



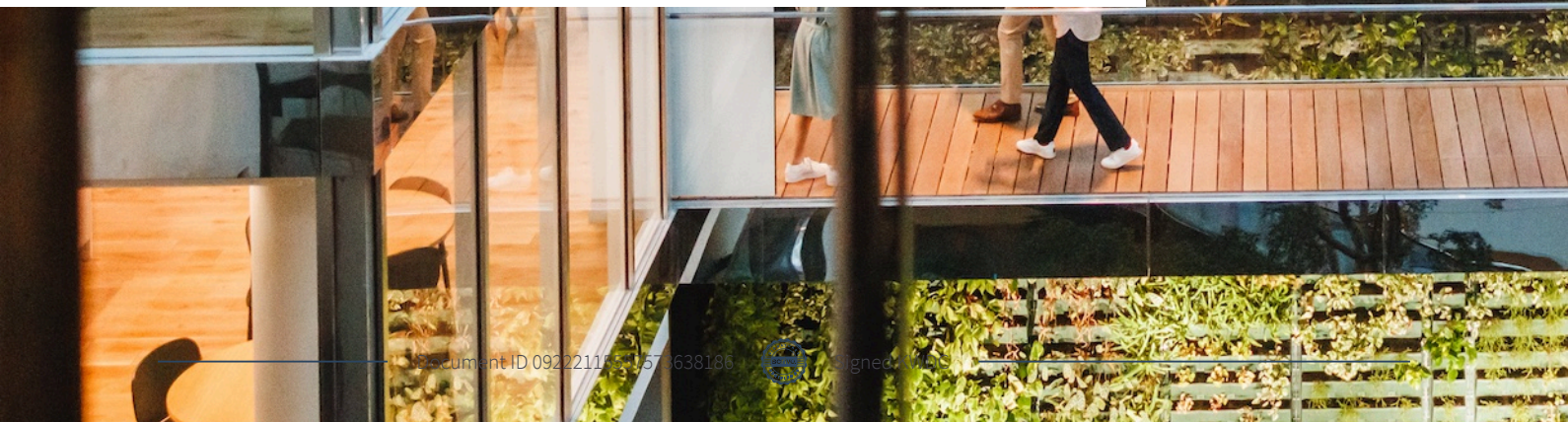
Due diligence for responsible business conduct with regards to people, animals, society and the environment

# Account reporting year 2025

for Wenaas Workwear AS



*Ethical Trade Norway has assessed the report of Wenaas Workwear AS to meet the criteria of our Implementer Level. More information about our Implementer Level can be found [here](#).*



# SUSTAINABLE DEVELOPMENT GOALS



## To Readers Of The Report

Private enterprises, the public sector and organizations have a significant impact on people, society, the environment, the climate and animals. Enterprises contribute to development, innovation and improved living conditions, but their activities also entail risk and real harm. Enterprises therefore play a key role in efforts to achieve the UN Sustainable Development Goals and the Paris Agreement's 1.5-degree target. This work is most effective when done in collaboration.

Ethical Trade Norway is a membership organization and a multi-stakeholder initiative bringing together businesses, trade unions, employer organizations, civil society and the public sector to jointly address the complex challenges in global supply chains that no single company can solve alone.

Transparency, accountability and continuous improvement are fundamental to this work. This membership report can be used as a statement under the Norwegian Transparency Act, but it also covers broader topics such as climate, environment and anti-corruption. Our framework is based on the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance – internationally recognized standards that form the basis for Ethical Trade Norway's 13 principles for sustainable business practices. These principles cover human rights, decent work, environment and climate, animal welfare and anti-corruption.

All members of Ethical Trade Norway are required to carry out risk-based due diligence and to report annually on progress in their own work. Companies at our quality level Basic meet the requirements of the Transparency Act for due diligence reporting. Members can also strive to achieve the levels *Implementing* and, from 2026, *Leading*.

Due diligence is not about being "risk-free", but about being transparent and systematic: identifying risks, preventing and mitigating negative impacts, communicating openly about how these are addressed, and – where necessary – contributing to remediation.

I would like to thank all members for their efforts, openness and willingness to contribute to responsible supply chains. Together, we demonstrate how responsible trade can be in the best interests of people, animals, society and the environment.

**Heidi Furustøl**

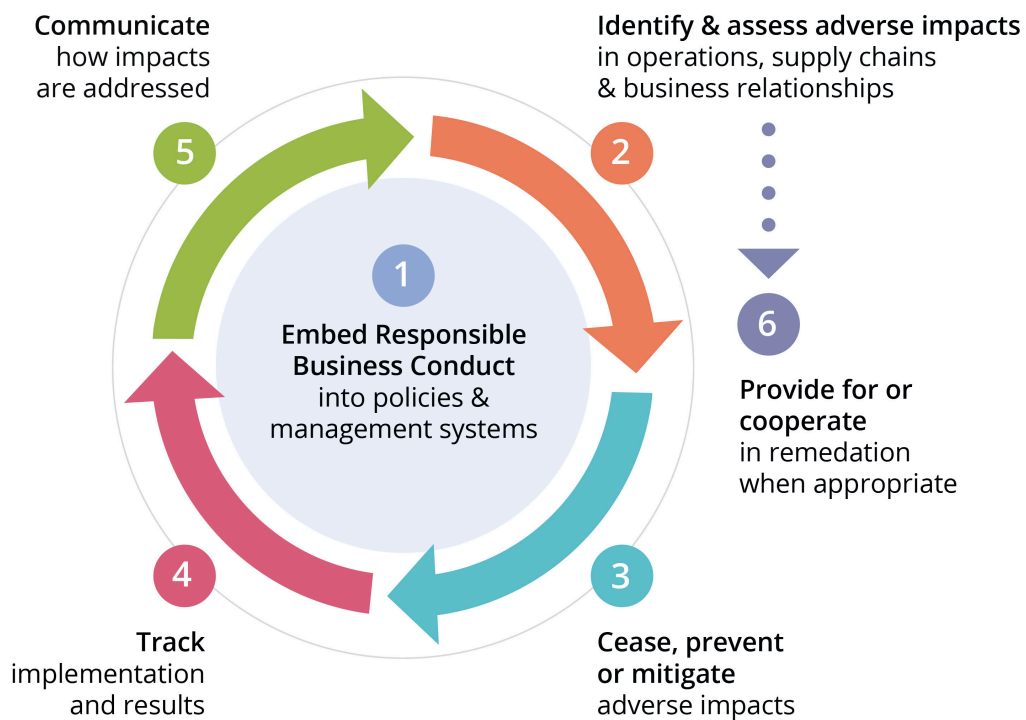
*Executive Director*

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

At Wenaas, we are committed to strengthening our due diligence practices as a core element of responsible business conduct. Over this period, we have enhanced our risk-based processes to better identify, assess, and address potential adverse impacts across our operations and supply chain. Due diligence is not a one-time exercise; it is an ongoing and essential part of how we operate.

Through structured processes and regular updates to our policies and practices, we are building a more robust and informed approach to risk management. While we have made meaningful progress, challenges remain - particularly in complex supply chains. We remain focused on continuously improving our ability to address these challenges effectively and consistently, including those related to human rights.

This work is essential to maintaining trust with our stakeholders, supporting informed decision-making, and creating long-term value. We will continue to advance these efforts with diligence and transparency. Responsible business conduct underpins our approach to sustainable value creation and the trust placed in us by our stakeholders.

I would like to thank our employees, customers, suppliers, and business partners for their ongoing commitment and contributions to this important work.



Katrine Wold Deunk  
CEO Wenaas Workwear AS

# Board Signature

This report is electronically signed. See last page for verification.

Katrine Wold Deunk  
CEO



# Enterprise information and enterprise context

## Key enterprise information

### Enterprise name

Wenaas Workwear AS

### Head office address

Bruasetvegen 122, 6386 Maandalen, Norway

### Main brands, products and services offered by the enterprise

Complete range of work clothes, uniforms, footwear, gloves and personal protective equipment.

### Description of enterprise structure

#### Wenaas Workwear AS

Founded in 1996, with roots dating back to 1931, Wenaas is an international supplier of complete safety solutions. Headquartered in Måndalen, Norway, with nationwide sales offices and stores in Stavanger, Mo i Rana, and Oslo, we serve both domestic and global markets. Wenaas produces and distributes workwear, gloves, safety footwear, and PPE including products from trusted partners such as 3M and Sundstrøm. Our products are developed in Norway in consultation with end users, cover flame retardant, rescue, visibility, construction, food industry, and custom solutions. Our solutions serve industries such as oil & gas, heavy industry, shipping, utilities, and the public sector, including police and military. Our mission is simple: to dress and protect people at work.

Wenaas employs 194 permanent staff across six countries - Norway (HQ), Sweden, the Netherlands, Aberdeen, Singapore, and the USA. The executive management team consists of our CEO, CFO/HR, Supply Chain Director, Sales & Marketing Director, and IT & Operations Director. The organization includes 13 departments structured under four reporting lines:

- Sales & Marketing Director: Sales, Market, WMS/Customer Service
- Supply Chain Director: Product Development, Sourcing, Purchasing, ESG
- CFO: HR, Projects, Finance
- IT & Operations Director: Operations, Logistics, IT.

### Revenue in reporting year (NOK)

966

### Number of employees

194

### Is the enterprise covered by the Transparency Act?

Yes

### Major changes to the enterprise since last and current reporting period

No.

**Contact person for the report (name and title)**

Sustainability and ESG Manager - Charlotte Schrader

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**Email for contact person for the report**

charlotte.schrader@wenaas.no

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## Supply chain information

### General description of the enterprise's sourcing model and supply chain

#### Supply Chain and Procurement Model

Wenaas operates a dual-sourcing procurement model with a diversified global supplier base across Asia, South Africa, North America, the USA, and Europe. This approach strengthens supply-chain resilience and flexibility, while supporting quality, innovation, and responsible sourcing. We purchase directly from manufacturers of finished goods and maintain direct relationships with factories producing our own brands. Where specialized expertise or lead-time efficiency is required, Tier 1 suppliers may engage sub-suppliers under our oversight. All sub-suppliers are assessed and required to comply with Wenaas' ESG standards, ensuring consistent responsibility across the supply chain.

Supplier due diligence includes internal evaluations, RFIs, questionnaires, certifications, and third-party audits, with a strong focus on labor standards and worker welfare. PPE products are fully sourced through contracted brand-owner manufacturers. While audits alone do not ensure full due diligence, Wenaas applies a proactive, risk-based approach to supplier engagement, fostering long-term partnerships built on transparency, fairness, and continuous improvement.

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#### A-Strategic Suppliers

A-Strategic suppliers provide key raw materials and/or finished products and are engaged through long-term partnerships. These relationships support innovation, market adaptability, sustainable growth, and circular value chain development, with clear targets and KPIs to monitor and report progress.

#### ESG Requirements & KPIs

- ESG Program: Suppliers must demonstrate transparent sustainability systems across their value chain and commit to agreed environmental and circular initiatives.
- Pre-engagement: All strategic suppliers (in-house and third-party) must sign the Company Code of Conduct and provide a valid social audit and/or recognized certification.
- amfori BSCI: In-house strategic suppliers must be amfori BSCI qualified. An approved audit report must be available within one year of onboarding.
- amfori BEPI: In-house strategic suppliers must be amfori BEPI qualified. A self-assessment is required in year one, followed by a third-party BEPI audit in year two.
- amfori Academy: Participation in relevant amfori Academy training courses are mandatory to support continuous improvement under BSCI and BEPI.
- Governance: One to two sustainability review meetings per year, with at least one on-site meeting when suitable.

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#### B-Tactical Suppliers

B-Tactical suppliers are not strategically equivalent to Group A but remain important for market positioning. From a sustainability perspective, these suppliers are required to operate transparently across manufacturing processes, production sites, and material sourcing. They must demonstrate alignment with national and international standards and show how the UN SDGs are embedded in their corporate strategies, including how sustainability risks and challenges are addressed.

