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FISKARS GROUP SUPPLY CHAIN DUE DILIGENCE, MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024

About Fiskars Group

Fiskars Group is the global home of design-driven brands for indoor and outdoor living. The Group is driven by its common purpose: Pioneering design to make the everyday extraordinary. Fiskars Group has a well-balanced portfolio of unique brands including Fiskars, Georg Jensen, Gerber, littala, Moomin Arabia, Royal Copenhagen, Waterford, and Wedgwood, as well as several smaller tactical brands. The company's brands are present in more than 100 countries in Asia-Pacific, Europe, and the Americas.

Fiskars Group embraces the power of design in all activities, from ideation to manufacturing and business development. Through the combination of craftsmanship, brand passion and digital transformation, the Group rethinks existing solutions while always remaining loyal to brand roots. Fiskars Group proudly upholds a longstanding commitment to ethical sourcing across its globally distributed product lines. In recent years, it has invested in mapping its supply chain to enhance transparency and continues to diligently craft and enforce ethical standards tailored to its diverse network of suppliers and distributors involved in the production, processing, and manufacturing of its product base.

The business

Fiskars Group utilizes a combination of its own manufacturing operations in connection with those of its carefully selected suppliers. Fiskars Group has 13 of its own manufacturing units located in Europe, Asia and the US. Fiskars Group has a wide network of suppliers for raw materials, components, and services. The company has built a strong network of approximately 170 finished goods suppliers that are committed to the Group's strict standards of sustainability and human rights, product excellence and compliance with local laws.

In 2024, Fiskars Group was organized into two Business areas (BAs): Vita and Fiskars. Business Area Vita accounts for approximately 52% and Fiskars 47% of net sales. The Business areas have full accountability for the global offering, enabling them to leverage the potential of their strong brands. Both Business areas have strong, yet BA specific, business drivers.

Recognized for creative design, BA Vita consists of brands such as Georg Jensen, Royal Copenhagen, Wedgwood, Moomin Arabia and littala. The innovation-driven BA Fiskars' brands include Fiskars and Gerber. It consists of the gardening and outdoor categories as well as the scissors and creating, and cooking categories.

Fiskars Group has a diverse team of close to 7,000 employees based in 29 countries.

Commitment to prevent modern slavery and human trafficking

Fiskars Group complies with all relevant labor laws and regulations in the countries where it operates, ensuring fundamental labor rights such as freedom of association and collective bargaining are respected. We are committed to eliminating forced labor, child labor, human trafficking, and discrimination in employment and occupation.

Fiskars Group is committed to adhering to the International Bill of Human Rights, UN Guiding Principles on Business and Human Rights, International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, and the United Nations Global Compact principles. The Group supports the values, freedoms, and fundamental rights promoted in these texts and is committed to continuously learning about and following the evolution of human rights.

Fiskars Group upholds zero tolerance for modern slavery and any working conditions that violate basic human rights, safeguarding vulnerable workers from exploitation, regardless of their employment contract or immigration status. To prevent these violations, Fiskars Group conducts risk assessments, performs due diligence within its operations and supply chain, and provides awareness training across its value chain.

Fiskars Group's commitment is communicated to stakeholders through the Fiskars Group website and reinforced within the value chain via the Supplier Code of Conduct.

Governance to prevent modern slavery and human trafficking

The Fiskars Group Board of Directors holds ultimate responsibility for ensuring that human rights are respected across the company.

The Chief Executive Officer (CEO) is tasked with overseeing the implementation of these principles. Day-to-day operations regarding the identification, assessment, mitigation, prevention, monitoring, and reporting of human rights risks are managed by the company's global functions and Business Areas.

The Internal Audit team helps Fiskars Group accomplish its business objectives by bringing a disciplined systematic approach to evaluate and improve the effectiveness of risk management, controls, and governance processes. To ensure the independence of the Internal Audit activities, VP Group Internal Audit reports administratively to the CEO and functionally to the Audit Committee.

Business Areas and Global Functions integrate the commitments and actions into their operations and respective business. BAs and Global Functions follow up on their own progress towards commitments, targets, and roadmaps.

Business conduct and policies

The Fiskars Group Code of Conduct defines and communicates the company's commitment to conducting business in an ethical and responsible manner. The Code of Conduct applies to everyone within Fiskars Group, including employees, managers, directors, officers, board members, consultants, and other full- or part-time personnel working under Fiskars Group's direction (referred to in this Code as "Fiskars Group People"), and covers all Fiskars Group's companies worldwide.

The Fiskars Group Employment Policy ensures that all Fiskars Group Employees, Managers and HR share a common understanding of the Group employment principles. The Policy also describes Fiskars Group's commitment to human rights and gives guidance on global employment-related topics at Fiskars Group. The employment policy covers all employment relationships between Fiskars Group companies and Employees and is applicable across the organization globally.

