

Modern Slavery and Transparency Statement

Published on: May 27th, 2025

In accordance with the requirements of the UK's Modern Slavery Act 2015 section 54, the following statement shares Haglöfs AB's and its subsidiaries effective policies and implemented measures to safeguard fundamental human rights and decent working conditions and prevent forced labor, slavery and human trafficking in its business operations and supply chains in the year preceding the above date.

Introduction

Haglöfs is committed to respecting human rights in our own operations and value chain and expects our suppliers and other business partners to do the same. This commitment includes zero tolerance for any type of modern slavery, including forced and bonded labor. We continuously work to identify, prevent, mitigate and address any adverse human rights impacts we may cause, contribute or be linked to, including any form of modern slavery. Our supply chain assessments and monitoring efforts lay the groundwork for our commitment to human and labor rights due diligence, and we work collaboratively with our manufacturers and their workers, third-party organizations, and other brands to mitigate any risks identified. Our membership in Fair Wear (a non-profit organization that works with brands, factories, trade unions, non-governmental organizations, and governments to improve working conditions for garment workers) plays a crucial role in this work and underpins our social responsibility initiatives in our clothing, footwear, and hardware factories. This statement outlines the steps Haglöfs has taken and continues to take to respect human rights and address modern slavery risks within our business operations and value chain.

Our business and supply chain

Haglöfs AB is wholly owned by LionRock Capital Limited and operates through subsidiaries in Sweden (Nordic Outdoor Group Aktiebolag – NOGAB), Norway (Hagløfs AS), Finland (Haglöfs Oy), Denmark (Haglöfs Danmark A/S), Germany (Haglöfs Deutschland GmbH), and the UK (Haglöfs UK Ltd.), as well as a branch in France. Haglöfs designs, develops and markets outdoor clothing, footwear and hardware from its headquarters in Bromma, Sweden. The company does not own any factories but works with a network of 83 trusted material suppliers and 30 clothing, footwear, and hardware manufacturers across 15 different countries. The majority of the products are shipped to Haglöfs' distribution center in Eskilstuna, Sweden, and from there distributed to its various sales channels. Haglöfs products are sold in 22 markets via wholesale, E-commerce in 12 countries, and 12 directly owned Haglöfs stores.

Most of Haglöfs' own employees are based in Sweden, where all employees benefit from collective bargaining agreements. For our warehouse operations in Sweden, we engage external staffing agencies, following an agreement with the regional union. Our selection criteria for external staffing agencies include the requirement that they hold a collective bargaining agreement. This approach aligns with our commitment to responsible and ethical employment practices. In locations without collective bargaining agreements, we adhere to local labor laws and regulations. There is also a structured and regular exchange between HR and employee representatives. This ensures comprehensive coverage, addressing various aspects in both daily operations and broader initiatives, where risk assessment is a crucial part of the process. In cases where these representatives are not appointed from Haglöfs' employees, we actively engage with regional or national representatives.

Haglöfs has direct relationships with all clothing, footwear, and hardware manufacturers involved in its production (Tier 1) and requires that any support factories (e.g. embroidery and printing facilities) or subcontractors used are disclosed and approved before any production starts. We have fully mapped our Tier 2 supply chain for nominated material suppliers, as well as the majority of our non-nominated materials. The work to complete the mapping of our non-nominated material suppliers and to improve our understanding of the factories involved in the various stages of material production is ongoing. We also work to map the origin of our natural materials deeper in the supply chain, though there remain challenges in maintaining visibility in this area of the supply chain.

Beyond our supply chain partners, we collaborate with a number of external stakeholders to address human and labor rights risks, such as Fair Wear, other Fair Wear member brands, and the European Outdoor Group (EOG). We are also a signatory to the AAFA/FLA Commitment to Responsible Recruitment.

