



Report on

Responsible Business Conduct 2020

for TRIMTEX SPORT AS

TRIMTEX

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

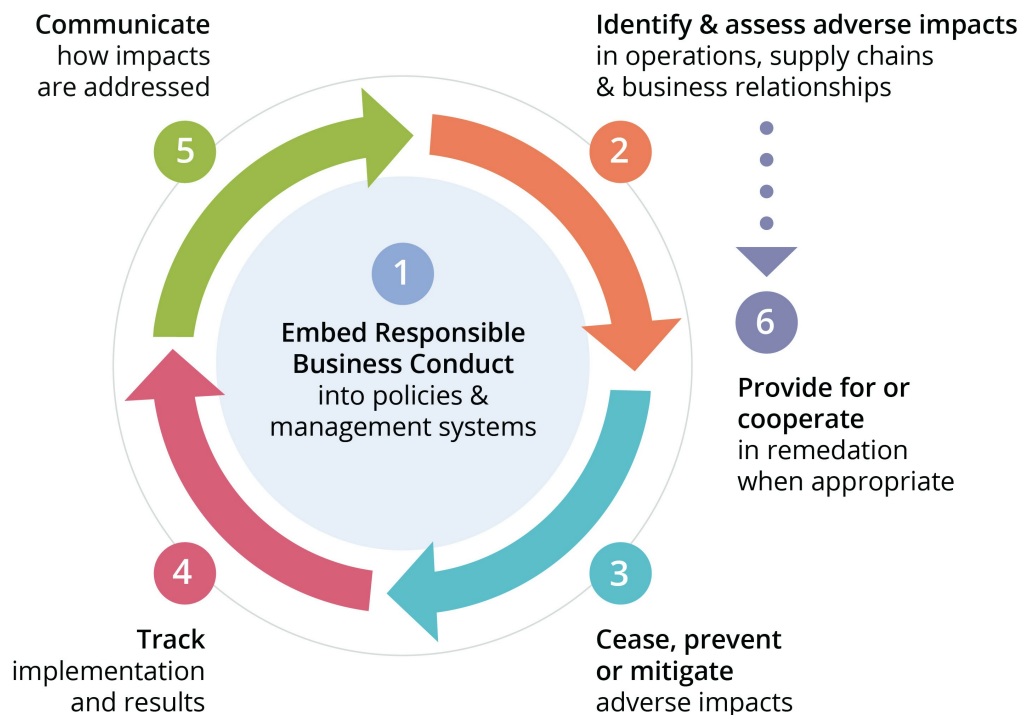
Executive Director

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

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)

168

Number of employees

120

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 - 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 99,02 % of all that we produce. We (Trimtex Baltic) buy all fabrics and accessories from our assigned suppliers (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.

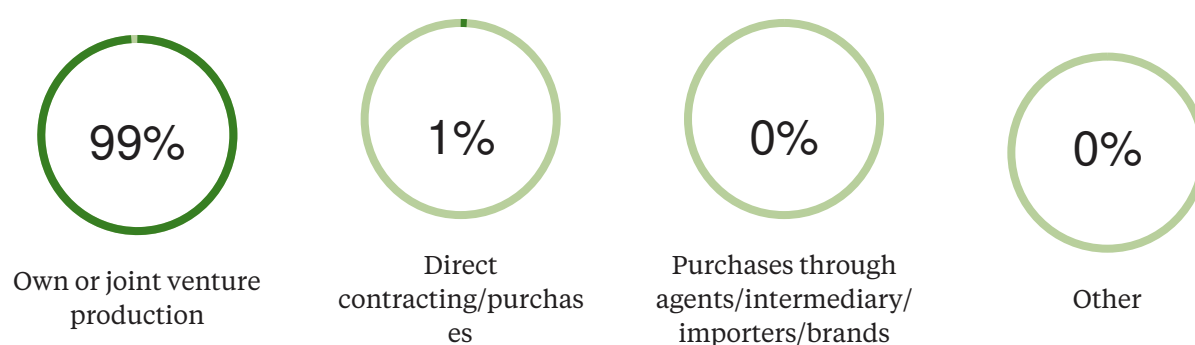
Number of suppliers with which the company had commercial relations in the reporting year

10

Comments to number of suppliers

Trimtex Sport AS has had direct commercial relations to the above 10 suppliers (NB! suppliers that we purchased for less than 500Euro from in 2020 are not taken into account in this report). Suppliers to Trimtex Baltic are viewed as Tier 2 suppliers just

Approximate ratio by sourcing options



99,02% 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 and send out COC to all high risk suppliers at this level as well.

