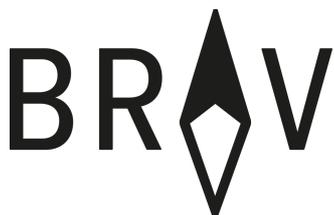




Report on

# Responsible Business Conduct 2021

for BRAV Norway AS



# SUSTAINABLE DEVELOPMENT GOALS



## To Readers Of The Report

Business has a major impact on people, society and the environment. It can make positive contributions to development but can also have negative impacts and cause harm. Companies therefore play a key role in achieving the UN's Sustainable Development Goals (SDGs). The Norwegian government expects all companies, regardless of size, to map, prevent, limit and communicate on how they handle risks for negative impact, as well as remediation mechanisms in cases of harm on people, societies or the environment. This is known as due diligence and applies to the private and public sector as well as organizations. As a consequence of the recently passed Transparency Act (åpenhetsloven), all larger corporations are obliged by law to conduct due diligence and show transparency in this work from 1 July 2022.

Members of Ethical Trade Norway have committed themselves to work with mandatory due diligence for responsible business practice. The foundation for this work is Ethical Trade Norway's Declaration of Principles (code of conduct) which covers the areas decent work, human rights, environment/climate, anti-corruption and animal welfare.

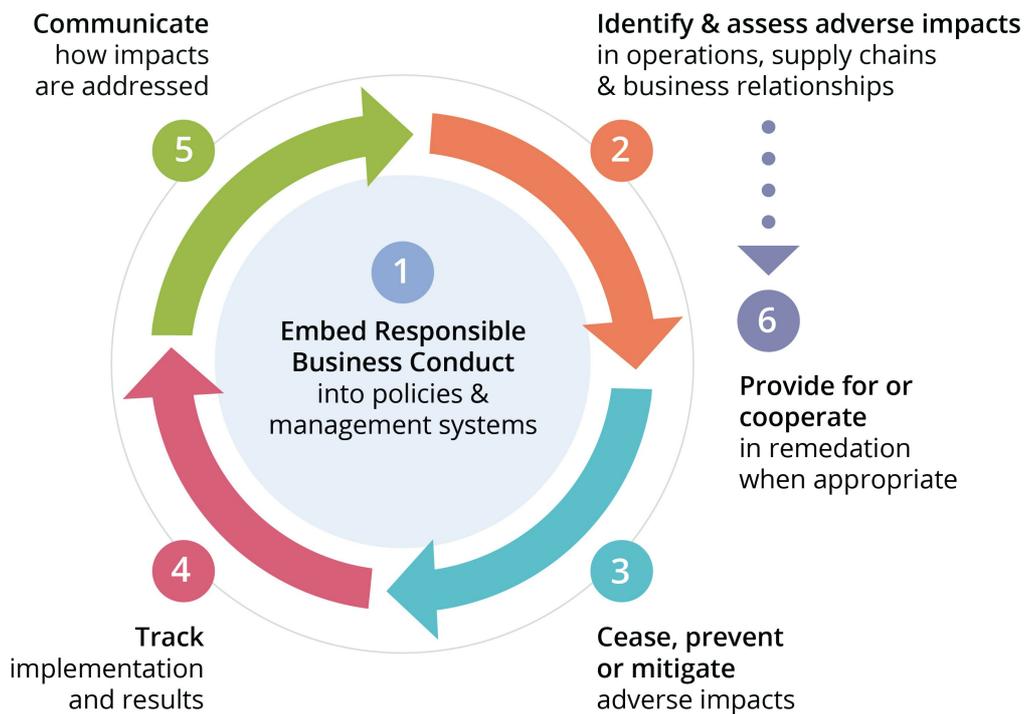
The reporting template is designed for the company to show transparency in their work on responsible and sustainable business practice, as described in the UN Guiding Principles (UNGP) and the OECD Guidelines for Multinational enterprises. The report should show how the company works with due diligence, and describe what challenges the company faces, which measures are being implemented to handle these challenges, as well as progress and results. All member reports are publicly available on Ethical Trade Norway's website.

**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

Brav develops, markets, and sells the brands Swix, Ulvang, Toko, Lundhags, Brav Teamwear, Helsport, and Skisporet.no in a total of 30 countries. All our products are timeless, created for performance and durability through innovation, research, and development, made to last, and possible to repair and replace parts. Our vision is "turning dreams into memories" and our mission is "to improve our customers' quality of life by providing innovative products and services, bringing together and developing talents, and acting responsibly". Our cultural values "Teamwork", "Passion" and "Courage" reflect our fundamental beliefs and are the guiding principles that direct our behavior, and how we interact with each other and the world around us.

Brav has been a member of the Ethical Trade Norway since 2005. By this membership, we are committed to acting responsibly in all areas of our business.

2021 has been a year where the world and Brav still had to cope with the challenges of Covid-19, scarcity of raw materials, and capacity challenges in world logistics. Even though we were prepared by the actions taken in 2020, Covid-19 has had consequences for our manufacturers and suppliers, our customers, and for all the employees at Brav. We have seen tremendous endurance by our employees in adopting digital work environments and coping with disturbances along our value chain. In our production and warehouse facilities employees have continued working in shifts to reduce the risk of spreading infection.

We are in our first year of implementing the Brav Corporate strategy for 2021-2024 and have set in motion activities to meet our ambition to be at the forefront in selected areas in sustainable business practices.

We have established the Brav Circularity model where longevity, maintenance, and repair of our products play important parts in our design and development process. We have chosen Chain of Custody (CoC) to ensure end customer, traceability, and third-party control. This eases our work and reduces the risk of non-compliant components and ingredients in our products. Internationally standardized certifications also enable communications through known symbols. We have defined the Brav Environmental Social and Governance (ESG) model and increased our efforts in all three areas. Our cross-functional Sustainability Group meets regularly; to share and create organizational competence. We have strengthened our external communication on how we work with sustainable business practices on Brav.com. We are preparing to be transparent and will share challenges as well as goals and achievements. To assure that we are allocating our resources where it has an impact we have conducted a materiality assessment and we have delivered a climate report for 2021. This brings us one step closer to implementing fact- and science-based targets, and contributing specifically to the UN Development goals #8 Decent work and economic growth, #12 Responsible consumption and production, and #17 Partnerships for the goals.

In 2020 we terminated all production of C6 fluoro-based ski waxes to the consumer market and stopped all related marketing activities. As of the 2022/2023 fall/winter season the entire ski wax collection is fluoro free. Brav will no longer sell any ski wax products containing fluoro components. In 2021 we prepared the campaign "FLUOR FRI for årets sesong, og alle etter" (fluoro free for this year's season and all after) that we launched in February 2022 with the purpose to remove as much as possible of ski wax containing fluoro from Norwegian households. We will continue our process to achieve Svanemerket ski wax.

As the CEO of Brav, I am proud to communicate that we have taken actions to make responsible business conduct the fundament of all our strategic ambitions. I am well aware that we have a demanding journey ahead of us, including complex dilemmas which need to be solved, but the path is set and we are well underway with the implementation of several initiatives.

Espen Falck Engelstad  
*CEO*

# Company information and business context

## Key company information

### Company name

BRAV Norway AS

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### Head office address

Snøkrystallen 11, 1470 Lørenskog, Norway. Tlf: ( 47) 61 22 21 00

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

Brav is a house of brands covering several international brands: Swix, Lundhags, Toko, Ulvang, Helsport, Brav Teamwear and Skisporet.no.

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### Description of company structure

Brav has offices and own companies in Norway, Sweden, Finland, Lithuania, Germany, Switzerland, Russia, Japan and the United States. In addition, our premium brands are distributed in more than 30 countries worldwide.

We sell mainly through sporting goods chains and specialty retailers in the sporting goods industry, and directly to consumers through brand stores/outlets and e-commerce.

The majority of the goods we sell is sourced from vendors in Asia and Europe. In addition we own production facilities in Norway (ski wax and plastic parts), Lithuania (ski poles and roller skis) and Sweden (boots).

Brav has an operating model where each brand is given significant opportunities to develop its own unique identity and culture, but with strong common functions in areas where synergies can be realized.

Brav is 100% owned by Ferd Capital.

