



Due Diligence Report 2025

AS PER THE NORWEGIAN TRANSPARENCY ACT

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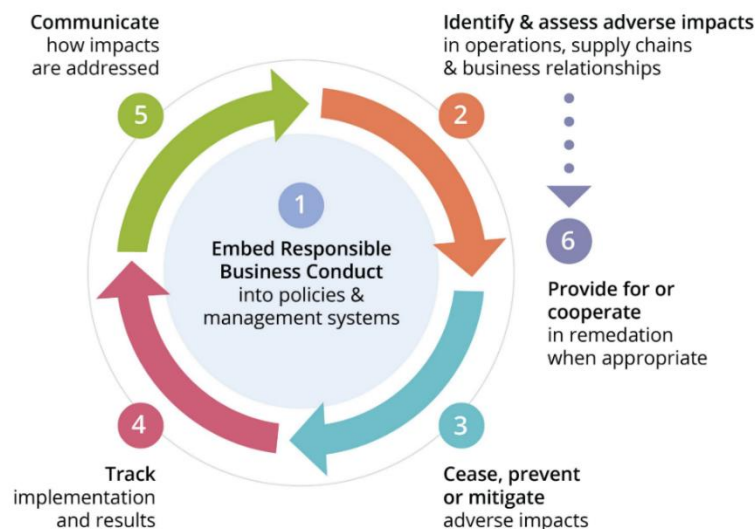
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1. Ethical Production

Unsafe working conditions and poverty wages in the garment and hard goods industries are a root cause of social injustice, which gravely impacts employees who work in factories, in particular woman. When local laws and customs can increase the risk for human rights violations, a strict due diligence approach and partnerships with independent auditing organizations, such as the Fair Wear Foundation, and joint audits with industry peers help us build accountability in addressing these challenges. To systematically improve workplace conditions in our supply chain, we also rely on long-term relationships with our suppliers to create a more even demand for workers despite the seasonality of collections. Responsibility is a team effort, and as such, we aim to work and learn together with our suppliers, retailers, and wider stakeholders.

2. Introduction to The Transparency Act and due diligence

The Norwegian Transparency Act requires Mammut to conduct this due diligence and report on due diligence assessments on fundamental human rights and decent working conditions. Not only in our own business, but throughout our whole supply chain as well as our business partners. This assessment is in accordance with the OECD model for Due Diligence for Responsible Business Conduct:



This describes in a 6-step manner how companies should perform their due diligence. This is of course no guarantee that there are no negative impacts, but it is a way for a company to make sure they are doing their very best in reducing their negative impact, to be honest about potential risks and challenges and to have clearly managed procedures and action plans in place to mitigate these risks and impacts.

This report gives a transparent overview of Mammut's' Due Diligence approach and human rights risk assessments. We address our responsible business conduct with our notification channels and complaint mechanisms and state how we are currently identifying and assessing potential adverse impacts. Next to that, we describe how we are ceasing, preventing and mitigating these impacts and how we keep track and communicate this.

3. Company Information

Company name

Local Subsidiary: Mammut Ajungilak AS

Mother Company: Mammut Sport Group AG

Registered Business Office Address

Mammut Ajungilak

Snofonna 5

1470 Lorenskog

Norway

Mammut Sports Group AG

Birren 5

5703 Seon

Switzerland

Main products and services

Mammut Sports Group AG offers outdoor apparel and equipment designed and developed in Switzerland. The focus is on core activities in the mountains, like hiking, climbing, skiing, and mountaineering. These products are, among others, jackets, pants, hard-shells, soft-shells, knitwear, sleeping bags, backpacks, shoes, climbing gear, gloves, and other accessories. The subsidiary in Norway, Ajungilak AS, offers marketing support and sales operations for the Nordic region, and supports our local wholesale customers and key accounts locally.

Description of company structure and operation areas

The Mammut Sport Group AG is founded in 1862 and based in Switzerland and operates in North America, South America, Europe, Middle East, EER, Africa, Japan, China, New Zealand, Australia, offering a full range of outdoor apparel, hardware, and footwear.

Local subsidiary Mammut Ajungilak AS owned by mother company Mammut Sports Group AG, is based in Norway, and operates in Norway, Sweden, Denmark, Finland, and Iceland.