Governance

The Haglöfs Sustainability and Business Development Director is responsible and accountable for developing and implementing the Haglöfs sustainability strategy, including human rights due diligence, and, as part of the management team, ensures that sustainability is integrated into our business strategy – which is subject to approval from our board of directors. The Sustainability and Business Development Director leads the Haglöfs Sustainability Team, that works to implement the sustainability strategy across the organization and value chain. Nevertheless, at Haglöfs, sustainability is not confined to a single team's responsibility, but integrated into roles across the entire organization.

The Risk Management Committee works to improve visibility of emerging risks and upcoming regulatory changes and is together with the Sustainability Team responsible for monitoring and reviewing human rights risks, including risks related to modern slavery. The Haglöfs Management Team oversees the Sustainability Team and its members form the Risk Management Committee.

Our policies and procedures

To support realizing our commitment to respect human rights, in our own operations as well as in the value chain, we have adopted policies and guidelines based on internationally recognized standards and norms (e.g. the International Labour Organization's Fundamental Principles and Rights at Work, the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector, the UN Guiding Principles on Business and Human Rights, and guidance from Fair Wear). These policies and guidelines govern internal processes, as well as outline the minimum requirements we place on business partners throughout our value chain. We regularly review and update our policies and processes to address emerging risks and legislative changes, as well as to incorporate improvements. Training is provided to both employees and manufacturing partners to help enforce our policies, procedures, and minimum requirements.

Haglöfs' Code of Conduct explains what it means to uphold our values while ensuring that acting with integrity, following legal requirements, and showing respect towards each other, our customers and our business partners continues to be the cornerstone of everything we do. It applies to everyone employed by, or who conducts business on behalf of, Haglöfs AB and its affiliates, regardless of seniority or location. All new Haglöfs hires must read and sign the Code of Conduct together with their employment contract. We actively encourage individuals to report any violations of the Code of Conduct and have established a confidential online reporting system (the Ethics helpline) to facilitate the reporting of ethics violations. How to use the reporting system and the process for investigation are described in the Haglöfs Policy on Protected Disclosure (Whistleblowing).

We expect our business partners to uphold comparable principles to the ones outlined in the Haglöfs Code of Conduct, and we aim to work only with those who meet these standards. Our Policy of Engagement lays out these standards for our manufacturing partners, covering areas such as human rights, labor standards, corruption, privacy protection, occupational health and safety, and

environmental practices. The Policy of Engagement is an essential component of the Terms of Agreement which all manufacturing partners must sign and comply with.

Haglöfs' Code of Labor Practices is based on the Fair Wear Code of Labor Practices and complements the Policy of Engagement. The Code of Labor Practices outlines the minimum requirements expected of our suppliers and other business partners and addresses topics such as forced labor (including bonded and prison labor, human trafficking, slavery and practices similar to slavery), child labor, discrimination, freedom of association and the right to collective bargaining, wages, working hours, safe and healthy working conditions, and legally binding employment relationship. In applying the code, suppliers must comply with national and other applicable laws and, where the provisions of the law and the code address the same subject, apply the provision that gives workers the greater protection. All manufacturers producing Haglöfs products (including support factories, such as embroidery and printing facilities, and authorized subcontractors) must sign and comply with the Code of Labor Practices.

To govern our work with manufacturing partners, we apply a set of internal guidelines and processes. Haglöfs' Factory Approval and Onboarding Process outlines the process for assessing and approving any potential new factories, including assessment of their ability to meet Haglöfs' Code of Labor Practices. No production is started at any new factory (including any subcontractors or support factories) before it has completed the approval process. Once a factory has been approved and properly onboarded, it is engaged in an ongoing monitoring and improvement program, as specified in Haglöfs' Factory Monitoring Guidelines. If a relationship with a manufacturing partner is terminated, Haglöfs' Responsible Exit Policy outlines the process that shall be followed to responsibly exit the relationship, including an assessment of the impact on the manufacturer's workers.

Human rights due diligence

To put Haglöfs' commitment to respect human rights into practice, we conduct human rights due diligence to identify, prevent, mitigate, and address any potential and actual adverse human rights impacts we may cause, contribute or be linked to. As the risk of human rights violations, including modern slavery, is most prominent in our supply chain, we predominantly focus our due diligence efforts on this part of our value chain. Our approach to human rights due diligence in our supply chain includes the following key steps:

1. Identifying actual and potential adverse human rights impacts

To identify any actual or potential adverse impacts at our clothing, footwear and hardware manufacturers, we conduct desk-based risk assessments as well as on-site factory audits.