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### Turnover in reporting year (NOK)

1 221 472 000

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### Number of employees

351

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### Major changes to the company since last reporting period

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

Hanne Haslum. Head of Sourcing

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### Email for contact person for the report

hanne.haslum@brav.com

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## Supply chain information

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

Most of our finished goods and raw materials are sourced from external suppliers in Asia and Europe. For the most part, we source directly from the suppliers, but in some cases we buy our goods through trading companies.

Our brands and category product managers source materials and products suitable for their collections, whereas our supply chain organization is responsible for approving suppliers, following up production, purchase orders and monitoring code of conduct through social audits.

In most cases we are one of several customers sourcing from and producing in the same factory, using their capacity and skills.

In addition to sourcing goods, we operate our own factories where we produce ski wax and plastic parts (Lillehammer, Norway), ski poles and roller skis (Ukmerge, Lithuania) and boots/shoes (Järpen, Sweden).

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

194

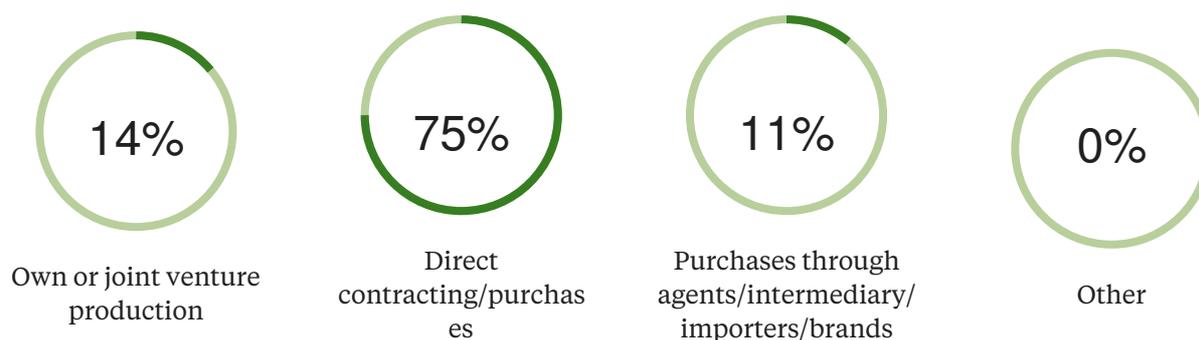
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### Comments

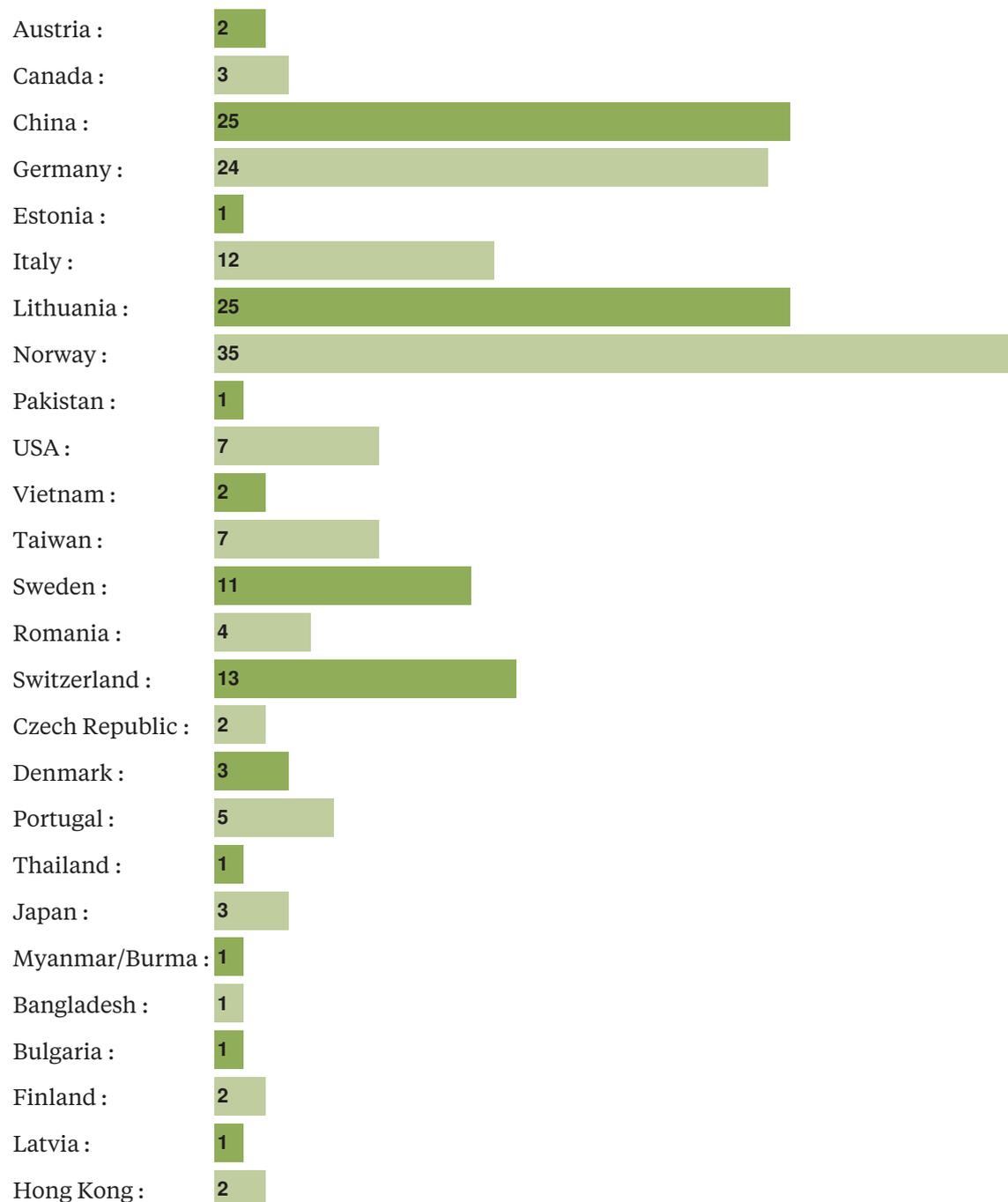
We have included purchases from own production at Lillehammer and in Lithuania, and including trading companies together with factories. The numbers are based on the same 194 vendors as explained above. We have for 2021 decided to list all suppliers both T1 and T2 for the whole Brav group supply chain. We have therefore also included raw material T2 vendors for our fully owned production facilities in these numbers. Both suppliers for raw materials and finished goods are included as long as a part of the Brav group has direct business contact with the supplier. We removed the NOK 500 thousand limit, so also all smaller suppliers are added and therefore the list of Tier 1 and Tier 2 increased quite a bit since the 2020 report.

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### Approximate ratio by sourcing options



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



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State the number of workers at first tier producers that the company has an overview of, and the number of suppliers this overview is based on:

#### Number of workers

5 880

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**Number of suppliers this overview is based on**

147

**Numbers of workers per supplier (calculated average)**

40

**Comments to number of workers**

We are currently working on updating key figures for all our vendors through both questionnaires, Integrity Due Diligence (IDD) procedure and social audits.

**Key inputs/raw materials and associated geographies**

<b>Wool (RWS merino and other thicker wool)</b>	China Spain Norway South Africa
<b>Polyester (GRS recycled and virgin)</b>	China
<b>Down (RDS duck and goose)</b>	China
<b>Carbon fibre</b>	Japan
<b>Aluminium</b>	China Norway The European Union
<b>Paraffines</b>	Germany South Africa
<b>Synthetic wax</b>	Germany Japan
<b>Cotton (organic)</b>	Turkey
<b>Nylon (regenerated and virgin)</b>	Japan Taiwan The European Union
<b>Steel</b>	Italy
<b>Plastic granulates</b>	Norway

<b>Tencel</b>	China The European Union
<b>Leather</b>	Germany
<b>Cork</b>	Austria Portugal
<b>Polyethylene (PE)</b>	Germany France Romania
<b>Polypropylene (PP)</b>	Germany France Romania
<b>EVA foam</b>	China
<b>Resin</b>	The European Union

Raw material input is based on an estimated largest consolidated value of purchase across brands.

