

Modern Slavery and Transparency Statement

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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 conduct human rights due diligence 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. We collaborate with our manufacturing partners and their workers, third-party organizations, and other brands to mitigate risks and issues 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 due diligence 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), the Netherlands (Haglöfs Benelux B.V), Hong Kong (Haglöfs (Hongkong) Limited) 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 79 trusted material suppliers and 26 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 various sales channels. Haglöfs products are sold in 23 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 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 human resources 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 facilities involved in the various stages of material production is ongoing. We also work to map the origin of our natural fibers 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 rights risks, such as Fair Wear, other Fair Wear member brands, and the European Outdoor Group (EOG).

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

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 potential new factories, including assessment of their ability to meet Haglöfs' Code of Labor Practices. No bulk 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 current and potential new clothing, footwear, and hardware manufacturers involved in Haglöfs production, which includes risks of modern slavery. In the risk assessments we consider various types of risks, such as risks related to the relevant country, sector, product, and factory, 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, training and visits, factory surveys, and any potential complaints from factory workers. The risk data includes specific forced labor indicators for each factory, such as the presence of vulnerable high-risk groups (e.g. foreign migrant workers), the use of recruitment agencies and employer provided

housing, and any forced labor-related findings from previous audits or complaints. When considering new manufacturing partners, they undergo an approval process in which their human rights risks are assessed, including forced labor risks.

- b. **Factory audits:** The risk assessments guide the prioritization of further actions to identify actual and potential human rights impacts at factory level, such as on-site social audits. The purpose of the audits is both to identify risks and to verify compliance with Haglöfs' Code of Labor Practices. 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 training and access to a worker helpline. To avoid making demands on our suppliers that may compromise their ability to respect human rights, 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 any issues 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 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, 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 provide training to our manufacturing partners to help improve both workers' and management's understanding of labor and human rights, including the topic of forced labor. The training aims to ensure workers are aware of their rights as well as the options available to them in case their rights are violated. At the same time, it supports factory management in establishing the processes and systems needed to mitigate risks and drive continuous improvements. The training is primarily conducted by Fair Wear or Better Work in collaboration with other brands, and is renewed at a frequency determined by the factory's risk level. In addition, human rights training is provided to key Haglöfs employees who regularly 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 preventing adverse human rights impacts in the supply chain. We therefore continuously review our internal policies and procedures aiming to avoid placing demands on suppliers that could compromise their ability to respect human rights. For example, to the extent possible, we avoid late payments, last-minute orders, and high-pressure deadlines that may create undue 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 factories, including:
 - Number of factory audits and worker interviews
 - Progress on corrective action plans

- Number of factory visits and training sessions conducted
- Number and type of complaints coming through the worker helpline
- Coverage of wage data and progress toward living wages.

The Fair Wear Member Hub, as well as internal systems, facilitates 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 report from 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 report. We also disclose all our Tier 1 clothing, footwear, and hardware manufacturers, including support factories, to Fair Wear and on our [website](#).

Our 2025 impacts and progress

In 2025, 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. At Tier 1, all countries except Sweden and Portugal were classified as high risk. Furthermore, all our Tier 1 clothing, footwear and hardware factories were assessed at factory level to support the prioritization of further actions to identify and address human rights risks. To strengthen the factory risk assessment and include more worker feedback, a worker representative survey was piloted in selected factories.

Audits conducted in 2025 of our Tier 1 factories confirmed that the main areas of non-compliance remained consistent with previous years. Safe and healthy working conditions continued to represent the largest share of findings, followed by wages and issues related to factory communication and grievance mechanisms. For more detailed information, please see the [Factory List](#).

At two factories in Vietnam, issues related to forced labor indicators were identified. At one factory, a gate pass system was used to monitor workers leaving the premises during lunch breaks. This practice has since been discontinued, and workers were informed of the updated policy. At the second factory, it was not possible to ensure that overtime was voluntary, as overtime registration was signed on a monthly basis without specifying overtime hours. The factory has since revised its procedures to obtain daily consent for overtime, specifying the hours worked. All workers were informed of the updated process through the internal communication system. The corrective actions will be further verified during upcoming visits and audits to ensure sustained remediation.

No reports were submitted to the Ethics helpline or the Fair Wear worker helpline in 2025.

The risks and issues identified were addressed through the due diligence policies, processes and activities described above. In 2025, we specifically implemented the following measures to address identified risks and issues:

- Ten of the factories we work with were audited by different audit schemes. As part of the audits, 413 workers were interviewed, including 280 women and 133 men.
- We continued to collaborate with our partner factories to address issues identified in previous audits, with all open CAPs followed up and progress monitored. For an overview of completed key corrective actions from the most recent audits, please see the [Factory List](#).

- Haglöfs staff conducted 48 factory visits across 13 partner factories, contributing to strengthened relationships and improved visibility of working conditions.
- Three factories participated in Fair Wear training, reaching 312 workers and 140 managers and supervisors. Internal training on human rights was also provided to relevant Haglöfs staff.
- We continued to consolidate our factory base in line with our Sourcing Strategy, reducing the number of active factories while strengthening long-term partnerships.
- We progressed our work on living wages by updating our living wage strategy, participating in the STS 2030 “United for Fair Wages” initiative, and expanding the collection of wage data. Third-party verified wage data was collected for a significant share of our production volume, and nine factories were identified as meeting or exceeding relevant living wage benchmarks.
- Haglöfs underwent a Fair Wear Brand Performance Check in 2025 and was awarded Leader status with improvements observed across key areas assessed. The assessment also highlighted opportunities for further progress, including increased worker engagement, integration of a gender lens in action plans, and increasing the share of production sourced from factories paying living wages. To learn more, see the [2025 Fair Wear Brand Performance Check Report](#).

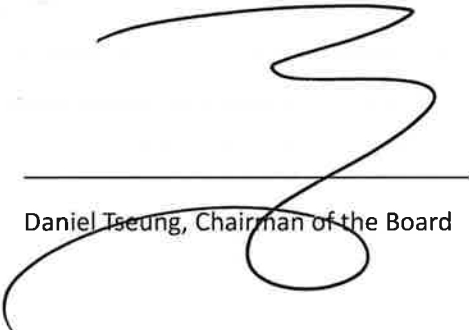
For more information about impacts identified and progress made during 2025, please see to the [2025 Haglöfs Sustainability Report](#) and [Factory List](#).

Further steps

Our work to identify and address risks related 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 efforts to address modern slavery risks and impacts:

- Continue mapping our supply chain beyond Tier 1 factories, to enable the identification of modern slavery risks further down the supply chain.
- Begin collecting risk information from Tier 2 suppliers, including risks related to forced labor.
- Continue the work to strengthen our policies and procedures to address relevant human rights risks in our value chain, including risks of modern slavery.
- Implement the 2025 Fair Wear Brand Performance Check Work Plan to further strengthen our human rights due diligence system, including increased worker engagement, integration of a gender lens in action plans, and continued implementation of our living wage strategy.

This statement has been approved by the Haglöfs AB Board of Directors on May 29th, 2026.



Daniel Tseung, Chairman of the Board