

# FENIX OUTDOOR

## CSR REPORT 2024



**TIERRA**

**DEVOLD**



SINCE 1921



**ROYAL ROBBINS**



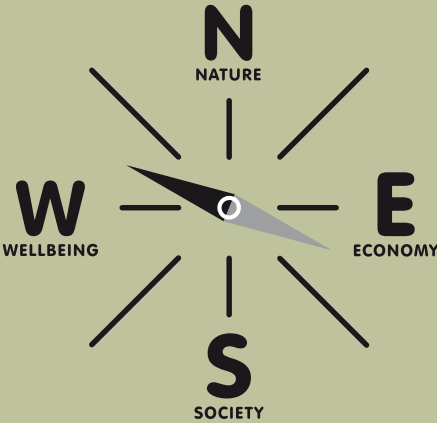
**FRILUFTS RETAIL EUROPE AB**

GLOBETROTTER NATURKOMPANIET PARTIOAITTA  
FRILUFTSLAND TREKITT



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With the help of our management compass, this report takes us on a journey through the sustainable business update of FENIX Outdoor and gives insights into our visions, aims and further steps.

**N = Nature:**  
As an outdoor company, we believe that business activities should contribute to resilient and well-functioning natural systems.

**E = Economy:**  
Ethical and sustainable activities can only be undertaken if a business is healthy and its finances are sound. Thus, we rely on long-term partnerships and strive to create sustainable working conditions.

**S = Society:**  
We are a responsible actor in society, enriching and inspiring each other and those beyond our company to move towards a sustainable future.

**W = Well-being:**  
We look for excellence in staff members; in return, they expect a fair and responsible employer.





# Our Commitment to Sustainability and Progress Continues



## Dear sustainability friends,

2024 was a challenging but insightful year. Supply chain disruptions, shifting weather patterns and inventory challenges, both internally and at our retailers, presented hurdles throughout the year. However, we are also seeing positive developments, particularly in gaining better control of our inventory situation.

Some challenges, such as shifting seasons and unpredictable weather, are beyond our control, yet they have a significant commercial impact on us. While we cannot influence these forces directly, I am proud that we remain steadfast in our commitment to sustainability, continuing to push for meaningful change through responsible business practices.

**WE ARE CONSTANTLY** striving to professionalize our CSR/ESG efforts – reducing our environmental impact, ensuring fair labor practices, promoting animal welfare

and integrating sustainability into every aspect of our business. Our guiding document, The Fenix Way, outlines our values and commitments, helping us stay on course by following our Fenix Managerial Compass, which is built on four cardinal directions: Nature, Economy, Society and Well-being. In line with these principles, we continue to uphold our commitment to the UN Global Compact and the UN Climate Action initiative. These frameworks shape our sustainability strategy and ensure we hold ourselves accountable to the highest standards of responsible business.

**AS I HAVE** stated before, we welcome the increasing regulatory focus on ESG transparency. Last year we proactively adapted our reporting framework to align with upcoming EU legislation. This dedication was recognized in 2024 when we won the ESG Transparency Award for our 2023 CSR Report, an achievement that makes me immensely proud. We remain committed to setting an even higher standard in transparent reporting.

Furthering this transparency agenda, Fjällräven launched a more accessible, condensed version of our CSR report to provide a clear and engaging overview of our progress and challenges. This 20-page report highlights key efforts in material innovation, responsible chemical management, animal welfare, social responsibility and climate action.

Beyond our own operations, we take responsibility for ensuring ethical practices across our supply chain. We continue working closely with the Fair Labor Association, aligning with its principles to uphold fair labor standards and improve working conditions for those involved in our production processes.

**BEFORE CLOSING,** I want to highlight a few initiatives that truly stand out. Circularity remains a challenging but essential area for us to address. Across the group, we have been testing various models to create real impact. Within Frilufts Retail, we have seen great success with circular business models, especially at Globetrotter and Naturkompaniet, where second hand sales and product care-and-repair programs have gained significant traction.

Within our brands, I want to highlight two key achievements from Fjällräven. First, the brand has once again been named the most sought-after on the Scandinavian secondhand marketplace, Tradera. Not only is Fjällräven the most searched-for brand across all categories (not just sports and outdoors), but it also retains one of the highest resale values – reinforcing the idea that investing in a Fjällräven product is both a sustainable and a financially wise choice. Additionally, Fjällräven launched *Pre-Loved* in North America, a peer-to-peer marketplace where our community can buy and sell used Fjällräven items. The early results are promising, and we are gaining valuable insights into how we can further promote circularity.

**LOOKING AHEAD,** we recognize that sustainability and commercial success are deeply interconnected. The achievements of the past year reaffirm that, even in times of uncertainty, our dedication to responsible business practices strengthens our long-term resilience. I want to extend my sincere gratitude to our employees, partners and customers for their continued support, and I look forward to another year of progress and shared success.

*Martin Nordin*  
Chairman of the Board







# 1. Introduction and Overview

## 1.1 PURPOSE OF THE REPORT

This report has been prepared in accordance with the Corporate Sustainability Reporting Directive (CSRD) to provide a comprehensive overview of our organization's environmental, social and governance (ESG) performance. The report aims to ensure transparency, accountability and compliance with the European Union's sustainability disclosure requirements. Through this document, we seek to offer stakeholders – investors, customers, employees, regulators, and the broader community – insights into our sustainability initiatives, impacts and strategic commitments. For more technical information, please refer to the section “About the report.”

## 1.2 SUMMARY OF GOVERNANCE AND STRUCTURE

Fenix Outdoor International AG is a group of companies that develops and markets high-quality outdoor gear through a selected retail network, with a high level of service and professionalism, to highly discerning and fastidious end-users. Fenix Outdoor International AG, Corporate Identity Number CHE-206.390.054, with its registered offices in Zug, Switzerland, is stock-listed in Sweden (Stockholm Stock Exchange – large cap) and originates from Örnsköldsvik, the town where Fjällräven was founded. The chairman and CEO of the group is Martin Nordin, eldest son of Åke Nordin, the founder of Fjällräven. The total number of shares in the company is 35,060,000, of which 24,000,000 are Class A shares, nominal value 0.1 CHF/share, and 11,060,000 are Class B shares, nominal value 1.0 CHF/share.