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

Yes

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## Goals and progress

### Goals and progress for the reporting year

1

**Goal :** Reduce our eco footprint by reducing our carbon footprint, water consumption, and waste in our value chain. : Implement principles for circular product life cycle. Measuring/KPI carbon footprint

**Status :** Brav Circularity model was established in 2021. The model is presented on internal and external websites, discussed in the Sustainability group and the BoD. Each department is establishing principles and goals according to the Circularity model.

2

**Goal :** Reduce our eco footprint by reducing our carbon footprint, water consumption, and waste in our value chain. : Implement new technologies to eliminate the need of sales samples. Measuring/KPI no of collections with digital sales samples

**Status :** Brav is looking into Higg for measuring actual footprint and reductions both at factory and product level.

3

**Goal :** Utilize suppliers, materials and transportation with minimal impact on people, nature and animals: Report our sustainability impact based on a recognized reporting standard. Measuring/KPI publicly communicate progress and results.

**Status :** Carbon footprint accounting results, <https://www.brav.com/wp-content/uploads/2022/05/Brav-Carbon-Footprint-Report-2021-Cemasys-Final-Report-.pdf>

4

**Goal :** Integrate UN development sustainability goals 8, 12, and 17 as guiding principles in our business processes. Measuring/KPI Guiding principles in all major business processes.

**Status :** Work in progress for 2022

5

**Goal :** Integrate responsible business practice end-to-end in the value chain: Develop competence among all employees in sustainability best practice. Measuring/KPI score of self assessment program.

**Status :** Our Responsibility strategy is communicated on Introduction courses for new employees, information meetings and competence development is one of the main objectives for the Sustainability group. A self-assessment program is not yet implemented.

6

**Goal:** Integrate responsible business practice end-to-end in the value chain: Implement strategy for compliance and risk mitigation through certification and audits of partners, own business and products. I.e BSCI, Responsible Wool. Measuring/KPI share of relevant certifications

**Status:** Brav supplier selection approval requirements are factory certification or a recent social audit with good results.

Material certification must-haves and nice to have, both with chain of custody, approved in Top Management group and are being implemented during 2021 and 2022.

7

**Goal:** Integrate responsible business practice end-to-end in the value chain: Establish sales and purchase processes which assures responsible ordering to manufacturers. Measuring/KPI score by manufacturer

**Status:** The Timeline process includes activities for forecasting, aligning order and delivery dates with our Tier-1 and Tier-2 suppliers. A KPI program is not implemented yet.

8

**Goal:** Drive the industry forward through partnerships with selected organizations and selected partners:  
Explore and implement alternatives for partnerships according to UN#17. Measuring/KPI no of partnerships and results

Brav wants to be a driving force to drive the industry forward and is currently in discussion on several cooperation projects for a more sustainable industry.

Hardware Swix/Toko has since 2013 been cooperating in several research projects for phasing out PFAS in the entire industry and driving the industry forwards through research and innovation, towards a science based sustainable future.

<https://www.ntnu.no/siat/nano2glide>

<https://www.sintef.no/siste-nytt/2014/jakter-pa-gronn-glid/>

**Status:**

[https://prosjektbanken.forskningsradet.no/en/project/FORISS/296540?](https://prosjektbanken.forskningsradet.no/en/project/FORISS/296540?Kilde=FORISS&distribution=Ar&chart=bar&calcType=funding&Sprak=no&sortBy=date&sortOrder=desc&resultCount=30&offset=0&TemaEmne.2=Nanoteknologi)

[Kilde=FORISS&distribution=Ar&chart=bar&calcType=funding&Sprak=no&sortBy=date&sortOrder=desc&resultCount=30&offset=0&TemaEmne.2=Nanoteknologi](https://prosjektbanken.forskningsradet.no/en/project/FORISS/296540?Kilde=FORISS&distribution=Ar&chart=bar&calcType=funding&Sprak=no&sortBy=date&sortOrder=desc&resultCount=30&offset=0&TemaEmne.2=Nanoteknologi)

<https://www.ri.se/en/popfree>

<https://www.ri.se/en/press/the-industry-invests-in-phasing-out-pfas>

9

**Goal:** 100% flouro free ski wax by 2022

**Status:** Completed.

10

**Goal:** For 2021 Swix and Toko is working towards a possible environmental-friendly Eco-label the Swan certified skiwax line and care line.

**Status:** This work is still in progress.

11

**Goal:** Increasing our use of recycled materials where it is functional and not decreasing durability/product lifetime.

**Status:** We are focusing on using recycled materials where this is available and does not reduce the functionality of the product.

Brav has decided and thereby request that all recycled materials need to be GRS certified to ensure that both social and environmental compliance are being taken care of.

12

**Goal:** Focusing on decreasing production waste and working on reuse of leftover production fabric.

Product department is working on pattern optimization and 3D design.

**Status:** For 2022 the first 3D sketches are replacing salessamples.

Ulvang is using leftover material to make beanies/hats and carpets from products not passing QC and therefore abundant.

13

**Goal:** Reducing water consumption by choice of raw materials and dyeing/washing methods in the production line. Starting 2021 by mapping which of our suppliers have modern water-saving machinery/processes and which of our suppliers have old water-wasting machinery. The next step will be adding reduced/low water consumption as a requirement for new suppliers, and working to have current suppliers with old water-wasting machinery updating to modern water-saving machinery and processes.

**Status:** Needs to be fact based, and Brav is in addition to looking into different measurements like Higg and STWI

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### Goal for coming years

1

Adjusting and making public measurable targets on carbon reduction and water reduction through internationally acknowledged standards like Science Based Target Initiative (SBTi) and Swedish Textile Water Initiative (STWI) or Higg Index

2

Implement new technologies to eliminate the need of sales samples. Measuring/KPI no of collections with digital sales samples, reducing our overproduction of samples

3

Reporting our sustainability work and targets on an international standard / Global Reporting Initiative (GRI) starting 2022

4

Integrating UN development sustainability goals 8, 12, and 17 as guiding principles in our business processes. Measuring/KPI Guiding principles in all major business processes across all Brav business areas.

5

Develop responsibility competence among Brav employees in sustainability best practice. Measuring/KPI on how many Brav employees are trained through Ethical Trade courses and similar responsibility training the next years

6

Measuring Brav reduction of excess packaging and virgin plastic, measurable amount converted to Global Recycle Standard (GRS) certified recycled plastic

7

Measuring and increasing amount of responsible predictable ordering processes and long term planning and partnerships with the manufacturers and suppliers, reducing the use of overtime

8

Social Due Diligence (SDD) of 100% of Brav spend ongoing, and Social auditing at least 80% of Brav spend starting 2022

9

Proper solid supplier terms and purchase contracts for at least 80% Brav spend covering ESG criterias starting 2022

10

Integrity Due Diligence (IDD) screening based on risk matrix of all risk suppliers starting 2022

11

Measuring and increasing the amount of supplier orders being pre-negotiated and adjusted to the focus on reducing potential overproduction

12

Measurably phasing out the last remaining possible PFAS in Brav in the remaining last Dual Water Repellent (DWR) textile areas, through 2022-2024

13

Swix and Toko working towards a possible environmental-friendly Eco-label the Swan certified skiwax line and care line.

14

Through carbon capture technology Swix and Toko working towards measurably carbon neutral skiwax production processes

15

Measurably increasing our use of recycled certified textile materials through % of Global Recycled Standard (GRS) certified materials

16

Continuing the focus on pattern optimization and 3D design for decreasing production waste, and continuing the work on reuse of leftover production fabric.

17

Drive the industry forward through partnerships with selected organizations and selected partners: Explore and implement alternatives for partnerships according to UN#17. Measuring/KPI no of partnerships and results



1

## Governance and commitment to responsible business conduct

Embedding responsible business conduct means that the company should have strategies and plan, as well as relevant policies\* and guidelines for 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 succeeding, and due diligence should be an integrated element in company operations. Clear expectations from senior management are crucial, as well as clearly assigned responsibilities within the company, for the implementation of the steps in the due diligence process. Those involved need to know how to proceed.



## 1.A Policy\* for own business

### 1.A.1 Link to publicly available policy for own business

<https://www.brav.com/responsibility/esg-in-brav/>, and Employee Code of Conduct and Brav Supplier Code of Conduct [https://www.brav.com/wp-content/uploads/2022/06/Brav\\_Supplier-Code-of-Conduct\\_06-2022.pdf](https://www.brav.com/wp-content/uploads/2022/06/Brav_Supplier-Code-of-Conduct_06-2022.pdf), to be found here <https://www.brav.com/responsibility/social/>

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

We are communicating our sustainability/responsibility work and commitment on our website <https://www.brav.com/responsibility/>.

