

# SUSTAINABLE GOALS





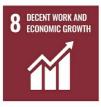
































# To Readers Of The Report

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.

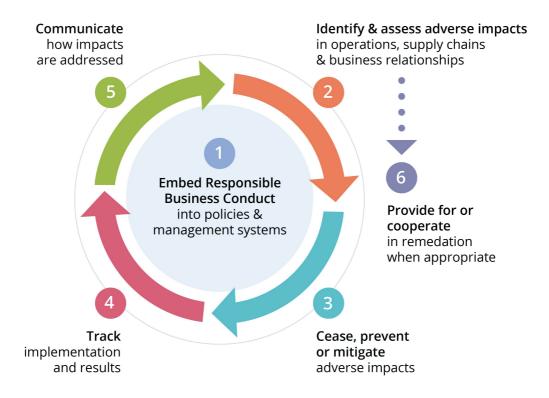
Heidi Furustøl

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

Over the 43 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 productional processes, it also keeps our carbon footprint low in terms of transportation. Trimtex has adapted and developed according to changes in the marked 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 emphasis 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

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 gouverning 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)** 157 **Number of employees** 130 Major changes to the company since last reporting period (mergers, acquisitions etc.) No major changes the previous year. Contact person for the report (name and title) Hilde Hallandvik Pisani - Product Developer and Brand Consultant 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

Need is established - Evaluate neccessity and potential of product - source supplier - RFI is sent out - supplier chosen based on established criterion - supplier package is sent - order is placed - production - QC (made based on risk evaluation) - goods are received - QC (based on risk evaluation) - QC repport is shared with supplier -Payment is done according to aggreement.

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

#### Comments to number of suppliers

Trimtex Sport AS has had direct commercial relations to the above 9 suppliers (NB! suppliers that we purchased for less than 500Euro from in 2019 are not taken into account in this report).

#### Approximate ratio by sourcing options

Own or joint venture production

2%

Direct contracting/purchase 0%

Purchases through agents/intermediary/ 0%

Other

98,2% of our purchases are form our sister-company Trimtex Baltic OU in Estonia. We have also started our work mapping and making risk analysis of all our tier 2 suppliers.

#### List of first tier suppliers (producers) by country

Estonia:

Norway:

Netherlands:

Italy: China:

1

Sweden:

1

Rzech Republic: 1

Bulgaria:

Our supplier in Estonia and our supplier in China make up the for 99,6% of our total purchase in 2019.

of suppliers this overview is based on **Number of workers** 1000 **Number of suppliers** 2 **Comments to number of workers** We only have an overview over 2 of these suppliers, however these two suppliers delivers between them 99,6% of the total ammount purchased by Trimtex Sport AS in 2019. Key inputs/raw materials and associated geographies East Asia **Polyester** South Europe Netherlands paper Switzerland ink East Asia spandex 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. Is the company a supplier to the public sector? Yes

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

## Goals and progress

## Goals and progress for the reporting year

Goal: Update COC in accordance with Ethical Trade Norway standard

Status: Completed

Goal: Complete overview over all TRIMTEX suppliers - tier 1

Status: Completed

Goal: Educate people in key positions on ethical trade.

Status: Started

Goal: Implement updated COC. Send out to all tier 1 suppliers.

Status: Started - deadline Q1 2020

Goal: Evaluate and update our sourcing and purchasing routines in 2020.

Status: Started - deadline Q3 2020

Goal: Make a preliminary Risk assessment of Tier 1 suppliers

Status: Completed

Goal: All products will contain recycled materials by 2025

Status: Started

Goal: Invest in systems for better control over product and timeline (PLM)

Status: Started - deadline Q4 2020

Goal: Develop Trimtex Policy for Sustainable Business Conduct

Status: Completed

#### Goal for coming years



CoC is sent out to all Tier 2 suppliers by 2020.



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



All our products will be Bluesign certified by 2030



New system for product development (Product Lifetime Management system) is implemented by 2020



Sourcing and purchasing routines are updated and implemented by 2020



Sesonal updates on Sustainability and ethical trade to all employees is implemented in 2020



Developing and implementing Trimtex Sustainability Strategy 2025 - Q2 2020



Implement KPIs for measurig and tracking actions above in 2020.