- a. **Risk assessments:** We continuously conduct risk assessments of all our current, as well as any potential new, clothing, footwear, and hardware manufacturers involved in Haglöfs production, which includes human and labor rights risks (i.e. risks to people), including risks of modern slavery. In the risk assessments we consider various types of risks, such as risks related to the relevant country, sector, and product, as well as risks connected to Haglöfs' sourcing and business model. We include risk information from external sources, such as non-governmental organizations, trade unions and experts, as well as internal sources like reports from factory audits, trainings and visits, and any potential complaints from factory workers. Prior to entering any new sourcing country, we also carry out a

specific country risk assessment, which, for example, includes an analysis of human and labor rights risks, political stability, and corruption.

- b. **Factory audits:** The risk assessments support prioritization of further actions to identify actual and potential human rights impacts on factory level, such as on-site social audits. The purpose of the audits is to verify compliance with Haglöfs' Code of Labor Practices, which all factories must comply with at all times. The audits are conducted by independent and credible third-party organizations, such as Fair Wear and Better Work. Typically, an audit includes a physical inspection of the factory site and any dormitories, a review of relevant documents and records, as well as interviews with factory management, workers, and any worker or union representatives. Each factory is audited at least every three years unless risks identified call for more frequent auditing. The outcome of the audits contributes to determining the type and frequency of future factory engagements to mitigate and remediate any negative impacts identified.

2. **Preventing, mitigating and remediating any adverse impacts identified**

To address any actual or potential adverse impacts identified, we work to prevent, mitigate and remediate the specific issues found via corrective action plans, factory dialogue, and visits. We also aim to strengthen worker awareness and voice by providing trainings and access to a worker helpline. To avoid making demands on our suppliers that may compromise their ability to respect human right, we continuously examine and aim to improve our own purchasing practices.

- a. **Corrective action process:** A factory audit can be a useful tool both in identifying adverse impacts, as well as to help enforce compliance with human rights standards. When non-compliance issues are found during an audit, Haglöfs works with the factory to address the issues through dialogue and a time-bound corrective action plan. This process also includes identifying and addressing the root causes of the issues found to support preventing future adverse impacts. Haglöfs monitors and supports the corrective action process until all issues have been addressed. Should the supplier refuse to engage in the corrective action process to remediate issues found, Haglöfs has the right to terminate the business relationship. This is, however, only used as a last resort when options for remediation have been fully exhausted. In the case forced labor is suspected or identified, it is immediately investigated further to determine the scope and nature of the case. It is critical to ensure the safety and wellbeing of the impacted workers throughout the investigation and remediation processes, and to verify that the case has been fully and sustainably remediated. This includes ensuring all workers impacted have received remediation and all means used to create a forced labor situation have been fully and comprehensively addressed. Haglöfs offers support and guidance to the factory throughout this process.
- b. **Factory visits:** Visiting the factories we work with enables better visibility of working conditions, following up on any complaints or issues found during audits, reinforcing our standards, improving communication, and building strong and transparent relationships. The visits are predominantly conducted by our sourcing team, but also by Haglöfs management, and sustainability, buying and development teams. For new factories, a visit must be made before bulk production starts.
- c. **Training:** We work to ensure our manufacturing partners receive training to help improve both workers' and management's understanding of labor and human rights, including the

topic of forced labor. The training provided aims to help workers understand their rights, while ensuring they are aware of the options available to them should their rights have been violated. Training also helps support factory management in setting up processes and systems for risk mitigation and continuous improvements. The training is mainly conducted by Fair Wear or Better Work and is renewed at a frequency which depends on the risk level of the factory. Training on human/labor rights is also provided to key internal Haglöfs staff that frequently interact with our manufacturing partners.