We also list our suppliers/factories on <https://www.brav.com/wp-content/uploads/2022/05/Brav-supplier-list-10-01-2022.pdf>. This list is updated once per year.

As a supplier of sporting goods and equipment for outdoor use, we are committed to taking good care of our customers, securing a safe and healthy working environment for the people developing and producing our products, as well as having a minimal impact on the natural environment <https://www.brav.com/responsibility/>.

Brav updated and approved their principles of responsible business 2020, available on <https://www.brav.com/responsibility/esg-in-brav/> and <https://www.brav.com/responsibility/social/>.

The Employee Code of Conduct describes what is expected of each of us and mirrors our environmental, social and governing responsibility. It defines our commitments and requirements for ethical conduct in Brav and applies to all Employees and Board members in Brav <https://www.brav.com/responsibility/social/>.

Brav supplier Code of Conduct describes what we expect from our suppliers and factories [https://www.brav.com/wp-content/uploads/2022/06/Brav\\_Supplier-Code-of-Conduct\\_06-2022.pdf](https://www.brav.com/wp-content/uploads/2022/06/Brav_Supplier-Code-of-Conduct_06-2022.pdf). Brav Employee Code of Conduct <https://www.brav.com/responsibility/social/>

These, in addition to General Terms and Conditions for Suppliers, need to be signed and agreed by all manufacturers and suppliers to be able to do business with Brav.

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

Brav company policy available on: [https://www.brav.com/wp-content/uploads/2022/05/Brav-policy-for-responsible-business-conduct\\_1.pdf](https://www.brav.com/wp-content/uploads/2022/05/Brav-policy-for-responsible-business-conduct_1.pdf), was updated and public 2020, after being presented to all departments and approved by the top management/board.

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## 1.B Organisation and internal communication

### 1.B.1 How is the due diligence work organised within the company, and why?

The Due Diligence work is anchored from the board of directors and top management and the daily responsibility is placed in in the supply chain at the sourcing department.

Brav Supply chain is organized as a separate strong central unit which works closely with all the brands and is in charge of all manufacturers and suppliers.

The responsibility for sustainable business conduct lies with the CEO and Supply Chain Director.

Head of Sourcing has the day-to-day responsibility for responsible business conduct in the company.

By combining the work for responsible business conduct (ESG) in the Sourcing department, we consider the three P's People, Planet and Profit when actively screening, implementing due diligence, selecting, approving and monitoring our manufacturers (T1) and suppliers (T2), and when negotiating supplier contracts, prices, locations, capacity, qualities and quantities.

Brav has decided on this organizational structure to improve control of responsible business conduct in the supply chain and our main business area, and to be able to act directly and efficiently.

The responsibility for integrating the corporate goals and initiatives lays within each department director.

By this we clarify the importance, the responsibility, and the authority of integrating responsible business conduct in core processes.

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

Responsible business practice is the foundation of everything we do and is communicated through all departments.

Sustainability/Responsibility is a regular topic at information meetings for the whole organization, on our Brav Portal integrated in our Brav 2021-2024 strategy presentation, Our Responsibility, and in the Personnel Handbook.

All employees are required to read, understand and follow the rules for responsible business conduct in all decisions and actions.

Integration of the company's due diligence work is also done through the Brav Sustainability group quarterly meetings, held by Head of Sourcing, with rotating members from all departments.

These meetings serve as educating, knowledge sharing and discussions on important responsibility topics.

After each meeting the representatives have the task to bring and report the topics/tasks back to their department meetings.

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

The Top management team and key personnel have joined workshops on compliance and the Taxonomy arranged by our owner Ferd Capital AS. As a part of the strategy development we conducted a workshop with external responsibility experts to get knowledge of rules and regulations, trends, and possibilities.

The Brav strategy 2021-2024 has clear ambitions, corporate goals, and initiatives. A row of workshops to familiarize the Brands and the various departments with ambitions, goals, and expectations have started. This includes topics such as circular economy and the UNSDGs in general and those we have decided to focus on; #8, #12 and #17.

By implementing Carbon Footprint Accounting Scope 1 + 2 + 3 and reduction targets, both supply chain, product development, finance, and relevant stakeholders will be trained.

Integration of the company's due diligence work is also done through the Brav Sustainability group quarterly meetings, held by Head of Sourcing, with rotating members from all departments.

These meetings serve as educating, knowledge sharing and discussions on important responsibility topics. After each meeting the representatives have the task to bring and report the topics/tasks back to their department meetings.

A row of courses and webinars for the relevant stakeholders at Ethical Trade Norway is planned throughout 2022 and 2023 to make sure the employees have adequate competence to work on due diligence for responsible business conduct.

We choose to lean on external expert competence such as Ethical Trade Norway, Elevate, Sedex, SAC/Higg, Swedish Textile Initiative for Climate Action (STICA), and TEKÖ. We lean on and contribute to the industry by active memberships in, for example European Outdoor Group, and Scandinavian Outdoor Group, where Lundhags holds a board member position.

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## 1.C. Plans and resources

### **1.C.1 How are the company's commitments to respect people, society and the environment rooted in strategies and action plans?**

There is increased focus on T2/T3 raw materials to manage risk (both human/working conditions and environmental) at the beginning of the value chain.

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### **1.C.2 How is the company's strategies and action plans to work towards being responsible and sustainable followed up by senior management and in the board?**

Execution of implemented strategies is done through game plans/action plans. Implemented action plans, status and progress on these are followed up in top management meetings and status is annually reported to the Brav board of directors.

During 2021 risk areas have been identified and presented in the Management group. This was followed up with 3rd party audits and findings through Elevate ERSA protocol, including a corrective action plan (CAP) presented to the Management group.

The Chair of the Board has initiated several compliance workshops with the Management group and key personnel. Responsibility and Compliance is requested from the Board of Directors to be on the agenda as a separate topic in 2021.

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## 1.D Partnerships and collaboration with business associates, such as suppliers

### 1.D.1 How does the company emphasise the importance of responsible and sustainable business conduct in its business relationships, particularly in the supply chain?

All suppliers must sign Brav Supplier Code of Conduct [https://www.brav.com/wp-content/uploads/2022/06/Brav\\_Supplier-Code-of-Conduct\\_06-2022.pdf](https://www.brav.com/wp-content/uploads/2022/06/Brav_Supplier-Code-of-Conduct_06-2022.pdf).

Company representatives visit the factories frequently (although also in 2021 has due to the pandemic been mostly digitally meetings, with 3rd party inspections on site).

Brav is committed to having a long-term supplier relationship and most suppliers have been with us for many years, some even from the very beginning more than 40 years ago, which means that we have got to know them quite well and are confident in their seriousness in the work. In several instances, we are now working with the second generation of owners over these long-term supplier relationships, and we have grown and developed together over the years through both better times and challenging times. We strive to be fair and balanced in our approach when it comes to price, volume, quantity and capacity utilization, and we are having the responsibility focus with us in all our purchasing decisions and supplier dialogue.

When sourcing for new suppliers we also have the same intention of a long-term supplier relationship. The Brav General Terms and Conditions for Supplier, Brav Supplier Code of Conduct and Restricted Substances List are distributed to all suppliers when initiating a business relationship. Before any orders are placed, all suppliers must read, understand and sign these documents.

Our suppliers are audited, both announced and unannounced, to see to that working conditions and environmental criterias are followed.

Suppliers are informed of the non-compliance we identify during mapping and inspections at factories and are given timelines for when we expect the issues to be resolved. Follow-up activities are held regularly when needed.

We communicate our expectations clearly and continuously throughout the cooperation with our suppliers. No supplier can produce for us unless the factories have been approved on our people, society and environmental requirements by the sourcing department. Price negotiations are done by the same sourcing department and our expectations that our suppliers respect people, society and environment are discussed equally.

