

Policy for Responsible business conduct Pierre Robert Group

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Introduction

This policy document, which includes our Code of Conduct (CoC), lays the groundwork for our sustainability efforts and our guidelines for suppliers. This document outlines the roles and responsibilities of Pierre Robert Group along with guidelines for our suppliers.

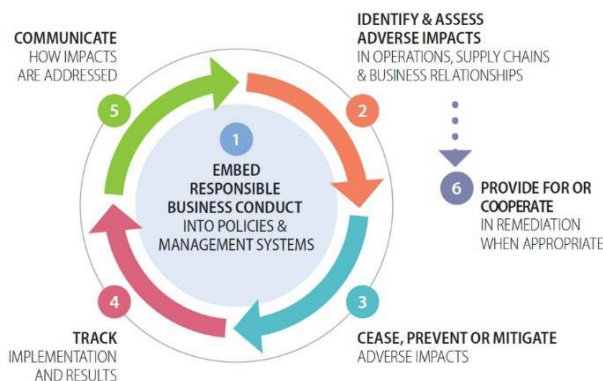
Pierre Robert Group aims to achieve responsible business practices that show:

- respect for people,
- respect for society,
- respect for the environment.

Pierre Robert Group believes that responsible business conduct is essential for sustainable development, meaning that the current generation meets their needs without jeopardizing the future generations' ability to meet theirs¹. The UN Sustainable Development Goals (SDGs) are the global common agenda for sustainable development. Pierre Robert Group actively supports the Sustainable Development Goals. Our business impacts 11 of the 17 goals. To achieve responsible business conduct, we want to cooperate closely with our suppliers and business partners. Pierre Robert Group sees collaboration as vital for responsible business conduct and key to reaching the UN Sustainable Development Goals.

As a member of Ethical Trade Norway, Pierre Robert Group commits to working proactively with due diligence for responsible business conduct². Due diligence is a risk-based method to respect and protect people, society and the environment in our own business and throughout the supply chain. We expect our suppliers and partners to follow the same method.

Ref: OECD due diligence guidance



Our suppliers and partners can expect from Pierre Robert Group that our purchasing practices strengthen and we always seek collaboration to achieve responsible business conduct. However, we will end business relationships or other forms of collaboration if our supplier or partner does not meet our expectations for responsible business conduct.

¹ The Brundtland commission, «Our Common Future», 1987

² UN OHCHR, *Guiding Principles on Business and Human Rights (UNGPs)*, 2011; OECD, «Due Diligence Guidance for Responsible Business Conduct», 2018.

We communicate in written form and in meetings with the suppliers that we emphasize the importance of responsible business conduct as part of the collaboration with PRG. We collect and evaluate social and environmental information from the factory as a part of the sourcing process. All suppliers must sign and accept our Code of Conduct before orders are placed.

Feedback to the factories is provided in the form of written feedback, through supplier meetings, our own factory visits, and continuous dialogue with the suppliers on areas of improvement and follow-up improvement measures from audits and our own visits.

All suppliers are requested to communicate our CoC to their suppliers. This is emphasized in the further dialogue with the supplier and is reinforced by the fact that selected sub-suppliers are asked to fill in Self-Assessment Questionnaire (SAQ) and/or are visited by us. This is the standard follow-up routine for all new suppliers existing strategic suppliers.

Requirements - own business

Pierre Robert Group's CEO and Board are dedicated to the company's efforts on ethical trade and sustainability. The company ambition statement has sustainability as its central element, and it influences all business decisions. Pierre Robert Group acknowledges that our business conduct can potentially have a negative impact on people, society, and the environment. At the same time, we see the potential to contribute to positive development in the supply chain. With this in mind, we have compiled the following principles and criteria guiding our own business:

The Director of Product Assortment is in charge of addressing risk in the value chains of Pierre Robert Group. Sustainability is part of the systematic work tasks of employees belonging to the Product Assortment & Compliance department. They have specific roles to make sure that sustainable fiber use, ownership of certification schemes, animal welfare and material are advancing. We recognize the risk of human rights violations and environmental issues to be highest in the raw materials- and production stage of our value chain.