As of December 31, 2024, the company held 132,337 B shares on its own books (the same as at the end of 2023). There were 22,000 personnel options outstanding as of December 31, 2024 (the same as at the end of 2023). Fenix Outdoor International AG had 8,118 shareholders at the end of 2024. The ownership participation of the 10 largest shareholders constituted 84.1% of the total capital. A list of the major shareholders can be found in the annual report 2024. The business model is grouped in three segments: Brands, Global Sales and Friluft's Retail.

## 1.3 EVENTS AFTER THE REPORTING PERIOD

### **Cancellation of shares**

Per February 11, 2025 an Extra General Meeting approved to the Board of Directors a cancellation of 112,898 B-shares, limiting the holding of own shares to 19,439 B-shares representing 0.15% of the capital of A-shares and B-shares. The Board of Directors revoke its resolution and the shares were used for the acquisition of Devold of Norway AS.

### **Viomoda**

In 2024 Fenix Outdoor AB entered into a partnership with the German outdoor brand Maloja to operate apparel production at their subsidiary production facility, Viomoda, in Plovdiv, Bulgaria. In 2024, as part of this agreement, Fenix Outdoor AB provided convertible loans of MEUR 1.5 to Viomoda Austria maturing at the lat-

est by December 31, 2025. The loan is convertible into up to 40% of Viomoda shares at the option of Fenix Outdoor AB and 49% at the option of Maloja. The loan was converted into 49% of Viomoda shares as of January 30, 2025.

## 1.4 STAKEHOLDER ENGAGEMENT AND MATERIALITY ASSESSMENT

We recognize the importance of engaging with our stakeholders to understand their expectations and concerns regarding sustainability. This report incorporates feedback from key stakeholder groups, including employees, investors, customers, suppliers and regulatory bodies. Fenix Outdoor engages in open dialogues with civil society groups and other societal actors on various subjects, particularly those relating to environmental, social, societal and human rights topics. We collaborate in projects or explore best practices and benchmarks for the outdoor industry.

By the end of 2024, around 95% of our business partners representing suppliers had signed our Code of Conduct (CoC). There were no significant changes over 2023. As we have four brands and five retail chains, the subscription rate to our CoC has a considerable bandwidth. This will improve over time, but every new acquisition may blur the picture.

### **Fenix Outdoor Brands Unit**

Each Fenix Outdoor brand has developed its own individual sustainability agenda with distinct sustainability goals and implementation plans. The sustainability plans for 2025 are well underway. In 2024 we continued our work on the upcoming 2025 to 2030 sustainability strategy. We engaged with an external partner to identify gaps and refine and restructure the outcome paper from the workshop, held the year before. In 2025 we will hold several individual sessions with brands, retailers, significant operational units and the top management. On that basis, responsibilities have been assigned and implementation deadlines have been set. We have developed and internally published our Climate Strategy to coordinate the efforts effectively across the organization.

To improve our supplier management, all brands worked much closer together, and under the roof of the central CSR Department we offered internal training and educational events that helped to build awareness and understanding for sustainability challenges.

### **Friluft's Retail Unit**

In response to the German Supply Chain Due Diligence Act (LkSG), we continued to require our brand suppliers to sign a Code of Conduct as a sign of goodwill and ethical commitment to decent supply chain and human rights management.

A total of 910 reputable brands, representing 98% of the purchase value, have signed our Brands Code of Conduct for Friluft's Retail in 2024. We have put on hold several brands for sale in 2024,

in response to poor responsiveness and commitment. And we have started several inquiries on ad hoc matters arising from political changes and threats to fundamental rights.

### **Materiality Assessment**

Our materiality assessment process has helped identify the most significant ESG issues that influence our business operations and long-term value creation. In 2024 we aligned our Materiality Matrix approach more with the legally prescribed process by the EU. The new approach is formalistic and does not add value to what we did in the past. However, there is a risk that resources need to be diverted away from “real impact” activities.

*Description of methodologies and assumptions applied in process to identify impacts, risks and opportunities and processes*

In our sustainability approach we started with the basic consideration by employees and management of the question of what it is that we are doing and what are the possible repercussions and side effects. To execute this throughout the Group, we apply the Fenix Management Compass® with the four cardinal directions “N = Nature,” “E = Economy,” “S = Society” and “W = Well-being.” With this approach we cover all relevant focus areas of sustainability. As signatory to the UN Global Compact since 2012, we also focus on Compliance and Anti-Corruption. Therefore, Compliance and CSR/ Sustainability are managed under one roof.

When assessing all steps of our production and services, we look at the following aspects:

- What effect does our way of doing things have on any of the four cardinal directions? Is it positive, negative or even both?
- What kind of unwanted side effects may exist?
- How can we remediate the negative effects of our activities?

Based on these basic questions we came to the Fenix Outdoor view of our business. Through several stakeholder surveys and roundtables, held between 2012 and 2023, we also engaged with customers/consumers, suppliers, service providers, regulators, science, non-governmental and not-for-profit organizations (civil society).

Based on the outcome of these steps, we prioritized the material matters based on:

- Number of mentions by various stakeholders
- Severity of the impact
- Urgency of the impact mitigation
- Business relevance based on influence and available remediation tools
- Own internal know-how and scientific considerations
- Economic impact.

With the application of the Global Reporting Initiative Standard in 2012, we introduced a monitoring and reporting framework. We set goals/targets for the Group as laid out in “The Fenix Way” Annex as a five-year strategic plan, for 2015–2020 in the first version of the document and for 2020–2025 in the second version.

Founded on the Sustainability Agenda, addressing the four cardinal directions, Fenix Outdoor’s CSR Team works with the relevant business units and upstream and downstream partners to address steps to achieve the goals set. The tactical steps are taking into consideration the role of Fenix Outdoor’s entities, our reach, the ability of the partners to contribute and the dependencies in certain geographical regions as well as possible mitigative steps achievable through wider partnerships, such as membership in the Fair Labor Association, Cascale and Textile Exchange.

The Fenix Management Compass® addresses prominently the cardinal direction “E = Economy.” Economic considerations and effects stemming from risks in the other three dimensions or from the view

angle of compliance and business ethics are taken into consideration in the annual report and reservations or investments to hedge or mitigate are undertaken. There is alignment between the Financial Department and the Sustainability/Compliance Department. The CFO and CSO/CCO meet frequently.