Number of employees

Local subsidiary: 8

Mother company: 950+

Reporting Period

This Report on the Norwegian Transparency Act covers the period of 1. January 2024 – 31. December 2024.

Contact

Tobias Steinegger, Head of Corporate Responsibility

4. Embed Responsible Business Conduct

4.1 Governance Structure

Mammut's ambition is to be a leader in environmental and social responsibility and push our industry forward. Responsible business conduct (RBC) is an expectation for ourselves and all partners we do business with. Aligning with the UN Guiding Principles on Business and Human Rights, we commit that people have an inalienable right to be treated with dignity and that human rights are inherent in all human beings, regardless of their nationality, place of residence, sex, national or ethnic origin, colour, religion, language, or any other status, every individual is entitled to enjoy human rights without discrimination and these rights are all interrelated, interdependent and indivisible. Mammut commits to working actively with due diligence based on the OECD RBC guidance. The purpose of due diligence is first and foremost to avoid causing or contributing to adverse impacts on people, the environment and society, and to seek to prevent adverse impacts directly linked to operations, products or services through business relationships, meaning today's generation get their needs covered without compromising the ability of future generations to meet their own needs.

Mammut commits to transparently use a verified form of internal risk assessment to continuously improve our social and environmental strategies, processes and actions. When involvement in adverse impacts cannot be avoided, we will use due diligence to mitigate them, prevent their recurrence and, where relevant, remediate them.

This effort is led by the corporate responsibility team, which supports the entire organization in implementing and coordinating sustainability initiatives. The team includes three dedicated employees who are specialized in communications, climate impact, and chemical and product stewardship, and one additional employee within the Purchasing department dedicated to Social Compliance. The Head of Corporate Responsibility is part of the extended general management team.

As of spring 2025, the corporate responsibility team is part of the Supply Chain department. The team works across the organization, reporting to our Chief Supply Chain Officer (CSCO), who ensures environmental and social issues maintain high visibility within the board and general management.

Corporate responsibility cannot be tackled by one department alone; it requires every employee's commitment to translate our responsibility strategy into their daily work.

4.2 Responsible Business Conduct

Mammut's Responsible Business Conduct (RBC) Policy document is structured to comply with current and expected supply chain legislation in the countries where Mammut products are sold. This follows the RBC guidance from the Organisation for Economic Co-operation and Development (OECD), which in turn references the United Nations (UN) Sustainable Development Goals (SDGs) and the International Labour Organisation (ILO) conventions.

The Responsible Business Conduct Policy summarizes the guidelines that Mammut commits to follow both within its own operations and in its supply chain. Requirements for Mammut's own operations cover: purchasing practices.

1. Human Rights

Mammut is committed to respecting human rights throughout our operations. We recognize that our activities and decisions can impact the lives of individuals and communities, and we fight discrimination and harassment based on sex, gender, age, race, ethnicity, religion, sexual orientation, gender identity or expression, disability, or any other characteristic. We strive to foster diversity and inclusion.

2. Due diligence

Mammut shall conduct due diligence for responsible business conduct, in accordance with the OECD model for Due Diligence for Responsible Business Conduct, as mentioned above. This involves conducting risk assessments to identify potential negative impact on people, society, and the environment and to stop, prevent and reduce such impact.

3. Anti-corruption

Corruption in any form is not accepted, including bribery, extortion, kickbacks and improper private or professional benefits to customers, agents, contractors, suppliers, or employees of any such party or government officials.

4. Whistleblowing

To ensure our own employees feel their concerns and grievances can be communicated effectively, legally, and without fear of retaliation, we have multiple pipelines in place for employees to report issues both internally and externally. The system allows the individual making the claim to remain anonymous should they so desire. The contact details are published in our annual Responsibility Report and accessible to the public. Reports may be sent directly to Mammut legal counsel or submitted anonymously via the Mammut whistleblowing Integrityline system. All additional claims can be filed with the legal firm Blesi & Papa.

