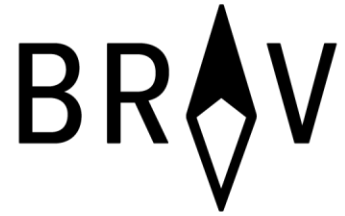


CODE OF CONDUCT

BRAV NORWAY AS

Updated 02.2020

Replacing Version 02.2017

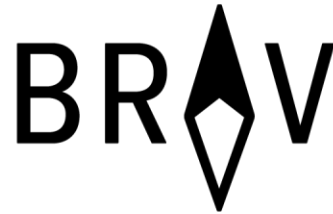


BRANDS WITHIN BRAV NORWAY AS

Swix
Toko
Lundhags
Ulvang
Helsport
Hard Rocx
Original Teamwear
Skisporet.no

COMPANIES WITHIN BRAV NORWAY AS

Brav Sweden AB
Brav Finland OY
Brav Germany GmbH
Toko AG
Brav LT UAB
OOO Brav RU
Swix Sport USA Inc.
Swix Sport Japan KK
Helsport AS



Introduction

At **Brav Norway AS («Brav»)**, which include all 100% or partly owned companies of **Brav Norway AS**, we promote decent working and environmental standards in our supply chains. We cooperate closely with our suppliers, their subcontractors and other business partners in pursuit of this aim. Accordingly, we have prepared this Code of Conduct to illustrate what we expect of our suppliers, their subcontractors and business partners. The Code of Conduct covers human rights, workers' rights, the environment and anti-corruption.

Brav is a member of the Ethical Trade Norway (IEH Norway), a membership organisation for private and public enterprises and organisations. IEH Norway is a resource centre and an advocate for ethical trade practices. **Brav** reports annually to IEH Norway. This report is made publicly available.

Brav is continuously seeking to improve policy and practice to assist suppliers in complying with this Code of Conduct, and will periodically update the Code of Conduct and other governing documents.

Principles

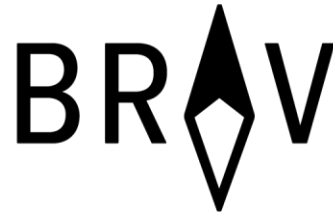
Brav's suppliers are to supply goods and services that are produced in compliance with the Code of Conduct. Moreover, the suppliers are to communicate the Code of Conduct to their sub-suppliers.

A supplier must be able to document compliance with the Code of Conduct at **Brav's** request. Such documentation may take the form of self-declaration, follow-up meetings, and/or audits performed by our employees or external auditors at the suppliers premises. The supplier will be obliged to name and provide contact information for any sub-supplier that **Brav** wishes to inspect.

In the event of a breach of the Code of Conduct, **Brav** and the supplier will jointly prepare a plan for remedying the breach. Remediation must take place within a reasonable period of time. The contract will only be terminated if the supplier remains unwilling to remedy the breach following repeated enquiries.

Requirement relating to own practice

When new suppliers are selected, emphasis will be given to the standards as described in this document. **Brav** and **Brav's** suppliers shall avoid partners that operate in countries subject to international boycott by the United Nations and/or Norwegian Authorities.



Requirement relating to working and environmental conditions

This Code of Conduct is based on internationally acknowledged UN and ILO conventions, and sets out a minimum standard. The employment legislation applicable to the place of production must be respected. Where national laws and regulations cover a topic that is also dealt with in this Code of Conduct, the higher standard shall apply.

1. Freely Chosen Employment (*ILO Conventions Nos. 29 and 105*)

- 1.1 There shall be no forced, bonded or involuntary prison labor
- 1.2 Workers shall not be required to lodge “deposits” or identity papers with their employer and shall be free to leave their employer after reasonable notice.