## **1.5 SUSTAINABILITY FOCUS AND COMMITMENTS**

Sustainability is embedded in our corporate strategy, with a focus on responsible resource management, social responsibility, ethical governance and long-term resilience. Our sustainability commitments include:

- Reducing carbon emissions and enhancing energy efficiency
- Promoting diversity, equity and inclusion (DEI) in the workplace
- Strengthening ethical supply chain practices
- Ensuring compliance with human rights and labor standards.

As in previous years, we consider climate change and the associated extreme and unpredictable weather events as strategic risks and a priority for action. We also think that most of our environmental endeavors are directly or indirectly linked to preventing or mitigating the negative climate effects and helping to achieve the 1.5° Paris Agreement goal. In 2024 we continued projects in our own operation and in our supply chain to help foster a more sustainable, independent and CO<sub>2</sub>e-reduced energy supply. The year 2024 is characterized by continued political and economic instability, economic downturn and disruption. The war in Ukraine, inflation and the extraordinary budgetary spending of many governments with unknown side- and long-term effects led to a general notion of insecurity, fear and enhanced polarization. In addition, more and more legal demands and restrictions concerning products, their packaging and disclosure requirements from more and more companies apply. This leads to increased bureaucracy and so far has not yet even remotely reaped the fruits of an economic “level playing field.” In fact, increasingly these well-intended political programs lead to disadvantages for European businesses and call for a change in the way they are executed.

Through continuous innovation and collaboration, we aim to contribute positively to the global sustainability agenda while ensuring business growth and resilience.

## **1.6 STRATEGY AND APPROACH**

Over the past few years, we have built partnerships and reinforced existing relationships, and we did not change our network in 2024. Fenix Outdoor has been a reliable and constant signatory to and supporter of the UN Global Compact since 2012 and continues to be a participant level for its further engagement. We actively take part in the UN Fashion Industry Charter for Climate Action (UNFCCC) and the Swedish Textile Initiative for Climate Action (STICA), and we are cooperating in the North American market with the Outdoor Industry Association (OIA) in Climate Action Corps. We continued our involvement in Cascale (formerly known as the Sustainable Apparel Coalition [SAC]) and furthered the rollout of the Higg modules such as applying the FEM and FSLM.

As a member of the Fair Labor Association (FLA) we continuously develop our social compliance governance. We are committed to fair labor conditions, and we support the concept of a living wage. A headquarters visit by FLA staff was done in early 2024 with a positive result.

Since 2015, Fenix Outdoor is also a member of the Textile Exchange. Through this network, several Fenix Outdoor brands work together with peers and scientists to support activities and research in recycling, the use of organic material, improved supply chain management and better choice of materials. As a signatory of

The Microfiber Consortium (TMC), we support and contribute to research of microfiber impacts on the environment.

One of our entities is a member of the Swedish Tourist Association (STF).

When it comes to certification schemes, we do not aim for formalized certifications of any type of management systems. We believe that our responsibility is to do things right and to communicate only what we have evaluated ourselves and can stand behind with our own name. However, in many operations ISO 9000 and ISO 14000 principles are applied in an informal manner. Several of our suppliers carry certifications or deliver materials which often carry significant and reputable signs of conformity to industry standards, such as GOTS, RCS, bluesign or others. We appreciate these certifications and labels. However, we only demand certifications of materials and the chain of custody for production purposes in order to make qualifying statements on our material use. The information is stored internally and not necessarily communicated to our constituency except in generic terms (such as “recycled” or “organic”).

The Fenix Way Management Compass® has continuously guided all Fenix Outdoor sustainability activities as described in “The Fenix Way.” It remains our universal management tool, mandatory for the whole group and all employees.

Various significant impacts and negative side effects occur in different stages of our services and products’ lives. From raw material sourcing, through spinning, dyeing and other processing steps, to the transport, sale, use and repair of our products until they truly reach the end of their life, all four cardinal directions of our compass are affected. We want to contribute to healthier, more resilient natural systems, top financial performance and more knowledgeable, happier and environmentally conscious people, so we have a wide array of projects, which are managed and organized by each entity individually. However, all activities address the compass directions and focus on moving us steadily along the path to sustainability. At the Group level, our brands and retail companies developed a common and streamlined program of focus areas: we have addressed social compliance matters throughout the supply chain and within our own organization, through addressing the recommendations we have received from our partners at the FLA. To meet the German Corporate Sustainability Due Diligence regulation, we have made changes in how to organize duties when it comes to human rights responsibilities. The CSO is also taking the responsibility of being the group-wide Human Rights Officer. That position is complemented by the Global Sustainability Director for Fenix Outdoor brands, the Human Rights Coordinator working in that particular team and the Social Compliance Auditing staff covering audits and remediation with suppliers and the Senior Sustainability Manager in Globetrotter Ausrüstung, who oversees the human rights tasks in the retail operations.

As climate change is a global challenge, we address the importance of climate mitigation and positive climate action. In 2024, we continued to dive deeper into our Scope 3 emissions of which we are capturing and calculating more and more. The transport-related activities are under constant scrutiny (including looking at the optimization of planning and shipping).

All suppliers and value chain partners working with Fenix Outdoor brands must adhere to our Restricted Substances List (RSL, which is also used as the MRSL, or Manufacturing Restricted Substances List). We update our chemical guidelines on a yearly basis, reflecting the latest scientific research and following our own precautionary and proactive approach going beyond the current and coming legal requirements. The Fenix Outdoor Chemical Guideline promotes the phase-out of hazardous substances as materials

and acts as a guide to less hazardous alternatives. The Fenix Outdoor RSL Guideline also includes additionally a testing matrix supporting the supplier in what substances may pose risks in different types of materials.

During 2024 we hosted a supplier webinar linked to the launch of the updated 2024 version of the Chemicals Guideline. Our purpose was sharing background information regarding added substances and supporting the chemicals management carried out by our suppliers. During the past year we have been sharing chemical topics, such as substances of concern, potential new regulations and other chemical-related topics of interest, in the Fenix Outdoor sustainability newsletters for suppliers. These communication instruments have helped to lift the transparency and made sure that both our business partner and our organization are able to proactively work toward safer and more sustainable products. A focus area of work in 2024 was the close monitoring of PFAS in products and often-unknown applications and the updated Cal. Prop. 65 regulations with respect to BPA and BPS.

We have also consolidated and streamlined the testing process for all textile brands under the Fenix Outdoor umbrella, including microfiber shedding tests according to the standard developed by the TMC with a new third party partner. The CSR team has also held several internal training courses on chemical-related topics such as the newly implemented or updated test standards and potential future challenges.