Mammut legal counsel:

legal@mammut.com

Phone: +41 (0)62 769 83 50

Anonymous submission:

Integrityline

Additional claims:

whistleblowing@blesi-papa.ch

5. Countries affected by trade boycotts

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

6. Animal welfare

Mammut requires that suppliers of animal-based materials adhere to the strictest international standards for the farming, transport and slaughtering of livestock. Since its founding in 1862, Mammut has never used real fur, and we see no reason to end this tradition.

7. Chemical management

To help suppliers, MAMMUT Sports Group has developed a standard for suppliers regarding primarily consumer safety in terms of chemicals used during production.

In 2011, we first partnered with bluesign®, an independent global authority that provides a system for developing more sustainable and responsible textile manufacturing practices. Under their guidance, we introduced a risk-based chemical management system to ensure the safety of our products. We also enforce a Restricted Substances List (RSL) based on the bluesign® SYSTEM SUBSTANCES LIST, committing ourselves to a higher standard than required by local and international law.

8. Environment

As a member of the United Nation Fashion Industry Charter for Climate Action, Mammut committed to support the ambition of the Paris Agreement in limiting global temperature rise to 1.5 degrees Celsius above pre-industrial levels by following SBTi approved science-based emissions reduction targets on scope 1, 2 and 3 in line with the latest criteria and recommendations of the SBTi; and commit to achieving net zero emissions no later than 2050.

9. Fair Wear Code of Labour Practices

Fair Wear Foundation is a multi-stakeholder initiative dedicated to improving working conditions in the garment and soft goods industry. As an independent verification body and training facilitator, Fair Wear audits member companies' production practices and their tier 1 sewing suppliers and subcontractors and encourages exchange between brands, factories, and workers. Fair Wear also offers training for factory workers and management, shifting the power imbalances that have been intrinsic to the industry for decades. In some countries, additional training modules, such as age verification during recruitment and harassment, are covered.

Our organization and suppliers must comply with Fair Wear's Code of Labor Practices (CoLP), based on the International Labor Organization (ILO) Conventions and the Universal Declaration of Human Rights. For workers this means: employment is chosen freely, freedom of association and the right to collective bargaining, no discrimination in employment, no exploitation of child labor, a living wage, reasonable working hours, safe and healthy working conditions, and a secured legally binding employment relationship. If a violation is found, we create a Corrective Action Plan, which is taken into account by Fair Wear in our Brand Performance Check (BPC). Learn more about the Code of Labor Practices in Due diligence approach.

A Brand Performance Check is conducted each year, auditing our procedures, activities, and reporting, and results are published publicly on both our own and Fair Wear’s websites. We are proud to have been recognized by Fair Wear for our efforts to promote industry collaboration, where we have encouraged other brands to pursue joint audits at shared facilities to help us collectively address these massive challenges.

The new Fair Wear assessment is based upon the Organisation for Economic Cooperation and Development (OECD) guidance for Responsible Business Conduct in alignment with new laws being implemented in Europe. Results of the Brand Performance Check are categorized as Leader, Good, or Needs Improvement. We aim to monitor at least 95% of our textile supply chain according to the Fair Wear Foundation standard. In 2023, our ranking remained at Good.

10. Responsible purchasing practices

Mammut shall adapt our purchasing practices in order to strengthen, and not undermine, our suppliers’ ability to deliver on our requirements related to people, society and the environment. We strive towards lasting supplier relationships with suppliers.

5. Identify and asses adverse impacts

5.1 General

To support Human Rights Due Diligence (HRDD), Mammut has been a member of Fair Wear Foundation since October 2008 and has published annual Social Reports since 2010. From 2014 onwards, this reporting has included reporting of the risks, complaints and findings, by country, according to each of eight points in the Fair Wear Code of Labour Practice.

Mammut’s membership of Fair Wear covers Tier 1 textile and sewing factories, covering apparel, backpacks, climbing harness, footwear and sleeping bags. Mammut actively cooperates with other customers at each factory to encourage resolution of problems found in audits.

Mammut applies the same HRDD principles to all products. Through the European Outdoor Group (EOG), Mammut was a founder member of the Audit Alliance for Hard Goods (AAHG). This AAHG group has commissioned and reviewed social audits in factories producing avalanche probes, belay devices, carabiners, helmets, snow shovels, and trekking poles.