#### ESG Requirements & KPIs

- Pre-engagement: Suppliers (in-house and third-party) must sign the Company Code of Conduct and provide a valid social audit and/or recognized certification.
- amfori BSCI: Based on spend, country, and risk indicators, in-house tactical suppliers are expected to obtain amfori BSCI qualification within two years of partnership.
- amfori BEPI: Based on spend, country, and risk indicators, in-house tactical suppliers are expected to complete an amfori BEPI self-assessment within two years of partnership.
- amfori Academy: Participate in relevant amfori Academy trainings to support continuous improvement under BSCI and BEPI.
- Governance: At least one sustainability review meeting per year - location determined by project needs.

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### C-Complementary Suppliers

C-Complementary suppliers provide non-standard products and are typically engaged on a short-term or limited basis. Relationships focus on constructive dialogue, feedback, and incremental sustainability improvements within the supply chain.

### ESG Requirements & KPIs

- Pre-engagement: Suppliers (in-house and third-party) must sign the Company Code of Conduct. Social audits, certifications, and/or documented compliance with the Transparency Act are encouraged.
- amfori BSCI: Based on spend, country, and risk indicators, in-house complementary suppliers are encouraged to obtain amfori BSCI qualification or equivalent within two years of engagement.
- Governance: Meetings held as needed, depending on project scope.

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### Number of suppliers with which the enterprise has had commercial relations in the reporting year

131

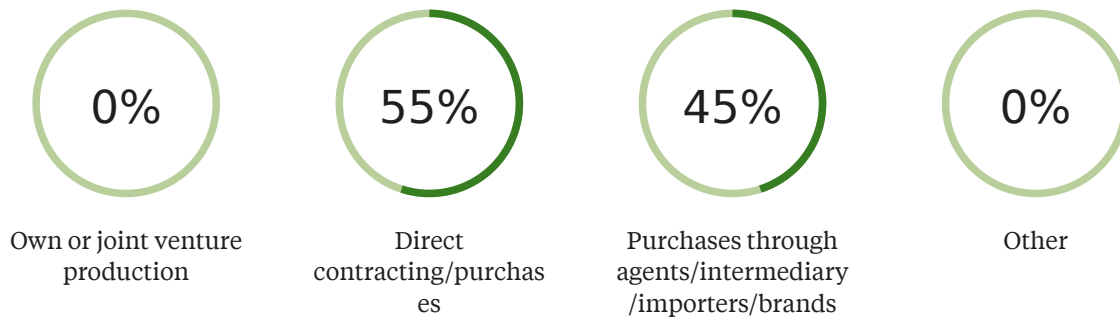
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### Comments

Textiles, Footwear, Gloves and Accessories belong to both our own Wenaas Brand and 3rd part suppliers, while PPE and logo are bought through 3rd part business partners only.

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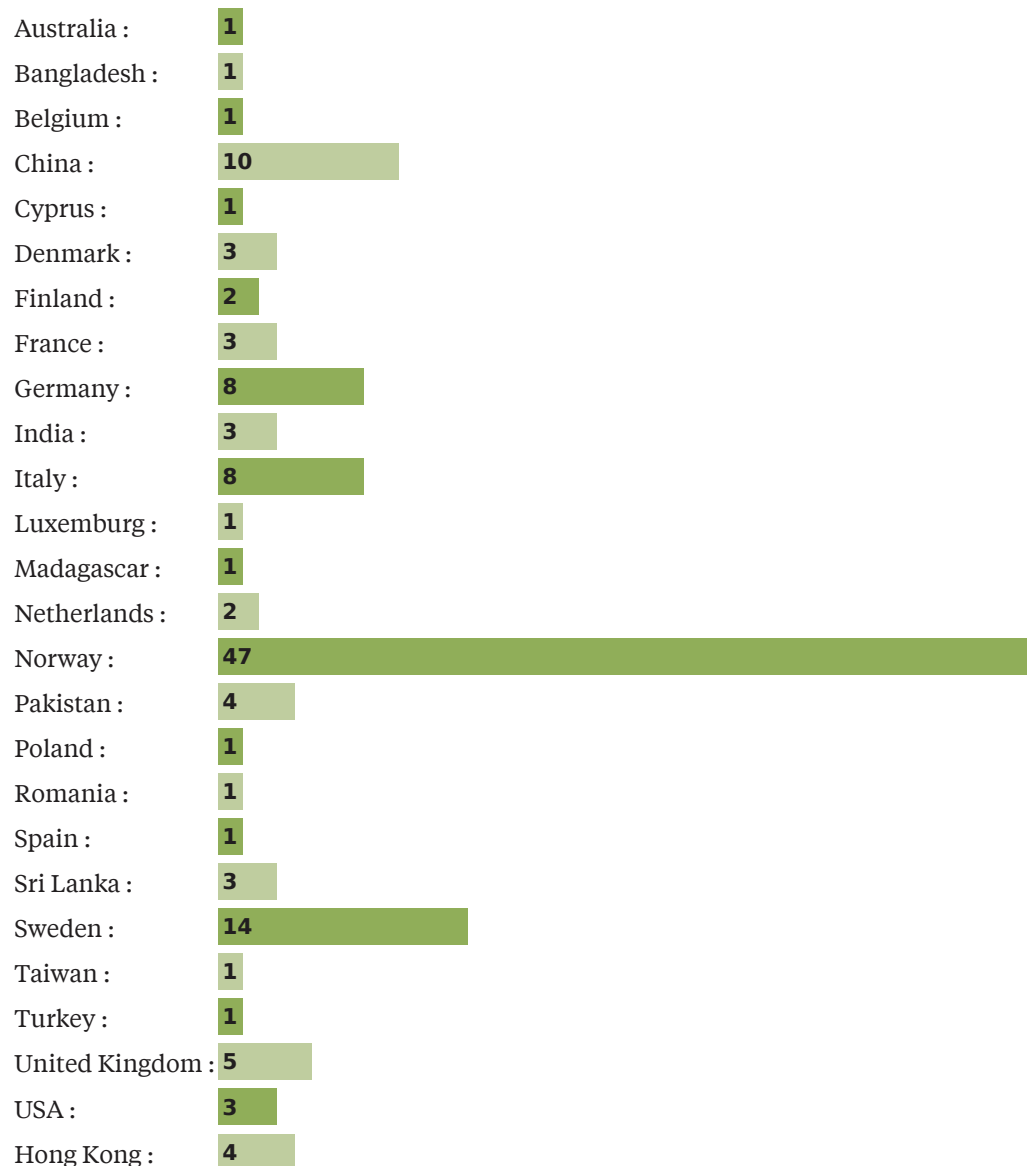
### Type of purchasing/ suppliers relationships



131 suppliers (Tier 1) whereas 26 producers represent Wenaas brand, 105 are 3rd part suppliers.



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



Tier 1 suppliers by country to Wenaas brand and 3rd part brand owner’s information.

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**State the number of workers at first tier producers**

**Number of workers**

18 506

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**Comments to number of workers**

The numbers of workers are collected from SAQ’s, amfori BSCI and Sedex audit reports (in-house brand).



**Key inputs/raw materials for products or services and associated geographies**

<b>Polyester</b>	China Germany Spain India Pakistan Poland
<b>Cotton</b>	China India Pakistan Poland
<b>Wool</b>	Australia Uruguay
<b>Leather</b>	Italy Pakistan
<b>Nylon</b>	China
<b>Modacrylic</b>	Germany Portugal
<b>Lenzing FR</b>	Austria
<b>Spandex</b>	China India
<b>Nitril</b>	Sri Lanka Pakistan
<b>Polyuretan (PU) &amp; Polyvinylchloride (PVC)</b>	China Italy Sri Lanka The European Union

98% of Wenaas fabrics are OEKO-TEX® STANDARD 100. Trims and packaging are excluded.

**Is the enterprise a supplier to the public sector?**

Yes

## Goals and progress

### Process goals and progress for the reporting year

1

#### OUR SOCIAL TARGETS 2025

- Goal:**
- **Progression of focusing on compliance issued in the CAP reports by amfori BSCI** – especially social management system, and decent working hours in China. In dialog with suppliers and amfori to address these issues in a positive systematically way – for example by encouraging suppliers to go on the Amfori platform and take courses to improve their training skills and own business performance especially related to their production capacity planning.
  - **WB Tier 2 & 3 (fabric and processing), risk screening and social compliance** – continue risk screening evaluations for sub-suppliers belonging to strategic and tactical suppliers on WB.
  - **Addressing freedom of association and collective bargaining in China factories** - in dialog with suppliers to understand the complexity associated with this matter. We continue to focus on bringing this issue up in different forums and seminars with Amfori and Ethical Trade Norway.
  - **“Amfori Speak for Change” program** (grievance mechanism program) - investigating for 2025 launch (India).
  - **Continue to build our knowledge to identify key actions towards addressing gender gaps** - the goal is to create equal growth and development opportunities for all genders in our supply chain. A continuous goal that is combined with the industry, production process, country and culture meaning that we are keeping an eye on it and mapping more suppliers in terms of workers by gender. For Wenaas, this has already been addressed and established in our ISO.

#### ESG Targets and Status (2025)

- Status:**
- To avoid duplication, ESG targets, priorities, and performance metrics are reported exclusively in Wenaas' ESG Report, which outlines our sustainability strategy, focus areas, and ESG progress. The report is available; <https://www.wenaas.com/en/sustainability>

2

#### OUR ENVIRONMENTAL TARGETS 2025

- Goal:**
- **Sustainable development of material info. awareness online** - to include maximize a product's lifecycle - “Take care” of your product, including VAS program, return and recycle arrangements.
  - **Product collections codes** - internal codes complying with our sustainable initiatives.
  - **Increase FSC-certified paper** - on packaging, tags, labels, and stickers.
  - **Reduce plastic packaging** - on certain collections and replace to recycled content on our polybags (HDPE & LDPE).
  - **Increase transparency in T2-4** - from raw materials to production.
  - **Increase OEKO-TEX® STANDARD and OEKO-TEX® MADE IN GREEN** - on high-profile and critical products. Wenaas has in line with our sourcing strategy five of our major textile strategic suppliers are OEKO-TEX® STeP certified.
  - **Continuing to replace conventional cotton with Better Cotton Initiative (BCI)** - Wenaas is committed to sourcing 25% of our cotton as Better Cotton and Fairtrade cotton by the end of 2025, and 50% by end of 2027.
  - **Continuing to replace virgin polyester with Global Recycled Standard (GRS)** - workwear and uniform collections.
  - **Mulesing free merino wool** - continue to document from raw-fiber to secure animal welfare.

- **Leather Working Group (LWG) member** - an environmental certification for the leather from the manufacture (tannery) and to apply to Wenaas Brand footwear and gloves.
- **Search for digital product passport (DPP) and Life-cycle assessment (LCA)** - possibilities with sustainability and traceability data throughout the products life cycle to reduce risks. Since the DPP is related content of the Eco-design for Sustainable Products Regulation (ESRP) proposal we are searching for more information and in dialog with several companies to understand more in depth the requirements in the value chain for our suppliers, our end customers, as well as our own possibilities forward. Ultimately, our timeline is set between 2025 to 2026 to implement DPP and/or LCA on our products as this will be mandatory by 2030 in EU.

**ESG Targets and Status (2025)**

**Status :**

To avoid duplication, ESG targets, priorities, and performance metrics are reported exclusively in Wenaas' ESG Report, which outlines our sustainability strategy, focus areas, and ESG progress. The report is available; <https://www.wenaas.com/en/sustainability>

3

**OUR GOVERNANCE TARGETS AND PERFORMANCE 2025**

- **Going beyond obligatory compliance** - with legal and customer-specific requirements by boosting ESG purchasing to meet higher quality of the products. Focus to comply to meet financial and sales goals through our sustainable performance. Over time, we believe that by improving our ESG proposition, we will create much higher value for the company and our stakeholders.