Position with responsibility for human rights and environmental issues in the business:

Chairman of the Board Lars Olav Olausen

CEO Andreas Norstø Aaserud

Director of Product Assortment Hege Bjørnholm

Due diligence

Pierre Robert Group shall conduct due diligence for responsible business conduct. This involves conducting risk assessments to identify potential negative impact on people, society and the environment and to stop, prevent and reduce such impact. The measures put in place are monitored and their effect evaluated. The measures are communicated to those affected by our actions. If our activities are found to cause or contribute to negative impact on people, society or the environment, we will stop the activities and seek to provide remedy. If our supplier is responsible for the negative impact, the supplier is responsible for providing a remedy, though we will support in the process.

Responsible purchasing practices

Pierre Robert Group considers responsible purchasing practices to be one of our most important tools for responsible business conduct. Pierre Robert Group shall adapt our purchasing practices to strengthen and not undermine our suppliers' ability to deliver on our requirements related to people, society and the environment.

Freedom of association and worker representation

Pierre Robert Group supports the right to freedom of association and other forms of democratically elected worker representation. We shall involve worker representatives and other relevant stakeholders in our work with responsible business conduct.

Supplier development and partnership

In dialogue with suppliers, we will consider contributing with capacity building or resources that enable our suppliers to comply with Pierre Robert Group's requirements related to responsible business conduct. This way we lay the foundation for collaboration with suppliers that show the willingness and ability to work on positive development for people, society, and the environment in the supply chain.

Anti-corruption

Pierre Robert Group-employees shall never offer or receive illegal or inappropriate monetary gifts or other remuneration to achieve private or business benefits in their own interest or in the interest of customers, agents, or suppliers. We have an anti-corruption manual that employees are trained in.

Countries affected by trade boycott

Pierre Robert Group and all our suppliers and partners shall avoid trading with partners that have activities in countries where a trade boycott is imposed by the UN and/or Norwegian Government authorities.

Requirements - conditions in the supply chain and Act of transparency law

We expect our suppliers and partners to work focused and systematically to comply with our Code of Conduct, that covers fundamental requirements regarding human rights, labour rights, anti-corruption, animal welfare and the environment. Our suppliers shall:

- Follow our guidelines for suppliers Code of Conduct.
- Conduct due diligence for responsible business conduct. This involves; conducting risk assessments to identify potential negative impact on people, society, and the environment and to stop, prevent and reduce such impact. The measures put in place must be monitored and their effect evaluated. The measures taken must be communicated to those affected by your actions. If suppliers are responsible for the negative impact/damage, they are responsible for providing remedy.³
- Conduct regular 3rd party social audits according to Smeta or BSCI standard.
- Show willingness and ability to continuous improvement for people, society, and the environment through collaboration.
- Be able to document how suppliers and the potential subcontractors work to comply with the guidelines.
- Follow the Transparency Act⁴ and ensure that the operations and the supply chain respect human rights and good working conditions. These are some possible next steps for the suppliers:
 - Further inquiries for information about the operations and value chain of the suppliers and subcontractors.
 - Learn more about the Transparency Act and the requirements companies will need to do to comply with it, such as [supply chain mapping](#).
 - Learn more at Sedex site: [Norway's Transparency Act: What you need to know | Sedex](#)

³ OECD, «Due Diligence Guidance for Responsible Business Conduct», 2018.

⁴ Transparency Act: Norway's Parliament law from June 2021, taking effect July 1st, 2022. links to the documents for the law in details: [transparency-act-english-translation.pdf \(regjeringen.no\)](#) ; [Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions \(Transparency Act\) - Lovdata](#)

Pierre Robert Group may end the contract by citing chapter 5 and 6 in the Contract document for a Framework agreement, if the supplier does not demonstrate the capability or intention to follow the guidelines for suppliers, even after three reminders.

Principles for responsible business conduct (Code of Conduct)

Pierre Robert Group and its suppliers shall respect the following principles for responsible business conduct- The principles are based on UN⁵ and ILO⁶ conventions and provide minimum, not maximum standards. The relevant legal framework at the place of production shall be respected. Where national laws and regulations address the same subjects as these guidelines, the most stringent shall apply. The Code of Conduct is also a separate document sent to suppliers for signature and we require suppliers to inform sub suppliers of the same.