- d. **Worker helpline:** All workers in our Tier 1 factories, including support factories, have access to an external helpline hosted by Fair Wear. Through this helpline, workers can anonymously contact a local team via email or phone and raise concerns about their working conditions in their language. Information about the helpline is shared via "Worker Information Sheets" that should be posted in visible and frequently visited areas of the factory. When a complaint is submitted, Haglöfs works with the factory and Fair Wear to address the complaint and remediate any potential violations.
- e. **Responsible exit:** In case Haglöfs terminates the relationship with a supplier, because of non-remediation of labor rights violations or other reasons, Haglöfs is committed to managing the termination process in a responsible way to prevent or mitigate any potential adverse impacts on workers. The process is guided by Haglöfs' Responsible Exit Policy, which, for example, includes notifying the supplier at least one season in advance, assessing the social impact of the exit on the factory's workers, and developing a phase-out plan for production orders.
- f. **Purchasing practices:** Responsible purchasing practices are an important aspect of working to prevent contributing to adverse human rights impacts in the supply chain. Hence, we continuously examine our internal policies and procedures aiming to avoid making demands on our suppliers that may compromise their ability to respect human rights. For example, to the extent possible, we avoid late payments, late orders, or high-pressure deadlines to not put additional pressure on the factories we work with.

3. Tracking progress and communicating about our human rights due diligence efforts

To ensure accountability and continuous improvements of our human rights due diligence system, we continuously work to track the implementation and progress of our due diligence efforts, as well as to publicly report on these.

- a. **Tracking progress:** To track the progress and effectiveness of our due diligence efforts, we continuously monitor the implementation of due diligence activities. This, for example, includes tracking the implementation of any open corrective action plans and monitoring the remediation of complaints until all issues have been fully addressed. It also entails monitoring risk data to ensure it is up to date and that activities are continuously implemented to address risks identified. To support tracking progress over time, we monitor a number of key performance indicators for our Tier 1 clothing, footwear and hardware factories, including:
 - Number of factories, management and workers that has received training on labor/human rights
 - Number and type of complaints coming through the worker helpline

- Number of workers interviewed in audits, including off-site worker interviews
- Number of in-person factory visits by Haglöfs staff
- Number of factory audits, as well as number and type of issues found in audits
- Total number of factories, as well as the length of each factory relationship
- Number of wage datasets collected, as well as the number of factories paying average wages that meet or exceed one of the living wage benchmarks used.

The Fair Wear Member Hub, as well as internal systems, facilitate management of data to track progress. Additionally, to help us identify and track improvements of our human rights due diligence system and internal practices, Haglöfs is regularly assessed by Fair Wear as part of their “Brand Performance Check”. The latest Brand Performance Check of Haglöfs can be found on the Fair Wear [website](#).

- b. **Reporting:** We publicly communicate about our human rights due diligence efforts, progress, and challenges through various channels, such as the Haglöfs website and annual sustainability and social reports. We also disclose all our Tier 1 clothing, footwear, and hardware manufacturers, including support factories, to Fair Wear and on our [website](#).

Our 2024 impacts and progress

In 2024, we conducted risk assessments of all our Tier 1 and Tier 2 sourcing countries to identify potential human rights risks, including risks of modern slavery. For Tier 1, all countries except from Sweden and Portugal were classified as high risk. We strengthened the country risk assessment methodology by taking more risk indicators into account, such as the U.S. Bureau of International Labor Affairs' List of Goods Produced by Child Labor or Forced Labor, the Trafficking in Persons Report, the Global Slavery Index, the Global Gender Gap Index, ILO statistics on working time, and the Environmental Performance Index. Furthermore, all our Tier 1 clothing, footwear and hardware factories were assessed on factory level to help prioritize further actions to identify and address human rights risks. Also the factory level risk assessment methodology was strengthened during the year by incorporating risk information from various sources, such as audits, trainings, complaints, visits, our annual survey, and risk data from Fair Wear. The annual survey allowed us to collect more detailed information from our manufacturing partners regarding risks specific to forced labor, including identification of vulnerable high-risk groups (e.g. foreign migrant workers), use of recruitment agencies, and employer provided housing. The updated risk methodology also enabled more detailed assessments of likelihood and severity of the areas in the Code of Labor Practices for every factory, including worker freedom.