## 1.7 STRUCTURE OF THE REPORT

This report has some deviating structural elements from previous reports. We enhanced the alignment with the CSRD requirements and follow the structural framework as follows:

Chapter 2: Nature. It includes all environmental performance topics and gives insights into our environmental impact, climate action strategies and resource management. In all chapters we identify the impacts, risks and opportunities and describe the policies, actions and targets. The latter can also be found in our Fenix Way Sustainability Agenda 2020-2025. It covers the CSRD topics covered under ESRS E1, E2, E3, E4 and E5.

Chapter 3: Economy. In contrast to previous reports, we capture our own information such as the activities under the “A Greener Choice” program and our “Pre-Loved” projects as well as the EU Taxonomy information here. We also describe the corporate governance structure and business model, offering an overview of our corporate governance framework, risk management and ethical practices including compliance and anti-corruption practices. Therefore, the CSRD topics ESRS E4, G1 and partly S3, and S4 are presented.

Chapter 4: Society. The chapter describes our social performance and focuses on details on our value chain activities including workforce, labor practices, community engagement and social responsibility initiatives. The ESRS S2 is covered.

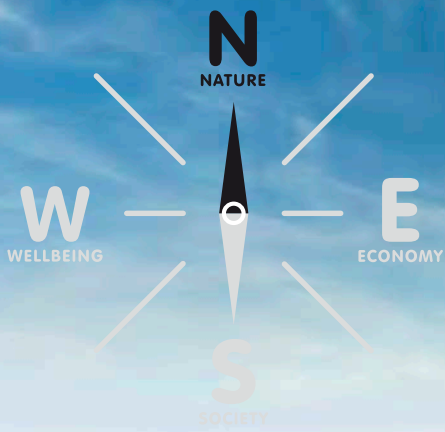
Chapter 5: Well-being. Here we describe the social performance with regard to our own workforce and cover the details on workforce diversity, labor practices, staff development and internal social responsibility initiatives. ESRS S1 is covered.

Chapter 6: Performance Metrics and KPIs. For all topical areas, tables on quantitative data points are given and serve as references to the respective chapters before.

Chapter 7: About the Report. It covers a description of performance metrics and the methodology used in the report.

We invite our stakeholders to review this report and engage with us in shaping a more sustainable future.







## 2. Nature (ESRS E 1 – E5): Our Environmental Mission

### 2.1 FENIX OUTDOOR'S APPROACH TO THE ENVIRONMENT

Nature is where we at Fenix Outdoor feel most at home. Enabling people to get outdoors is why our founder made his first backpack in 1950, and it continues to be the main reason why we make and sell outdoor products today. At Fenix Outdoor, we feel it is our duty to protect our planet by minimizing our impact on the environment as much as possible, so that jointly with our customers and other stakeholders we can continue to enjoy the outdoors for generations to come.

Represented by the “Nature” pillar of our management compass, ecological sustainability is a core part of our operations and decision making at Fenix Outdoor. We aim to be transparent about our approach to sustainability, considering not only our emissions, but also our impact in other areas such as pollution and chemical use, water, circular economy and resource efficiency, and biodiversity. In this section, we will provide a detailed overview of the actions we have taken to reduce our environmental impact in 2024, the risks and opportunities we see for the future, and how our strategy and targets will continue to guide us forward.

Fenix Outdoor and its entities jointly base their actions on the following key aspects:

- Sustainable material solutions: Increasing our share of “more sustainable” materials based on our Preferred Fiber List (PFL), inspired by using leading industry benchmarks, such as Cascale’s Higg Materials Sustainability Index and the Textile Exchange Preferred Fiber Matrix.
- Transparent supply chain: Partnering with Lloyds Register Quality Assurance (LRQA) to extend our reach and deepen our knowledge of the full array of supply chain matters with environmental regard; strengthening the adoption of the Higg Facility Environmental Module (FEM) by our suppliers and supporting them with trainings and a Corrective Action Plan (CAP) process.
- Environmentally responsible production: CO<sub>2</sub> emissions accounting and reduction in line with our Fenix Outdoor Climate Strategy (see CSR Report 2021, p. 20 and first draft of our [Transition Plan](#)): striving for integration of circular production practices (e.g., zero waste development) into standard processes and implementing circular business models (textile to textile recycling, rent and repair services).
- Sustainable store management: Adoption of the Green Business Benchmark (GBB) in our US stores to measure and enforce sustainable practices and preparation work to implement the ISO 50001 at Globetrotter in 2025. Re-think store concept for the Globetrotter stores including care and repair, second-hand and product rental and measurement of the store’s sustainability performance with the Circularity Passport Interiors.

- Continuation of eliminating hazardous chemicals and updating the groupwide Chemicals Guideline considering new regulations.
- Enabling consumers to identify the best suitable and most sustainable product for their needs by expanding our internal labeling/scoring models and enforcing supply chain compliance with transparency and traceability demands.

We at Fenix Outdoor make our products consciously, to last for generations while ensuring emotional longevity. We call it timelessness, durability and sustainability. Fun fact, as we stem from Swedish roots: Did you know that in Swedish, durability and sustainability are the same word? “Hållbarhet” means more than long-lasting. It is a holistic and all-encompassing concept that looks far into the future. We make our garments to last for generations: they should have a lifelong stories, not short-lived ones. But sometimes trade-offs are tough to solve: some materials might be better for the climate but are not recyclable and do harm to animals and plants when they end up in nature.

We have identified all environmental related reporting standards as material for Fenix Outdoor either in our own operations, our value chain or both. The governance of our positive and/or negative impact at any stage of our value chain is supported by several tools, internal and external policies, monitored by the different Sustainability Managers within the Fenix Outdoor Group, the Chief Sustainability Officer, and supported by our Compliance staff in Asia as well as our third-party service-partner, LRQA. To strengthen our due diligence process and supplier engagement in China, we joined the International Institute of Public and Environmental Affairs (IPE) in 2023. Our work complies with international and national environmental laws and aligns with global frameworks and international standards (e.g., the UN Framework Convention on Climate Change or the GHG Protocol). We are also members of a diverse range of industry initiatives that help us to stay on track with the latest developments in regard to environmental developments (see Chapter Introduction and overview).

While working toward a more sustainable business anchored in our Fenix Way, adverse impacts on nature and environmental resources remain. Through our double materiality assessment, we systematically reassess actual and potential positive and negative impacts, risks and opportunities regarding the environment from our own operations as well as from the supply chain.