Mammut produces in many countries. The most important are Vietnam, Bangladesh, China, Switzerland, Czech Republic, and Turkey.

Vietnam	57%	Czech Republic	3%
Bangladesh	18%	Taiwan	1%
Switzerland	5%	Indonesia	1%
China	5%	Romania	1%
Turkey	3%		

5.2 Mammut’s risk assessment

In the following section the risks, complaints and findings are summarised, by country, according to each of eight points in the Fair Wear Code of Labour Practice.

1. Employment is freely chosen

Forced labour is possible in all countries, but is not regarded as a major issue in Bangladesh, Czechia, Hungary, Latvia, Lithuania, Philippines, Romania, Switzerland, and Vietnam.

China has a Poverty Reduction Program which has been very successful in raising living standards for millions of people. However, the program involves relocating people from poor rural areas to urban areas where there is employment, sometimes against their will. NGOs have concerns about the treatment of minority groups such as Uyghurs and Tibetans. In particular, Uyghur Muslims from Xinjiang, are alleged to be subject to forced labour and internment. There are also allegations that workers from ethnic minorities are sent to work in factories all round China. USA has laws which came into effect in June 2022, banning imports of goods produced in Xinjiang. This area is an important source of cotton and it can be difficult to prove the origin. US Customs can stop the import of goods based on a suspicion and it is up to the brand to prove innocence.

Taiwan generally has good working conditions but there are serious concerns about foreign migrant workers. Taiwan employs thousands of workers from Indonesia, Myanmar, Philippines, Thailand, and Vietnam. There are concerns about some employment agencies who charge high fees, which could lead to debt bondage. There are also reports of passports being held by employers.

In Turkey, there are concerns about undocumented Syrian refugees working in subcontractors.

2. Freedom of association and the right to collective bargaining

When a factory supplies to us, we require that all workers be permitted to join a union and engage in collective bargaining without consequence. The reality is that in certain countries, local customs and laws can restrict union activities and other forms of worker representation. Our partner, Fair Wear, evaluates the status of unions in each factory audit and communicates overarching issues in country reports.

Freedom of association is allowed and encouraged in Czechia, Hungary, Latvia, Lithuania, Romania, Switzerland, and Taiwan.

In Bangladesh, China, Philippines, Turkey, Vietnam, Labour Unions exist but they are not independent as they are often led by factory managers. In Turkey, there is often antagonism between unions and factory management, which can result in threatening behavior and even violence.

3. There is no discrimination in employment

Discrimination can take many forms including age, caste, disabilities, gender, political views, race, religion, and sexual persuasion.

In China, there are concerns about treatment of ethnic minorities such as Uyghurs and Tibetans.

Bangladesh and Turkey are male dominated societies and factories often have 90% female workers. Verbal abuse and even physical abuse is very common. Fair Wear offer special training to combat Gender Based Violence in Bangladesh.

4. No exploitation of child labour

Child labour, meaning under the age of 16 is quite rare in the countries where Mammüt produces. However, there are often young workers (16-18) in factories. Young workers should not engage in shift work, heavy work or overtime.

China had a one child policy from 1986 to 2016. Child labour is rare in manufacturing industry in China. Parents who have only one child discourage them from factory work.

Child labour is encountered in Myanmar, where many children leave school at 13. Mammüt stopped production in Myanmar in 2021 following the coup.

In Turkey, children of Syrian refugees have been discovered working in subcontract factories. Fair Wear require member brands to require suppliers to have clear policies about subcontracting and employment of refugees and their children. So far Mammüt suppliers are not affected.

5. Payment of living wage

Most countries define a legal minimum wage, and by referring to third party audits and wage surveys, we can be confident that our primary suppliers pay their workers the required minimum wage. Problems have however occurred with minor suppliers. This is typically related to piece work, temporary workers, and wage averages when there are temporary layoffs. Payment of public holidays or overtime premiums often follow local customs rather than strict adherence to law.

There are several issues with wages. The first is compliance with the legal minimum wage (LMW), which is respected in most countries. The second is compliance with legally specified uplifts to hourly pay for overtime, which are often ignored in countries where factories have piece work. There are often problems with late payment of wages or even non payment of allowances and holiday pay.