In the audits conducted in 2024 of our Tier 1 clothing, footwear and hardware factories the two areas with most issues identified were the same as in 2023. Safe and healthy working conditions continued to represent the area with most noncompliance issues identified (accounting for over half of all the audit findings), followed by issues connected to wages (representing 19% of the findings). The third area with most non-compliance issues identified regarded working hours (accounting for 11% of all the findings). For an overview of the main risks and issues identified in the most recent factory audits, please see the [Factory List](#).

At one factory in Vietnam, a case of child labor was identified during the year. A 14 year old boy was found to have falsified his ID to get a job at a security company contracted by the factory. The boy ceased working immediately upon discovery, and the factory provided financial support to him and his family until he turned 15, while also offering him the opportunity of employment by the time he reached this age. The factory and the security company also reviewed their age verification process, re-checked IDs for all on-site contractors' employees, and provided training to relevant staff responsible for age verification to help prevent re-occurrence.

An issue connected to a forced labor indicator was identified at one factory in Indonesia, as new workers claimed to have been charged fees by already employed workers during the recruitment process. The factory offered reimbursement to affected workers, though no worker came forth to claim compensation. As a result, internal processes were strengthened and workers were informed that it is prohibited to charge fees to potential new workers or to pay fees as part of any recruitment process.

No reports were submitted to the Ethics helpline in 2024, though two complaints were received through the Fair Wear worker helpline. The complaints regarded two different factories in Vietnam and both of them concerned issues connected to wages and legally binding employment relationships. One of the complaints received regarded a misunderstanding connected to the resignation process, where the worker was accused of unlawfully terminating the labor contract. Consequently, the worker did not receive the remaining salary and social insurance book. The case was solved, and the worker was compensated. To prevent the issue from recurring, the factory updated its resignation procedure based on feedback from Fair Wear and Haglöfs, and also provided training on the procedure to relevant staff. The second complaint also regarded a misunderstanding related to the resignation process. An illiterate worker fell ill and was unable to properly communicate about the circumstances, which made it look like unlawful termination. Also this worker was properly compensated and provided with relevant benefits and documents. Similar to the first case, the root cause of the issue was connected to lack of training of relevant staff. Hence, training was provided to prevent recurrence.

The risks and issues identified were addressed through the due diligence policies, processes and activities described above. In 2024, we specifically implemented the following measures to address identified risks and issues:

- Eight of the factories we work with in Vietnam, Indonesia and Turkey were audited by different audit schemes. Four of the factories were audited by Fair Wear or Better Work, while the other four provided already existing audit reports that were used for risk assessments and corrective action follow-up. While we recognize the strengths of Fair Wear's and Better Works' audit approach, making use of existing audit efforts enabled us to access up-to-date risk information also for factories that are considered a lower priority from a risk perspective.
- As part of the audits conducted in 2024, a total of 258 workers were interviewed; 191 women and 67 men.
- We continued to collaborate with the factories we work with to address the issues identified in previous audits, both independently and in collaboration with other brands and third party organizations. During 2024, all of the open CAPs were followed up on and 54% were fully closed during the year. The factories in China and Vietnam where Haglöfs was in the lead for CAP follow up worked to address and remediate the following issues:
 - o In Vietnam, three factories worked to strengthen worker representation by ensuring representatives are democratically elected and not part of the management. They also made sure written negotiation records were properly maintained and posted on