## 1.A Policy commitment

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

Our policy is developed in cooperation with/guidenace from Ethical Trade Norway. The policy is approved by the board and ready for implementation - however not yet public.

## 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?

The company is now finalizing the mapping (initial fase) process. We have organized the work with sustainable business conduct by firsly establishing a "Trimtex sustainability group" consisting of CEO (owner), Head of Product and Brand (Owner) and Product Developer. Head of Product and Brand (owner) is made responsible for CSR work, and Product developer is made responsible for daily activities. The group have developed and defined the guiding principles for how Trimtex Sport AS will conduct business (Policy and Code of Conducts). Also governing routines have been evaluated and the groundwork is made to adapt new systems and routines in key departments. Fase two of this is to implement/communicate tasks and responsebilities to relevant positions within the company to ensure that our goals will be reached.

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

As stated in 1.B.1 - we are currently working on the implementation of fase two. Key people in charge ("Trimtex sustainability group") are aware of their responsibilities. These are determined and communicated in meetings with clear agenda and deadlines for progress. The group have monthly meetings.

## 1.B.3 How does the company make sure employees have adequate competencies to work towards implementing 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. Also, we will consider to send more people in relevant positions to tutorials/workshops at Etisk Handel Norge when the responsibilities are definitely decided and communicated (see 1.B.1). For 2020 we will also implement regular seasonal updates for all employees on sustainability - how we work and our progress here.

## 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?

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 in top 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 evalute the effect of these.

## 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?

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. We are now in the process of updating these forms to include all aspects of our updated code of conduct.

## 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 the topic of sustainability is ever evolving and changing. However, we have seen that this work is extremely beneficial in many ways. This year we have worked a lot with assessing our gouvening systems and determined the best way to attach this work to the existing structure. We have evaluated our processes and work flow and learned a lot about where we have room for improvement but also where we have good control. Next for us is to determine the best way to mesure and communicate our activities and involve all employees in the process.



# 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
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

#### **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

Based on resources from Ethiacl Trade and also through discussing with other stakeholders/suppliers/ audits, we determined our most salien risks.

We determined these on the basis of scale and and scope, the gravity of the risk in question and also reversability. Can it be fixed.

Our most salient risks:

- 1. Environment / because of to the quantity of non-degradable fabrics used and that that the waste of this affects all of us. A global challenge.
- 2. Labour rights / Due to some of our suppliers are situated in areas where labour rights are considered to be high-risk due to the country's laws (no protection fro workers rights). It is up to each supplier to uphold these standards.
- 3. PFC chemicals (Long-chained perfluorooctanoic acid- C8 and short-chained perfluorooctanoic acid- C6) often used in DWR (Durable Water repellency) / We know that DWR treatments have a negative effect the environment (especially local communities to producers) because of water-pollution. However it has a potentially severe effect on people working directly with the chemicals. Many of our products are made to be used outside and in tough Scandinavian conditions. In order to keep the quality and performance at a high level (long lifetime) we have DWR treatments on many of our fabrics today. However, we have changed to CO (PFC FREE treatment) on several products and C6 (Short-chained perfluorooctanoic acid) on the rest, we still need to continue the search for better and more sustainable options here.

#### 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.

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.



## 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	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 poccible without reducing quality and durability. KPIs will be determined to track our progress.

#### Actions:

On new product purchase we always source re-cycled materials. On exsisting 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 someting 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 are now determining KPIs to measure and check the progress and effect of the above actions. These will be implemented within 2020.

Salient issue	Labour rights in China
Goal:	Complete overview and make a risk assessment of Trimtex tier 1 suppliers.
Status :	CoC is sent to all High-risk suppliers at tier 1 level. Rest of the tier 1 suppliers will receive COC within year 2020.
Objectives in reporting year :	The objective was to get an overview of all our tier 1 suppliers and to prioritize sending COC based on salient issues.

## Actions:

We have done a complete mapping of all our tier 1 and also most of our tier 2 suppliers. Based on this mapping/ risk assessment, we established our most salient risks. We have sent out COC and got compliance from all high-risk suppliers at both tier 1 and tier 2 level. We will by 2021 have sent out COC and started the dialogue with ALL suppliers at both tier 1 and tier 2 level. We have made changes to our development timeline and purchasing routines in order to reduce the risk of overtime at supplier level.

