

## TRANSPARENCY STATEMENT UNDER THE NORWEGIAN TRANSPARENCY ACT For 2024 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 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.

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, in 2024 we signed a contract with House of Control for a comprehensive system that allows us to carry out self-assessment of our supplier base in specific intervals.

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.

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### 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. In January 2024, we dispatched 40 questionnaires. 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.
- b. Other suppliers – includes suppliers with low revenue impact and non-critical items. This category consists of approximately 84 vendors and contributes 15 % of our annual revenue. 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 2024, 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.

During 2024 we also planned an unannounced inspection, utilizing a third-party auditor, Slave free Alliance, to conduct an inspection of this facility in January 2025. Results from this inspection will be included in our Transparency Report for 2025.

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 the 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.

## 5 SIGNATURES

This transparency statement under the Transparency Act is signed by the Managing Director on 30<sup>th</sup> June 2025.

A handwritten signature in blue ink, appearing to read "B. Staveland", written over a horizontal line.

Bengt Staveland

Managing Director