

CODE OF CONDUCT

To our valued suppliers and business partners

Both Friluftts Retail Europe AB as a leading group of distributive retailers and our suppliers have an important responsibility to take care of nature and our environment, and ensure that all people and animals that are a part of our processes are treated lawfully and in a morally and ethically correct manner.

Friluftts Retail Europe AB has a distinct vision of what it means to be a leading and responsible company and how to adhere to the high level of corporate responsibility; we are constantly striving to minimise our impact on the environment, offer opportunities for development to our staff and want to contribute to the advancement of society. For this reason we have developed an internal Code of Conduct for all of our employees, and an external Code of Conduct for all of our suppliers and business partners in order to align our efforts and to ensure we join forces in a common quest.

This Code of Conduct provides us with a means of checking that all of us have at least the same high standards and act as a responsible company. Our relationships and partnerships are built on trust and we take it as a given that we treat each other with honesty and respect and that all parties involved will follow our Code of Conduct. We expect that you manage your supply chain responsibly and that you have or will establish an own Code of Conduct that in no way undermines or contradicts this Code. We also encourage all our partners to be aspirational and go beyond the provisions of this document.

For us, a commitment to the fundamental principles and values set forth in this Code of Conduct is essential for doing responsible business. So grab your backpacks and make sure to join us on our sustainability journey!

Frilufts Retail Europe AB

Code of Conduct for suppliers and Business Partners

Frilufts Retail Europe AB's goal is to join forces with our suppliers and business partners and to ensure, that all of them accept their share of responsibility for nature and our environment and to ensure that the people who manufacture the products we buy and sell do so under good working conditions and with a fair remuneration. We want our business partners to show respect for human rights and take care of workers' health.

We buy products from the world's leading brands and suppliers within the outdoor industry. We are convinced that through cooperation we can contribute to positive changes being made in the production processes of our suppliers. This can happen through the sharing of information, training, monitoring, the implementation of a decent supply chain management system, and by conducting dialogues regarding a more environmentally-friendly and responsible range of products. This work is a continuously ongoing process.

We are constantly in dialogue with our suppliers about current legal requirements regarding topics related to work environments, animal protection, environmental issues, chemical management and all other issues of compliance and ethical character. All manufacturing processes are continuously monitored and inspected.

We have adopted a Code of Conduct – a document that describes the values and principles that all our suppliers and business partners are required to read, follow and respect and to further by implementing the values with their respective supply chains.

We have high aspirations and we hope that we will inspire others to join us in our quest.

The following provisions are binding for all our suppliers and business partners; it is their responsibility to ensure, that their supply chain is also adhering to this Code and that all rules are followed, so no product sold in our stores is subject to systematic violations of this Code:

Our Code of Conduct is based on current international conventions and standards, including:

- The United Nations Global Compact
- The United Nations Universal Declaration of Human Rights
- The International Labour Organisation's Declaration on Fundamental Principles and Rights to Work
- The Rio Declaration on Environment and Development
- The United Nations Convention against Corruption
- The United Nations Convention on the Rights of the Child

1. Legal Compliance

Our suppliers and business partners follow all applicable laws and regulations in the country where they operate. Should any of the requirements by us be in violation of the national law in any country or territory, the law in that country takes precedence over the Code of Conduct, unless it violates general ethical and universal principles. In this case, immediate reporting to us is necessary so a decision can be made regarding how to proceed. In cases where legal requirements are less strict than the Code of Conduct, the Code shall prevail.

2. No Bribery and Corruption

Our suppliers and business partners act towards us and towards their subcontractors and governmental agencies in a straightforward and truthful manner and in accordance with international anti-bribery standards, the United Nations Global Compact, and local anti-corruption and bribery laws. This includes any transaction that might appear to be arranged for granting concessions or benefits. We demand that our suppliers refuse all acceptance or participation in any form of bribery or corruption, including making payments or providing other forms of benefits to governmental agency employees or other governmental employees with the aim of influencing decisions that violate the law.

3. Environment

Nature conservation and environmental protection are of the highest importance for us. Our primary contribution to the environment is that we buy and sell products of high quality that have a long life span. We do not believe in the kind of consumption where products of limited life length need to be constantly replaced. We do not tolerate any form of animal mistreatment, and we support animal welfare and that all animals are treated with respect and have the right to a life in dignity. National and international environmental standards shall be the guiding principles for our suppliers. In particular we expect that all products, offered to any of our entities is compliant with the most recent REACH regulations and that all suppliers have a Restricted Substances List (RSL) describing the most recent scientific test method for individual chemicals that may or may not pose a threat to human health or the environment. We also expect our suppliers to make every effort to protect the environment and to keep the impact their activities have on it as low as possible. Our suppliers must comply with all applicable environmental laws and regulations in the country of operation or manufacture of products. Our suppliers must also minimise their environmental impact and make continuous improvements in environmental protection.

3.1 A Greener Choice

We strive to influence our suppliers to manufacture products that are as environmentally friendly as possible. To guide our customers in their decision-making process, we have decided to mark products whose manufacturers actively try to minimise their negative impact on the environment and positively contribute to societal development with our label “A Greener Choice”.