In Bangladesh, the LMW is very low compared to Living Wage benchmarks. In China, LMW is set by each province, but payments less than LMW are rare as workers are free to move to other factories. Turkey has very high inflation which rapidly erodes wages. In Vietnam, LMW is set by the government according to 4 regional classifications and is increased annually.

Payment of a Living Wage is a huge problem in most countries. There are many different benchmarks for living wages and often they are disputed. Inflation is a major problem as it erodes the wages over time.

6. Reasonable hours of work

The fashion industry produces summer and winter collections, which results in every retailer around the world expecting to receive the same collection items at the same time. Retailers place their orders after the trade shows, six months before the season launches in-store. This causes a rush to order fabrics and make the required quantity of garments in time for the retail release.

Many apparel factories have very strong seasonality so there is a risk of overtime, particularly in peak season. Overtime is considered excessive if the total hours are 60 hours per week or if employees are working 7 days a week.

Excessive overtime and seven day working in peak season is a very common and serious issue in Bangladesh and China. Overtime is also a recurrent problem in Turkey and Vietnam.

7. Safe and healthy working conditions

Occupational health and safety (OHS) issues are often identified during audits and factory visits. Along with local quality specialists, our team members who frequently visit factories are prepared to routinely check for OHS infringements in work processes, environment, and use of personal protective equipment (PPE). To prevent OHS shortcomings from recurring, OHS training of management, supervisors, and workers is key.

Serious problems such as inadequate fire and building safety are usually found in the first audit of a factory. Sometimes these can be very expensive to remediate.

Every factory audit produces a long list of non-compliances, but most of them are easily fixed. Typical examples are lapsed test or training certification, non-functioning fire sensors, missing machine guards, missing item in a first aid kit and improper labelling of chemicals.

In China and Taiwan, many workers live in dormitories, which are sometimes of a poor standard of hygiene and fire safety.

7.b Building & Fire Safety

Bangladesh has a poor reputation for fire and building safety following horrible accidents. Many Bangladeshi and Indian owned factories in Bangladesh have very poor safety standards in terms of building construction, electrical wiring, fire safety and machine guards. Proper PPE is expensive, so home-made PPE is common. Dust masks made from left over fabric are usually inadequate. Fire doors may be painted red but they often do not conform to any recognised safety standards. Factories with Korean or Taiwanese owners are usually much better.

The Accord on Fire and Building Safety in Bangladesh was created after the collapse of Rana Plaza in 2013. The accord audits factories for fire and building safety and ensures that required safety upgrades are completed. In 2021, the International Accord for Health and Safety in the Textile and Garment Industry was established and this will extend cover to additional countries. Mammut joined the International Accord on 20th April 2023.

8. Legally binding employment relationship

Every worker should have a written contract and suitable explanation so that they understand the content. Mammut has received complaints relating to unfair dismissal and also non-payments of bonuses when workers resign.

Summary of most salient social risks in production

Mammut has identified the following four risks as the most salient ones in our supply chain: Seasonal overtime, minimum wage, union culture and regulation, and occupational health and safety. Each year we re-evaluate this by monitoring the factories we work with. This is published in our annual Responsibility Report, where we outline the salient risks country- as well as factory-specific. Further, we outline the complaints we have had and the actions we took to remediate the challenges. Below is the country-specific chart of the risk assessment (for sewn goods only), for the factory-specific charts, please see our 2024 Responsibility Report (available in June).

Country	Employee is Freely Chosen	Freedom of Association	No Discrimination	No Child Labour	Living Wage	Reasonable Hours of Work	Safe & Healthy Working Conditions	Legally Binding Employment	2024 purchasing value [%]	2023 purchasing value in [%]
Vietnam	1	2	1	2	2	3	2	1	65.5%	61.1%
Bangladesh	1	1	1	2	2	3	3	1	20.9%	18.4%
China	1	2	1	2	2	3	2	1	5.7%	12.4%
Türkiye	2	2	1	1	2	2	3	1	2.8%	1.2%
Romania	1	1	1	1	1	1	2	1	1.3%	2.9%
Indonesia	1	1	1	2	2	2	2	2	1.3%	n/a
Ethiopia	2	2	2	2	2	3	3	1	0.8%	n/a
Germany	1	1	1	1	2	1	2	1	0.5%	0.7%
Lithuania	1	1	1	1	1	1	2	1	0.4%	1.2%
Taiwan	3	2	1	2	2	1	2	2	0.4%	0.1%
Latvia	1	1	1	1	1	1	2	1	0.1%	2.0%

6. Ceasing, preventing, and mitigating risk

In addition to Fair Wear's Brand Performance Checks, our team does factory visits to confirm ethical production. These audits are prioritized based on suppliers who account for 2% or more of our sewn products.