Brav focuses on transparency and fair play in dialogue with all suppliers and believe this is key to enable improvements. We will support our suppliers in doing the required improvements. Suppliers that are not willing to do the required improvements will get alerted that improvement measures are necessary for a continued cooperation. Lack of cooperation with respect to implementation of responsible business practices will affect future orders and volumes. Continuous lack of cooperation on required improvements will result in termination of the business cooperation with a supplier.

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## Indicator

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



## 1.E Lessons learned and changes in the reporting period

### 1.E.1 What lessons has the company learned during the reporting period concerning responsible business conduct, and what has changed as a result of this?

Brav has through the Covid and the reduced possibility to travel to suppliers become more digital, and learned that the combination of questionnaires, dialogue, Integrity Due Diligence (IDD), Social Due Diligence (SDD), and unannounced/pre-announced third party audits uncover most irregularities in the supply chain and is the most efficient combination of tools we have had up til now to unveil and improve the social conditions in the Brav value chain.

In 2021 we also saw the need for and started our systematic supplier evaluation and performance monitoring process with supplier scorecards (run as a cooperation between sourcing and quality department, combining business and ESG criterias) and annual evaluation which is our ongoing Due Diligence model in Brav supply chain.

With this process we monitor, evaluate, and communicate with our suppliers regarding our increased demands for continuous improvement which must be followed within a certain amount of time to be able to continue doing business with Brav.



## 2

### Defining the focus for reporting

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

“Identify and assess” is about identifying the company's risk for, and actual negative impact on, people, society and the environment, including in the supply chain and through business relations. As a first step the company should get an overall risk picture, before subsequently prioritising measures where the risk of negative impact is the greatest, i.e. salient issues. How the company is involved in the negative impact is central to determine the right actions to take. 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

### STATEMENT ON SALIENT ISSUES

*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 the company's prioritised risk of negative impact on people, society and environment.

Salient issue	Related topic	Geography
Workers safety, migrant workers, marginalized populations, child labor	Forced labour Child labour Discrimination Harsh and inhumane treatment Occupational Health and safety Marginalized populations	Bangladesh China Myanmar/Burma Pakistan Turkey
Workers rights, freedom of association and collective bargaining	Freedom of association and collective bargaining	China Myanmar/Burma Turkey
Working hours, use of overtime, decent wages in our supply chain	Wages Working hours Regular employment	Bangladesh China Myanmar/Burma Pakistan Turkey
Chemical production control	Emission Waste Water Use of materials	Global
Anti-corruption	Corruption	Global

Animal welfare	Animal welfare	Argentina Australia China South Africa
Water scarcity/drought, water consumption in the supply chain	Water Use of materials	Australia Bangladesh China Pakistan South Africa
Greenhouse Gas (GHG) emission, Carbon footprint	Emission Greenhouse gas emission Energy Waste Water Use of materials	Global

The list above reflects what we consider to be the salient issues in our value chain, related to the various production countries.

## DETERMINATION OF SALIENT ISSUES

**2.A.2 Describe in short the company's routines for mapping and identifying risk and show how the negative impact was identified and prioritised in this period. Describe how information was gathered, what sources were used, and which stakeholders have been involved/consulted. Further, describe whether you have identified areas where information is lacking in order to get an overview, and how you are planning to proceed to collect more information/handle this.**

Through due diligence and risk assessment per country, raw materials and type of production, and potential scale and scope of the salient issues, we have determined which salient issues to focus on for the upcoming years.

The social risk assessment is based on open international sources where we define risk on country and raw materials.

The country based risk assessment was carried out in 2020 after a workshop at Ethical Trade Norway and uses, among other things, country reports from Ethical Trade Norway, reports from United Nations Development Program, US Department of State Bureau of Economic and Business Affairs, ITUC Global Rights Index, and Transparency International.

In addition to the country criterias Brav has in 2021 added criterias like amount of purchase, supplier structure and then selected into levels of Integrity Due Diligence (IDD) for third party screening.

We use Excel files that lists risk and defines priority both on country, type of production and materials. Then we do a risk matrix on impact and probability, seek approval and agreement internally from superiors on the priorities, and act according to that.

## ADDITIONAL SEVERE IMPACTS

**2.A.3 Describe any other severe impacts on people, society and the environment that were identified in the mapping of the business, supply chain or other business relationships during the reporting period and how these have been handled.**

A woman in a blue surgical cap and gown is shown in profile, looking down, in a hospital operating room. Other staff in similar attire are visible in the background, working at a surgical table. The room is brightly lit with overhead surgical lights.

### 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, 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 company is involved in the negative impact is key to taking the appropriate action. Negative impact that the company causes or contributes to must cease, be prevented and be reduced. To address negative impact directly linked to the company, 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 company's own policy documents and management systems. Effective management of the negative impact on people, 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 For each salient risk, add a goal, progress status and describe the measures you have implemented to handle the company's prioritized negative impact on people, society and the environment

<b>Salient issue</b>	<b>Workers safety, migrant workers, marginalized populations, child labor</b>
<b>Goal :</b>	Safe working environment for all workers in our supply chain. No workers should be exploited or discriminated.
<b>Status :</b>	Brav has a large part of our production in Asia/China which involves the possible risk of use of migrant workers and breach of workers rights.
<b>Objectives in reporting year :</b>	Identifying priorities, potential high risks/red flags, auditing and following up.

Actions :

This is high priority now and the next years.

We have found that the risk for corruption or other irregularities could be an indicator for also possible social breaches.

Comparing different audit partners and protocols and external systems for risk-assessment and audit findings.

High risk suppliers and red flags suppliers are being prioritized in the audit plan, and several are being audited unannounced for a more correct true status for corrective action plan (CAP).

We have through our Integrity Due Diligence (IDD) work made a more complete risk assessment overview of all our suppliers.

Through the risk matrix we have found which suppliers are high risk priority and possible red flags.

<b>Salient issue</b>	<b>Workers rights, freedom of association and collective bargaining</b>
<b>Goal :</b>	Workers in our supply chain should be allowed to collective bargaining and able to speak their opinion
<b>Status :</b>	Our Policy and Code of Conduct states our demand for collective bargaining and workers ability to speak their opinion. We are addressing the issue with our suppliers, but will have to find a better system to follow this up and to give systematic training to workers in our value chain
<b>Objectives in reporting year :</b>	Establish a system for interviewing and training the workers and factory on the workers' rights, not only interviews during audits.

**Actions :**

We are currently mapping our supply chain for understanding practices for workers' rights (focus Asia), and whether the suppliers are complying to our Code of Conduct. This is also being checked at 3rd party audits. We are looking into training tools for improving this work, and this will be further explored in 2022.

<b>Salient issue</b>	<b>Working hours, use of overtime, decent wages in our supply chain</b>
<b>Goal :</b>	Workers in our supply chain should be paid fairly, and have decent working hours
<b>Status :</b>	We are addressing the issue with our suppliers
<b>Objectives in reporting year :</b>	Continuing the process of finding out how the situation is for our workers in our supply chain. Continue the work on forecasting and ethical purchase practice to reduce/avoid stressful periods and periods without work at the supplier.

**Actions :**

We are working on mapping our supply chain for understanding practices for living wages, and use of overtime.

This is also being checked at audits.

We communicate that living wages should be discussed in general, also when negotiating the product prices. We are working on responsible buying practices, and communicate our forecasts/production plans and our timeline/deadlines through our supply chain as soon as they are ready. Running orders are placed in low season where it is possible.

<b>Salient issue</b>	<b>Chemical production control</b>
<b>Goal :</b>	Responsible chemical use, storage and waste
<b>Status :</b>	We are addressing the issue with our suppliers
<b>Objectives in reporting year :</b>	All suppliers including raw material suppliers must follow REACH and Brav restricted substances list. We need to map to see they follow responsible chemical use, storage and waste, with no harm to workers or environment

**Actions :**

Mapping our wet process producers (dyers, washers, raw material producers, chemical production) to see they have functioning protection equipment, water cleaning systems and HSE routines. This is also being checked at 3rd party audits.

<b>Salient issue</b>	<b>Anti-corruption</b>
<b>Goal :</b>	Transparency in our supply chain (as opposed to opaque suppliers) as a tool to limit corruption
<b>Status :</b>	We are working to have our supply chain transparent. We are for 2021 conducting Financial Due Diligence in addition to the social audits at where we are not completely sure about the ownership/transactions or where there are changes and where the volumes are high (scale/scope)
<b>Objectives in reporting year :</b>	Using transparency and knowledge in our supply chain to work against and limit corruption, requesting all suppliers to show open calculation, and continue to nominating spinners, weavers and accessories suppliers we have direct communication with.