1. Forced and compulsory labour (ILO Conventions No. 29 and 105)

- 1.1. There shall be no forced, bonded or involuntary prison labour.
- 1.2. Workers shall not be required to lodge deposits or identity papers with their employer and shall be free to leave their employer after reasonable notice.

2. Freedom of Association and the Right to Collective Bargaining (ILO Conventions No. 87, 98, 135 and 154)

- 2.1. Workers, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively. The employer shall not interfere with, obstruct, the formation of unions or collective bargaining.
- 2.2 Workers' representatives shall not be discriminated and shall have access to carry out their representative functions in the workplace.
- 2.3 Where the right to freedom of association and/or collective bargaining is restricted under law, the employer shall facilitate, and not hinder, the development of alternative forms of independent and free workers representation and negotiations.

3. Child Labour (UN Convention on the Rights of the Child, ILO Conventions No. 138, 182 and 79, and ILO Recommendation No. 146)

- 3.1. The minimum age for workers shall not be less than 15 and comply with
 - i) the national minimum age for employment, or;
 - ii) the age of completion of compulsory education,whichever of these is higher. If local minimum is set at 14 years in accordance with developing country exceptions under ILO Convention 138, this lower age may apply.
- 3.2. There shall be no recruitment of child labour defined as any work performed by a child younger than the age(s) specified above.
- 3.3. No person under the age of 18 shall be engaged in labour that is hazardous to their health, safety or morals, including night work.
- 3.4. Policies and procedures for remediation of child labour prohibited by ILO conventions no. 138 and 182, shall be established, documented, and communicated to personnel and other interested parties. Adequate support shall be provided to enable such children to attend and complete compulsory education.

4. Discrimination (ILO Conventions No. 100 and 111 and the UN Convention on Discrimination Against Women)

- 4.1. There shall be no discrimination at the workplace in hiring, compensation, access to training, promotion, termination or retirement based on ethnic background, caste, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

4.2. Measures shall be established to protect workers from sexually intrusive, threatening, insulting or exploitative behaviour, and from discrimination or termination of employment on unjustifiable grounds, e.g. marriage, pregnancy, parenthood or HIV status.

5. Harsh or Inhumane Treatment (UN Covenant on Civil and Political Rights, Art. 7)

5.1. Physical abuse or punishment, or threats of physical abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, is prohibited.

6. Health and Safety (ILO Convention No. 155 and ILO Recommendation No. 164)

6.1. The working environment shall be safe and hygienic, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Hazardous chemicals and other substances shall be carefully managed. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in, the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

6.2. Workers shall receive regular and documented health and safety training, and such training shall be repeated for new or reassigned workers.

6.3. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

6.4. Accommodation, where provided, shall be clean, safe and adequately ventilated, and shall have access to clean toilet facilities and potable water.

7. Wages (ILO Convention No. 131)

7.1. Wages and benefits paid for a standard working week shall as minimum meet national legal standards or industry benchmark standards, whichever is higher. Wages should always be enough to meet basic needs, including some discretionary income.

7.2. All workers shall be provided with a written and comprehensible contract outlining their wage conditions and method of payments before entering employment.

7.3. Deductions from wages as a disciplinary measure shall not be permitted.

8. Working Hours (ILO Convention No. 1 and 14)

8.1. Working hours shall comply with national laws and benchmark industry standards, and not more than prevailing international standards. Weekly working hours should not on a regular basis be more than 48 hours.

8.2. Workers shall be provided with at least one day off for every 7 day period

8.3. Overtime shall be limited and voluntary. Recommended maximum overtime is 12 hours per week, i.e. that the total working week including overtime shall not exceed 60 hours. Exceptions to this are accepted when regulated by a collective bargaining agreement or national law.

8.4. Workers shall always receive overtime pay for all hours worked over and above the normal working hours (see 8.1 above), minimum in accordance with relevant legislation.

9. Regular Employment (ILO Convention No. 95, 158, 175, 177 and 181)

9.1. Obligations to employees under international conventions, national law and regulations concerning regular employment shall not be avoided through the use of short term contracting (such as contract labour, casual labour or day labour), sub-contractors or other labour relationships.