**Goal :**

Upcoming CSRD reporting is finalized.

- **Integrated reporting incl. carbon emissions in Scope 1, 2, 3** - in collaboration with CEMAsys, Wenaas continues to measure carbon emissions. The carbon accounting is measured in line with the GHG Protocol and ISO14064-1.

- **The Corporate Sustainability Reporting Directive (CSRD) reporting** - disclose information on our risks and opportunities (DMA according to EFRAG).

- **Combining our business and increasing collaboration** - with our suppliers, partners, and NGO's.

**ESG Targets and Status (2025)**

**Status :**

To avoid duplication, ESG targets, priorities, and performance metrics are reported exclusively in Wenaas' ESG Report, which outlines our sustainability strategy, focus areas, and ESG progress. The report is available; <https://www.wenaas.com/en/sustainability>

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**Process goals for coming year**

1

**ESG Targets and Status (2026)**

To avoid duplication, next year's ESG targets, priorities, and related performance metrics are presented exclusively in Wenaas' ESG Report, which sets out our sustainability strategy and progress.



# 1

## Governance and commitment to responsible business conduct

Embedding responsible business conduct means that the enterprise should have strategies and plan, as well as relevant policies and guidelines for due diligence for responsible business conduct (hereafter due diligence) which are adopted by management. These should comprise the enterprise's own operations, its supply chain and other business relationships. Effective management systems for implementation are key to success, and due diligence should be an integrated element in enterprise operations. Clear expectations from senior management are crucial, as well as clearly assigned responsibilities within the enterprise, for the implementation of the steps in the due diligence process. Those involved need to know how to proceed. Transparency about commitments the enterprise has for itself, challenges they are facing, and how these are managed is fundamental

## 1.A Policy for own enterprise

### 1.A.1 Link to publicly accessible policy for own enterprise

<https://www.wenaas.com/en/sustainability>

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### 1.A.2 What does the enterprise say publicly about its commitments to respect people, animals, society and the environment?

#### **Protecting People and Planet at Work**

At Wenaas, protecting people at work is our core mission. As a leading international supplier of workwear and protective equipment, we set high standards for safety, quality, and responsibility across our value chain. We take environmental and social responsibility seriously - from product development and ethical sourcing to supplier requirements and measurable improvements.

Wenaas conducts supplier due diligence to identify, prevent, and mitigate risks related to human rights, environmental impact, and business ethics across the value chain. Compliance with the Wenaas Code of Conduct is a prerequisite for all suppliers and business partners and forms the basis for ongoing monitoring and follow-up. Adherence is assessed through risk-based evaluations, dialogue, and corrective action plans where necessary. Failure to remediate identified non-compliance may result in escalation measures, including termination of the business relationship.

Founded in 1931, Wenaas builds on decades of expertise while actively shaping the future of sustainable workwear. Our ESG strategy strengthens supply-chain resilience and risk management while incorporating ESG aspects into new opportunities through responsible sourcing, climate action, and innovation. Our commitment is clear - protecting People, respecting the Planet, and building long-term value for our customers and stakeholders.

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### 1.A.3 How has the policy/commitment been developed and how is it embedded in the enterprise?

#### **From Policy to Practice**

Wenaas' commitment to responsible business conduct is anchored in executive management and embedded across our corporate strategy, policies, governance frameworks, and daily operations. Management sets clear expectations for the development, implementation, and oversight of our ESG strategy. Sustainability objectives are integrated across all relevant departments and applied throughout the value chain, with responsible sourcing of textiles, footwear, and PPE as a core priority. Worker safety is our highest priority, supported by continuous innovation to improve protection and reduce environmental impact.

Due diligence assessments for responsible business conduct are an essential element of our sustainability approach. We systematically identify, assess, and address actual and potential adverse impacts through a risk-based due diligence process, evaluating their severity and likelihood and prioritizing actions based on the scale, scope, and remediability of the potential harm. Our approach is aligned with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, and supports the EU 2030 targets, the Paris Agreement, and the UN Sustainable Development Goals (SDGs). Wenaas' strategy contributes to SDGs 5, 7, 8, 10, 12, 13, and 17.

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## 1.B Organisation and internal communication

### 1.B.1 How is the due diligence work organized within the enterprise, embedded in internal guidelines and routines?

#### **Our Approach to Managing Due Diligence**

Due Diligence assessments are performed yearly according to our ESG program. The online supplier quest back is analyzed accordingly to the answers and against internal and external information. Based on the feedback and our on-going supplier follow-up routine, we implement measures for improvements. The process and result of risk assessments are documented in this report, in accordance with the Norwegian Transparent Act and published on our company's websites before the end of Q2.

Our CEO is responsible for the process, in collaboration with the Supply Chain Director and the ESG Manager. The ESG Manager reports directly to the Supply Chain Director on responsible business conduct. Master data Manager quality assures supply data and information towards supplier. Product Development, Sourcing and Purchasing departments work closely to following up our sustainable goals in our supply chain and report directly to the Supply Chain Director. Five dedicated Product Managers are responsible for sourcing and development within their defined categories (Textiles, Footwear, Gloves, PPE, and Fabrics & Trims). The product development department is a teamwork of ten people in total and is split into certifications, designing, tailoring and product development areas. To secure demands six purchasers work closely together with each of their respective product managers.

Organized in this way continuously predicts dilemmas and secures information internally on supplier decisions, risk assessments, purchasing planning and practices on our ESG standards and principles.

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### 1.B.2 How is the significance of the enterprise's due diligence work defined and clarified for the employees through their job description (or the like), work tasks and incentive structures?

#### **Daily Due Diligence**

Together with Sourcing Chain Director the Sustainability and ESG Manager will continuously follow-up information towards internal stakeholders and management on due diligence work within the supplier chain. To address these topics our ESG strategy has set targets and performance goals in a short- and long-term perspective. All employees in Wenaas receive clarified job descriptions and training programs are implemented to increase awareness within their working field.

Throughout 2025, employees in the product development and sourcing functions have participated in advanced training programs on responsible and sustainable business practices by Ethical Trade Norway and amfori. These programs strengthen our understanding of sustainability risks and impacts across the supplier value chain. Sales teams receive tailored sustainability training and guidance to enhance awareness, support informed customer dialogue, and strengthen professional competitiveness. This is delivered through internal meetings, seminars, and relevant professional networks.

This structured approach to competence development supports our ability to meet customer expectations for high quality, transparency, and trust, while upholding strong standards for occupational safety and environmental performance in the production of our products.

### 1.B.3 How does the enterprise make sure employees have adequate competence to work on due diligence for responsible business conduct?

#### **Due Diligence Competence**

Due diligence is embedded across the organization through clearly defined roles, responsibilities, and procedures. Relevant job descriptions and mandates include accountability for responsible business conduct, particularly for employees involved in sourcing, product development, sustainability, and management. Due diligence requirements are integrated into daily decision-making processes such as supplier selection, risk assessment, and monitoring, and are reinforced through performance management where relevant.

Throughout 2025, the company has strengthened internal competence on responsible business conduct and supply chain due diligence. An ESG Supplier Program is strengthened and defines clear expectations for suppliers and business partners and to operate the company's due diligence processes. The Code of Conduct and Business Ethics program is supported by mandatory training for all employees, including certification requirements, and ongoing guidance through internal policies and communication.

Employees are supported by a confidential digital whistleblowing channel for reporting concerns. In addition, the company engages in internal and external collaboration through recognized standards, certifications, and partnerships with relevant industry and sustainability organizations, contributing to continuous improvement and shared solutions across the value chain.

## 1.C. Plans and resources

### 1.C.1 How are the enterprise's commitments to respect people, animals, society and the environment embedded in strategies and action plans?

#### **Integrating Responsibility into Strategy**

Wenaas embeds sustainability at the core of its operations, with a strong commitment to people, society, and the environment. Through responsible sourcing and continuous supplier due diligence, we drive measurable ESG improvements and act on a clear sustainability vision to deliver change.

Within our ISO-based supplier follow-up routines, Wenaas applies a structured control framework supported by multiple data sources and monitoring tools to ensure compliance with our ESG Supplier Program Code of Conduct and defined performance targets. Our ESG strategy is a comprehensive sourcing framework and translated into measurable KPIs disclosed in our ESG report. Execution is driven through a documented, risk-based action plan covering the supply chain, ISO management system principles, and double materiality considerations under CSRD.

The risk-based action plan is structured around four key risk areas:

1. *Labor and human rights risk* – exposure to violations in Tier 1 suppliers across high-, medium-, and low-risk sourcing countries, based on country risk classification and audit findings.
2. *Environmental management risk* – inadequacy related to chemical management, water stewardship, energy consumption, and emissions performance.
3. *Supply chain traceability risk* – insufficient transparency and traceability within Tier 2–5 suppliers, including raw material sourcing.
4. *Operational supplier risk* – financial, governance, and performance-related risks within Tier 1 suppliers.

Each risk area is supported by documented mitigation measures, clearly assigned ownership, defined timelines, and SMART performance indicators. These indicators are integrated into our ESG KPI framework and aligned with relevant datapoints under the European Sustainability Reporting Standards (ESRS) in accordance with CSRD requirements. Performance is systematically monitored through periodic supplier evaluations, audit reports, corrective action tracking, and management review processes to ensure continuous improvement and annual target achievement.

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### 1.C.2 How are the strategies and action plans for sustainable business conduct followed up by senior management and the board?

#### **Sustainability Oversight**

Wenaas' Board of Directors and executive management exercise active oversight and leverage to ensure delivery on the company's value proposition and sustainability commitments. The Board and top management are directly involved in setting strategic direction, approving ESG priorities and targets, and ensuring effective implementation and follow-up. Wenaas' ESG strategy is based on a long-term commitment to innovation, profitability, and sustainable value creation, supported by responsible production practices. Progress against ESG objectives is regularly monitored by executive management and the Board, ensuring accountability and continuous improvement.

## 1.D Partnerships and collaboration with business relationships

### 1.D.1 How does the enterprise communicate the importance of responsible business conduct in its business relationships?

#### **ESG Supplier Program**

Wenaas' ESG Supplier Program reflects our long-standing commitment to responsible business conduct and supply chain management. The program sets clear requirements for suppliers and business partners through our Code of Conduct, policies, and supporting documentation, which are publicly available. The program aims to promote decent working conditions and strong environmental standards throughout the supply chain. All suppliers are subject to a pre-engagement screening to ensure compliance with minimum ethical and environmental requirements. Supplier performance is monitored on an ongoing basis and identified risks, or non-compliances, are addressed through structured follow-up and remediation.

Our supply agreements are structured into three categories - A: Strategic, B: Tactical, and C: Complementary, reflecting the level of business criticality and the importance of business relationships. Supplier risk management requirements are defined according to the applicable agreement category. Supplier and business partner relationships are structured to meet market and operational needs, while our overarching objective is to build and maintain long-term partnerships.

Wenaas strengthens its ESG program through amfori membership, using BSCI and BEPI to monitor social and environmental performance across the supply chain. We require all suppliers to comply with applicable laws, regulations, and social and environmental standards, including zero tolerance for forced and child labor, non-discrimination, fair wages, reasonable working hours, freedom of association, occupational safety, and training. Supplier screening, audits, long-term collaboration, ongoing dialogue, and on-site visits support continuous ESG improvement. This approach is embedded in our due diligence process to identify, assess, and mitigate risks across the value chain.