**Actions :**

Seeking advice at Transparency International, accountant companies (PwC) and Ethical Trade Norway. Having direct communication with nominated spinners, weavers and accessories suppliers to be able to check and negotiate prices and free to place orders with the most suitable supplier with the best environmental and social criteria and at the correct price. Doublechecking manufacturers CMT prices when we know the materials cost. Checking local news and stakeholders whether there are any cases or issues on the factories. It is important to raise awareness and work to prevent the risk of corruption also in connection with certifications and 3rd party audits.

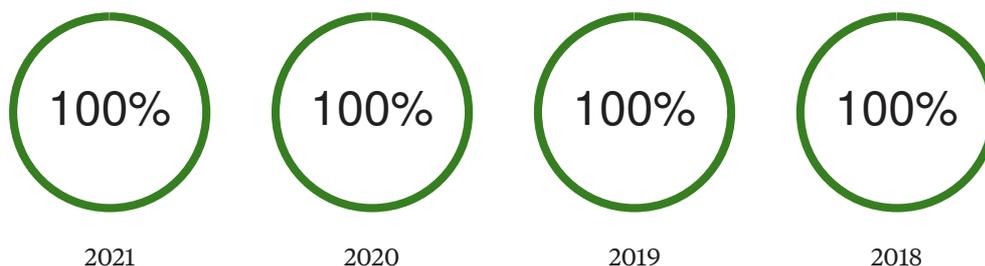
<b>Salient issue</b>	<b>Animal welfare</b>
<b>Goal :</b>	All animal fibre for Brav products should be sourced responsibly and traceable
<b>Status :</b>	Achieved Responsible Down Standard (RDS) for all down and Responsible Wool Standard (RWS) for most wool. Discussing how to get the European and Norwegian wool certified
<b>Objectives in reporting year :</b>	Animal welfare focus, certificate and traceability in all our down and wool products.

**Actions :**

Making sure all our down is Responsible Down Standard (RDS), and continue the work to request chain of custody traceability by bale-number to farms on our products. KPI on % of our wool which is Responsible Wool Standard (RWS), and continue the work to request traceability by bale-number to farms on our products. It is important to raise awareness and work to prevent the risk of corruption also in connection with certifications and 3rd party audits.

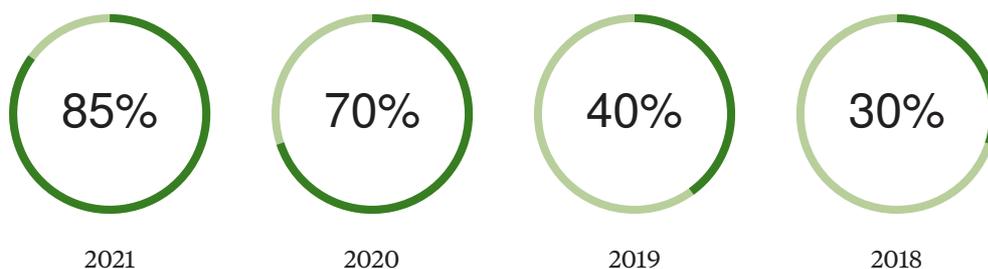
### Indicator

**Amount of Responsible Down Standard down in our products**



Helsport and Swix both use Responsible Down Standard (RDS) down in their down products

**Amount of Responsible Wool Standard (RWS) wool in our products.**



Ulvang, Lundhags and Swix all use 100% certified mulesing-free and traceable wool, most with RWS. We are during 2021 continuing the work of having most of the traceable mulesing-free wool to be Responsible Wool Standard (RWS) certified which covers the 5 freedoms for animals

<b>Salient issue</b>	<b>Water scarcity/drought, water consumption in the supply chain</b>
<b>Goal :</b>	To use production processes and raw materials which are water saving
<b>Status :</b>	Started addressing 2019, this work will continue in 2021 as a continuing of the LCA
<b>Objectives in reporting year :</b>	Addressing areas, raw materials and wet processes which are open for improvement when it comes to saving water

Actions :

Looking into new water-saving colouring methods and type of new washing/dyeing machines which use less water

<b>Salient issue</b>	<b>Greenhouse Gas (GHG) emission, Carbon footprint</b>
<b>Goal :</b>	Measurable reducing our Greenhouse Gas (GHG) emissions/our Carbon footprint.
<b>Status :</b>	Carbon footprint accounting report scope 1, 2 and 3 done for 2021 and public on our website <a href="https://www.brav.com/wp-content/uploads/2022/05/Brav-Carbon-Footprint-Report-2021-Cemasys-Final-Report-.pdf">https://www.brav.com/wp-content/uploads/2022/05/Brav-Carbon-Footprint-Report-2021-Cemasys-Final-Report-.pdf</a>
<b>Objectives in reporting year :</b>	Mapping our Greenhouse Gas (GHG) emissions/our Carbon footprint by conducting a life cycle assessment (LCA) to address focus areas for measurable improvement.

**Actions :**

We have conducted a Carbon footprint accounting scope 1, 2, 3 to get a better overview where to start improving. We have also published the result on our website and will use this result for public committing to measurable reduction in line with the Paris Agreement <https://www.brav.com/wp-content/uploads/2022/05/Brav-Carbon-Footprint-Report-2021-Cemasys-Final-Report-.pdf>

## OTHER ACTIONS RELATED TO MANAGEMENT OF NEGATIVE IMPACTS

**Describe cross-cutting actions to cease, prevent or mitigate negative impacts, including in your supply chain**

### **3.B.1 Reduction of environmental and climate footprint**

Brav has phased out all fluorocarbons in ski wax production. Swix and Toko skiwaxes are all 100% fluoro free by Fall 2022.

Brav has since 2013 worked intensively on identifying sustainable replacement materials with initiatives supported by Swedish and Norwegian research authorities (2013-2019 LowFriMat (SINTEF), 2017-2020 POPFREE (RI.SE), 2019-2021 GoGlobal (Vinnova), 2019-2023 Nano2Glide (NTNU/SINTEF)), and 2021-2024 POPFREE (RI.SE).

In 2021 Swix and Toko are continuing the work towards a possible environmental-friendly Eco-label the Swan certified skiwax line and Care line.

Brav decided 2021 on using only internationally standardized product certifications with Chain of Custody (CoC) to ensure end customer, traceability, with third party controls. This to reduce risk of non compliant components and ingredients in our products.

Global Recycled Standard (GRS) and Bluesign are Brav preferred certifications as they have criterias for both social and environmental requirements.

Brav made for 2021 a full Carbon Footprint Accounting scope 1, 2, 3, published the result on the website <https://www.brav.com/wp-content/uploads/2022/05/Brav-Carbon-Footprint-Report-2021-Cemasys-Final-Report-.pdf>, and will use this as a base for measurable carbon reduction following the Paris Agreement.

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### **3.B.2 Adapting own purchasing practices (sourcing)**

We supply our textile suppliers with forecasts for preparing coming seasons.

We follow up deliveries and orders each week, based on information from our suppliers reported in a documents called WIP (work in progress) Status of each order is reported, and in case of any issues it is reported here for follow up by our QC and any other relevant parties.

We supply early buy orders so suppliers can use low season to produce for us.

We use a model internally called "FLOW" where stock of NOOS goods are evaluated regularly, resulting in orders being placed regularly throughout the year to even out production and capacity.

During the pandemic there was a challenge regarding responsible business practice when parts of the world shut down, but we have been working hard to honor our order/volume promises and on-time payments, and keeping close dialogue with our suppliers. Due to the pandemic we have experienced both delays and price increases at several of our suppliers due to lockdown in different parts of the world at different periods, lower capacity on transport due to insecurity and border controls/covid tests, amongst other reasons. We keep a constant dialogue with problem-solving constructive focus, and understanding possible delays and challenges further down in the value chain.