The Fiskars Group Procurement & Supply Management Policy describes the principles applied in all the sourcing and purchasing activities of Fiskars Group globally. The main objective is to provide value through ethical sourcing that supports growth in a sustainable way. The policy sets the minimum standard that applies to all Fiskars Group employees and externals of the organization involved in all aspects of Fiskars Group sourcing and purchasing processes, and supplier management. The policy enables sourcing roles to control supply risk and engage with Fiskars

Group's suppliers in seeking the best supply solutions, maintain quality, and identify development needs to benefit the mutual partnership.

The Fiskars Group Supplier Code of Conduct outlines the standards all suppliers and partners must meet to do business with Fiskars Group. A new version of the Fiskars Group Supplier Code of Conduct was announced at the beginning of 2023. The new version is aligned with the latest legislation and with Fiskars Group's updated commitments. It covers important topics such as labor and human rights, health and safety, environment, due diligence, business ethics and integrity, management systems and commitments, and the Ethics & Compliance Hotline. The Supplier Code of Conduct includes requirements on labor and human rights, including child labor, forced or involuntary labor and any form of human trafficking.

The Supplier Code of Conduct Process describes engagement with suppliers through site visits, annual supplier days, questionnaires, training, and an audit program.

The Supplier Code of Conduct is implemented as described in the code implementation process and monitored via audits. The implementation process describes escalation steps to be taken in case of a failed audit result.

Risks of Forced Labour or Child Labour in the Supply Chain

Fiskars Group is dedicated to maintaining a supply chain that ensures the upmost adherence to international human rights and labor standards. The company's position in the global market provides it with a responsibility to protect and advocate for the working conditions of the people throughout its supply chain who make its products.

As part of the due diligence, Fiskars Group actively engages with its suppliers and their subsuppliers to prevent the risk of non-compliance with the company's human rights policies. Fiskars Group manages the effectiveness of the human rights due diligence by proactively following up on group risk management assessments and all incidents of non-compliance. Fiskars Group is proactive in reassessing processes and actions to ensure that the management system is current and effective.

The overall objective of Fiskars Group's risk management is to identify, evaluate and manage risks that may threaten the achievement of the Group's values and business goals. The most material sustainability related risks, including environmental, social and employee matters, respect for human rights, and anticorruption and bribery matters, are included in the established annual enterprise risk management process. This ensures that risks related to these areas are identified and assessed, and that control measures are set.

In 2019, Fiskars Group conducted a human rights assessment to better understand the gaps, risks, opportunities, and steps required to enhance its human rights due diligence process.

In 2023, Fiskars Group participated in the Business & Human Rights Training Program, organized by the UN Global Compact. The program provided useful tools for further developing the human rights due diligence process and supported the integration of human rights management into existing processes, annual risk management assessment, ESG strategy management and reporting.

In 2023, the double materiality assessment (DMA) required by the Corporate Sustainability Reporting Directive (CSRD), indicated a potential significant financial risk in Fiskars Group's upstream value chain in certain high-risk countries of sourcing. Potential risks relating to working conditions, working hours or employment conditions for migrant workers could be present due to certain sourcing activities taking place in countries with elevated risk. The potential financial risks cause Fiskars Group to deepen monitoring and prevention of potential impact. The DMA can be found in the <u>Sustainability Statement</u>.

In 2024, the ESG risk list of the risk assessment tool was reviewed and updated to ensure that the risk types reflect Fiskars Group's current operational and strategic environment.

Fiskars Group Due Diligence to Prevent Forced Labor and Child Labor

- creating awareness

Everyone at Fiskars Group, including leaders, employees, suppliers, partners, and community members, has a role to play in defending human rights throughout the entire value chain. The Fiskars Group Code of Conduct and related training provide a detailed description of its approach to doing business in an ethical way. The Code of Conduct training is mandatory for all employees, and it is part of its onboarding package. Classroom training sessions are held at all Manufacturing Units and Distribution Centers in local languages at regular intervals by the local HR departments. In addition to on-boarding, everyone at Fiskars Group must complete the training every two years. The completion rate for the 2024 training is 91.6%.

Fiskars Group requires all its business partners and customers, and their subcontractors, to be governed by the same or similar principles stipulated in the Fiskars Group Code of Conduct. Fiskars Group's Supplier Code of Conduct communicates Fiskars Group's ethical and sustainability expectations to all its suppliers and cooperation partners.

Fiskars Group engages with its suppliers through site visits, questionnaires, training (regarding, for example, setting science-based targets) and audit program with the aim to expand awareness of the requirements in the Supplier Code of Conduct and of the topic of forced and child labor.

Fiskars Group Due Diligence to Prevent Forced Labor and Child Labor

- risk management of the supply chain

Human rights and other ESG- and sustainability related topics are included in the annual ERM process, to ensure that risks related to human rights are identified and assessed, and that control measures are set up.