List of first tier suppliers (producers) by country



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

1 000

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

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.

Is the company a supplier to the public sector?

Yes

Goals and progress

Goals and progress for the reporting year

1

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

Status : Started. All high risk tier 2 suppliers have signed our COC.

2

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

Status : in 2020 we have increased the percentage of products containing more than 50% recycled materials with %

3

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

Status : Completed

4

Goal : Sourcing and purchasing routines are updated and implemented by 2020

Status : Implemented

5

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

Status : Implemented. With introduction of a new season we have a section on sustainability and where we are in terms of our sustainability Strategy.

6

Goal : Developing and implementing Trimtex Sustainability Strategy 2025 - Q2 2020

Status : Completed.

7

Goal : Implement KPIs for measurig and tracking actions above in 2020.

Status : Completed

8

Goal : Monthly posts in own channels (Newsletters, Instagram, Facebook and LinkedIn) on sustainability. Educating.

Status : Implemented

Goal for coming years

1

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

2

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

3

All our products will be Bluesign certified by 2030

4

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

5

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



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?

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/ 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 work with responsible business conduct organised within the company and why in this particular way?

Trimtex is now in the early implementation stage. We have determined our salient risks, and looked at our organization - what should we do, what can we do and how can we do this. Based on this we have in 2020 developed a Trimtex Sustainability Strategy 2025. In this strategy we have made our startingpoint based on the UNs sustainability goals for 2030. We have determined which of these goals we will to focus on (based on where we can have the most affect) and how we want to do this. We have determined KPIs, implemented them and now started to measure our progress towards our main sustainability goals for 2025/30.

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

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 Head of product and Brand - this is a key role in the company with the power to make real changes. Design and Development Manager is in charge of reporting and keeping un 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 repport on them (make sure that there is a system in place to do so and that people in key roles have the neccessary info and routines to do the job).

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. Now that clear tasks and routines have beed esatblished we have started inviting more people to attend relevevant talks and tutorials offered by Ethical Trade Norway especially and will consider if more is needed. We also keep our slaesforce updated on a seasonly basis so they can easily and with confidence forward and promote our policy and progress.

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 evaluate 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?

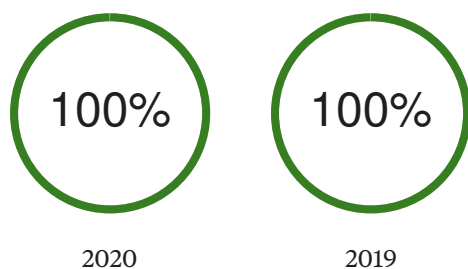
Today we send out our Code of Conduct together with an engagement letter to better explain why this is important to our company. We follow up our suppliers to make sure they understand how this will effect them. We also discuss this topic and the importance of it with our businesspartners when we meet 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. All forms are updated.

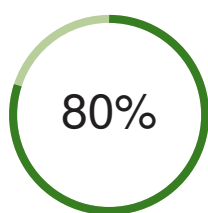
Indicator

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



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

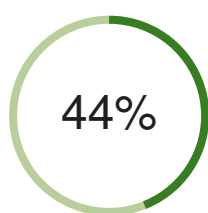
Percentage of Tier 2 FABRIC suppliers that have signed our CoC.



2020

We have received signed CoC from 80% of all our tier 2 FABRIC suppliers.

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



2020

44% of our Tier 2 ACCESSORIES suppliers have signed our CoC.