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 :	Search for alternative treatments that will keep the same level of protective

## 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). One of our goals for 2020 is to search and test new and more sustainable alternatives for our C6 coatings.

## 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

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. 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 fro in the future. Due to our closeness to marked we transport most our products by road. Our target for transport is to have >1% sent by air by year 2025.

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

The approach to our own purchasing / sourcing is to review the neccessity of new supplier thorougly. If we can use exisitn 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.

#### 3.B.3 Choice of product design and of 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 criterias in the best way). We are however, changing gradually to re-cycled polyester - our goal is to be 100% re-cycled by year 2030.

## 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 in the high risk category (based on our risk analysis per country/area. 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 most of (close to all) our tier 2 suppliers. We will continue to work with these also in 2020. In Trimtex Baltic workers reps. play an active role for supporting the workers.

#### 3.B.5 Contribute to development, capacity building and training 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 to consider a diffeent approach.

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

Our focus has in 2019 been to get an overall picture of our impact on people and the environment. We have established a group consisting of CEO, Head of Product and Product developer. The topic of sustainable business conduct and environment has been raised up as one of our three main focus areas in our 2025 business strategy which has beenm approved by the board.



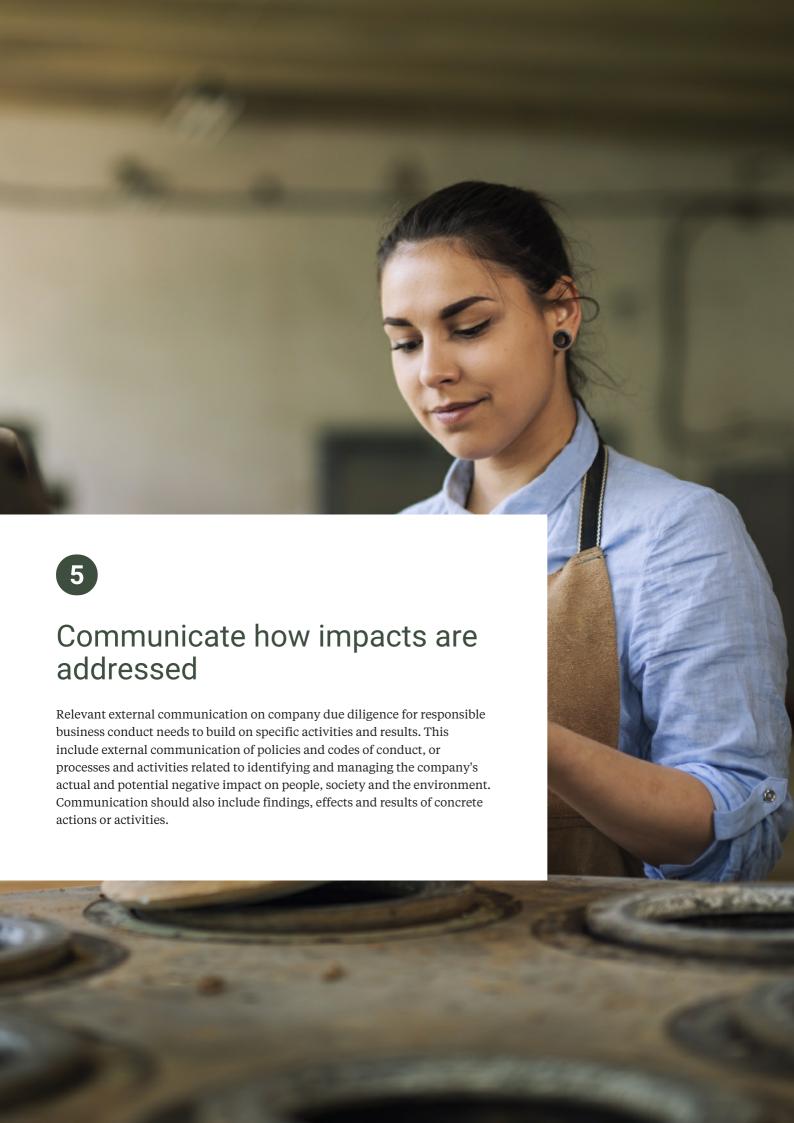
## 4.A Monitoring and assessment

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

Through analysis of internal processes we have determinded which roles / departments have the most effect on this work. We have added responsibilities here and are now in the process of implementing trackable indicators (KPIs) to evaluate these added aktivities.