In 2025, we strengthened supply chain transparency across Tiers 1–4 through risk-based supplier screening, expanded traceability, and structured audit follow-up aligned with ESG targets. ESG requirements are embedded in onboarding, performance reviews, and annual evaluations, supported by clear KPIs and accountability. Ongoing monitoring, site visits, and corrective action tracking drive measurable improvements. We mapped Tier 1 suppliers to sub-supplier level (Tiers 2–4), required disclosure of subcontractors and production units, and collected SAQs and ESG documentation from sub-suppliers. Certain fabric suppliers in Europe and Asia are formally nominated to further enhance traceability. ESG performance is directly linked to business decisions. For specific supplier incentives we link ESG performance to business decisions: production volumes were increased with two major suppliers due to strong amfori results and documented health and environmental initiatives, demonstrating that responsible business practices are a key factor in supplier evaluation and long-term partnership development.

Wenaas maintains continuous, structured supplier engagement as an integrated part of daily operations across Production Development, Purchasing, Sourcing, and ESG. The Sourcing team holds overall responsibility and ensures systematic follow-up through regular dialogue, digital and physical meetings, production site visits, and participation in relevant industry forums. ESG requirements and audit processes are embedded in this engagement. Key suppliers are visited regularly to review working conditions, health and safety, and environmental management as part of long-term collaboration. Between visits, ESG performance is followed up through ongoing dialogue via email and digital meetings, where it remains a recurring agenda item.

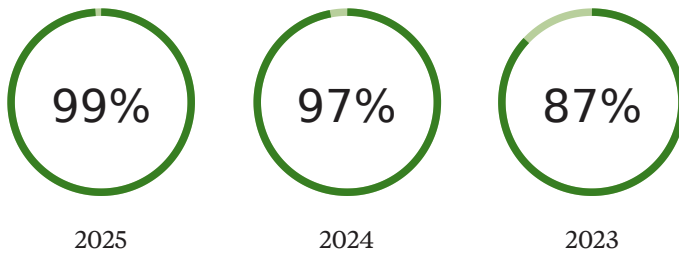
Regular supplier site visits complement ongoing operations, supporting production oversight, quality assurance, and ESG monitoring. Key suppliers are invited to the head office for annual commercial and strategic review meetings to promote transparency, alignment, and mutual understanding of operational expectations. Furthermore, Head of Fabrics & Trims Manager performs regular visits to sub-supplier production sites to strengthen traceability, oversee materials, and enhance visibility into upstream production processes.

Wenaas is also a member of Ethical Trade Norway, sharing principles of respect for people, animals, the environment, and climate. Our operations are certified to ISO 9001:2015 (Quality), ISO 14001:2015 (Environmental), ISO 45001:2018 (Occupational health and safety) and recognized by schemes including CDP, Sedex, Achilles, StartBANK, Magnet JQS, SEQual, IMPA, and ShipServ, reinforcing responsible business conduct and customer trust.

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## Indicator

### Percentage of the company's suppliers that have accepted guidelines for suppliers



99% of the company's suppliers have accepted our guidelines with the following distribution by brand and supplier categorization (based on spend).

- All 26 Tier 1 suppliers of Wenaas Brand including 35 sub-suppliers.
- The remaining 1% are 3rd part supplies and categorized as complementary. In dialog.

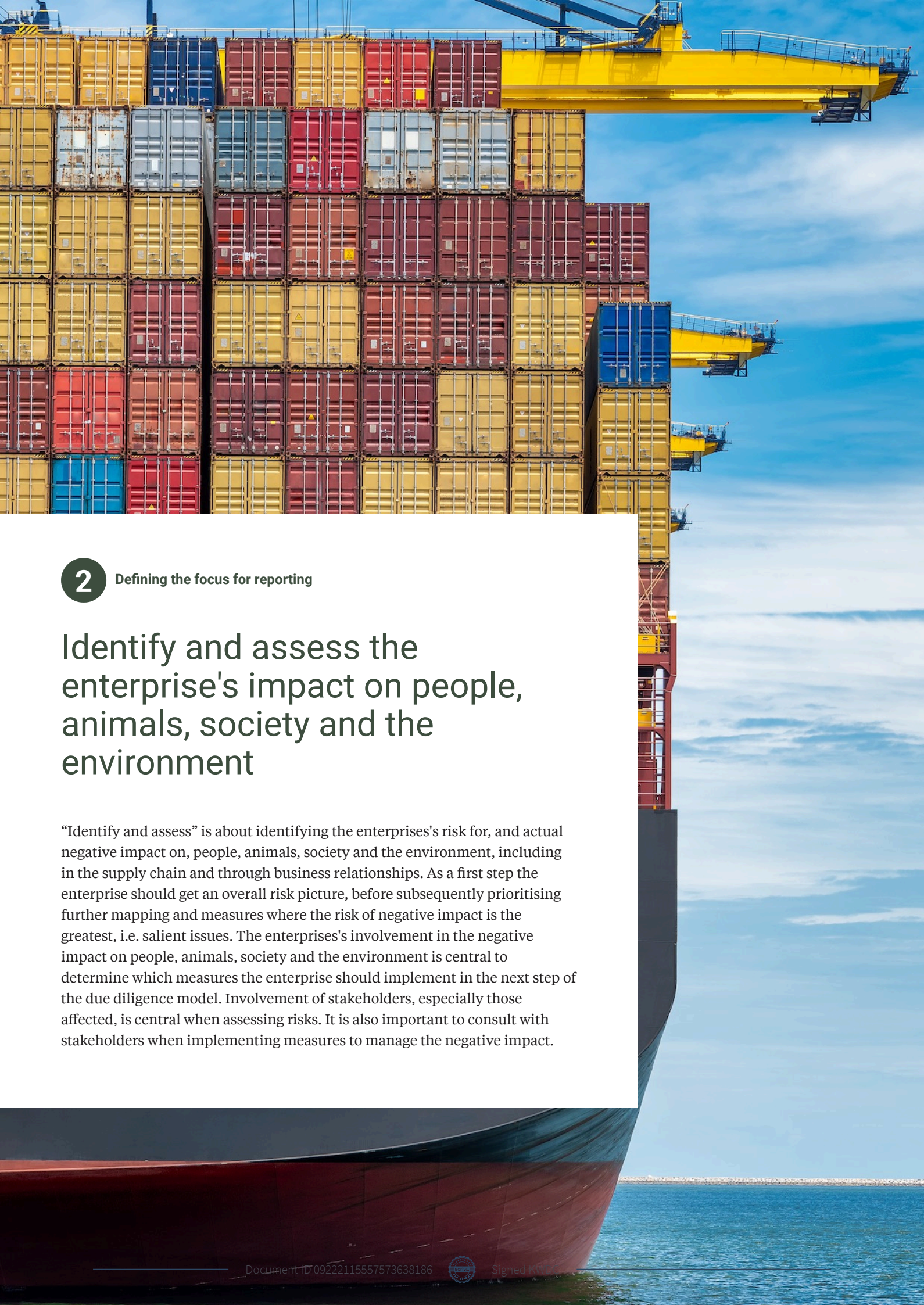
## 1.E Experiences and changes

### 1.E.1 What experiences have the enterprise encountered during the reporting period concerning responsible business conduct, and what has changed as a result of this?

#### **Supply Chain Experiences and Progress**

Wenaas' ESG strategy focuses on maintaining responsible business conduct across our supply chain. Up-to-date policies and procedures, combined with internal and external solutions, support sustainable growth. Effective collaboration with suppliers relies on careful planning, two-way communication, and mutual trust. We recognize ongoing challenges in global supply chains, including geopolitical instability, climate disruptions, material shortages, and logistics constraints, which can impact costs and production.

In 2025, our efforts have strengthened supply chain transparency across Tier 1-4, emphasizing traceability, transparency, and trust. We continue to advance ethical expectations with suppliers, identify, and manage risks, and source materials responsibly. To enhance accountability, we have published our first ESG report in line with relevant ESRS requirements under CSRD and will continue to build on this to meet future customer expectations and EU sustainability obligations.



## 2 Defining the focus for reporting

# Identify and assess the enterprise's impact on people, animals, society and the environment

“Identify and assess” is about identifying the enterprises's risk for, and actual negative impact on, people, animals, society and the environment, including in the supply chain and through business relationships. As a first step the enterprise should get an overall risk picture, before subsequently prioritising further mapping and measures where the risk of negative impact is the greatest, i.e. salient issues. The enterprises's involvement in the negative impact on people, animals, society and the environment is central to determine which measures the enterprise should implement in the next step of the due diligence model. 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

### PRIORITISED ACTUAL OR POTENTIAL NEGATIVE IMPACT ON PEOPLE, ANIMALS, SOCIETY, AND THE ENVIRONMENT

*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 List prioritized significant risks and/or actual negative impacts on people, animals, society and the environment.

Salient issue	Related topic	Geography
Occupational Health and Safety	Occupational Health and safety	China India Sri Lanka Madagascar Pakistan
The Rights of Freedom of Association and Collective Bargaining	Freedom of association and collective bargaining	China India Sri Lanka Madagascar Pakistan
Decent Working Hours	Wages Working hours	China India Sri Lanka Madagascar Pakistan
No Discrimination, Violence or Harassment	Discrimination Harsh and inhumane treatment Regular employment	China India Sri Lanka Madagascar Pakistan
Welfare of Livestock and Working animals	Environment Animal welfare	Argentina Australia China India Italy Pakistan Uruguay
The Impact of Climate Change and the Environment	Environment Greenhouse gas emission Energy Waste	Global

### Key ESG Risks & Impacts

Through our membership in Ethical Trade Norway, key suppliers and sub-suppliers are registered in a digital risk tool, supporting a systematic due diligence process to identify, assess, and mitigate ESG risks across our value chain. We focus our efforts where leverage and potential impact are highest, particularly in mid- to high-risk sourcing countries such as China, India, Pakistan, and Madagascar.

Priority social focus areas include Health and Safety, Freedom of Association, and Decent Working Hours. Risks related to discrimination, harassment, equality, wages, and overall social performance are closely monitored. Environmental and climate-related risks are addressed through strict requirements. We believe that a strong governance framework and continuous focus on salient ESG risks are essential to minimizing adverse impacts on people, society, and the environment.

Within the amfori BSCI audit, worker perspectives are incorporated through a structured, multi-layered approach that prioritizes confidentiality, direct engagement, and independent grievance mechanisms. Confidential worker interviews are mandatory and conducted with a representative sample of employees. These interviews take place without management present, ensuring workers can speak freely and without fear of retaliation. Auditors are specifically trained to apply sensitive, tailored questioning techniques and, where appropriate, female auditors interview female workers to create a safe and comfortable environment. In addition, our Head of Fabrics & Trims Manager visits Tier 1–5 suppliers in Asia and regularly engages with workers directly on the production floor. These conversations are conducted respectfully and without disrupting operations, providing further insight into overall risk assessment, and working conditions.

In 2025, the Double Materiality Assessment (DMA) progressed through three phases: Phase 1 launched the process; Phase 2 identified value chain risks, impacts, and opportunities; Phase 3 closed gaps to ensure reporting and assurance readiness. The Group's and each entity's business model, value chain mapping, and stakeholder identification formed the foundation of the assessment. Material topics were evaluated against the business model, gaps were identified, data requirements were mapped, and remediation actions were defined to support voluntary alignment with CSRD requirements and relevant ESRS disclosures. Each entity coordinator executed the required tasks individually, in collaboration with PwC Denmark for The Cotton Group. Key internal and external stakeholders were systematically identified and engaged throughout the DMA process, including employees, senior leadership, and external partners.