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 on determining our KPIs on sustainability based on our salient risks. We have assigned tasks to the relevant positions, and made systems/routines to make sure the information needed is collected and documented. The groundwork is now laid so next is to evaluate if the actions made are sufficient in order for us to reach the goals set in Trimtex Sustainability Strategy, or if we need to adjust/improve/scale our efforts.

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
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

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. Land/produkt <https://www.mvorisicochecker.nl/en/risk-check>,
7. The US Department of Labour; List of Goods Produced by Child Labor or Forced Labor

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 Ethical Trade and also through discussing with other stakeholders/suppliers/ audits, we determined our most salient risks.

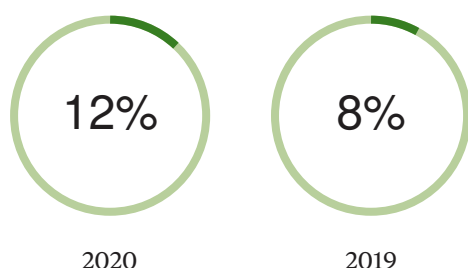
We determined these on the basis of scale and scope, the gravity of the risk in question and also reversability. Can it be fixed.

Our most salient risks:

1. Environment / because of the quantity of non-degradable fabrics used and 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 for 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 C0 (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.

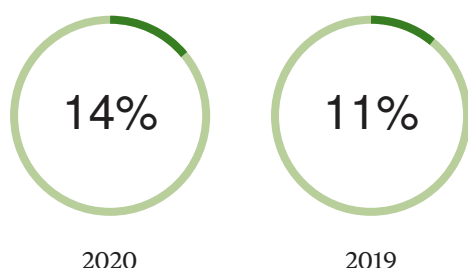
Indicator

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 (articles) used in collection



We have increased the number of fabrics/articles used in our collection by 27% from 2019 to 2020 and we are next year expecting to increase this with new 71% to totally 24% of our totally usages.

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.

In addition we are also looking at our supplychain when it comes to Energy consumption - to get an overview over what energy is used. We want to determine if and if so, where we can improove also here.

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 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

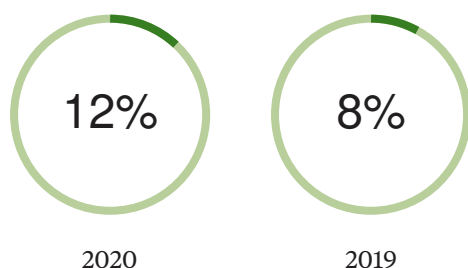
Salient issue	Use of non-degradable fabrics (Polyester/ Spandex)
Goal :	100% re-cycled materials in collection by year 2030
Status :	ongoing
Objectives in reporting year :	Increase volume of recycled materials in collection as much as possible without reducing quality and durability. KPIs are determined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

Actions :

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 are now determining KPIs to measure and check the progress and effect of the above actions. These will be implemented within 2020.

Indicator

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



Of our total collection, 37% contain more than 30% of 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 most 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 and to investigate closer to see where we can make changes.

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 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 as well as our purchasing routines in order to reduce the risk of overtime at supplier level. Pls see section 1.D.1 for complete overview.

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 qualities.

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). Here we have just started the mapping process. One of our main goals for 2021 - to get a complete overview over where the coating exists and determine a clear plan on how to replace our C6 DWR coatings with new and more sustainable alternatives.

Cross-cutting actions related to management of negative impact:

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. 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. 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. Pls see attached KPI report for detailed information/progress on waste handling.

For 2021 we also want to get an overview of our Energy consumption, both type (renewable/ non renewable) and volume.

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 are also working on moving our timeline in order to give all steps of the development and production the necessary time to do their jobs in a sustainable way. Working to reduce pressure in the high-seasons.

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 criteria 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 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. 2020 has been a challenging year and without any possibility of 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. For 2021, our aim is to dig a bit deeper into a few of our smaller business partners that we lack some information from, and to try to make sure that all is according to our standards also here.