factory notice boards, along with lists of management and employee representatives. Two factories also worked to reduce excessive overtime and ensure workers have at least one day off in seven and 12 hours rest between shifts by improving both the production plan and monitoring of overtime hours. One factory addressed gender discrimination in the recruitment process by updating its policies and procedures. They also informed all departments of the updates to ensure a fair recruitment process based on skills and experience. The same factory further updated its procedure on temporarily transferring staff to ensure legal compliance, while another factory updated its contracts to fulfill local law. Wage issues related to inaccurate calculation of overtime and lacking injury compensation were also addressed by two different factories in Vietnam. Six of the factories in Vietnam also completed remediation connected to a number of health and safety issues, such as ensuring first aid kits are adequate both in content and quantity, pregnant employees are transferred to safer positions, and warning signs are posted in the local language. Some of the factories also worked to ensure marked and unobstructed evacuation routes, safety inspections, updated evacuation plans, appropriately labelled chemicals, accurate accident reporting, and the provision of health and safety training. Additionally, three of the factories worked to improve the use of personal protective equipment (PPE) by providing training to workers.

- In China, one of the factories we work with made improvements to reduce excessive overtime, while another factory worked to ensure workers receive at least one day off in seven. The second factory also worked to improve ergonomics for workers by equipping workstations with anti-fatigue mats.
- There was a total of 42 visits by Haglöfs staff to 14 of the factories we work with, which is a significant increase compared to 2023. The vast majority of the visits were done by our sourcing team in Vietnam and Hong Kong. To support Haglöfs staff to identify and collect information about potential risks and issues during visits, a checklist was developed in collaboration with the sourcing team. This enabled valuable identification of risks and issues and more thorough follow up in connection to some of the visits. However, despite training provided, effective implementation of the checklist remained a challenge during the year due to lack of time and resources.
- Four of the factories we work with participated in training sessions led by Fair Wear or Better Work. Fair Wear held an onboarding training at one of our biggest factories in Vietnam, reaching a total of 402 workers, 145 supervisors, and 10 managers (58% of all the participants were women). The training covered the topics in the Code of Labor Practices (including worker freedom), the Fair Wear worker helpline, Vietnamese labor law, worker-management dialogue, and social dialogue. The other three factories participated in management training from Better Work (reaching 12 staff in total), focused on gender equality, labor contracts, social and health insurance, labor law, and working conditions regulations.
- To further help raise awareness about the Fair Wear worker helpline beyond the information sheets posted, two factories in Vietnam also distributed Fair Wear Worker Information Cards. These cards provide an overview of the Code of Labor Practices, including worker freedom, and information about how and when to contact the Fair Wear helpline.
- Our work to consolidate factories continued in accordance with our Sourcing Strategy. The total number of factories that produced Haglöfs products in 2024 was reduced compared to 2023 (from 34 to 30).

- The sourcing team in Vietnam and Hong Kong, as well as the sustainability team, participated in an internal training covering human rights, Fair Wear requirements, and Haglöfs' human rights due diligence process. All new staff joining Haglöfs during the year also received a basic introduction to Haglöfs' human rights due diligence process, the Code of Labor Practices, and Fair Wear.
- One additional wage dataset was collected during a Fair Wear audit in Turkey, resulting in complete wage data for 16 factories in China, Vietnam and Turkey. Nine of these factories, accounting for over 35% of the 2024 volume, pay average wages that meet or exceed one of the living wage benchmarks used.

For more information about impacts identified and progress made during 2024, see the [2024 Haglöfs Sustainability Report](#) and the [Factory List](#).

Further steps

Our work to identify and address risks connected to modern slavery, as well as potential and actual negative impacts on human rights more broadly, continues. In addition to our ongoing human rights due diligence work described above, we aim to focus on the following key actions in the coming year to further strengthen our work to address modern slavery risks and impacts:

- Continue to map our supply chain beyond Tier 1 factories, to enable identification of modern slavery risks further down in our supply chain where risks may be higher.
- Start collecting risk information from Tier 2 suppliers, including forced labor risks.
- Assess the internal training provided and, where necessary, provide targeted training to relevant staff on how to identify and handle cases of forced labor in our supply chain.
- Continue the work to strengthen our policies and procedures to address relevant human rights risks in our own operations and value chain, including risks of modern slavery.

This statement has been approved by the Haglöfs AB Board of Directors on May 27th, 2025.



Daniel Tseung, Chairman of the Board