We trust that our suppliers will provide us with as detailed and correct information as possible on an individual product basis. It is based on this information that we classify products and decide if they qualify for this label or not. All criteria and process are constantly under review and will be up-dated and expanded from time-to-time.

4. Animal Derived Material

Down

We require that geese are treated in an ethically correct manner and in accordance with applicable animal rights laws. We do not tolerate the practices of live-plucking or force-feeding geese. Down should always be a by-product of meat production and under no circumstances be plucked from living birds.

Merino Wool

We require that sheep and lambs are treated in an ethically correct manner and in accordance with applicable animal rights laws. We do not tolerate any unethical animal handling and do not accept the practice of mulesing being carried out.

Fur

We require that our suppliers make it known to us if any product contains any type of real animal fur. We have a general policy that we do not accept the use of fur from animals that are bred, kept or killed for the purpose of fur production.

5. No Child Labour

We do not accept child labour. We expect our suppliers and their supply chain members to only employ workers according to applicable laws and regulations but at least with the minimum age of 15 years or at least having completed compulsory education – whichever is higher. The minimum employment age is laid down in several conventions of the International Labour Organization (ILO), which regulates internationally recognised valid lower limits. If a higher minimum employment age is valid in the country in which a supplier maintains its business premises, then the supplier must adhere to it.

6. Employment Rights

We expect our suppliers to respect the fundamental employment rights established by a number of international conventions from the United Nations and the International Labour Organization (ILO).

6.1 No Discrimination

We do not accept discrimination with regards to race, ethnicity, skin colour, religion, age, sexual orientation, gender, national origin, disability or other classes protected by law. We expect our suppliers to promote equal opportunities for and treatment of its employees irrespective of the above-mentioned factors.

6.2 No Forced Labour

We do not tolerate forced and compulsory labour. By that we mean any form of work that is not carried out voluntarily or based on a mutual agreement between the employee and employer.

6.3 Freedom of Association and the Right to Collective Bargaining

Our suppliers shall respect the employees' right to freedom of association and collective bargaining. We therefore expect our suppliers to neither favour nor discriminate against members of employee organisations or trade unions.

6.4 Working Hours

We expect that our suppliers will not exceed the local limits and regulations on work hours and that the fundamental levels as stated in ILO conventions are respected and followed.

6.5 Compensation / Wages

Our suppliers shall pay their employees regularly and on time. We also expect our suppliers to guarantee that their employees receive at least the national statutory minimum wage, the prevailing industry wage or the wage that is negotiated in a collective agreement, whichever is the highest. We further expect that suppliers strive to pay a fair and comfortable wage in order to allow a decent life for their workers. We do not accept deductions as a disciplinary measure. It is a tax measure and is only to be made when provided for by the national law.

6.6 Respectful Treatment

All employees shall be treated with respect and dignity. Under no circumstances do we accept the use of offensive or degrading treatment or corporal punishment by our suppliers, their subcontractors or other business partners. No employee shall be subject to physical, sexual, psychological or verbal harassment or abuse. Employees shall be free to lodge complaints with their superiors. We expect that our suppliers shall respect the personal integrity, dignity, right to a private life and other personal rights of every individual, and to prohibit all forms of violence and assault in the work place, including threatening behaviour from the employee.

6.7 Labour Contracts

We expect our suppliers to ensure that all employees are aware of their legal rights and obligations. All employees shall be entitled to a written employment contract.

6.8 Special Protection for Young Workers

Young workers shall be protected against conditions of work, which are prejudicial to their health, safety, morals and development.

7. Health and Safety

We expect our suppliers to take responsibility for the health and safety of their employees at their place of work. All employees deserve to work in a safe and healthy work environment.

8. No Unacceptable Business Partners

It is not acceptable for our suppliers to conduct business with companies or organisations whose business practices are built on the exploitation of employees, animals, society or the environment.

9. Data Protection

Our suppliers shall not disclose information that is not known to the general public for personal gain or for the benefit for anyone other than Friluft. Such information includes technical data, financial data, operating data, customer information, memoranda or other information regarding the company's business and operational activities and future plans.

10. Monitoring, Consequences and Amendments

10.1 Monitoring

We reserve the right to monitor compliance with the principles and requirements stated in the Code of Conduct. We expect our suppliers to carry out periodic announced and unannounced inspections and controls of their own business activities and at their subcontractors' facilities. Such inspections shall always be carried out in accordance with applicable laws and regulations.

10.2 Consequences

The consequences of deviations from the Code of Conduct depend on the significance of the breach. Minor breaches usually lead to the opportunity of improvement within a suitable and binding period. If measures of improvement are not implemented within the improvement period, the business relationship will be seriously damaged and could lead to a termination of business relations by us. Significant breaches of the Code of Conduct will not be accepted and lead to the immediate termination of the business relationship.

10.3 Amendments

We reserve the right to amend or modify the Code of Conduct from time to time.