Our material impacts, risks, and opportunities are assessed during different processes:

- Integrated production country assessments in conjunction with HREDD assessments, updated annually and on request from brands by CSR team. On national and sub-national level data is obtained on a regular and constant basis via our ESG tool EiQ, which also covers environmental parameters (carbon intensity, flood risk, water stress and so on).



- On material/fiber level (especially with regard to natural fibers based on industry knowledge and company-specific supply chains for our main materials).
- On brand level (during strategy development with support of CSR workshops and during the adoption of new markets and if applicable, in new production countries).
- Updated during CDP Reporting, in case any new impacts have been identified during the annual greenhouse gas accounting process or specific circumstances.
- On retail level as part of the energy management system.

## 2.2 CLIMATE CHANGE (E1)

### 2.2.1 Impacts, Risk, and Opportunities

Climate change is one of the most pressing topics of our time. To mitigate climate change, we developed our first climate strategy in 2020, which will be updated in 2025, informed by our DMA and the identified impacts, risk and opportunities. For our long-term planning we developed a first edition of our climate transition plan with the objective to limit global warming to 1.5°C, achieving net-zero and outlining the major decarbonization levers in our value chain and with respect to our business model. Renewable energy sourcing and electrification of production processes in the supply chain, transitioning to more sustainable raw materials, decarbonizing our logistics operations and expanding our circular business models were identified as among the biggest levers.

#### 2.2.1.1 Impacts

Our main impacts derive from different value chain stages and need to be assessed as such. From our own operations, the main climate impact comes from the energy consumption of our own locations, of which our two production sites, stores and distribution centers are the most impactful. Our main upstream climate impact stems from the production of our products, including raw materials and transportation. The use phase and end-of-life treatment mark our biggest impacts from products sold.

Our energy consumption is mainly driven by electricity used to produce Hanwag shoes, store operations (lighting, air conditioning and in some cases heating) and distribution centers, followed by gas consumption for heating and warm water generation. A more detailed breakdown is provided in table N-1. Since renewable electricity sourcing is globally available to some extent and under certain limitations, we see the decarbonization of our heating sources as the most challenging of our impacts coming from energy consumption.

In general, energy sourcing is decentralized. Most of our locations are rented and thus energy supply for heating is most often included in the rental agreement. Our influence on the energy sources is therefore limited. For stores located in shopping malls we most often depend on the shopping mall operator even for electricity. However, with green leases for an increasing number of locations we have progressed to having agreements in place to incorporate environmentally sustainable practices and energy-efficient measures to reduce the environmental impact of a building. The green lease outlines responsibilities for both landlords and tenants in managing energy use, waste, and resource consumption. It encourages collaboration to improve building performance, reduce costs and promote sustainability. To steer renewable energy procurement, we established a guideline on renewable energy sourcing that outlines targets and definitions. Energy Attribute Certificates are secured centrally for the whole group for locations where we are unable to choose green tariffs.

#### 2.2.1.2 Risks

From the identified impacts, we can derive potential risks (physical and transitional), some of which we already saw materialize in the past:

- Huge parts of our supply chain partners are in the global south. This region is in general more vulnerable to climate change than the global north. Changing weather conditions and increasing frequency and severity of extreme weather events (floods, storms, water scarcity and droughts) can lead to loss of harvest, threatening our raw material sourcing of cotton or hemp, destroying homes, and creating unsafe circumstances for our supply chain partners. Reduced production capacity can also lead to disruptions in our product supply through delayed deliveries. Independent from production capacity but depending on changes in weather patterns, our warehouses (especially in Asia) might not be accessible due to floods or heavy storms. Unfortunately, we already saw some of those risks materialize in the US with physical damage to some of our storage and products.
- As a result of unforeseeable weather conditions that affect traffic into our retail stores, our retail strategy has shifted toward emphasizing conversion as a key metric to increase sales.
- A study from the ILO shows that large swaths of apparel-producing areas in Asia will be underwater by 2030. This may also affect our suppliers in the Ho Chi Minh area of Vietnam.
- Although no legal requirements are in place for our industry for now, more regulations with respect to a company's greenhouse gas emissions and carbon pricing are to come. Already today we are affected by increasing carbon pricing for fossil fuels due to our self-operated locations (mainly production and retail) and increasing operating costs.
- We see the risk of a regulated market especially for recycled synthetics in the textile industry. We are aware of possible restrictions on PET bottles being recycled into fabrics. In the future, only textile-to-textile recycled synthetics are likely to be accepted as certifiably sustainable. Since this is a technology that needs to be upscaled, we see the risk of a slow adaptation, so existing fabrics will most likely come with a premium for a couple of years.
- To maintain competitiveness in the journey toward a low-carbon economy, it is not only important that we prepare and adapt but also that our direct and indirect partners in the value chain do so. Partners without a climate strategy including science-based targets and action plans can be a risk to the resilience of our business in the future.

#### 2.2.1.3 Opportunities

By adapting our business to a changing environment, we see an opportunity to enter new markets by developing garments for hotter, more humid conditions. This will also help us to stay strong in the market when conditions for outdoor activities will change in our main markets (Europe and the US) due to climate change. This potentially gives us a chance to also expand our business in the global south, where conditions are already very suitable for our lighter products.

### 2.2.2 Policies

To mitigate climate change, we have a set of policies in place that help us to implement our climate strategy and transition plan. The scope of the policies covers all Fenix Outdoor entities if applicable, and they are updated if necessary.

- Renewable energy policy (renewable energy sourcing criteria and targets, including heating and cooling)
- Company car policy (procurement/leasing of company cars)



including pollution-related limits)

- Air freight policy (internal process description of how to act if additional air freight is needed (former guidance for internal carbon pricing)

Other policies that do not target climate change primarily but align with our mitigation efforts are:

- Fenix Outdoor Chemical Guideline (RSL)
- Preferred fiber list (PFL)
- Due diligence process for new store locations and interior design guideline for Frilufts Retail entities
- Frilufts Retail Brand Supplier Code of Conduct Implementation Policy (supports application of the Code of Conduct, which requires partners to also engage in climate actions in their operations and deeper supply chain).

### 2.2.3 Actions

Our actions in 2025 focused on energy efficiency and renewable electricity sourcing for our own operations as well as renewable electricity sourcing in production countries, capacity building and implementation projects.