2. Freedom of Association and the Right to Collective Bargaining (*ILO Conventions Nos. 87, 98, 135 and 154*)

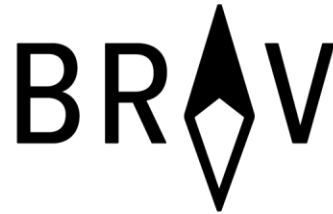
- 2.1 Workers, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 Workers representatives shall not be discriminated and shall have access to carry out their representative functions in the workplace.
- 2.3 Where the right to freedom of association and collective bargaining is restricted under law, the employer shall facilitate, and not hinder, the development of parallel means for independent and free association and bargaining.

3. No Child Labour (*UN Convention on the Rights of the Child, ILO Conventions Nos. 138, 182 and 79, and ILO Recommendation No. 146*)

- 3.1 Children and young persons under the age of 18 shall not be engaged in labour that is hazardous to their health or safety, including night work.
- 3.2 Children under the age of 15 (14 or 16 in certain countries) shall not be engaged in labour that is detrimental to their education.
- 3.3 New recruitment of child labour in infringing of the above mentioned conventions is unacceptable. If child labour, as described above, is already in existence, sustained efforts shall be made to redress the situation as quickly as possible. However, the children concerned shall be given the possibility of earning a livelihood, as well as acquiring an education until they are no longer of compulsory school age.

4. No Discrimination (*ILO Conventions Nos. 100 and 111 and the UN Convention on Discrimination Against Women*)

- 4.1 There shall be no discrimination at the workplace based on ethnic background, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- 4.2 Measures shall be established to protect workers from sexually intrusive, threatening, insulting or exploitative behavior, and from discrimination or termination of employment on unjustifiable grounds, e.g. marriage, pregnancy, parenthood or HIV status.



5. No Harsh or Inhumane Treatment

5.1 Physical abuse or punishment, or threats of physical abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, shall be prohibited.

6. Safe and Hygienic Working Conditions (ILO Convention No. 155 and ILO Recommendation No. 164)

6.1 The working environment shall be safe and hygienic, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in, the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

6.2 The employer must work proactively to avoid accidents causing harm to any employee in the workplace. Relevant first aid equipment must be available in each factory, and at least one person in each department should have training in basic first aid. It is recommended that a doctor or a nurse should be available at short notice, in case of an accident in the factory. The employer should pay any costs not covered by the social security, which a worker may incur for medical care, following an injury during work in the factory.

6.3 Workers shall receive regular and documented health and safety training, and such training shall be repeated for new workers.

6.4 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

6.5 Accommodation, where provided, shall be clean, safe and adequately ventilated, and shall have access to clean toilet facilities and potable water.

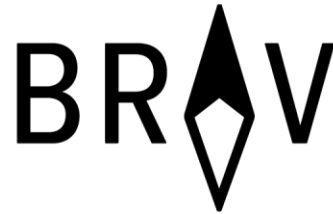
6.6 Fire Safety. The factory should have clearly marked aisles and exits, and emergency exits should be provided on all floors. Emergency exits must be clearly marked, well-lit and unblocked all the way out of the building. Evacuation through emergency exits must always be possible during working hours. If emergency exits are locked, the keys should be placed behind breakable glass next to the doors, and thus be available to all staff at all times. Everyone working on the premises, including managers and guards, must be regularly trained in how to act in case of fire or other emergencies. Regular evacuation drills for all employees are required; evacuation plans and firefighting equipment must be in place. Audible fire alarms should be present in all work areas and should be tested regularly.

7. Adequate Wages (ILO Convention No. 131)

7.1 Wages and benefits paid for a standard working week shall meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. Wages should always be enough to meet basic needs *and to provide some discretionary income*.

7.2 All workers shall be provided with a written and comprehensible contract outlining their wage conditions and method of payments before entering employment.

7.3 Deductions from wages as a disciplinary measure shall not be permitted.



8. No Excessive Working Hours (*ILO Convention No. 1 and 14*)

8.1 Working hours shall comply with national laws and benchmark industry standards, whichever affords greater protection. It is recommended that working hours do not exceed 48 hours per week (8 hours per day).