9.2. All workers are entitled to a contract of employment in a language they understand.

9.3. The duration and content of apprenticeship programmes shall be clearly defined.

10. Marginalized Populations (UN Covenant on Civil and Political Rights, art. 1 and 2)

10.1. Production and the use of natural resources shall not contribute to the destruction and/or degradation of the resources and income base for marginalized populations, such as in claiming large land areas, use of water or other natural resources on which these populations are dependent.

11. Environment

11.1. Negative impact on the environment shall be reduced throughout the value chain. In line with the precautionary principle, measures shall be taken to continuously minimize greenhouse gas emissions and local pollution, the use of harmful chemicals, pesticides, and to ensure sustainable resource extraction and management of water, oceans, forest and land, and the conservation of biodiversity.

11.2. National and international environmental legislation and regulations shall be respected and relevant discharge permits obtained.

12. Corruption

12.1. Corruption in any form is not accepted, including bribery, extortion, kickbacks and improper private or professional benefits to customers, agents, contractors, suppliers or employees of any such party or government officials.

13. Animal welfare

13.1 Animal welfare shall be respected. Measures should be taken to minimize any negative impact on the welfare of livestock and working animals.

13.2 National and international animal welfare legislation and regulations shall be respected.

Other sustainable requirements for doing business with PRG:

Suppliers must adhere to PRG Supplier manual that outlines precise production and product quality criteria, requirements, standards, and guidelines.

⁵ UN: The United Nations is an international organization founded in 1945. Currently made up of 193 Member States, the UN and its work are guided by the purposes and principles contained in its founding Charter.

⁶ ILO: The only tripartite U.N. agency, since 1919 the ILO brings together governments, employers and workers of 187 Member States, to set labour standards, develop policies and devise programmes promoting decent work for all women and men
<https://www.ilo.org/global/lang-en/index.htm>

Sourcing requirements for animal welfare, raw materials and traceability

Pierre Robert Group strives for a more sustainable product and value chain for people, animal welfare, and the environment.

Ethical aspects

- Ethical aspects shall always be considered when choosing suppliers of animal materials.
- For Pierre Robert Group, this means a focus on traceability, health and safety, and a focus on animal welfare in farms and production units.
- These elements are also found in The Five Provisions on how animal welfare should be managed, set by the World Organization for Animal Health⁷ (OIE) and used as guidelines for all suppliers to Pierre Robert Group.
- For advice and guidance on protecting animal welfare on farms, in transport, at markets and at slaughter, see homepage of UK Department for Environment, Food & Rural Affairs (<https://www.gov.uk/animal-welfare>).
- The Pierre Robert Group Animal Welfare Policy are requirements the supplier is obliged to follow.
- Due to campaigns and reporting of occurrences of failing animal welfare, additional policies, both temporary and permanent, may be implemented in addition to this policy.

Animal welfare

Animal welfare is an important part of a responsible supply chain. We aim to have 100% of our products with minimal environmental impact. Pierre Robert Group wants to contribute to improve animal welfare practices in our industry by setting strict requirements for ourselves as well as for our suppliers. We have a zero-tolerance policy for all use of inputs or materials (including processing of such inputs or materials) listed below:

- Wool from sheep that undergo mulesing procedures. We do not buy merino wool from Australia unless it is certified to RWS, due to the common practice of mulesing in the country.
- Angora wool and angora wool blend yarns.
- Endangered species: Materials derived from species appearing on the IUCN⁸ (International Union for Conservation of Nature www.iucn.org) or the CITES⁹ (the Convention on International Trade in Endangered Species of Wild Fauna and Flora) lists of endangered species shall not be used in products supplied to Pierre Robert Group.
- All use of real fur is prohibited.

⁷ The World Organisation for Animal Health (WOAH), formerly known as the Office International des Epizooties (OIE), is an intergovernmental organization founded in 1924. It is composed of 183 member states and is mandated to improve animal health and welfare worldwide².

