

## Norwegian Transparency Act 2025, Hultafors Group Norge AS

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 2025, Hultafors Group Norge AS (HGNAS) met the inclusion criteria for the Act. This statement constitutes HGNAS's account for the financial year 2025.

### 1 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 2025:

- Snickers Workwear
- Solid Gear
- Hellberg Safety
- Scangrip
- Hultafors
- W.steps
- Telesteps

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

HGNAS continuously assess actual and potential adverse impacts on fundamental human rights and decent working conditions, in-line with the requirements of the Act. This process was initially established

with support by 2050 Consulting AB and other external stakeholders (to complement HGNAS' 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 includes the following interrelated stages:

- Supply chain mapping, including suppliers in HGNAS' supply chain(s) and considered a range of risk factors such as amfori BSCI's 'Countries' Risk Classification' and The World Bank Worldwide Governance Indicators (WGI) human rights index.
- Preparing a long-list 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.

## 2 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' 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 opportunity & elimination of discrimination	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 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

## 2.1 Identified actual risks of adverse impacts

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

- Lack of documentation in relation to workers' compensation and working conditions
- Long working hours and overtime
- Unsafe working environment and lacking personal protective equipment
- Low wage levels compared to deemed living wage

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

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

Ethical business practices are central to the management of our supply chain. We follow the OECD Due Diligence Guidance to promote fair labor and respect for human rights, and our policies, targets, and standards reflect these commitments. Partners and workers in our value chain are essential to our long-term business performance, as they secure product quality and support the achievement of our

sustainability targets. We are committed to working with suppliers, business partners, and other stakeholders to advance human rights and generate positive social outcomes.

To operationalize these commitments and mitigate risks in the value chain, Hultafors Group has established the following measures:

- The Hultafors Group Supplier Code of Conduct is the foundation for our sustainability work and operations. It applies to the entire supply chain of every Hultafors Group product and sets out minimum requirements for fair, safe, and healthy working conditions, environmental responsibility, and ethical business practices.
- All direct suppliers providing materials or products and registered in our finance system must comply with the Supplier Code of Conduct and our Restricted Substances List (RSL) through our sourcing platform. We expect these requirements to be cascaded to sub-suppliers.
- Hultafors Group encourages the reporting of suspected violations of our Code of Conduct and Supplier Code of Conduct. Our reporting channels are designed to ensure that individuals who raise concerns are not disadvantaged, discriminated against, or exposed.
- To promote high business ethics, fair working conditions, and respect for human rights in our value chain, we regularly audit suppliers and subcontractors to verify compliance with the Supplier Code of Conduct. We also use supplier self-assessments to monitor progress and increase transparency.
- In line with the Hultafors Group Sustainability Policy, we apply continuous improvement and preventive measures to reduce identified risks.
- We use the Worldfavor Sourcing Platform (implemented in 2024) as a Group-wide tool for Supplier Code of Conduct implementation and supplier risk assessment.
- All brands report regularly on internal KPIs relating to Supplier Code of Conduct implementation, supplier risk assessments, and completed audits.

We assess sustainability performance across our operations and supply chain through a structured compliance program, including self-assessments, risk analyses, site visits, and audits. Several brands operate chemical compliance programs requiring lab testing of products against our RSL based on a risk-based approach.

### 3.1 Actions and results 2025

- At the end of 2025, 93% of our direct supplier spend was covered by suppliers that had signed our Supplier Code of Conduct.
- Among targeted direct suppliers, 61% had completed a sustainability assessment in Worldfavor.
- We partnered with Intertek to conduct audits across 11 of 15 brands, and Fristads participated in the amfori BSCI initiative.
- In 2025, brands within the Group conducted 134 (101) supplier audits.
- Number of targeted suppliers\*: 495  
*\*Direct suppliers providing materials or products.*

## 4 Access to additional information

Please find more information about our organization and practices for sustainability in our latest Sustainability Progress Report.

Upon written request, any person has the right to information from an enterprise regarding how the enterprise addresses 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 Kristina Altner, Group Sustainability Manager, [kristina.altner@hultaforsgroup.com](mailto:kristina.altner@hultaforsgroup.com).

For specific whistleblower issues or submissions, please see:  
<https://www.hultaforsgroup.se/sustainability/whistleblowing>.

## Approval and signatories

This statement has been prepared in accordance with the Norwegian Transparency Act and has been reviewed and approved by the Board of Directors of Hultafors Group Norge AS.

Electronically signed by:

- Andreas Ytterdal, Managing Director and Deputy Board Member
- Ida Saalman, Chairman of the Board
- Pelle Widén, Board Member

# Participants

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