Ongoing and completed mitigation measures in our own operations in 2024 include:

- Decarbonization of our car fleet: Updating of our car fleet with hybrid/electric cars in South Korea and Switzerland; release of a streamlined and more rigid car policy, installation of wall boxes in the Netherlands.
- Decarbonization of our energy consumption: we extended the investment into energy attribute certificates from electricity to biogas certificates for some of our European sites as a first trial. Though market-based accounting for Scope 1 is under discussion, it shows the potential to cater as one solution especially for rented operations. The share of our renewable electricity for own and operated locations is now at 100% (2023: 99.99%), the share of renewable gas is at 54% (mainly biogas certificates and small volume contracts). The systematic purchase of green electricity is having a significant impact on our scope 2 emissions, which decreased by 72% compared with the baseline year 2019. We adhered to the RE 100 criteria for energy attribute certificates (electricity) wherever possible but use iRECs ex domain for some countries. Forecasting for certificate sourcing was difficult for 2024 due to inconsistent data reporting and sources. Datasets for biogas consumption are estimated for a proportion of the consumption and are therefore expected to be inaccurate. We follow the discussion on market-based accounting for Scope 1 closely.

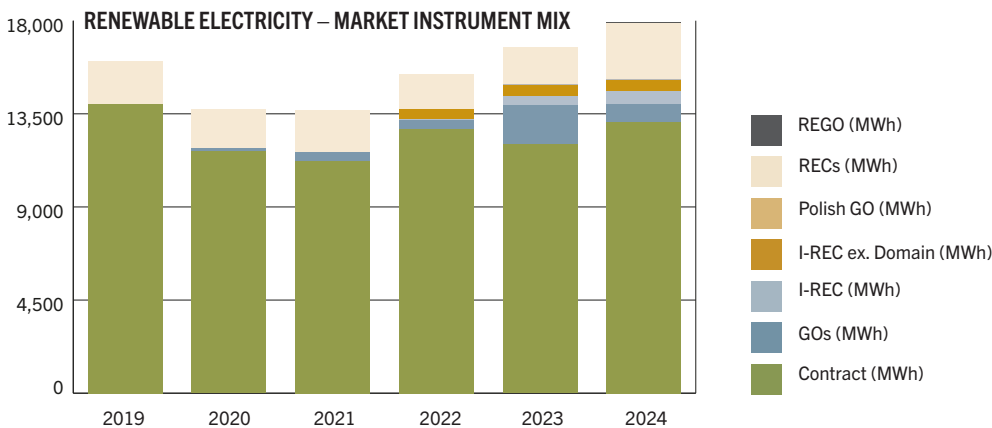
- For our distribution center in Germany, we implemented motion detectors and LED in our picking area as well as air curtains for the roll-up doors.
- Stores' GBB scores increased by an average of 56 points in 2024, an 11% increase from 2023. 86% of stores achieved Gold status or above, while 19 stores achieved Platinum-level certification (53%). The increase was mainly driven by stores adopting energy efficiency measures, such as reducing air conditioner usage and turning off lights and technical equipment.
- In 2024 Globetrotter became a member of the Outdoor Retail Climate Commitment (ORCC), a group of European outdoor retailers who commit to the 1.5 degrees Celsius target and to transparently report on their GHG emissions and actions. The group speaks with one voice toward brands in the outdoor industry to set science-based targets themselves and to start or continue the climate journey. Currently, 59% of brands based on sales volume demonstrate commitment toward climate action.
- We continue to reduce technical equipment (e.g., air conditioning units in Austria) whenever possible.

Ongoing and completed measures in our transport operations in 2024 include:

- We optimized the order process to decrease the absolute amount of transport in Finland.
- We optimized carton size to increase container load efficiency at Fjällräven.
- To decarbonize our transport operations, Fjällräven invested in marine biofuel certificates for the first time in cooperation with our forwarder Flexport. The cooperation helped us to understand the sourcing process and the economic and operational implications. In total, we reduced our emissions from sea freight by 332 tons of CO<sub>2</sub>e, a 95% reduction for Fjällräven sea shipments.

Ongoing and completed measures in our production countries in 2024 include:

- Finalizing of coal phase-out project in Vietnam with a Tier 1 supplier, which is shared amongst our Fenix Outdoor apparel brands (page 9: <https://www.giz.de/de/downloads/giz2024-en-sustainability-forward-7-news-from-the-initiative-for-global-solidarity.pdf>).
- Collaborative renewable electricity sourcing study in Taiwan, conducted with EOG and a selected range of Tier 2 suppliers. The outcome shows that renewable electricity sourcing will remain an economic challenge for the time being.





- By end of 2024, 20 of our Tier 1 suppliers conducted renewable energy feasibility studies according to their declaration in our GRI survey; at least 11 of them installed the panels. As far as we are aware, the share of suppliers sourcing renewable electricity increased compared with last year, covering 19% (2023: 13%) of our share of electricity reported through our GRI survey.

The triad of our climate strategy is to avoid, reduce and compensate for unavoidable emissions. Because we are not yet able to eliminate our energy, transport and product-related emissions, we decided to compensate for them through investments in carbon-reduction projects outside our value chain. The projects we have invested in can be identified below.<sup>1</sup> The total amount we compensated for was 20,780 t CO<sub>2</sub>e (2023: 20,472 t CO<sub>2</sub>e), which equals our own directly controlled emissions (Scope 1 and 2) and selected Scope 3 emissions: consumables, transport of shipments (up- and downstream), business travel, commutes and work-from-home emissions, waste and water, some product-related emissions and internal as well as external events (Classics, Globetrotter Friluftss, Kick Offs). Again, we considered a couple of main suppliers. In addition, marketing materials such as catalogues and flyers were partially offset as part of the purchase agreement, which amounted to an offset of about 560 t CO<sub>2</sub>e (2023: 485 t). Leather for Hanwag was compensated too, amounting to 46 t CO<sub>2</sub>e.

We increased the amount of carbon removals (Oxford category 4 & 5 projects) from carbon credits in our portfolio to 3% in 2024 from 0.8% in 2023. Our future sourcing strategy will focus on the steady increase of the share of removals instead of ton-to-ton compensation. See table N-2 for details.