In addition to amfori, Wenaas engages with stakeholders through our memberships in Ethical Trade Norway and Norsk Industri. These platforms facilitate dialogue with industry peers, civil society, sustainable trade associations, and trade union representatives. This structured engagement provides insight into risk areas within our value chain and supports effective due diligence and follow-up actions. Through regular meetings, working groups, and ESG-focused initiatives, we actively seek insight into risk areas within our value chain. This dialogue enables us to identify material issues, strengthen due diligence processes, and ensure appropriate follow-up actions. Engagement with our memberships is an important mechanism for mitigating risk, aligning with stakeholder expectations, and guiding continuous improvement in our sustainability performance. For more information on our memberships: <https://www.wenaas.com/en/memberships-and-collaborations>

## JUSTIFICATION FOR THE PRIORITISATION OF RISKS OF NEGATIVE IMPACT ON PEOPLE, ANIMALS, SOCIETY, AND THE ENVIRONMENT

**2.A.2 Describe: a) the enterprise's routines for mapping and identifying risk and show how the negative impact was identified and prioritized b) activities or sections of the enterprise not covered in this report , if any (product groups, own products, departments etc.), and why c) how the information was gathered, what sources were used, and which stakeholders have been involved d) whether you have identified areas where information is lacking, and how you are planning to proceed to collect more information about this.**

### Risk and Information Management

Under our ESG Supplier Program, all suppliers and business partners undergo pre-engagement screening against minimum ethical, social, and environmental standards. Supplier performance is continuously monitored and risks, or non-compliances, are managed through a structured remediation process.

Most of our sourcing is concentrated on major producers in East and South Asia - the core of the global textile and footwear industry. Given the sector's long, complex, and labor-intensive supply chains, we prioritize due diligence in our own operations and manufacturing partners, where our leverage and risk exposure are greatest and where we can most effectively drive fair wages and safe working conditions. Own Brand represents 55% of total spend, with more than 80% of production concentrated in high-risk countries. By comparison, third-part suppliers account for 45% of spend, with only 1% associated with high-risk countries. In mid-risk countries, Own Brand and third-part suppliers each represent 9% of spend.

Our salient ESG risks are identified through internal and external risk indexes and assessments, covering industry, production, country, and environmental factors, as well as findings from SAQs, social and environmental audits, supplier dialogue, and site visits. We also assess suppliers' management certifications, memberships, and use of environmentally friendly materials to evaluate governance and sustainability maturity. This multi-layered approach strengthens oversight at leadership level, promotes awareness, and supports safe, inclusive and fair employment workplace practices.

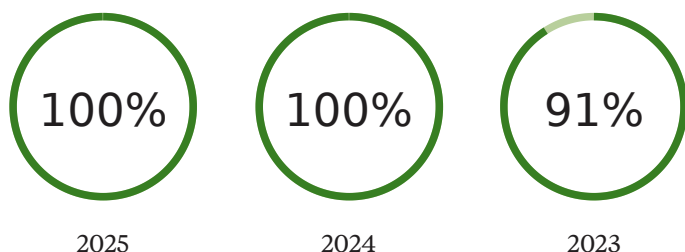
This report does not fully cover the PPE product group, as these products are sourced through importers and branded suppliers and are not developed by Wenaas. For third-part suppliers, we continue to enhance transparency across the products we purchase. As part of this effort, we have increased supply chain transparency at site level for our largest third-part suppliers by spend.

Several of our third-part business partners operate globally, and their social and environmental practices are assessed through established frameworks, standards, and ongoing engagement to support the protection of workers' rights and working conditions.

*\*Non-commercial goods and services are not performed due diligence on in this report.*

## Indicator

### Percentage of suppliers in high risk supply chains that have been mapped



Through our due diligence process, all Tier 1 Own Brand suppliers are mapped, with 99% covered by social compliance documentation. In total, due diligence coverage aligned with our social requirements applies to 93% of spend across Own Brand and third-part suppliers.

## ADDITIONAL SEVERE IMPACTS

### 2.A.3 Describe other risks of negative impacts on people, animals, society and the environment that were identified but not prioritized, and how these have been handled.

#### Other Identified Risks

Overall, risk levels are lower in Europe than in Asia, but the same supplier guidelines apply globally to ensure equal treatment of workers. While no systemic non-compliance has been identified, audits and surveys at Chinese sites highlighted excessive overtime, despite compliance with legal overtime pay. In response, and following improved amfori BSCI audits, we engaged our largest Chinese supplier to reduce overtime through better production planning, external expertise (e.g., consultancy and amfori), clear roles, and greater worker representative involvement. This ongoing initiative over the past year has contributed to improving the supplier's amfori BSCI score from C to B.

In terms of sub suppliers (Tier 2-5) information on materials, fabrics, and processing units is ongoing work within the Sourcing department, continuously emphasizing the importance of deeper supply chain transparency when in dialog with suppliers and business partners. As a further extension of this work, and to reinforce the importance of our standards, several sub-suppliers have formally signed our CoC.

Living wage mapping has been identified but not previously prioritized due to resources and data constraints. In 2026, Wenaas is joining Ethical Trade Norway living wage group in early 2026 to advance our due diligence on fair wages. The associated project is scheduled to continue through Q1 2027, supporting the mapping and assessment of living wages across our supply chain.



### 3 Management of salient issues

## Cease, prevent or mitigate negative impacts

“Cease, prevent and mitigate” is about managing findings from the risk assessment in a good way. The most salient negative impact on people, animals, society and the environment should be prioritised first. This does not mean that other risks are insignificant or that they are not handled. The way the enterprise is involved in the negative impact is key to taking the appropriate action. Negative impact that the enterprise causes or contributes to must cease, be prevented and be reduced. To address negative impact directly linked to the enterprise, e.g. in the supply chain, the business must use its leverage to influence the entity causing the negative impact to cease, prevent or mitigate it. This involves developing and implementing plans and routines to manage risk and may require changes to the enterprise's own policy documents and management systems. Effective management of the negative impact on people, animals, society, and the environment is a major contribution to the achievement of the Sustainable Development Goals (SDGs).

### 3. A Cease, prevent or mitigate

#### 3.A.1 Describe goals and progress status for the measures you have implemented to reduce the enterprise's prioritized negative impact

	<b>Occupational Health and Safety</b>
<b>Goal :</b>	Higher human rights risks in Far East countries make strong due diligence essential. Through our processes, we ensure suppliers uphold safe, healthy, and secure working conditions, ethical practices, and supply chain transparency.
<b>Status :</b>	Our policies set stricter standards and enhance transparency to protect labor rights and improve working conditions across our supply chain. Supplier performance is monitored through SAQs, audits, certifications, reports, and site visits, both internally and via amfori BSCI and SEDEX. This due diligence process enables us to identify risks, prioritize high-risk suppliers, and implement corrective actions where needed.
<b>Goals in reporting year :</b>	In the reporting year, we prioritized ethical, safe, and healthy working conditions across our workforce and supply chain. Regular audits and remediation were conducted in close collaboration with suppliers. Minor non-compliance issues were identified but presented no serious risk; all were addressed with corrective actions in line with our ESG program.

**Describe already implemented or planned measures :**

We use social audits and CAP reports to guide suppliers in strengthening social management systems and engaging workers in safety and operational decisions. In 2025, these actions supported an average amfori BSCI audit score of B.

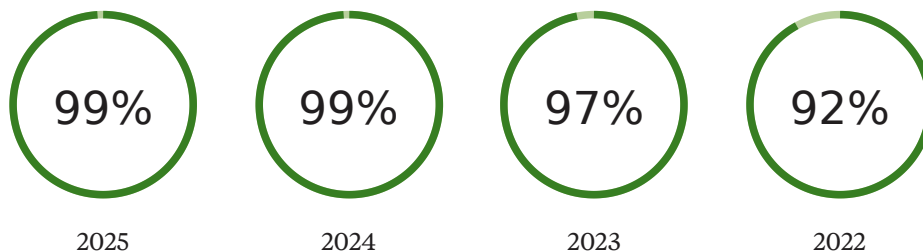
**Describe actual or expected results of the measures, as well as goals and activities for the coming reporting year :**

We strengthen health and safety in own brand production through certifications and amfori membership. All Tier 1 suppliers, and key third-part suppliers, undergo audits by authorized auditors, with corrective actions tracked and implemented within set timeframes. Factory visits include checks of facilities and if applicable work accommodation to ensure safe and ethical working conditions.



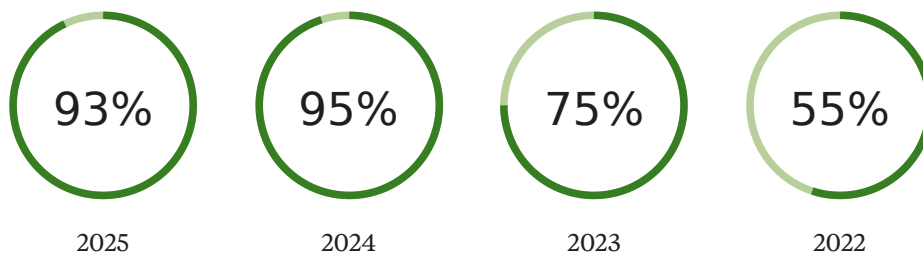
## Indicator

### Social compliance programs - Wenaas Brand



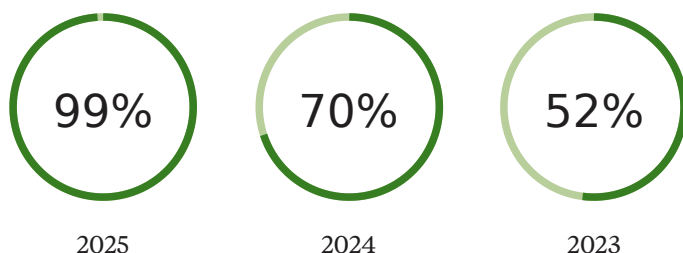
99% of Wenaas Brand suppliers with documented third-part audit reports.

### Social compliance programs - Wenaas Brand + 3rd part Suppliers Brand



93% of our total spend is documented by third-party audit reports and/or social compliance programs.

### Amfori BSCI audit reports on Wenaas Brand



In 2025, 20 amfori BSCI audits with our Tier 1 suppliers were completed, with 4 audits scoring A, 8 scoring B, and 8 scoring C - an overall average score of B. In addition, 15 audits were conducted by sub-suppliers, supporting transparency and compliance further down the supply chain.

	<p><b>The Rights of Freedom of Association and Collective Bargaining</b></p>
<p><b>Goal :</b></p>	<p>Globalization has created millions of jobs in the Global South, yet unionization remains low, particularly among part-time and temporary workers (ILO ACTRAV, J. Visser, 2019). All workers must have the freedom to join organizations of their choice. By actively monitoring and engaging with suppliers on this issue, we can safeguard freedom of association, strengthen collective bargaining, prevent unintended negative impacts, and enhance both worker and supplier engagement.</p>
<p><b>Status :</b></p>	<p>Through our Responsible Business Practices, we actively monitor and engage with suppliers on workforce challenges. By 2025, 100% of our own-brand suppliers have worker representation, while 35% have established trade unions. This applies to suppliers in China, Mauritius, Pakistan and Sri Lanka.</p>
<p><b>Goals in reporting year :</b></p>	<p>Our goal is to ensure that all our own manufacturing suppliers have worker representation and to track how many have established trade unions. This allows us to verify that factories provide structured channels for workers to voice concerns and participate in decisions affecting their work and workplace conditions. We believe that the freedom to engage with management on work-related matters is fundamental to a free and open society and has a significant positive impact on both the working and living conditions of employees.</p>

**Describe already implemented or planned measures :**

Our focus has been to increase BSCI auditing and actively engage key suppliers to ensure their audit participation, while maintaining compliance with our updated terms and conditions. Moving forward, we aim to challenge suppliers to expand training completion through the amfori platform, strengthening awareness and implementation of these rights.

**Describe actual or expected results of the measures, as well as goals and activities for the coming reporting year :**

We recognize the need for collaboration by partnering with companies sourcing from the same suppliers through the amfori BSCI platform. This approach targets identified CAP issues, with a focus on strengthening freedom of association at work. Key measures include effective worker representation, robust grievance procedures, and anonymous complaint mechanisms that management addresses seriously.

Open communication between suppliers’ management and workers remains essential. To advance these efforts, we plan to launch “amfori Speak for Change” in China, in partnership with our largest supplier, which has already completed the training program and is ready to implement it once amfori launches the initiative.



