

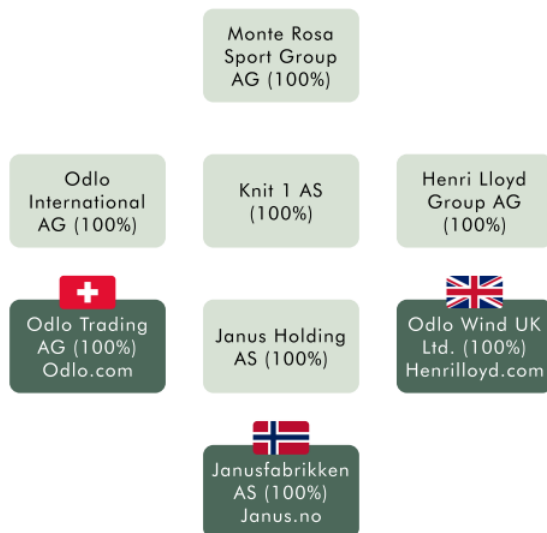


Report: 30.06.2025

Statement on Due Diligence Assessment

Janus strives to create a good working environment that supports, inspires, and respects all colleagues, job seekers, local communities, customers, and our suppliers and their employees. We are committed to respecting human rights throughout our value chain. We reject the use of child labor, forced labor, and exploitative working conditions. These are expectations we also place on our suppliers and partners.

Key Information About the Company and Its Supply Chain



For 130 years, Janus have mastered the art of knitting wool. Our deep expertise, rooted in the venerable factory at Espeland in Bergen since 1895, means one important thing for you: we know how to create quality garments. Every thread, every seam, and every design choice carries a legacy of knowledge and innovation.

When you choose Janus, you're not just buying a wool garment—you become part of a proud tradition synonymous with quality and trust.

From chilly mornings in kindergarten to mountain hikes in changing weather - our garments provide natural warmth for all of life's journeys. Generations of Norwegians have proudly chosen Janus, as we've worked continuously since 1895 to deliver real quality and comfort.

We use soft merino wool, nature's miracle fiber known for its softness, thermoregulation, and moisture control, and combine it with our knitting expertise. The result? Garments that are not only comfortable but also built to last. We are proud to remain one of the few remaining textile companies with production in Norway.

Janusfabrikken AS is 100% owned by Janus Holding AS and is part of the Monte Rosa Sports Group AS. The company is led by CEO Cathrine Stange, and the chair of the board is Daniel Eppler.

In the fiscal year 2023–2024, Janusfabrikken AS had a turnover of 326 MNOK.

1.1 Areas of Operation

The company knits and dyes wool textiles at its factory in Espeland outside Bergen. The textiles are then sent to our supplier of cutting and sewing services, Odlo International or third-party suppliers, where they are finished into garments. Products are sold through third-party retailers, our online store, and the order office, in addition to our own stores in Espeland, Voss, Lillehammer, and Bogstadveien.

1.2 Stakeholders

Janusfabrikken AS has a number of stakeholders affected to varying degrees by the Transparency Act. We have identified the following:

External:

- Customers
- Suppliers
- Local communities
- Authorities
- Textile industry
- Banks

Internal:

- Employees
- Owners
- Board of Directors

Our most significant stakeholders are suppliers of raw materials and production services, as well as subcontractors related to sales. The company has both national and international suppliers.

Janusfabrikken AS used 373 suppliers in the period July 2024 – June 2025. The due diligence assessment is based on suppliers used in the most recent fiscal year.

2. Policies and Procedures

Janus has established processes and procedures to ensure that the behavior of the company and its employees complies with applicable laws and guidelines. These

include contributing to sustainable development, protecting the environment, respecting human rights, safeguarding labor rights, and preventing corruption. Internal whistleblowing procedures have been developed to allow anonymous reporting for both the whistleblower and the subject of the report.

Janusfabrikken AS also has a set of requirements and expectations for its suppliers and partners related to the above. All suppliers are required to sign a Code of Conduct before cooperation begins, confirming that they comply with expectations related to sustainability, environmental protection, human rights, labor rights, and anti-corruption.

2025 is the second year that Janusfabrikken AS formalizes and reports on its work under the Transparency Act and performs a due diligence assessment. The report is based on ongoing assessments of new suppliers, an annual risk-based evaluation, and special follow-up of high-risk suppliers. If the need for action is identified, it is implemented and followed up.

3. Process for Due Diligence Assessment

Janus' due diligence process is based on the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. The model consists of six steps aimed at anchoring responsibility at the highest level of the organization, identifying and assessing actual or potential negative impacts, ceasing, preventing or mitigating such impacts, monitoring the effectiveness of implemented measures, communicating findings and actions externally, and providing or cooperating on remediation when needed.

3.1 Anchor Responsibility

This step focuses on anchoring responsibility for the Transparency Act and the due diligence process at the highest level within the organization. Janusfabrikken AS is currently updating its internal governance systems and guidelines to ensure that the company's and employees' behavior aligns with relevant laws and standards. The CEO and the company's leadership are responsible for ensuring the due diligence process follows the OECD guidelines. The work is carried out by a risk management group that includes representatives from finance and purchasing.

3.2 Identify and Assess Actual and Potential Negative Impact

The second step involves identifying, assessing, and mapping the actual and potential negative impacts of the company's operations on the environment, society, and human rights. This is done through a risk analysis of the company's internal processes and an assessment of processes the company is involved in via its suppliers and business partners. Stakeholder engagement is a key element.

In 2025, the working group updated the risk assessment, identifying the following stakeholder groups: employees, local communities around Janus' own operations, workers in the supply chain and their local communities, customers and end-users, and business partners. Various information sources have been and continue to be used to identify real and potential negative impacts in our value chain.