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.

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 do more.

We did send out a survey on COVID and the effect on the workers here. We got very good attendance on this one and also good feedback from workers.

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

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 dept but also in the product- and technical depts. of course. 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 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

We have assigned several additional tasks to key departments.

Our key departments to address and handle salient issues concerning suppliers are the departments that have direct contact with these (Ex: Purchasing and 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).

Everything is interlinked here - but here are some of the tasks that we are currently working on:

1. New timeline is implemented to make sure that no unnecessary pressure is put on any of our suppliers. This is still fairly new, so we are still not exactly where we want to be yet, but we have a clear plan and we are working hard to turn the wheel and create more time for development and production.
2. Always look for opportunities to reduce waste and re-use. KPIs in place.
3. Sourcing re-cycled materials to replace all virgin-materials currently in our collection. KPIs in place.
4. Researching alternative DWR coating with the same resistance as current coating.
5. Researching options for circular possibilities.
6. Do risk analysis on a regular basis.
7. Evaluating actions taken.

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 indicator to the general health of the supplier. Currently we rate the communication with our suppliers as well as their financial details. We regularly ask for updated /current certificates 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 are placed and where we can generate a total score per supplier based on their overall performance.

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

Re-Cycled Polyester:

1. The general ammount of waste that the Apparell industry is producing is crazy, 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, 2020 has not been good for meetings due to Covid-19.

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, but we still have some with C6. We have no with C8 or higher.

2. We are in dialogue with our suppliers continuously and will 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 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.

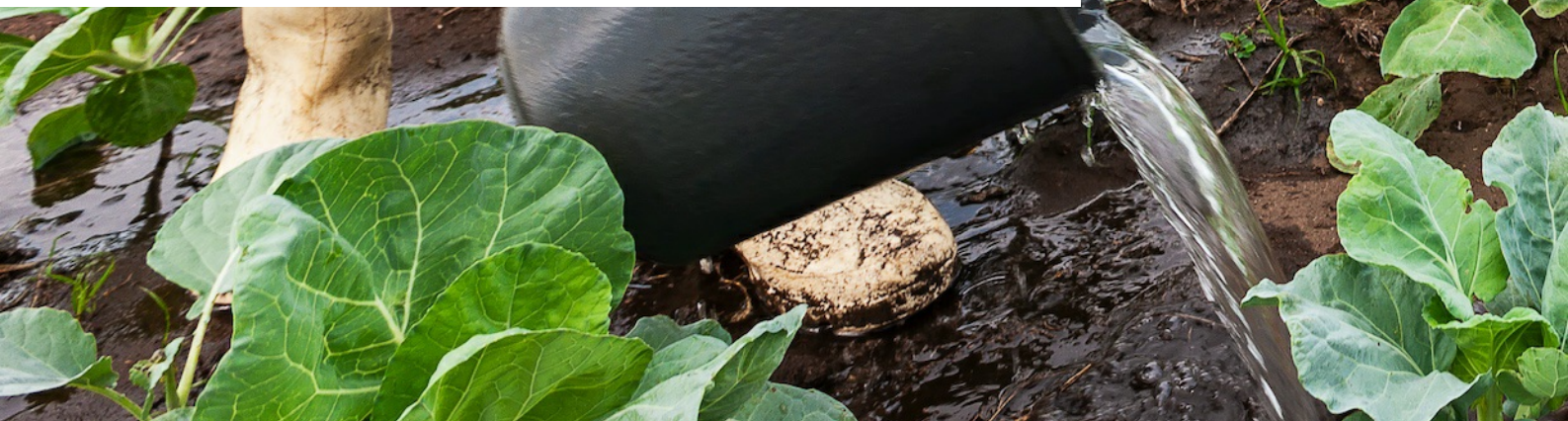
On this page we now have available our Policy for Sustainable Business Conduct and CoC. We have made a FAQ (frequently asked questions) on sustainability issues which is also here. In addition we have made our yearly report to Ethical Trade Norway available here.



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

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 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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