Data collection was conducted in-house with the support of a newly implemented IT-based tool, the Novisto/Minimum suite. The goal is to have more accurate and consistent data in the future. However, since data providers needed to get used to the new tool, it led to some insecurities, since some datasets need to be evaluated manually, and data consistency and completeness cannot be fully assessed. There is still some ambiguity, and some developments can only be explained by possible misstatements in the past. Whenever we have new information (e.g., through ancillary cost invoices), when emission factors are updated or when misstatements are obvious, we correct our figures for the past years in the upcoming report. In any event, again, we took a precautionary conservative approach and believe that – based on the data and emission factors we have or methodologies that are applied – we slightly overstate our emissions in some categories (e.g., raw materials, working from home, events) and understate them in others (e.g., transportation, energy consumption). Our data and methodology undergo spot analysis from the Swedish Textile Initiative for Climate Action (STICA) and underwent a CSRD-readiness check in 2024. More methodological details are published in Chapter 7 of this report.

#### 2.2.4 Targets

Our overall market-based gross carbon dioxide equivalents amounted to 80,534 t CO<sub>2</sub>e (2023: 96,950 tCO<sub>2</sub>e, N-3).

Our actions have a positive impact on our targets set in in our Climate Strategy 2019-2025 (base year 2019) and in the Fenix Way, cardinal direction “Nature” (page 42).

Target	KPI	Status	Future action
Reduce Scope 1 and 2 by 40%	Reduction in %	72%, reached	Increase energy efficiency and improve forecasting for EACs sourcing
Reduce 50% in our net emissions per product produced (considering purchased goods and services and upstream transportation)	Reduction in % per product produced	-15% Not on track; target will most likely not be reached; absolute net emissions decreased by 37%.	Emphasize decoupling growth from emission strategies for upcoming climate strategy
100% renewable sourcing for purchased electricity	Renewable MWh / Total MWh	100%, reached	Embed renewable electricity sourcing via contractual instruments to be less dependent on forecasts
Optimize operations, facilities, offices and stores in line with energy consumption reduction targets – efficiency improvement 25% versus baseline year 2019	Overall energy consumption (in kWh) Use of energy/capita and per turnover	Overall: 1% increase Per capita: -17,5% Per net revenue (MEUR): -16% On track	Focus on energy efficiency

## 2.3 POLLUTION (E2)

### 2.3.1 Impacts, risks, and opportunities

#### 2.3.1.1 Impacts

During the reporting period, we were able to quantify our positive or negative potential impacts coming from pollution of air, water and soil to a certain extent. Our potential negative impacts come from our production processes and use of our products: chemical use in production, wastewater contamination, microfiber release during fabric manufacturing and washing at home, and fossil fuel consumption for transportation. There is no formal process to identify and assess pollution-related impacts except for chemical management.

However, we work together with our system partners and use standardized industry tools to track pollution-related impact and to stay up to date with latest developments:

- To measure pollutants from transportation we use industry-specific tools, e.g., EcoTransit and data provided by forwarders for other emissions than CO<sub>2</sub>e (NO<sub>x</sub>, SO<sub>2</sub>, NMHC, PM<sub>10</sub>).
- To track environmental performance of our supply chain we included certain environmental parameters into our HREDD scheme; in addition, we use Higg FEM from Worldly and in-house designed surveys.
- To understand and manage the number of microfibers released from our products, we are a member of The Microfiber Consortium and conduct shedding tests according to their standard. In addition, we do not intentionally add releasable microplastics to our products. We established a mandatory microfiber test for newly developed fleece fabrics and submit our test results to the Microfiber Consortium database.
- Throughout the year we are in close contact with the Chemicals Group, run by RISE, working closely with European experts and global third-party laboratories to identify current and future chemical-related risks.

<sup>1</sup> <https://app.ceezer.earth/share/portfolio/xw9fcmjn17>



### 2.3.1.2 Risks

Though we are not yet able to quantify pollution-related risks, we see the biggest risk coming from potential regulations on microfiber shedding and information disclosure as well as chemical spills in our production countries.

### 2.3.1.3 Opportunities

We are not able to identify any possible positive effect stemming from pollution that gives us the impression to gain from opportunities. We believe the biggest opportunity lies in applying the precautionary principle, avoiding pollution wherever possible to the greatest extent and staying ahead in terms of own safeguards.

### 2.3.2 Policies

Our main policy is the Fenix Outdoor Chemical Guideline, which is updated on a yearly basis.

Through the Fenix Outdoor Chemical Guideline, we mitigate negative impacts related to pollution of air, water and soil through strict chemical management and proactive environmental strategies. Our approach includes:

#### Air Pollution Mitigation:

- Restricting the use of volatile organic compounds (VOCs), chlorinated solvents and other hazardous air pollutants (HAPs) in production processes.
- Requiring compliance with the EU Industrial Emissions Directive (IED) and VOC Directive 1999/13/EC.
- Encouraging the adoption of water-based and less harmful alternatives in dyeing, printing and finishing processes.

#### Water Pollution Mitigation:

- Ensuring compliance with regulations such as REACH and the Stockholm Convention on Persistent Organic Pollutants (POPs).
- Prohibiting the use of hazardous substances such as Per- and Polyfluorinated Alkyl Substances (PFAS), heavy metals and azo dyes that degrade into carcinogenic arylamines.
- Mandating suppliers to conduct routine water quality testing and report compliance with wastewater treatment standards.

#### Soil Pollution Mitigation:

- Banning persistent and bio-accumulative chemicals, including certain pesticides, biocides and heavy metals, to prevent contamination of soil.
- Enforcing stringent chemical restrictions to ensure that substances classified as persistent, mobile and toxic (PMT) or very persistent and very bio-accumulative (vPvB) are not used in our supply chain.
- Adopting a precautionary principle, actively phasing out hazardous substances before legal mandates require it.

The latest version of the RSL can be accessed here: [https://www.fenix-outdoor.com/wp-content/uploads/2023/05/Chemical-Guideline\\_EN\\_Rev-7.0-Fenix-Outdoor.pdf](https://www.fenix-outdoor.com/wp-content/uploads/2023/05/Chemical-Guideline_EN_Rev-7.0-Fenix-Outdoor.pdf)

### 2.3.3 Actions

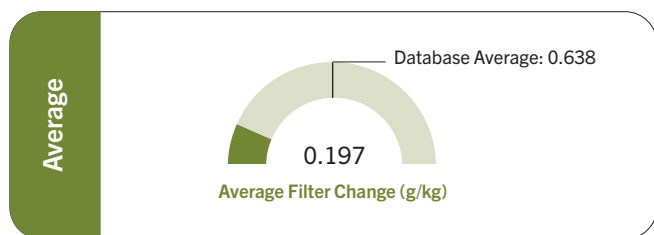
During 2024 we hosted the yearly supplier webinar linked to the launch of the updated 2024 version of the Chemicals Guideline. Our purpose was sharing background information regarding the added substances and support the chemicals management carried out by our suppliers. During the past year we have been sharing chemical topics, such as substances of concern, potential new regulations and other chemical-related topics of interest, in the Fenix Outdoor sus-

tainability newsletters for suppliers. These communication instruments have helped to increase transparency and make sure that both our business partners and our organization are able to proactively work toward safer and more sustainable products.