All garment manufacturers involved in our textile and soft goods production commit to enforcing Fair Wear's Code of Labor Practices. To ensure workers are informed and supported, we provide our suppliers with posters in their local languages that explain how to file complaints either locally or directly with Fair Wear. These posters must be clearly displayed inside the factory. During our regular supplier visits, our purchasing and quality staff verify whether this is the case. If there is a breach, individuals can file complaints either to the factory management or directly to Fair Wear by emailing complaints@fairwear.org. Should the individual feel safer, they can make complaints anonymously. When we receive a complaint or a problem is identified during an audit or visit, a Corrective Action Plan (CAP) is created to outline the issue and the steps that will be taken to address it.

Increasing lead times

To address overtime, we extended the lead time for orders and share detailed forecast information with our suppliers early in the production cycle. After lead times were dramatically impacted in 2021 due to supply chain issues, we responded by ordering with longer lead times of up to a year in advance.

Specialized inspectors

When our partners at Fair Wear Foundation conduct an audit, a document inspector is always included. This inspector is responsible for reviewing factory contracts, training certificates, and vacation records. They also verify if the factory procedures comply with local laws and International Labour Organization standards.

Audit collaboration

Multiple brands often work with the same supplier or in the same region. To build industry alignment and accountability and to increase efficiency and impact, brands can pursue factory audits together. This coordinates requirements, reduces overlap, and facilitates a more thorough implementation of Corrective Action Plans.

Long-term contracts

Changing the status quo requires strong relationships. By having long-term supply contracts with partners who comply with the values in the outdoor industry, we can achieve and maintain high social and human rights standards across our sector.

In 2022, Fair Wear changed its emphasis to risk-based Human Rights Due Diligence to align with new mandatory laws that are being introduced in many countries. Mammut prepared for this change by attending seminars and retraining relevant staff. In 2023, we continuously audit our suppliers according to the Fair Wear requirements and initiated additional Worker Education Training (WEP). Internal responsibilities are strengthened, aiming at a closer involvement from the purchasing and sourcing teams, to prevent or address potential complaints directly.

7. Corrective Action Plans

Every social audit produces a Corrective Action Plan (CAP). This is shared with the factory together with the audit report. Periodically, Mammut requests updates on the CAP including evidence of completion. Audits are repeated every three years or more frequently if serious faults are found. Fair Wear Foundation engages closely with trade groups and worker committees in production countries, with a special lens to safeguard women's and children's rights. Through engagement in industry associations, such as the Social Labour Convergence Framework, Sustainable Apparel Coalition and Fair Wear, Mammut is fostering dialogues from Brands, manufacturers and authorities on human rights topics.

If there is a worker complaint, an audit may be requested to determine the validity of the complaint and identify the root cause.

In the case of serious faults reoccurring or if factory management refuse to implement corrective action, Mammut may choose to disengage and stop purchasing from the supplier.

8. Tracking and communication

8.1 Responsibility Report and Policies

We publicly report and track the progress of our human rights and environmental initiatives through our annual **Responsibility Report**: www.mammut.com/responsibility-report-2023.

(2024 Report will be published in June)

Additionally, our **Responsible Business Conduct** and the independent Brand Performance Check from Fair Wear can be found at: www.mammut.com/no/no/support.

More general information can be found on our responsibility homepage: www.mammut.com/no/no/responsibility.

8.2 Contact Details

If you have any questions or comments regarding our due diligence and this report, we are more than happy to elaborate and answer your questions! Please feel free to contact our Corporate Responsibility Team: responsibility@mammut.com

9. Signature