

# Hultafors Group Norge AS and the Norwegian Transparency Act

**HULTAFORS GROUP**

The Norwegian Transparency Act (the Act) aims to promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

In 2023, Hultafors Group Norge AS (HGNAS) met the inclusion criteria for the Act. This statement constitutes HGNAS's account for the financial year 2023.

## A. Structure, area of operations, guidelines, and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions

HGNAS is a non-listed wholly owned subsidiary of Hultafors Group AB (Hultafors Group). HGNAS operates exclusively in Norway and marketed the following brands in 2023:

- CLC Work Gear
- Hellberg Safety
- Hultafors
- Scangrip
- Snickers Workwear
- Solid Gear
- Toe Guard
- Wibe Ladders

Hultafors Group, including HGNAS, supports and respects the protection of internationally proclaimed Human Rights. HGNAS adheres to, and applies, Hultafors Group sustainability and responsible business conduct policies, systems, structures, and procedures, including but not limited to the:

- Hultafors Group Sustainability Policy & Hultafors Group Work Environment Policy
- Hultafors Group Code of Conduct
- Hultafors Group whistleblowing process
- Continuous stakeholder dialogue
- "The Way We Work" Management System, which aligns with ISO 14001 & 9001 requirements
- Online Sustainability Management Platform (Worldfavor), including Sustainable Sourcing module
- Governance structure and organization (e.g. Group Head of Sustainability part of Hultafors Group Management Team)

HGNAS has completed a Human Rights Due Diligence (HRDD) process, in-line with the requirements of the Act. This process included support from 2050 Consulting AB and other external consultants (to complement HGNAS's internal knowledge and resources) and was informed by guidance included in a range of aligned reference documents such as the OECD Guidelines for Multinational Enterprises (2011), OECD Due Diligence Guidance for Responsible Business Conduct (2018), and UN Guiding Principles on Business and Human Rights (2011).

This HRDD process included the following interrelated stages:

- Supply chain mapping, which included 385 unique entities (38 countries) in HGNAS' supply chain(s) and considered a range of risk factors such as amfori BSCI's 'Countries' Risk Classification'
- Preparing a long-list (32) of actual and potential adverse impacts on fundamental human rights and decent working conditions, based on, for example, the International Covenant on Economic, Social and Cultural Rights of 1966 (ICESCR), the International Covenant on Civil and Political Rights of 1966 (ICCPR) and the ILO's core conventions on fundamental principles and rights at work (ILOCC)
- Risk assessment and risk prioritization based on the assessed Severity and Likelihood of the (potential) adverse impacts. This included consideration of a range of risk factors such as Geographic Risks, Sectorial & Product Risks and Enterprise-specific risk factors.

## B. The actual adverse impacts and significant risks of adverse impacts that HGNAS has identified through its due diligence

HGNAS identified 12 priority actual and potential adverse risks on fundamental human rights and decent working conditions linked with HGNAS's operations and/or products.

HGNAS has assessed that the most at-risk stakeholder group for these key risks are workers in the value chain.

Human Right	Definition	Source(s)
Protected from economic exploitation	No one shall be held in slavery or forced labour; slavery & the slave-trade in all their forms shall be prohibited.	ICESCR, ILOCC
Rights to freedom of thought, conscience & religion	Everyone shall have the right to freedom of thought, conscience & religion.	ICCPR
Rights of minorities	Where ethnic, religious or linguistic minorities exist, persons belonging to such minorities shall not be denied the right, to enjoy their own culture, to profess & practise own religion, or to use own language.	ICCPR
Rights of protection for the child (child labour)	Every child shall have, without any discrimination as to race, colour, sex, language, religion, national or social origin, property or birth, the right to such measures of protection as are required by his status as a minor, on the part of his family, society & the State.	ICCPR, ILOCC
Right to education	Everyone has the right to education. Primary education should be compulsory & free to all.	ICESCR
Right to an adequate standard of living	Everyone has the right to an adequate standard of living for himself & his family, including adequate food, clothing & housing. Everyone has the right to be free from hunger.	ICESCR
Right to a family life	Protection & assistance should be accorded to the family. Marriage must be entered into with the free consent of both spouses. Special protection should be provided to mothers. Special measures should be taken on behalf of children, without discrimination.	ICESCR
Rights to freedom of opinion & expression	Everyone shall have the right to hold opinions without interference	ICCPR
Right to health, including Occupational Safety & Health	Everyone has the right to the enjoyment of the highest attainable standard of physical & mental health. Workplaces, machinery, equipment & processes under their control are safe & without risk to health	ICESCR, ILOCC
Right to enjoy just & favourable conditions of work – Fair wages & equal	Everyone has the right to just conditions of work; safe & healthy working conditions (including but not limited to safe & well	ICESCR

opportunity & elimination of discrimination	maintained buildings & factory conditions that are clean & free from pollution, as noted in HG's Code of Conduct)	
Right to enjoy just & favourable conditions of work – Working conditions	Everyone has the right to just conditions of work; safe & healthy working conditions (including but not limited to safe & well maintained buildings & factory conditions that are clean & free from pollution, as noted in HG's Code of Conduct)	ICESCR
Right to freedom of association, collective bargaining & right to strike	Everyone has the right to form & join trade unions, access collective bargaining, & the right to strike.	ICESCR, ICCPR, ILOCC

### Identified actual risks of adverse impacts

During the year, on-site audits identified the following actual risks in the supply chain:

- Long working hours and overtime
- Unsafe working environment
- Low wage levels compared to deemed living wage
- Inherent geographical risks associated with freedom of association.

Corrective actions to mitigate risks have been implemented in collaboration with the relevant suppliers.

### C. Measures the enterprise has implemented or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts

The Hultafors Group Code of Conduct is the foundation for our sustainability work and our operations – it applies to the whole supply chain of every Hultafors Group product. It sets forth the minimum requirements and clearly defines standards for fair, safe, and healthy working conditions and environmental responsibility.

Hultafors Group encourages reporting misconduct in relation to our Code of Conduct and take steps to ensure that people who report misconduct are not disadvantaged, discriminated against or traceable.

To ensure high business ethics, fair working conditions and human rights in our value chain, we conduct audits of our suppliers and subcontractors on a regular basis, to make sure they follow our Code of Conduct. We are also working with self-assessments to follow improvement and increase transparency within our supply chain.

Consistent with the Hultafors Group Sustainability Policy, we apply continuous improvement strategies and preventative actions to mitigate risk.

In 2023, Hultafors Group started the transition to an updated sustainability platform. This strategic move had three key objectives: enhancing supply chain control, broadening the operational scope, and streamlining group coordination.

During the year updated KPIs, targets and mitigating activities were identified, based on conclusion from the conducted risk assessment and risk prioritization.

### Access to additional information

This statement can be found in Norwegian on the [Hultafors Group website](#).

Upon written request, any person has the right to information from an enterprise regarding how the enterprise addresses

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actual and potential adverse impacts pursuant to The Norwegian Transparency Act. This includes both general information and information relating to a specific product or service offered by the enterprise.

If you have any general questions relating to HGNAS and The Norwegian Transparency Act, please contact us at [sustainability@hultaforsgroup.com](mailto:sustainability@hultaforsgroup.com) and we will get back to you via email. For specific whistleblower issues or submissions, please see <https://report.whistleb.com/en/message/hultaforsgroup>