## Indicator

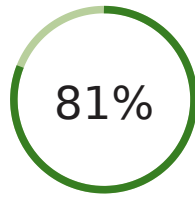
Wenaas Brand suppliers (Tier 1) with worker representatives.



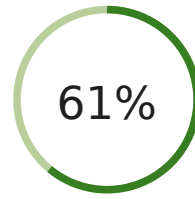
2025



2024



2023



2022

35% have Trade Unions.

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**Decent Working Hours**

**Goal :**

In line with our Code of Conduct, we aim to improve decent working hours across our supply chain by addressing excessive overtime through fair and lawful supplier engagement, transparent production planning, and constructive collective bargaining. Identifying living-wage gaps enables us to improve labor practices into negotiations, reduce overtime, and support worker well-being.

**Status :**

Wenaas is ISO 9001 certified and applies structured quality and planning processes across its supply chain. Mass production begins only after technical documentation and product certifications are approved. Orders are placed based on customer contracts rather than seasonal fashion cycles. To support predictable production and responsible lead times, Wenaas conducts six cross-functional assortment planning meetings annually to forecast needs for the coming twelve months.

Orders are then placed in line with agreed lead times with suppliers in Europe and Asia. This approach supports compliance with our ESG strategy and contributes to improved working conditions. In 2025, after a year of continuous dialogue and close collaboration with the supplier and amfori, we achieved a reduction in overtime at Wenaas' largest supplier in China. This milestone shows that meaningful progress is possible and strengthens our commitment to promoting decent working hours and worker well-being.

**Goals in reporting year :**

Excessive overtime remains a structural risk in the textile sector, particularly in China. Our goal is to ensure supplier compliance with national working-hour legislation, in line with our Code of Conduct and ESG Supplier Program. BSCI audits conducted in 2025 identified excessive overtime at certain Chinese suppliers, linked to gaps in Social Management Systems (PA1). Although workforce capacity procedures are in place, audit records showed that monthly overtime in some cases exceeded legal limits.

Through ongoing supplier engagement, contributing factors such as labor shortages, turnover, and delivery timelines have been identified. Overtime is reported as voluntary and remains subject to continued monitoring. Our objective for the reporting year is to further reduce overtime and support suppliers in improving their BSCI rating from C to B, strengthening compliance and enabling reduced audit frequency.

**Describe already implemented or planned measures :**

Monitor and follow up on BSCI audits for own-brand suppliers and address corrective action plans (CAPs) related to the use of overtime. In parallel, Wenaas will continue its annual internal quality improvement processes in line with ISO 9001.



**Describe actual or expected results of the measures, as well as goals and activities for the coming reporting year :**

Excessive working hours remain a key risk, particularly in China, driven by order delivery pressures, last-minute changes, and unexpected disruptions. While some suppliers have overtime control policies, implementation remains challenging. Although Wenaas cannot set workers' wages, we continue to source responsibly, promote better conditions, and encourage collective bargaining. By supporting living wages through dialogue, we aim to reduce overtime and strengthen supplier workers' conditions wherever possible.

Our objective is to promote supplier compliance with applicable national working-hour legislation, in alignment with our Code of Conduct and ESG Supplier Program requirements. Based on the most recent assessments and available documentation, suppliers were found to overall operate in accordance with applicable national working-hour regulations. All Chinese suppliers have completed the required continuous improvement actions outlined in their Corrective Action Plan (CAP) reports, and no outstanding actions remain at this time. However, overtime practices in China continue to require monitoring. Although overtime is voluntary, well compensated, and generally infrequent, there have been occasional instances in which it exceeded the monthly legal limit of 36 hours due to operational demands.

Going forward, we continue mapping legal minimum wages against the lowest regular wages paid at own brand supplier sites. These figures will be assessed against calculated living-wage benchmarks and fixed base salaries, excluding additional benefits. This step-by-step process is conducted in collaboration with ETN and in line with amfori guidance, using data from audit reports. Our goal is to complete this assessment by Q1/2027. In 2025, no inconsistencies related to legal minimum wages were identified among Wenaas brand suppliers.

	<p><b>No Discrimination, Violence or Harassment</b></p>
<p><b>Goal :</b></p>	<p>We recognize higher risks of discrimination, violence, and harassment in parts of Asia’s garment sector and require all suppliers to comply with our Code of Conduct. To support implementation, suppliers are offered voluntary, free-of-charge training on the amfori platform, tailored to their CAP report from audits, helping promote respectful workplace practices, effective grievance mechanisms, and stronger worker rights.</p>
<p><b>Status :</b></p>	<p>Our Self-Assessment Questionnaire and amfori BSCI data indicate that our own brand production workforce is generally balanced between women and men. However, gender representation varies across sourcing countries - e.g., and based on statistics India’s, female labor participation is below 20%, in Pakistan 30%, and in China over 40%. Gender metrics are monitored in audits and, where relevant, discussed in supplier meetings to understand context and trends.</p> <p>We recognize that increasing female participation not only promotes gender equality but also creates social and business opportunities. To support this, we continue to offer voluntary training via the amfori platform and are exploring the upcoming amfori Speak for Change program in China and Pakistan. An external supplier chain grievance mechanism system designed to complement, rather than replace, local operational-level grievance processes.</p>
<p><b>Goals in reporting year :</b></p>	<p>In 2025, we continue to gather data from amfori BSCI to monitor gender discrimination and support transparency around pay equity. During supplier visits, we review how gender and anti-violence training is implemented, ensuring women are protected from harassment, sexual intimidation, and other similar risks, including through anonymous reporting mechanisms.</p>

**Describe already implemented or planned measures :**

We uphold international laws and a strict Code of Conduct to prevent discrimination, violence, and harassment, monitoring compliance through audits, supplier visits, and effective reporting mechanisms.

**Describe actual or expected results of the measures, as well as goals and activities for the coming reporting year :**

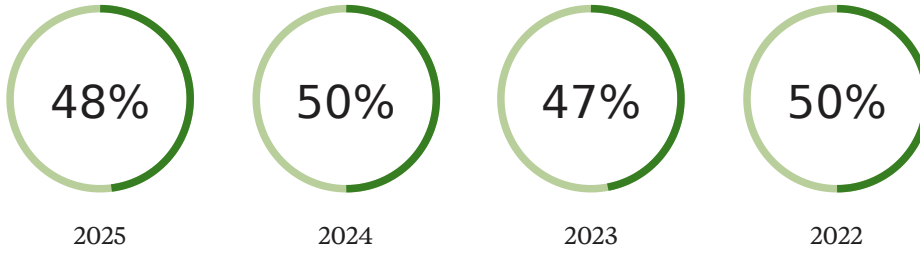
According to the ILO, women often face lower pay, fewer opportunities for advancement, and increased risks of harassment, discrimination, and limited influence in decision-making. Wenaas systematically monitors suppliers through amfori BSCI across all 13 performance areas, including non-discrimination, and continues to strengthen our knowledge base to identify effective actions for closing gender gaps. This includes sharing insights, promoting training via the amfori platform, and supporting whistleblower mechanisms. While cultural and industry factors can present challenges, we remain committed to fostering decent, equitable, and safe working conditions for all workers.





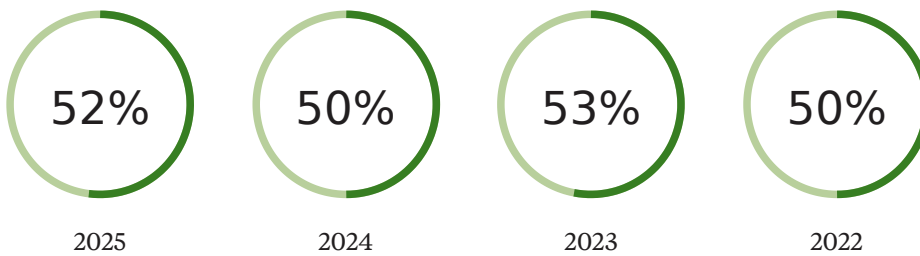
## Indicator

### Gender - female workers (Wenaas production)



Total workforce: 18.506, with 48% female workers.

### Gender - male workers (Wenaas production)



Total workforce: 18.506, with 52% male workers.



	<b>Welfare of Livestock and Working animals</b>
<b>Goal :</b>	Our goal is to ensure humane treatment of working animals and enhance traceability of materials. For wool, we aim to align with Woolmark and/or Responsible Wool Standard (RWS) certifications, while for leather, we will focus on transparency and documenting animal origin through OEKO-TEX® Leather Standard and Leather Working Group (LWG) certifications.
<b>Status :</b>	As of 2025, most of our wool is sourced through third-party suppliers, with well-documented fibers from Uruguay and South Africa. For our own brand, merino wool is sourced from Australia. Leather, primarily used in footwear and gloves, comes from Italy, India, and Pakistan.
<b>Goals in reporting year :</b>	75% of Wenaas leather gloves meet OEKO-TEX® Leather Standard certification, all leather footwear is from LWG-certified manufacturers, and Australian merino wool is verified as non-mulesed.

**Describe already implemented or planned measures :**

We uphold a strict Code of Conduct and policies, in line with international animal welfare standards and regulations, to promote the humane treatment of animals.

**Describe actual or expected results of the measures, as well as goals and activities for the coming reporting year :**

Our goal for the upcoming reporting year is to maintain the use of traceable, mulesing-free merino wool and wool certified to the Woolmark Standard. Major leather glove product lines will continue to meet OEKO-TEX® Leather Standard certification, while our footwear will be sourced from LWG-certified tanneries. We actively engage our suppliers on these topics to raise awareness and further strengthen responsible animal welfare practices throughout our supply chain.

**Indicator**

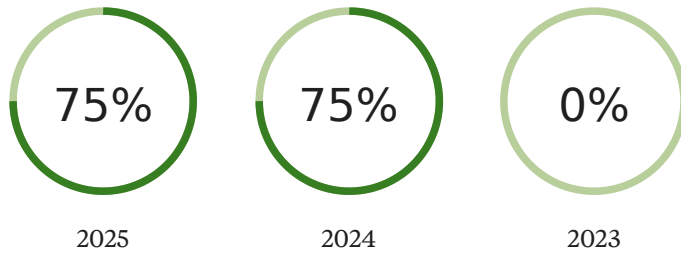
**Leather Working Group (LWG)**



100% of Wenaas leather footwear are from manufacturers certified against LWG audit standards.

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**OEKO-TEX® LEATHER STANDARD**



75% of Wenaas leather gloves is certified according to OEKO-TEX® LEATHER STANDARD.

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## The Impact of Climate Change and the Environment

<b>Goal :</b>	<p>Our goal is to strengthen ethical business practices while reducing the environmental impact of our value chain, particularly through material choices and CO<sub>2</sub> emissions. By prioritizing environmentally certified fibers and fabrics, sourcing from manufacturers with ISO 14001 and OEKO-TEX® STEP certifications, and engaging in the amfori BEPI program, we minimize environmental risks. We are committed to aligning with the Paris Agreement on climate change by actively engaging suppliers, prioritizing low-impact solutions, and continuously working to reduce our carbon footprint.</p>
<b>Status :</b>	<p>We report Scope 1, 2, and 3 carbon emissions in line with the GHG Protocol to gain a clear overview and guide ongoing improvements in our energy and emissions data. Our materials include BCI-certified cotton and GRS recycled polyester, promoting lower resource use and social compliance, fully aligned with our Code of Conduct. We have also expanded our range of styles with OEKO-TEX® Made in Green. In 2025, we expanded the amfori BEPI program with own-brand suppliers, strengthen renewable energy tracing, and continue responsible sourcing through preferred certifications.</p>
<b>Goals in reporting year :</b>	<p>Wenaas annually reviews its Restricted Substance List (RSL), which limits harmful chemicals including SVHC and PFAS, and works with suppliers to phase out PFAS while promoting safe alternatives in line with upcoming EU regulations. ISO 14001 certification and the amfori BEPI framework help suppliers reduce environmental impact, business risks, and costs.</p>

### Describe already implemented or planned measures :

In line with our strategy and chemical guidelines, we promote sustainable procurement and increase awareness of climate impacts across our supply chain. We are building a traceability overview for raw fibers and fabrics, covering Tier 2 to Tier 4 suppliers. Our approach prioritizes the use of BCI cotton across many styles, supporting improved environmental practices, farmer livelihoods, and biodiversity, alongside increased use of recycled materials in selected product lines. Where possible, we offer customers sustainable fiber options aligned with our ESG initiatives and customer requirements.