### **3.B.3 Choice of product design and raw materials**

We source for environmental friendly yet functional materials and alternatives, and plan for the majority of our products to have some form of certification to ensure the traceability/origin or quality of the product and make it recognizable and measureable. Example of product certifications in our different products: OEKO-TEX, Bluesign, Responsible Down Standard (RDS), Responsible Wool Standard (RWS), GOTS organic cotton, FSC certified bamboo and tencel, Global Recycled Standard (GSR) polyester, ECONYL nylon, REPREEVE our ocean polyester, ASI recycled aluminium, Oceanworks recycled plastic.

We are constantly following up on and requesting for new developments of sustainable fabrics and processes through our suppliers, spinners, media, visits to fairs etc.

Regarding recycled materials from waste, we are for 2021 looking into whether certifications cover ethical working condition for the raw material gathering and sorting. If working conditions are not covered by the certifications, we will look into this separately.

Product design is in addition to the focus on high performance, longevity and repairability, increasingly focusing also on circularity/recycleability. Some Helsport tents and Lundhags boots can have up to 20-30 years of use with proper care and repair in our repair studios.

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### **3.B.4 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.**

Brav has this demand in our Code of Conduct and as a topic during third party social audits.

We are aware this is a challenge in international supply chain.

But we have not yet started the work on actively support and following up with our suppliers. This work will start in 2022/23

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### **3.B.5 Contribution to development, capacity building and training internally and of suppliers and workers in the supply chain**

We are working on the mapping of our value chain of the standards related to people, society and the environment. So far we are doing risk assessment, Integrity Due Diligence (IDD) and Social Due Diligence (SDD), and factory audits which also include workers' interviews. But the systematic training is something which is in focus for 2022.

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### **3.B.6 Other relevant information concerning the company's work to cease, reduce and handle negative impact on people, society and environment**



## 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 company conducts sound due diligence work. The company 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 company's negative impact work as intended? Is negative impact remediated where relevant? This may apply to measures taken by the company alone or carried out in collaboration with others. The company'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 the assignment of responsibility for tracking the effect of measures implemented to cease/prevent/mitigate salient risks of negative impact on people, society and the environment, as well as how the tracking is done in practice

The Head of Sourcing has the responsibility for due diligence processes related to humans, society, and the environment.

The CFO holds the responsibility for our financial IDD process. To assure that our procedures meet high quality and are compliant with relevant laws and guidelines we have developed the procedures in co-operation with experts.

The Quality Manager is responsible for evaluating the overseeing the annual product risk assessment and Tier-1 risk assessment.

The Top Management group and the Board of Directors hold the responsibility of conducting periodical Risk Assessments. Compliance is defined as a regular topic in the annual meeting schedules.

We have a risk-based approach to our due diligence processes including triangularity of information, data collection, and reporting.

Brav uses a 3rd party to conduct audits of our Tier-1 suppliers, while the Sourcing team follow up directly on the Corrective Action Plan (CAP).

There is a continuously updated Sourcing plan which takes into consideration high-risk areas and Tier-1 performance.

Responsible business conduct is measured independently from business criteria such as price and profit and plays an important part when suppliers are being evaluated.

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## Indicator

### 4.A.2 Describe how the company ensures that measures taken to identify, prevent and reduce negative impact actually work

In 2021 we have added two external analyses; a Materiality Assessment and a Carbon Footprint Accounting Scope 1, 2, 3, to identify the main areas where we can prevent negative impact on the environment. This has also given us a baseline for us to monitor how our measures have an impact. Using expert expertise and internationally agreed standards, as GRI and the Greenhouse Gas Protocol, assure the quality of our reports and enable us to monitor the results and progress in a credible manner. We also think that including our internal experts in Finance, HR, Product development, Logistics, and Supply Chain assures the quality of the findings and heightens the organizational competence needed to obtain results moving forward.

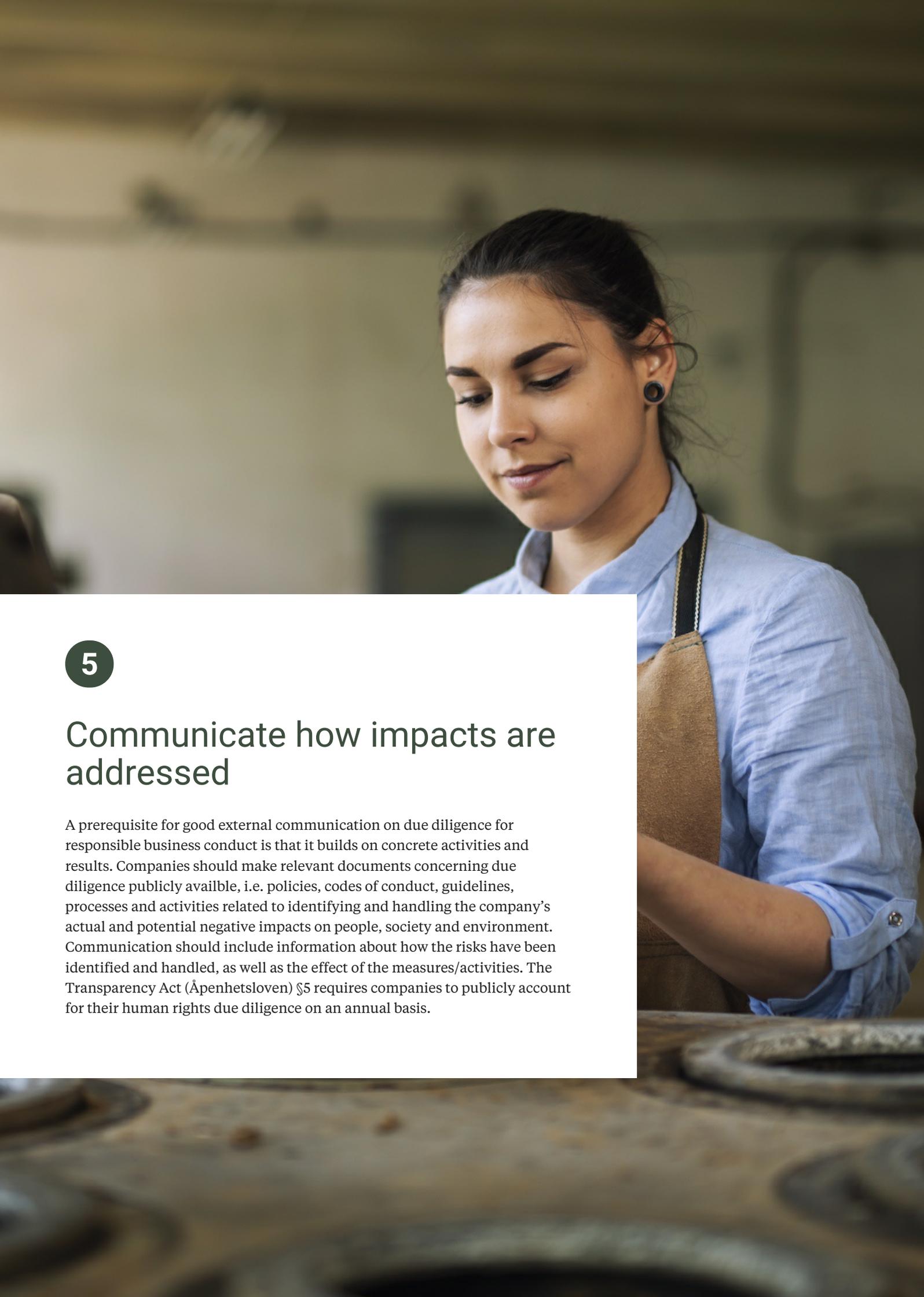
The Materiality Assessment was conducted to identify and prioritize activities that have a significant negative or positive impact. The assessment was conducted by an external partner, according to the GRI methodology, in a close corporation with internal key personnel. Internal stakeholders as the Chair of the Board, Brav's CEO, CFO, Supply Chain Director, and Head of Sourcing have been interviewed, as well as external stakeholders as one main customer, two Tier-1 suppliers, and an NGO. The results are presented on [https://www.brav.com/wp-content/uploads/2022/06/Brav\\_Materiality-assessment.pdf](https://www.brav.com/wp-content/uploads/2022/06/Brav_Materiality-assessment.pdf)

For the reporting year 2021, we have conducted Carbon Footprint Accounting to quantify our greenhouse gas emissions (GHGE). This assessment was conducted by CEMAsys and internal resources and is done according to the Greenhouse Gas Protocol and "A Corporate Accounting and Reporting Standard Revised Edition". The report includes Scope 1-3. We regard the report as a starting point for our systematic work of measuring our impact on GHG. We are aware that the accounting for 2022 may differ from 2021, as we are developing our internal systems for capturing data. Brav Carbon footprint accounting 2021: <https://www.brav.com/wp->

content/uploads/2022/05/Brav-Carbon-Footprint-Report-2021-Cemasys-Final-Report-.pdf

A 12-month plan for Tier-1 announced and unannounced social audits are developed and followed up by the Head of Sourcing. The number of conducted audits versus planned is measured, the reports are being analyzed and Corrective Action Plan is followed up with factory management, and possible follow-up audit.