To manage the risks identified, firstly all suppliers and service providers to Fiskars Group are required to sign the Fiskars Group Supplier Code of Conduct prior to entering a business relationship with the company and are submitted to the Supplier Code of Conduct assessment program. New suppliers are checked in a due-diligence process prior to new vendor approval and are Supplier Code of Conduct audited prior to their approval as a supplier to Fiskars Group. Georg Jensen is certified under the Responsible Jewellery Council (RJC), built on international standards, providing a common standard for responsible business from mine to retail, requiring third-party auditing of all locations in the value chain.

The performance of the suppliers is monitored continuously via the Supplier Code of Conduct audits, designed, maintained, and updated by the internal or external lead auditor. Fiskars Group applies business consequences to the supplier based on the latest Supplier Code of Conduct audit results. Any zero-tolerance findings lead to a failed audit result, regardless of the overall score, and the deviation process and business consequences for any current supplier with a failed audit result will be initiated.

During the reporting year 2024, 81 audits in total were performed by Fiskars Group auditor and 3rd party auditor. No supplier relationships were exited due to Zero Tolerance findings, while 2 supplier engagement workshops were held with suppliers in Asia. Further, during 2024 Fiskars Group became a member of SEDEX and AMFORI platforms and utilized the platform resource in supplier management.

Fiskars Group Due Diligence to Prevent Forced Labor and Child Labor

- monitoring performance

Fiskars Group ensures risk mitigation and drives improvement in supplier compliance by setting annual supplier sustainability targets. KPIs are set to measure Supplier Code of Conduct performance relating to percentage of annual spend placed with low-risk suppliers for finished goods.

During the reporting year, two targets were set to monitor performance and drive actions. The first KPI relates to finished-goods spend with low-risk suppliers. The annual global spend with suppliers either from low-risk countries or receiving a low-risk result in the latest audit is set at 80%. The second KPI relates to 'fail' audit results resulting from a zero-tolerance finding due to a score below 60% and/or any zero-tolerance finding. The target level for this KPI is always zero. Both KPIs are updated monthly, and the updated result is shared in business reviews with the Supply Chain leadership teams.

In cases of SCoC audit findings and nonconformances, Fiskars Group closely follows up to ensure that the supplier has met the minimum compliance level and to encourage them to work towards better levels. Follow-up audits are conducted, and worker interviews are included in the audits when required, to verify suppliers' corrections and improvements.

A Supplier Code of Conduct email account is open for contacting the Fiskars Group audit team to report misconduct, as instructed in the Supplier Code of Conduct. Investigation of and remediation of human rights breaches identified via the Ethics & Compliance Hotline is enabled and managed by the Legal team.

Fiskars Group Due Diligence to Prevent Forced Labor and Child Labor – reporting misconduct

Employees, external supply chain workers and other business partners can report suspected violations through an anonymous Ethics & Compliance helpline. The Company has country-specific anonymous hotline numbers available in the regions where it operates or have significant suppliers. Compliance helplines are provided by an external partner, NAVEX WhistleB, to ensure anonymity. Reports are responded to within seven days of filing, and all reported cases are handled confidentially and investigated by the Legal and Compliance function. Depending on the case, other relevant functions such as HR are engaged in the investigation.

The Fiskars Group Code of Conduct Violation Response Policy complies with the EU Whistleblowing Directive (EU) 2019/1937. It provides clear procedures for investigating suspected violations and applies to all employees and entities within the Fiskars Group. The policy defines how to report suspected code violations, what is considered a code violation, the confidentiality of reporting, prohibition of retaliation acts and freedom of liability, the rights of the subject of investigation, consequences of malicious reports, assessment of the report, investigation principles and post-investigation actions, including result reporting.

All reported cases are reported quarterly to the Board's Audit Committee, and to local law enforcement if necessary.

During 2024, Fiskars Group had a total of 46 reported misconduct cases. 21 reports were made anonymously through the ethics and compliance helpline and hotlines, 8 cases were received via management, 11 cases were received via HR, and 6 were reported via the compliance email address. Fiskars Group had no significant cases of noncompliance related to human rights.

About the Fiskars Group Supply Chain Due Diligence, Modern Slavery and Human Trafficking Statement 2024 and approval

This statement is prepared on behalf of Fiskars Group and its affiliates, in compliance with the UK Modern Slavery Act (2015), the California Transparency in Supply Chains Act (2010), the Norwegian Transparency Act (2022), and the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act (2023). Fiskars Oyj Abp is the ultimate parent company with head office in Helsinki, Finland.

This statement has been prepared for the financial year ending December 31, 2024.

Approval of Statement

"In accordance with the requirements of the Act, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above."

Full name: Jussi Siitonen Title: Chief Financial Officer

Date: 07/03/2025
Signature: (Signature: (Signature) (S

Full name: Päivi Timonen Title: Chief Legal Officer

Date: 07/05/2025

Signature: Păivi Timonen (Jul 2025 13:26 GMT+3