⁸ IUCN: "Membership union composed of government and civil society organizations. It was created in 1948 and is now the world's largest and most diverse environmental network, harnessing the knowledge, resources, and reach of more than 1,400 Member organizations and 15,000 experts¹. It provides a neutral space in which governments, NGOs, scientists, businesses, local communities, indigenous peoples' organizations, and others can work together to solve environmental challenges and achieve sustainable development." Source: www.iucn.org

⁹ CITES: global agreement among governments to regulate or ban international trade in species under threat Learn more <https://www.worldwildlife.org/pages/cites>

Traceability

We are working to get materials, products and production facilities that have global or recognized certifications such as:

- **Global Organic Textile Standard (GOTS):** Leading textile processing standard for organic fibers, including ecological and social criteria, backed by independent certification of the entire textile supply chain. Website: <https://www.global-standard.org/>
- **Better Cotton:** A global not-for-profit organization and the largest cotton sustainability program in the world. Website: <https://bettercotton.org/>
- **Organic Content Standard (OCS):** A standard for tracking and verifying the content of organically grown materials in a final product. Website: <https://textileexchange.org/standards/organic-content-standard/>
- **Global Recycled Standard (GRS):** A standard for verifying recycled content in products and ensuring responsible social, environmental, and chemical practices in production. Website: <https://textileexchange.org/standards/global-recycled-standard/>
- **Recycled Claim Standard (RCS):** A standard for verifying and boosting recycled content in products. Website: <https://textileexchange.org/standards/recycled-claim-standard/>
- **Responsible Wool Standard (RWS):** A standard for protecting the welfare of sheep and the land they graze on. Website: <https://textileexchange.org/standards/responsible-wool-standard/>
- **ZQ Merino:** On-farm certification programme with regard to animal welfare, environmental integrity, social responsibility, fibre quality, and traceability. Aligned with RWS. Website: [RWS Certified Wool Fibre | New Zealand \(discoverzq.com\)](https://www.zq.com.au/)
- **Nordic Swan Ecolabel:** The official sustainability ecolabel for the Nordic countries. Website: <https://www.nordic-ecolabel.org/>

The requirements and procedures for suppliers to ensure traceability, documentation, and animal welfare in the supply chain are listed below:

- The origin of animal fibres must always be declared and authenticated.
- We have a zero-tolerance policy for cotton sourced from Xinjiang China and Turkmenistan. Cotton from Uzbekistan¹⁰ is authorized.
- Pierre Robert Group reserves the right to visit and audit all entities in the supply chain including farms and slaughterhouses.
- It is the supplier's obligation to share information on Pierre Robert Group Animal Welfare for animal fibres with sub-suppliers.
- Traceability is an important factor, and declaration forms shall be filled out completely and all supporting documents shall be supplied.

¹⁰Uzbekistan's cotton sector: "Uzbekistan has successfully eliminated systemic child labour and forced labour in its cotton sector, according to recent ILO findings" source: [Better Cotton Launches Programme in Uzbekistan After Several Years of Piloting - Better Cotton](#)

- All suppliers must describe the supply chain for all kinds of animal fibres through PRG “Declaration on the use of animal fibres”, including a Certificate of Origin of the raw material. This routine applies no matter the percentage of fibre in the finished product. The document must be signed and returned to Pierre Robert Group office.
- When a Certificate of Origin cannot be supplied for the fibre due to further processing in the same country, a dialogue on what documentation is valid as substitution shall be made with the Product Assortment & Sustainability department.

See separate documents for full version of PRG Supplier manual, Declaration on the use of animal fibres and Code of Conduct.

Signatures

Place & date: Oslo 12 March

Signature



Complete signature
in capital letters:

HEGE BJØRNHOLM

Position:

Director of Product Assortment

Place & date: Oslo 12 March

Signature


Andreas N. Aaserud (Mar 12, 2026 11:05:33 GMT+1)

Complete signature
in capital letters:

ANDREAS NORSTØ AASERUD

Position:

CEO

Place & date: Oslo 12 March

Signature


Lars Olav Olausson (Mar 12, 2026 12:22:27 GMT+1)

Complete signature
in capital letters:

LARS OLAV OLAUSSEN

Position:

Chairman of the Board











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Final Audit Report

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