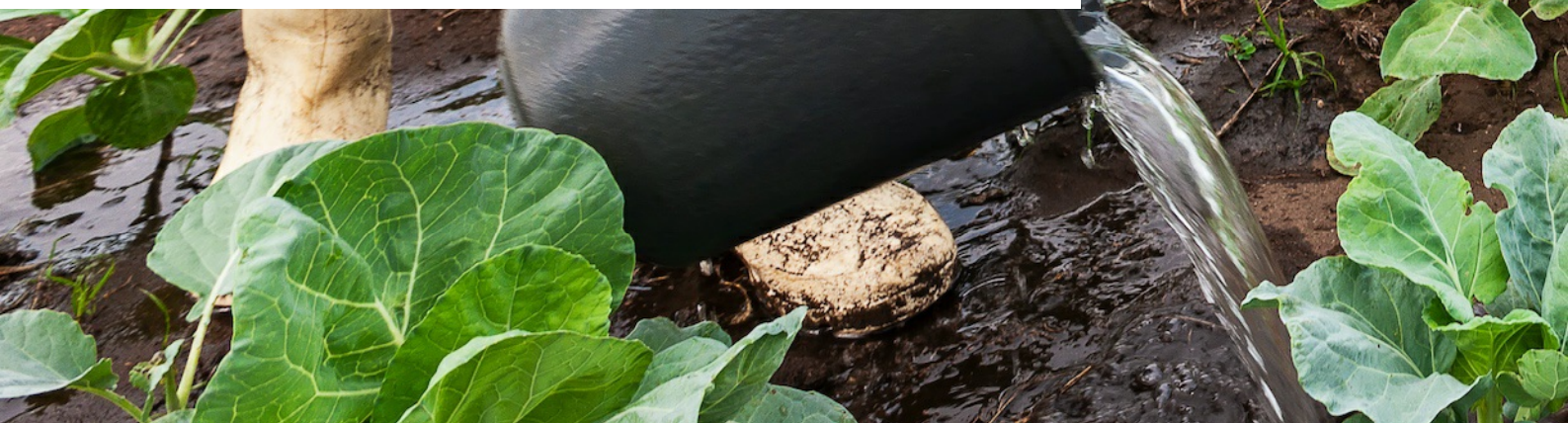
Our work on ethical trade is annually reported to Ethical Trade Norway, and the report is publicly available.



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 to ensure remediation. Remediation may involve financial compensation, a public apology or other ways to remediate the negative impact. When appropriate, companies should provide for or cooperate with legitimate remediation mechanisms through which impacted stakeholders and rights holders can raise complaints.



6.A Remediation

6.A.1 Describe the company's policy for remediation of negative impacts on people, society and the environment

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

We work actively with our suppliers and in the screening selection of our suppliers, to make improvements in our supply chain. This is in line with Ethical Trade Norway's Statement of Principles and our Code of Conduct/ethical guidelines for suppliers.

In the event of a violation of the ethical guidelines, we will work with our supplier and possibly intermediaries to create a plan for the recovery within a reasonable agreed time.

If, after several attempts, the supplier shows unwillingness to implement necessary improvements, we must consider the responsible termination of the supplier relationship.

6.A.2 Describe cases of remediation in reporting year, if relevant

In the end of the reporting year there was a case in the media about PFAS in production of Swix ski wax at our former Italian raw material supplier.

The raw material supplier Miteni S.p.A (originally RiMar Chimica owned by Marzotto group, then renamed Miteni by new owners Mitsubishi/Enichem and finally owned by WeylChem/ICIG group), has produced fluorochemicals since 1964 and was mainly producing fluorochemicals/herbicides for the agrochemical (herbicides) and pharmaceutical industries and also waterproof finishings for the textiles industry.

April 2018 a legal case was brought against Miteni by Public Prosecutor's Office in Vicenza for emission of PFOS and contaminating the drinking water in the Bergamo and Veneto regions over several years. November 2018 Miteni went bankrupt.

PFOA was not an ingredient in Swix fluoro skiwax. However, impurities in low concentration have been present in some products due to cross contamination or byproduct formation in the production process. 0,3%-0,5% of the Miteni production 1984-2018 was for Swix fluoro ski wax. Swix placed their last order 2018.

Due to the factory location being Europe and therefore committed to follow European regulations, this supplier has not by us been regarded as high risk. The work with this supplier started in the 1980's when there were not the same routines for screening thoroughly beforehand and it has only been visited and inspected normally, no unannounced visits or third party audits. We always demand all our manufacturers and factories follow applicable laws and regulations including REACH. ECHA REACH regulations entered into force 1. June 2007 with a transition period until about 2013.

There has been an increasing consciousness and scepticism regarding the environmental and medical side effects of the use of fluorocarbons, and the fluorocarbons resistance of degrading in nature. Our decision to phase out fluorocarbons in ski wax had already been decided and started 2013 with the research project LowFriMat (SINTEF). Brav have since then worked proactively and one of the main driving forces on the research and development of fluorocarbon free alternatives, both through the research projects POPFREE (RI.SE) and Nano2Glide (NTNU/SINTEF).

Apart from an occupational study presented for Swix in 2008, there were no signals on non-compliance issues from Miteni. In 2015, Miteni presented figures showing that the emissions from the site were according to the regulations from the authorities. Hence, at that point there were no reasons to raise any concerns from our side. News in Italian media about allegations concerning PFAS pollutions from Miteni did not reach Norwegian media or Swix. We have up till now had our main focus on human and environmental risk outside the EU. Retrospectively we clearly see we could have run better checks of this supplier during the years, especially after the occupational study 2008.

This has been a very difficult case and a wake-up call for improving our routines. We have discussed with, and sought advice at Ethical Trade Norway and followed their advice on how to handle this case and prevent similar cases. We follow the news of the Italian investigation and court case coming up. We choose to trust that the Italian judicial system will be able to carry out a fair trial and expect to see justice done.

From this case we have learned from now on screening and improving risk assessment per country including Europe, and implementing better routines for checking our entire supply chain including sub suppliers and raw material suppliers more thoroughly.

6.B Secure access to grievance mechanisms

6.B.1 Describe what the company does to ensure that workers and communities have access to effective remediation mechanisms, when appropriate:

Internally, we have good procedures for dealing with complaints, both for the corporate and consumer markets through help.

Our employees are represented by union representatives and safety representatives.

Should circumstances arise where Bravs business directly or indirectly is linked to negative impact or harm to people, society or the environment, we will do our best to contribute to remediation being done.

Contact details:

BRAV Norway AS
Hanne Haslum. Sourcing manager
h.haslum@brav.com