



TRANSPARENCY STATEMENT UNDER THE NORWEGIAN TRANSPARENCY ACT 2023.

TRANSPARENCY STATEMENT UNDER THE NORWEGIAN TRANSPARENCY ACT 2023 RED WING NORWAY AS

1 INTRODUCTION

The Norwegian Transparency Act came into effect on 1 July 2022. Red Wing Norway AS ("Red Wing") is subject to the Transparency Act, which requires the company to carry out due diligence assessments to identify potential adverse impacts on fundamental human rights and decent working conditions. Red Wing is dedicated to respecting human rights and promoting workers' rights. In this transparency statement, we will elaborate on our internal procedures, policies, and the measures implemented inter alia because of our due diligence assessments to minimize the possibility of any adverse impact throughout our value chain.

In compliance with Section 5 of the Transparency Act, Red Wing is obliged to publish a statement detailing the due diligence assessments conducted by the company. The objective of this disclosure is to provide the public with an understanding of the company's policies and procedures regarding the mitigation of human rights violations. This includes any actual and potential adverse impacts on human rights or decent working conditions identified through our due diligence assessments, as well as the actions implemented to halt, prevent, or minimize adverse impacts based on the company's priorities and evaluations, and the achieved or expected results.

2 OUR OPERATIONS, GUIDELINES AND PROCEDURES

Red Wing Norway AS is an importer, marketer and distributor of personal protective footwear, garments, and accessories (PPE). Red Wing is a wholly owned subsidiary of Red Wing Holdings UK Ltd, with ultimate ownership held by the Red Wing Shoe Company Inc., a corporation headquartered in the state of Minnesota, USA.

Red Wing offers a full line of premium, head-to-toe PPE in the Nordic market. We operate with a strong focus on ethical business conduct and responsible sourcing practices. Although we have not encountered such issues in our own business so far, we are aware that the textile industry generally speaking has faced numerous human rights challenges and breaches over the years, such as forced labor, child labor, unsafe working conditions, low wages, discrimination and harassment, lack of freedom of association and environmental impact.

In order to ensure that Red Wing also avoids such human rights issues in the future, we have implemented guidelines and procedures in compliance with international standards and regulations. Our Policy for Responsible Business Conduct ("RBC"), approved by the Red Wing board in 2022, outlines our approach and processes in line with the requirements set forth in the Norwegian Transparency Act. Additionally, we have developed a Due Diligence Action Plan for 2022 and 2023, outlining the steps to fulfill these requirements.

Our internal policies emphasize respect for human rights and workers' rights throughout our operations and supply chain. Within our organization, we have focused on fostering a culture of accountability and ethical behavior. We have established clear expectations for our employees, suppliers, and business partners regarding the protection of human rights and the promotion of fair working conditions.

3 DUE DILIGENCE PROCESS

As part of our commitment to transparency and in accordance with the Norwegian Transparency Act, we have undertaken due diligence assessments to identify any potential adverse impacts on human rights and working conditions within our supply chain. The assessments are carried out in accordance with the OECD Guidelines for Multinational Enterprises and the OECD Due Diligence Guidance for Responsible Business Conduct. Furthermore, the assessments are carried out in proportion to the size of our company, the context of our operations, and the severity and probability of adverse impacts on fundamental human rights and decent working conditions.

Our due diligence process commenced with the distribution of questionnaires to our suppliers. On 20 January 2023, we dispatched 103 questionnaires. So far, we have received responses from 20 suppliers. We have issued reminders to suppliers who have not yet responded.

We have divided our suppliers into two categories, with differing frequencies for questionnaire distribution:

- a. Critical – includes suppliers with high revenue impact and critical personal protection equipment. This category will receive questionnaires every two years. For the period from May 2022 to April 2023, sixteen of our suppliers are within this category, contributing to 85 % of our annual revenue for this period.
- b. Other suppliers – includes suppliers with low revenue impact and non-critical items. This category consists of approximately 84 vendors that contribute 15 % of our annual revenue in the period May 2022 to April 2023. Suppliers in this category will receive questionnaires every three years.

4 RESULT OF DUE DILIGENCE

We have not identified any actual or potential risk of adverse impact on human rights and decent working conditions in our own operations. There were no reported work-related injuries during 2022, and the working environment is good. The company follows the global ethical policies and guidelines of the RWSC Group, and discrimination of any kind is prohibited.

Based on the feedback received from the questionnaires distributed to our suppliers, we have not identified any actual or significant risk of adverse impacts on human rights or decent working conditions within our supply chain.

In our supply chain due diligence process, we utilize heatmaps to assess corruption, human rights indices, and sanctions across the European Union and globally. Our facility, Sapphire Mills in Pakistan, which produces a significant portion of our garments under our parent company, Red Wing Shoe, stands out in our portfolio. Despite the country's low ratings for corruption and human rights, this facility stands out by actively protecting women's rights, advocating sustainable solutions, adhering to ethical business practices, and exhibiting social responsibility.

A representative from our organization conducted an inspection of this facility in 2019, confirming the assurance of human rights and decent working conditions. The facility provides on-site kindergarten and school facilities, enabling female workers to engage in production activities. It also employs water recycling processes, sustainable energy production, and effective waste



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management practices. We will also in due course consider the use of third-party audits or other means of follow-up to ensure consistent compliance with human rights standards.

5 MEASURES AND RESULTS

We remain dedicated to continuous monitoring and improvement in this regard. To ensure this, we have implemented various measures amongst others involving our supply chain, including:

- Regularly sending out questionnaires reflecting requirements in the Norwegian Transparency Act to our suppliers, gathering relevant information regarding their practices, policies, and commitment to human rights and workers' rights.
- Utilizing a supplier appraisal database to facilitate self-assessment and documentation of compliance with EN ISO certification requirements.
- Policies to monitor and promptly address any actual adverse impacts identified, issuing warnings, providing opportunities for corrective actions, and documenting positive changes.
- Actively share best practices and lessons learned with our suppliers, fostering a culture of continuous improvement and ethical business conduct.
- Engagement in collaborations with industry associations, non-governmental organizations, and other stakeholders to stay updated on emerging standards and guidelines.

By implementing these measures, we aim to enhance our understanding of the risks present within our supply chain, enabling us to gain a more comprehensive insight. We are optimistic that this enhanced knowledge will prove instrumental in effectively mitigating any identified risks, thereby minimizing their potential impact.

In Red Wing, we will remain dedicated to upholding the principles of the Norwegian Transparency Act and continue to implement measures that contribute to the protection of human rights and promotion of fair working conditions in our own operations and throughout our supply chain.

6 SIGNATURES

This transparency statement under the Transparency Act is signed by the board and the CEO on

21st of June 2023.

Sarah Zimmer Erickson

Chairman of the board

Bengt Staveland

CEO and board member