8.2 Workers shall be provided with at least one day off for every 7-day period.

8.3 Overtime shall be limited. Recommended maximum overtime is 12 hours per week.

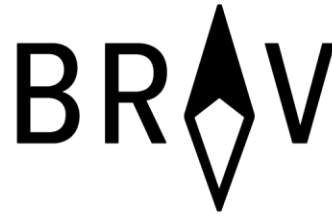
8.4 Workers shall always receive overtime pay, minimum in accordance with current legislation.

9. Providing Regular Employment

9.1 Obligations to employees under international conventions and social security laws, and regulations arising from the regular employment relationship, shall not be avoided through use of short term contracting (such as contract labor, casual labor or day labor), sub-contractors or other labor relationships.

9.2 All workers are entitled to a contract of employment that shall be written in a language they understand.

9.3 The duration and content of apprenticeship programs shall be clearly define.



Requirement relating to conditions outside the workplace

10. Anti-corruption

Brav has a zero tolerance for corruption. We require full transparency for all business transaction and do not accept bribes, facilitation payments or any other kind of improper benefits to take place between Brav and suppliers or between suppliers and subcontractors. Our policy is further described in the document **Brav Anti-Corruption Policy**.

11. Consideration for Marginalized Populations

11.1. Production and extraction of raw materials for production shall not contribute to the destruction of the resources and income base for marginalized populations, such as in claiming large land areas or other natural resources on which these populations are dependent.

12. Protection of the Environment

12.1. Environmental measures shall be taken into consideration throughout the production and distribution chain ranging from the production of raw material to the consumer sale. Local, regional and global environmental aspects shall be considered. The local environment at the production site shall not be exploited or degraded by pollution.

12.2 National and international environmental legislation and regulations shall be respected.

12.3 Relevant discharge permits shall be obtained where required.

12.4 Hazardous chemicals and other substances shall be carefully managed.

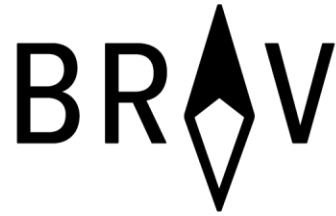
12.5 All **Brav's** suppliers must keep record of all chemical substances used in production and all associated processes. No restricted substances according to REACH Annex XVII, and EU regulations and/or other international standards as further described in our **Restricted Substances List** may be used in production of our products or in any associated process.

13. Animal welfare

Brav is aware of our responsibility for the welfare of animals. Traceability, sustainability, animal welfare, and farm conditions must be taken into account when choosing suppliers of animal fibers. Suppliers must follow international ethical standards and regulations.

13.1 *Mulesing*. Mulesing is a practice performed on some Merino sheep herds in Australia and New Zealand to prevent fly strike. This kind of treatment shall not occur in **Brav's** supply chain with regards to the production of **Brav's** wool products. **Brav** does not accept clips as an alternative to perform mulesing.

13.2 *Down*. Down used in **Brav's** products shall be taken only from birds killed for food purposes. **Brav** does not accept "live-plucking" of down.



13.3 *Leather products.* Leather products are only to be made from utility animals as pigs, sheep and cattle, where the animal was slaughtered for the purpose of meat productions. We have a clear ban on use of tanneries from Bangladesh.

13.4 **Brav** does not use animal fur in any shape or form.

14. Management systems of suppliers

The management system is key to the implementation of the Code of Conduct. **Brav** emphasises the importance of suppliers having systems that support such implementation. **Brav's** expectations in this regard are summed up in the following measures:

- The supplier must make the CoC known in all relevant parts of its organization.
- The supplier must obtain **Brav's** consent prior to outsourcing production or parts of production to a sub-supplier/contractor, if this has not been agreed in advance.
- The supplier must be able to give an account of where goods ordered by Brav are produced.

15. Monitoring and audits

Brav expects all suppliers to respect the Code of Conduct. To make sure suppliers are in compliance with the Code of Conduct, Brav may perform audits either by written communication and/or by physical inspections at the supplier's production sites. The audits may be performed by employees of the Brav Group or independent auditors. The audits may be announced or unannounced.

We hereby accept to comply with the above standards.

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Company, signature and date