We are committed to having a long-term supplier relationship and most suppliers have been with us for many years, which means that we have got to know them well and are confident in their seriousness in the work.



## 5

# Communicate how 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. Companies should make relevant documents concerning due diligence publicly available, i.e. policies, codes of conduct, guidelines, processes and activities related to identifying and handling the company's actual and potential negative impacts on people, 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 company communicates with affected stakeholders when managing negative impact

Brav's Responsibility strategy with a four-year ambitious roadmap is approved by the Board of Directors and is firmly founded in the organization. Our BOD is being updated on plans, risks, actions, and findings, and Responsibility has been a topic in regular Board meetings and was also a separate topic in the Board's strategy meeting in 2021. We have started introducing our position of responsibility towards major customers.

Brav is aiming for transparency for all our stakeholders, internally and externally on information that can be made publicly available on our websites, including the yearly Ethical Trade Norway report.

Our regular ESG audit program with external audits is documented in reports and corrective action plans (CAP) when negative impacts are identified. These CAPs are shared and followed up with the suppliers and with internal stakeholders and decision-makers. The supplier's score on the audits and willingness to improve on negative findings is one of the selection criteria when our product development and sourcing team decide supplier on new and existing products.

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### 5.A.2 Describe how the company communicates publicly about its own work on identifying and managing salient risks

Brav is aiming for transparency for all our stakeholders, internally and externally. Our ambition is to enable all external stakeholders to find desired information on our corporate web site.

<https://www.brav.com/responsibility/>

and our Brand websites:

<https://www.swixsport.com/en/about-swix/Sustainability/>

<https://www.ulvang.com/en/explore-ulvang/sustainability/>

<https://www.lundhags.com/en/about-lundhags/sustainability/>

<https://www.helsport.com/en/discover-helsport/sustainability/>

<https://www.toko.ch/en/about-toko/company/#c380>

Our work on ethical trade is annually reported to Ethical Trade Norway, and the report is publicly available.

The result from our Carbon Footprint Accounting scope 1, 2 and 3 2021 is presented on our website <https://www.brav.com/wp-content/uploads/2022/05/Brav-Carbon-Footprint-Report-2021-Cemasys-Final-Report-.pdf>.

Our improved Business partner procedure process is described on the corporate website:

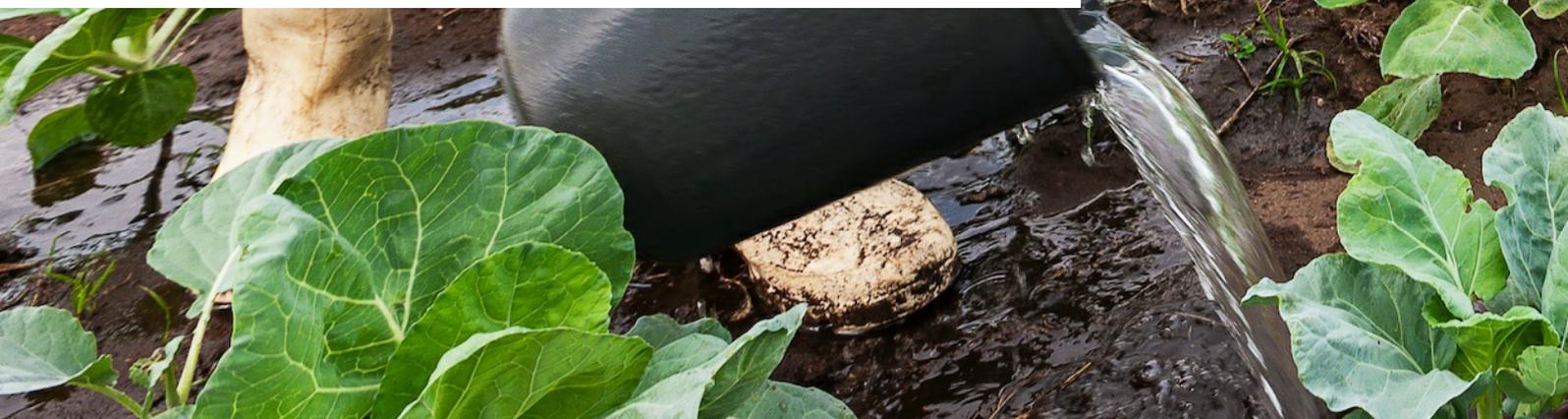
<https://www.brav.com/responsibility/social/>



6

## Provide for or cooperate to ensure remediation when appropriate

Once a company has identified that it has caused or contributed to negative impact on people, society or the environment, the company 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 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 company's policy for remediation of negative impacts on people, society and the environment

By being a member of Ethical Trade Norway, we are committed to working for sustainable business practices that respect people, society and the environment.

We work actively with our suppliers and in the screening selection of our suppliers, to track, monitor and make improvements regarding working conditions and environmental issues in our supply chain. This is in line with UN Guiding Principles on Business and Human Rights, OECD Due Diligence Guidelines for Responsible Business Conduct, Norway's Transparency Act, Ethical Trade Norway's Statement of Principles and our Supplier Code of Conduct/ethical guidelines for suppliers.

In the event of a violation of the ethical guidelines, we will work with our supplier and possibly intermediaries to create a plan for the recovery within a reasonable agreed time.

If the supplier after several attempts shows reluctance to cooperate to implement improvements, we must consider responsible termination of the supplier relationship.

Should circumstances arise where Brav's business directly or indirectly is linked to negative impact or harm to people, society or the environment, we will do our best to contribute to remediation being done.

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

There are no cases of remediation in the reporting year.

Ref. reporting PFOA contamination previous year report, we follow the upcoming courtcase and expect to see justice done.

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## 6.B. Ensure access to grievance mechanisms mechanisms

### 6.B.1 Describe what the company does to ensure that workers and local communities have access to effective grievance mechanisms when this is appropriate

Internally, Brav has good procedures for dealing with complaints, both for the corporate and consumer markets.

Operational-level grievance mechanisms (OLGM):

Internally: Through the employee handbook on the Brav portal (intranet) employees have a channel for reporting misconducts /whistleblowing.

We believe that transparency and good communication are key to fostering a better workplace culture.

We expect our employees to report occurrences or suspicions of misconduct.

This could include violations of Brav's organizational policies and procedures, as well as applicable laws and regulations.

Examples of breaches include but are not limited to fraud and corruption, harassment and discrimination, and violations of environmental and human rights laws.

Employees should report concerns to someone they trust in Brav, preferably directly to their line manager.

Brav confirms that employees reporting potential misconduct are protected against retaliation and negative consequences.

Employees may also decide to report directly to: [whistleblowing@brav.com](mailto:whistleblowing@brav.com).

By using this email the HR department will confidentially process your concern.

On the Brav Portal (intranet) front page there are links to report HSE non-conformities and reporting of Products with severe quality-related non-conformities. HSE non-conformities are handled by HR.

Reported incidents of Products with severe quality-related non-conformities are handled by the Brav's Quality Manager (QM).

The contingency process is designed to identify the severity of the non-conformity, the following activities, and the decision makers involved due to the level of severeness.

Brav conducts regular meetings with safety representatives (HSE) and between management representatives and union representatives.

Externally: The e-mail [whistleblowing@brav.com](mailto:whistleblowing@brav.com) is available on our website, and is currently being communicated to the manufacturers and suppliers in our value chain.

This is the main channel worldwide for raising complaints to the enterprise.

Contact details:

BRAV Norway AS  
Hanne Haslum. Head of Sourcing  
[hanne.haslum@brav.com](mailto:hanne.haslum@brav.com)