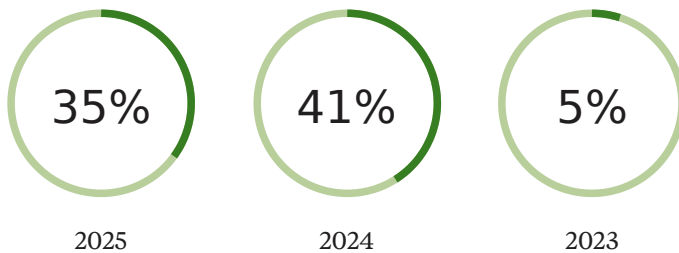
Describe actual or expected results of the measures, as well as goals and activities for the coming reporting year :

Overall, we continue to follow a consistent path, translating our ESG ambitions into operational practice to deliver measurable results, scalability, and lasting impact. Below are selected KPIs that further illustrate our progress and are not covered elsewhere in this section:

- Suppliers with signed RSL: 99%
- Products without PFAS: >98%

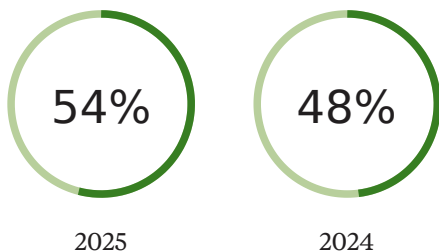
## Indicator

### BCI-certified cotton (MT)



Sourced 35% BCI-certified cotton in 2025 (203 MT)  
- 10% over BCI Sourcing Target.

### OEKO-TEX® STeP certification



Spend with OEKO-TEX® STeP-certified factories (Wenaas Brand): 54%  
(Spend with OEKO-TEX® STeP-certified factories, incl. third party: 43%)

## 3.B Other actions related to management of negative impact

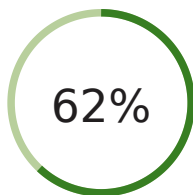
### 3.B.1 Reduction of nature- and environmental impact

#### Environmental Impact

Aligned with our ESG strategy and amfori BEPI, we assess and mitigate environmental impacts across our supply chain. Product development follows KPIs that enhance resource efficiency, durability, and circularity. We monitor transport and packaging, engage suppliers to ensure REACH, ILO, and hazardous substance compliance, and recognize OEKO-TEX® STeP-certified partners. Through our risk mapping, self-assessments, and ongoing supplier engagement, we promote safe handling and advance sustainability.

#### Indicator

Percentage of suppliers with programme or measures for handling of chemicals



2025

All suppliers are REACH-compliant, while 62% of own-brand suppliers have completed a Risk Assessment (RA) in line with amfori BEPI.

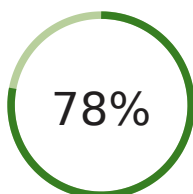
### 3.B.2 Reduction of greenhouse gas emissions

#### Reducing Our Footprint

Wenaas is committed to reducing GHG emissions in line with the Paris Agreement, targeting a 45% reduction from 2010 levels and net zero by 2050. We focus on high-impact measures early in the product lifecycle, including eco-friendly materials and production in certified facilities using renewable energy. Circular economy initiatives, such as recycling textiles, cutting waste into new products, support our goal of zero-waste production with key suppliers. Furthermore, we are in the process of implementing EcoVadis assessment and Life Cycle Assessment (LCA) solutions, including Digital Product Passports (DPP), underscoring our continued commitment to transparency and measurable environmental performance.

#### Indicator

Percentage of suppliers that use renewable energy



2025

Percentage of own-brand suppliers using and/or producing renewable energy

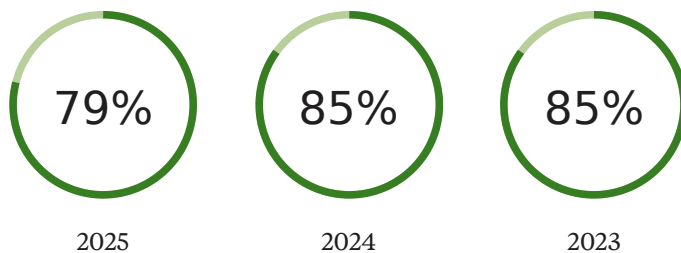
### 3.B.3 Improvements in own purchasing practices

#### Purchasing with Purpose

Throughout 2025, we strengthened collaboration with our suppliers, integrating ESG principles and sustainable costing into our sourcing practices. Our staff engage regularly with suppliers through meetings, visits, and fairs to drive improvements in social and environmental standards. Senior Management conducts quarterly reviews to assess strategy, planning, and purchasing impacts, while pricing and payment processes are managed to maintain fairness and reliability. These practices ensure consistent supplier engagement, performance tracking, and alignment with our integrated ESG strategy.

#### Indicator

Percentage of the company's suppliers with whom the company has had a business relationship for more than three years



- Long-term relationship (≥10+ years): 42%
- Mid-term relationship (≥4-9 years): 37%
- Short-term relationship (≥1-3 years): 21%

### 3.B.4 Choice of products and certifications

#### Responsible Materials & Packaging - Our Strategy

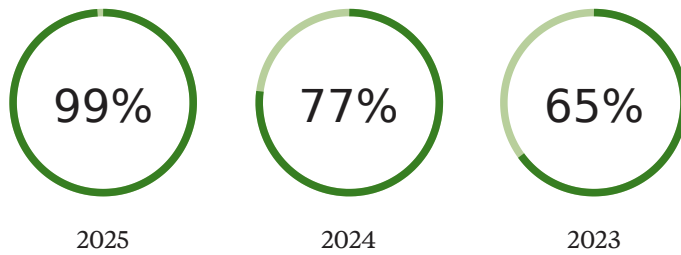
• Transition to certified eco-materials within our core product lines - e.g. OEKO-TEX® STANDARD 100, OEKO-TEX® LEATHER STANDARD, Better Cotton Initiative (BCI), Woolmark, the Global Recycled Standard (GRS), the Forest Stewardship Council® (FSC), and the Leather Working Group (LWG).

- Increasing products carrying the OEKO-TEX® MADE IN GREEN label (unique QR codes for supply chain visibility).
- Minimize unnecessary packaging and increase the recycling value for the packaging materials.
- Reduce plastic usage on product and packaging (aligned with EU's plastics strategy and the European Green Deal).

Standards and certifications are key tools to prevent negative impacts on people, animals, society, and the environment, and are fully aligned with our Code of Conduct. Our policy prohibits sourcing from regions associated with forced labor, such as Xinjiang Uyghu region, China, and we expect suppliers to implement additional measures for environmentally responsible practices. All standards are independently verified, ensuring credibility and transparency across our supply chain.

#### Indicator

### Percentage of suppliers in high risk supply chains with sustainability certification



99% of own-brand suppliers are aligned with our prioritized sustainability initiatives.

### 3.B.5 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

#### Freedom of Association

We actively monitor and support freedom of association, collective bargaining, and the right of workers to join trade union organizations. However, in line with ILO observations, national legal frameworks in certain countries, particularly China limit the exercise of these rights. Under Chinese law (1992), enterprise-level unions are required to affiliate with the legally mandated All-China Federation of Trade Unions (ACFTU), which constrains independent union representation.

Our 2025 SAQ mapping shows all own-brand suppliers have worker representation mechanisms, with 35% having trade unions. We will focus on transparent audits, stronger grievance systems, and fostering direct, constructive management-worker dialogue to enhance meaningful worker representation.

### 3.B.6 Contribution to development, capacity building and training internally and of suppliers and workers in the supply chain

#### Building Skills, Strengthening Supply Chains

Long-term supplier relationships are central to value creation at Wenaas. We strengthen supply chain performance through collaborative planning, sustainability KPIs, and targeted supplier training, including effective use of the amfori platform. Internally, this is reinforced through cross-functional collaboration and ethical online training programs for employees. We also actively engage in industry collaboration to strengthen knowledge sharing, customer cooperation, transparency, and higher ethical and environmental standards.

### 3.B.7 Combatting corruption and bribery in own enterprise and supply chain.

#### Anti-Corruption Compliance

Wenaas has a Corruption and Anti-Bribery Policy covering our own operations and supply chain. We conduct all business activities in accordance with applicable laws and the highest standards of ethical conduct and integrity. Bribery and corruption in any form are strictly prohibited and will not be tolerated.

### 3.B.8 Other relevant information concerning the enterprise's work to reduce, prevent, and manage negative impact

#### Driving Responsible Practices Across Our Business

In 2025, the Sourcing Team conducted supplier site visits across Europe and Asia, covering more than 60% of own production and 40% of total spend. In addition to planned visits, extra onsite visits were carried out. These visits form a partial part of our systematic ESG approach and play a critical role in strengthening our risk management processes and long-term supplier relationships. Beyond providing valuable insights into production capabilities, operational practices, quality standards, and product development, these visits are essential for building transparency, trust, and mutual accountability with our suppliers. We consider this engagement a key foundation for a strong and responsible partnership going forward.

Prior to each visit, we review supplier performance with a particular focus on the audit report follow-up findings. While the Sourcing Team are not trained auditors, they may apply a structured checklist aligned with our commitments under amfori BSCI. This enables targeted monitoring of key risk areas, including Occupational Health and Safety, Decent Working Hours, and the prevention of Discrimination, Violence, and Harassment. While not a substitute for formal audits, this approach significantly strengthens our ability to identify, assess, and monitor social risks over time.

Importantly, these visits reinforce our shared responsibility with suppliers to drive continuous improvement. Insights gathered are systematically used to update risk profiles and strengthen actions within the ESG Supplier Program, ensuring ongoing alignment and progress. Guided by our ESG strategy, Wenaas works systematically to manage impacts across the value chain, supported by long-standing environmental efforts, measurable programs, and transparent reporting.



## 4

# Track implementation and results

Tracking implementation of actions and results relates to measuring the effects of the systematic approach and own work in each step of the due diligence process, showing whether the enterprise conducts sound due diligence work. The enterprise needs to have procedures and routines in place in order to uncover and critically assess own conclusions, prioritizations and measures that have been made as part of the due diligence process. For example, is mapping and prioritisation of salient issues done in a scientifically sound and credible way? Does it reflect the actual conditions in the supply chain? Do measures aimed at ceasing, preventing and reducing the enterprise's negative impact work as intended? Is negative impact remediated where relevant? This may apply to measures taken by the enterprise alone or carried out in collaboration with others. The enterprise's experiences from working on due diligence should be used to improve procedures and routines in the future.

## 4.A. Track and assess

**4.A.1 Describe a) assignment of responsibility for tracking the effect and result of implemented measures, as well as how the tracking is carried out in practice, b) who is responsible for evaluating the enterprise's implementation and work with due diligence, and how the evaluation is carried out in practice.**

### **Due Diligence Approach**

Wenaas has established a due diligence framework to identify, assess, prevent, mitigate, and monitor actual and potential adverse impacts related to human rights, labor standards, environmental protection, business ethics, and health and safety within its supply chain. This framework is integrated into supplier onboarding, sourcing decisions, and ongoing supplier management and is designed to align with applicable regulatory requirements and internationally recognized standards.