## 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

Previously we have mostly looked at the quality of the garment ,which also is a good indicater to the general health of the supplier. Currently we rate the communication with our suppliers as well as their financial details. We yearly ask for updated /current certificates (ISO, Bluesign and Oeko-Tex etc..). Now we are developing a file where all information from suppliers are placed and where we can generate a total score per supplier based on their overall performance.



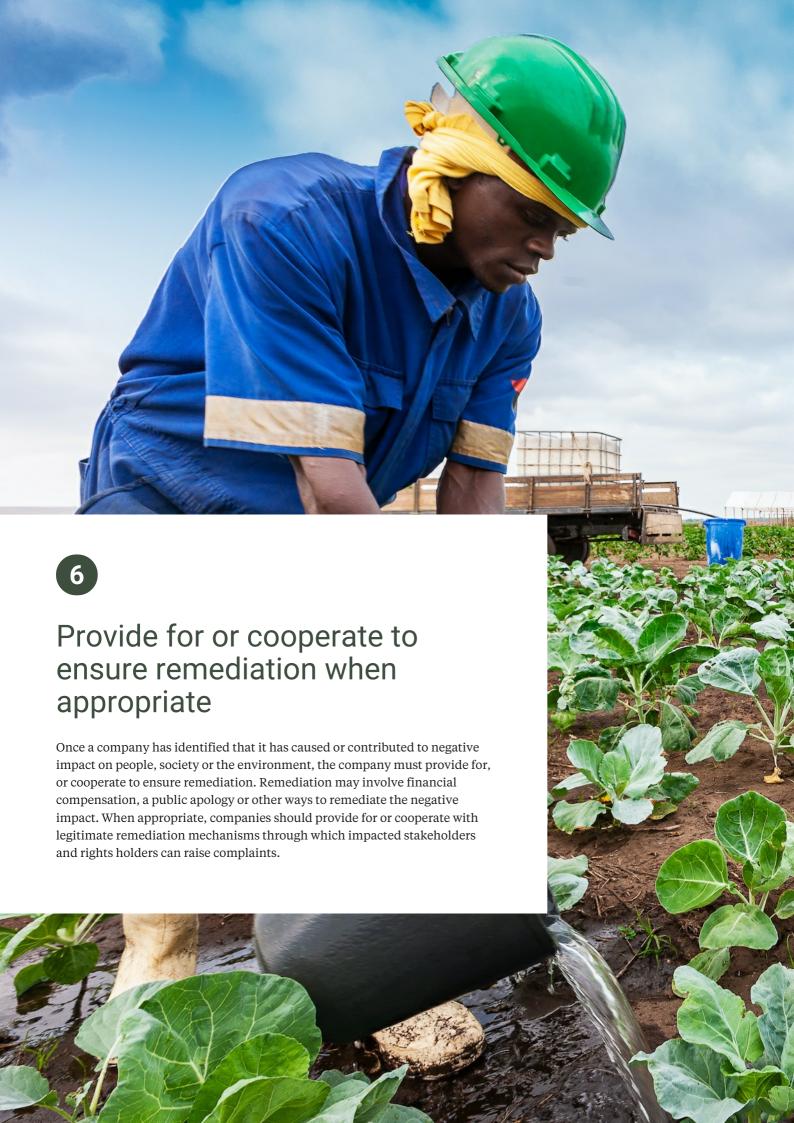
## 5.A External communication

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

We have just finished identifying and assessing the salient risks and are now working on how to proceed. Adding tasks to key roles and establishing the systems / routines needed.

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

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.



## 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 Describe cases of remediation in reporting year, if relevant

We have not experienced any cases of redemiation in the reporting year.

# 6.B Secure access to grievance mechanisms

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

At Trimtex Baltic we have clear routines in place to ensure that our workers rights are being upheld. Estonian law is also clear on these matters.

## Contact details:

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