Identified risks related to internal operations:

- **Environmental damage to the local area** from pollution, particularly if wastewater or production waste is not properly managed.
- **Workplace injuries** caused by industrial machinery or the use of flammable materials.
- **Damage to equipment and facilities** from improper use can also lead to personal injury or hazardous events.

Registered incidents (June 2024 – June 2025):

- 03.12.2024 – Blunt injury: An unsecured support plate fell and hit an employee.
- 15.02.2025 – Laceration: Employee sustained a cut to the nose bridge from machine impact.
- 03.03.2025 – Burn: Contact with hot roller caused burn injury on the arm.

All incidents were followed up with immediate corrective and preventive measures. None of the injuries had serious consequences but had potential for greater harm.

In March 2025, a thorough risk mapping of Janus' machinery was conducted in collaboration with external occupational health services. This led to several immediate measures and identified improvement areas, which are now being followed up through systematic HSE (health, safety, environment) work.

Identified risks related to external operations:

Suppliers and partners failing to meet requirements related to human rights, environmental standards, and labor rights. Janus works with many suppliers and partners both in Norway and internationally. Non-compliance can lead to real negative consequences.

The following risks of actual negative impacts were identified during the review of our external operations:

Suppliers and partners that fail to comply with requirements related to human rights, environmental standards, and labor rights represent a significant concern.

Janusfabrikken collaborates with a large number of suppliers and business partners, both in Norway and abroad. If these actors do not meet our standards regarding human rights, environmental responsibility, and employee protections, it can lead to real and adverse consequences.

During the mapping phase of suppliers and business partners, the following approach is applied:

Process for mapping, risk assessment and follow-up of the supply chain



Selection of Prioritized Areas for Further Assessment

Two criteria were used to select suppliers for further assessment; the countries in which suppliers operate, and the total purchase volume from Janusfabrikken during the

period June 2024 – June 2025. Purchase volume is a criterion because it gives Janus greater influence to effect positive change and indicates a higher level of responsibility as a major customer. Suppliers operating in countries with historically higher risks of labor exploitation or human rights violations were prioritized.

Individual Risk Assessments

Based on the mapping in section 2, five suppliers were selected for risk assessment. Information was gathered from official supplier documentation (certifications, policies), third-party reports (e.g., Fair Wear Foundation, Clean Clothes Campaign) and sector-specific risk analyses. Key risk factors in the textile industry (e.g., production in low-cost countries, subcontracting, seasonal labor, chemical use, weak labor protections) were evaluated based on their relevance to each supplier. The OECD Due Diligence Guidance for the Garment and Footwear Sector was used to focus on the most severe and probable risks. Suppliers' mitigating measures (e.g., certifications, Sedex or Fair Wear memberships) were also reviewed. Follow-up actions were established based on the severity of the risk.

Follow-Up Actions

Follow-up is based on the results of each supplier's risk analysis: 1 supplier rated low risk, 2 suppliers rated low to moderate risk, 2 suppliers rated moderate risk

These suppliers will be asked to provide details on:

- Their human rights and decent work practices
- Any internal guidelines and routines related to these topics
- Requirements for their own suppliers and how compliance is monitored
- Their ethical guidelines

The extent and depth of follow-up are adjusted according to the supplier's assessed risk level.

3.3 Cease, Prevent, or Mitigate

Janus has worked on several priority areas for a long time and does not consider the risk of negative impact equally high in all areas, precisely because mitigating measures have been in place over time. However, ongoing efforts are needed to avoid future harm. Actions include:

- HSE risk-reduction measures in internal production (training, procedures)
- Environmental monitoring and certification

Certifications regularly audited by third parties:

- ISO 9001:2015 – Quality Management Systems
- ISO 14001:2015 – Environmental Management Systems
- Oeko-Tex SteP
- Fjordkraft Green Energy certification

Ongoing actions:

- Continuous review of supplier list to identify risk areas
- Obtain signed Codes of Conduct from all suppliers
- Further mapping of working conditions through direct dialogue with selected suppliers
- Checklists for buyers prior to new agreements

3.4 Monitor

This step involves ensuring that we have adequate information to assess whether the measures implemented are actually effective. Robust systems for documenting and managing information also form the basis for external communication of findings and actions.

The risk management group and the CEO are responsible for monitoring the effectiveness of the measures implemented. Many of the measures are still too recent to fully evaluate their impact, and several are inherently difficult to measure.

The risk management group is responsible for supplier follow-up and ensures a forum for information exchange, communication, and systematic follow-up of suppliers. The work is documented and archived in a dedicated folder with meeting minutes and received documentation.

Due diligence is conducted on an ongoing basis, ensuring regular updates to risk assessments. This also ensures employee training, follow-up of assessments, and the integration of risk findings into strategies and action plans.

3.5 Communicate

The results of our risk assessments, information on actual negative impacts, and significant risks identified through our due diligence process, along with the measures implemented and their expected outcomes, will be communicated on our website and updated annually.

Information on where to find the report is also included in our annual reports.

3.6 Provide or Cooperate on Remediation and Compensation

This step involves addressing harm that the company has caused or contributed to. It also includes ensuring, or cooperating to ensure, that those affected or potentially affected have access to a grievance mechanism through which their concerns can be heard (OECD).

If harm, or significant risks of harm, are identified, Janus will implement measures appropriate to the situation.

We want it to be, and to feel safe to report concerns related to our value chain. We are currently working to enable anonymous reporting via our website for anyone who discovers violations or potential negative consequences in our value chain.