Risk identification and mapping are conducted through a structured supplier risk assessment process, considering country risk, sector risk, and the nature of supplier activities. This process is supported by third-party assessment and audit systems, including amfori BSCI, Sedex, and amfori BEPI, which provide site-level insight into social, human rights, environmental, and ethical risks. Risk assessment and prioritization are based on the severity and likelihood of identified impacts, informed by audit findings, risk ratings, and the recurrence or systemic nature of non-compliances. Where risks are identified, Wenaas requires the implementation of appropriate preventive and mitigating measures through corrective action plans with defined responsibilities and timelines.

Suppliers are contractually and operationally required to comply with the amfori Code of Conduct and Wenaas's supplier requirements and to demonstrate progress in addressing identified risks. The effectiveness of implemented measures is monitored through ongoing supplier engagement, review of corrective action progress via the amfori platforms, and follow-up audits. Audit results are used to reassess supplier risk levels, identify trends, and determine whether additional mitigation measures, enhanced monitoring, or escalation are required. In cases of severe or repeated non-compliance, Wenaas may apply further measures, including increased oversight or consideration of business disengagement, in accordance with its internal procedures.

Operational responsibility for supplier engagement and implementation of ESG requirements rests with the Sourcing Team. Oversight of risk mapping, evaluation of audit outcomes, and monitoring of the effectiveness of mitigation measures is the responsibility of the ESG Manager. Wenaas reports on its due diligence processes and outcomes internally and externally through this report and other relevant communication channels, supporting transparency, accountability, and continuous improvement.

#### 4.A.2 Describe how you track the effect, and/or demonstrate the probability of effect, of measures taken to reduce negative impact.

##### **How Wenaas Tracks and Demonstrates the Effect of Measures**

Wenaas ensures the effectiveness of its measures to reduce negative impacts through factory visits, third-party audits, corrective action follow-up, and ongoing risk reassessment. Regular inspections of new, key, and existing suppliers allow direct evaluation of working conditions, management practices, and supplier culture.

Effectiveness is measured through audit ratings, amfori performance scores, non-compliance severity, corrective action closure, SAQ completion, and high-risk supplier coverage.

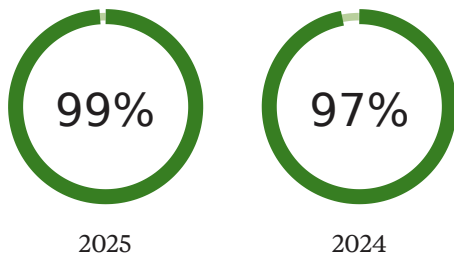
Compliance requirements are further embedded through procurement and contractual documentation, ensuring that suppliers meet Wenaas Code of Conduct and applicable standards prior to and during cooperation. Social and labor risks are monitored primarily through amfori BSCI and SMETA audits, supplemented by equivalent certifications such as SA8000, ISO 45001, WRAP, and Higg FSLM to ensure comprehensive risk coverage while avoiding audit fatigue.

The ESG Manager and Sourcing Team apply enhanced monitoring where risks persist, reviewing audit results and corrective actions to track improvements and address recurring issues. Minimum C-scores in amfori BSCI audits are required, with immediate corrective action and re-audit for lower scores. Code Red non-compliances follow a zero-tolerance policy, including potential production stoppage. In 2025, no Code Red non-compliances or amfori BSCI ratings below C were recorded, confirming robust due diligence.

Trends are reviewed periodically to identify systemic risks or repeated gaps. The Sourcing Team monitors supplier-level performance through ongoing dialogue and follow-up in the amfori platforms, while the ESG Manager evaluates total results, risk trends, and improvement rates to assess the overall effectiveness of mitigation measures. The due diligence framework and its outcomes are reviewed at management level on a regular basis to ensure continuous improvement and alignment with regulatory expectations.

#### 4.A.3 Outcome indicators

01.03 Share of spend from production sites audited against a scheme covering all ILO Indicators of Forced Labour



2025  
Target: 100%

2024

Own-brand suppliers are assessed through amfori BSCI and Sedex SMETA audits, which under the Code of Conduct systematically verify all 11 ILO forced labour indicators (e.g., confiscation of passports, debt bondage, restricted movement, unpaid overtime).





## 5

# Communicate how negative impacts are addressed

A prerequisite for good external communication on due diligence for responsible business conduct is that it builds on concrete activities and results. Enterprises should make relevant documents concerning due diligence publicly accessible, i.e. policies, codes of conduct, guidelines, processes and activities related to identifying and handling the enterprise's actual and potential negative impacts on people, animals, society and environment. Communication should include information about how the risks have been identified and handled, as well as the effect of the measures/activities. The Transparency Act (Åpenhetsloven) §5 requires companies to publicly account for their human rights due diligence on an annual basis.



## 5.A External communication

### 5.A.1 Describe how the enterprise communicates with affected stakeholders about managing negative impact

#### Wenaas ESG Supplier Engagement – Executive Summary

Wenaas communicates proactively with affected stakeholders including suppliers, management, customers, NGOs, and regulatory partners about identified social and environmental risks in our supply chain. We share audit findings, Due Diligence Accounting Reports, and ESG requirements through meetings, reporting, and publicly on our website. Continuous dialogue, clear expectations, and collaborative follow-up ensure that stakeholders are informed of negative impacts, progress on mitigation measures, and corrective actions. Through this integrated approach, Wenaas promotes transparency, strengthens supplier accountability, measurable ESG improvements, and long-term positive impact on people, communities, and the environment.

#### Key Policies and Tools

Wenaas Code of Conduct, Responsible Business Conduct Policy, SAQ for Suppliers, Restricted Substances List, Chemicals Guidance REACH, Minimum Supplier Criteria, Anti-Corruption and Gifts Policies, amfori BEPI and BSCI Standards, and Packaging Guidelines.

#### Supporting Documentation and Collaboration

In 2025, our Head of Fabric & Trims Manager participated in several conferences addressing the India-EFTA Trade and Economic Partnership Agreement (TEPA), organized by Ethical Trade Norway and the Embassy of India in Norway. The entry of the agreement strengthens our partnerships with suppliers in India and reinforces shared commitments to responsible business practices, including sustainability, respect for human rights, and climate action in alignment with the Paris Agreement.

Our ESG ambitions are aligned with UN SDGs, ISO standards, Due Diligence and GHG Accounting Reports, Product Certifications, Industry Recognitions, and NGO Collaborations.

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### 5.A.2 Describe how the enterprise publicly communicates its own work on identifying and managing negative impact/harm

#### Public Communication

Wenaas communicates sustainability performance annually through three public reports:

- Wenaas ESG Report
- Wenaas Due Diligence Report
- Wenaas Carbon Report

Our climate performance is reported in accordance with the Greenhouse Gas Protocol, covering Scope 1, Scope 2, and relevant Scope 3 emissions. The climate accounts are developed in close collaboration with CEMAsys, an independent sustainability advisory firm. The cooperation includes regular working meetings, data validation processes, methodology assessments, and discussions on emission factors and system boundaries to ensure accuracy and continuous improvement.

This structured dialogue strengthens the quality, transparency and comparability of our emissions reporting. Our climate results, reduction initiatives and year-on-year progress are published on our website, providing stakeholders with clear insight into our environmental impact and mitigation efforts. For more information on our climate report: <https://www.wenaas.com/en/sustainability>

### 5.A.3 Describe the enterprise's routines for answering external inquiries related to the information requirement imposed by the Transparency Act

#### **Managing External Inquiries**

Wenaas has established formal routines to manage external inquiries under the Transparency Act. All requests from stakeholders are handled by our ESG team, which verifies the request, collects information from relevant departments, and provides accurate, consistent, and timely responses. Our procedures ensure full compliance with legal requirements and our transparency policies. Responses regarding actual or potential adverse impacts are issued in writing within three weeks, with an extension of up to two months if the request is complex or requires extensive information.



An aerial photograph of a vast, dense coffee plantation. The trees are a vibrant green, and several workers in various colored shirts (blue, red, grey) and hats are scattered throughout the canopy, engaged in harvesting or maintenance. The perspective is from a high angle, looking down on the rows of trees.

## 6

# Provide for or cooperate to ensure remediation when appropriate

Once an enterprise has identified that it has caused or contributed to negative impact on people, animals, society or the environment, the enterprise must provide for, or cooperate in, remediation. Remediation may involve financial compensation, a public apology or other ways to remediate the negative impact. Another aspect of remediation is that companies should provide for, or cooperate with legitimate complaint mechanisms, to ensure that workers and/or local communities can raise complaints and be heard.

## 6.A Remediation

### 6.A.1 Describe the enterprise's policy for remediation of negative impact

#### **Our Approach to Remediation**

Wenaas has formalized and implemented principles and procedures that respect the rights of individuals, particularly those in vulnerable groups, and address risks faced by men and women in our supply chain. Suppliers and partners commit to human rights due diligence by joining our ESG program, which sets the standards, expectations, and responsibilities for social and environmental conduct. Wenaas annually reviews our policies and enforcement measures to identify and address risks, including human rights issues.

Our Responsible Business Conduct policy states: *“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”.*

In practice, critical breaches of our Code of Conduct related to decent work or human rights are first managed by the ESG Manager in coordination with the relevant Product Manager and supplier. Depending on seriousness, cases may escalate to the Sourcing Director, Management Team, or external bodies such as amfori for further assessment. Wenaas may conduct factory visits and engage stakeholders to assess the situation, define next steps, and implement remediation. A corrective action plan (Code Red process) is drafted, approved by both parties, and monitored according to the agreed timeline.

#### **Summary of Remediation Priorities:**

- *Immediate Attention (Red High - Immediate):* freeze orders, engage suppliers immediately, establish compensation plans if required, monitor supply chain risks, and provide timely stakeholder updates.
- *Medium Attention (Red Medium - 2 weeks to 1 month):* correct documentation, address union rights, resolve payroll and time record discrepancies, and ensure environmental compliance.
- *Low Attention (Red Low - 1 month):* implement operational improvements, correct wage issues, and address minor safety or licensing gaps.

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### 6.A.2 If relevant, describe cases of remediation in the reporting year

No cases of remediation in the reporting year have been identified.

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## 6.B. Ensure access to grievance mechanisms

### 6.B.1 Describe what the enterprise does to ensure that employees and other stakeholders, especially impacted workers and local communities have access to whistleblowing systems and grievance mechanisms

#### Whistleblowing & Grievance Access

Wenaas provides access to grievance mechanisms for workers, employees, communities, and other stakeholders. Factory workers are expected to have access to grievance channels under the amfori BSCI Code of Conduct, and the company is considering participation in the external “amfori Speak for Change” program to strengthen grievance access across the wider supply chain. All employees complete a mandatory online ethics training course each year to reinforce high standards of integrity and responsible conduct. These web-based modules emphasize the company’s commitment to acting in an honest, responsible, and ethical manner. They also provide guidance on the Code of Conduct and Business Ethics, including how to raise concerns.

Wenaas encourages open communication and aims to ensure that everyone who works with or for the company feels safe when raising concerns. The whistleblowing process is designed to ensure that reports are recorded, reviewed, and handled in a structured manner while protecting the legitimate interests and confidentiality of all individuals involved. All employees have access to a group-wide grievance and anonymous whistleblowing system, allowing them to report workplace concerns with a high level of confidentiality. The Group’s Helpline can be accessed here: <https://thecottongroup.integrityline.com/>

Complaints, including those related to recruitment practices, working conditions, or supply chain issues are handled through established procedures designed to ensure proper review, response, and feedback in accordance with applicable laws and internal policies. This approach allows the company to maintain oversight of stakeholder concerns and, where negative impacts are identified, to address and remedy them in line with local laws and regulations while maintaining dialogue with affected stakeholders.

In conclusion, it should also be noted that Wenaas, in addition to being certified under ISO 9001 and ISO 14001, holds ISO 45001 certification. This international standard sets requirements for implementing and maintaining an occupational health and safety (OHS) management system, which further supports the company’s framework for managing workplace risks and employee well-being.

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# Verification

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## Document

### Wenaas Workwear AS

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