Even as PFAS remained a key focus area for the group in 2024, our attention shifted toward detecting and tracing BPS, which was added to California's Proposition 65 list in 2023. This intensified our efforts to monitor its presence in products and ensure compliance with regulatory requirements. The brands have requested suppliers to provide us with chemical test reports confirming compliance with our requirements and in addition to that, the brands have ordered more than 50 chemical tests on various materials to ensure compliance. When findings were detected the material team in each Fenix brand has followed up with the concerned business partner.

We have also further consolidated and streamlined the testing process for all textile brands under the Fenix Outdoor umbrella, including microfiber shedding tests according to the standard developed by The Microfibre Consortium (TMC) and deepened our collaboration with our third-party partner. The CSR team has also held several internal trainings on chemical-related topics such as newly implemented or updated test standards and future potential challenges. Due to the reorganization that took place in the beginning of 2024, the CSR team has formed a new working group, the Fenix Outdoor Chemical working group, with representatives from all Fenix brands. The purpose of this working group is to foster internal knowledge sharing and strengthen collaboration across all Fenix Outdoor brands in regard to chemical management.

Since microfiber shedding is a big and important topic and the choice of material highly affects the product's impact, we are happy to see that the average test results for Fenix materials are below the average of TMC fiber-shedding results. The fact that Fjällräven only tested high-risk materials such as brushed piles and fleeces during the last year and still had a lower average proves the high awareness in the team and among our suppliers.



An overview of our pollutants coming from transportation can be found in the annexed Table N-5.

### 2.3.4 Targets

Pollution-related targets of 2025 in our cardinal direction "nature" (Fenix Way, page 42):

Target	KPI	Status	Future action
Reduce the amount of toxic substances during the production processes to the greatest possible extent by 2025	No. of risk chemicals used	On track	Constant monitoring of legal and scientific developments



## 2.4 WATER AND MARINE RESOURCES (E3)

### 2.4.1 Impacts, risks, and opportunities

We are aware that the garment industry has a major impact on the planet's water basins, water quality and water scarcity, and we assume that our biggest negative impact comes from cultivation of natural fibers and fabric production (area of production and dyeing methods as well as finishing processes). We do not operate in water-risk areas, but an analysis we conducted in 2022 showed that part of our Asian fabric supply will most likely be affected by water stress in 2030 if climate change proceeds unmitigated. Our fabrics are mainly produced in China, Taiwan and Italy. According to the WRI Aqueduct Water Risk Filter, our Chinese mills and Italian tanneries could be affected by water stress by 2030. We see the risk of water stress, since our mills might compete with other water needs, e.g., for agriculture or food production. As more water-efficient or even waterless dyeing technologies arise, the risk could be mitigated in the future. Due to water stress, we see the risk of restricted or regulated access to fresh water due to competitive water use in the two regions. This can influence production and lead times. Interruptions in our supply chain can lead to more expensive transport modalities (e.g., air shipments) or penalties in case we cannot deliver end products in time. Lost revenue from products that do not make it to the market in time can have significant impact on revenue and thus cash flow along the value chain. Knowing that our own operations account for only a very small share of our overall water footprint, we estimated the amount of water withdrawn from our own and operated locations was 155,963 m<sup>3</sup> (2023: 62,256 m<sup>3</sup>). We received much more water data from our own operations in 2024 than we have in previous years, which is the main reason for the reported increase in usage between 2023 and 2024. The main purpose is for drinking, cooking and household use, although some operations have vast green spaces that require care, and some of our mega stores have pools and diving tubes for equipment testing. The water we withdraw is mainly drawn from the community supply (groundwater and surface water, e.g., in northern Finland, South Korea, China and the Czech Republic). Since the datasets for our operations were still fragmented in 2024, we added a 10% security surcharge. Although we are only able to quantify our water footprint in the supply chain on an incomplete level, we monitor water management practices of our supply chain partners via the Higg FEM and certain risk criteria. We strive for water-reducing technologies and use technologies such as solution dye and CO<sub>2</sub> dyeing.

Except for two Asian locations (Korea and Hong Kong), the effluents were collected in community sewers and treated at a public treatment plant. No toxic chemicals were released by our own operations into sewers or surface water bodies. The amount of water discharge was not precisely determined. We estimate that about 153,449 m<sup>3</sup> (2023: 51,319 m<sup>3</sup>) were released by our operations (toilets, washing, kitchens). In our own operations, we do not discharge any wastewater that requires chemical oxygen demand (COD) monitoring, nor do we handle or use halogenated absorbing organic compounds requiring AOX demand monitoring. Our wastewater is normal household wastewater.

### 2.4.2 Policies

There are no policies in place yet, since this was not a prioritized area of work so far.

### 2.4.3 Actions

Ongoing and completed mitigation measures in 2024 include:

- Encouraged reuse of water and rainwater capture.

- The search for new technologies with lower water impacts, e.g., in dyeing or tanning processes.
- In a couple of North American stores water audits and data collection exercises have been conducted to outline options for water savings.
- First draft of a guiding document for preferred dyeing technologies based on the Best Available Techniques Reference Document for the Textile industry.

### 2.4.4 Targets

Water-related targets in our cardinal direction "nature" (Fenix Way, page 42):

Target	KPI	Status	Future action
Significantly reduce the use of water including for chemical production of garment and finishing of fibers	Total water used	Not on track due to missing resources to track water consumption in dyeing processes properly	Establish a better process and data availability to measure water consumption in fabric production

## 2.5 BIODIVERSITY AND ECOSYSTEMS (E4)

### 2.5.1 Impacts, risks, and opportunities

We started to map our biodiversity impacts and risks with the WWF biodiversity risk filter regarding our own operations and production sites and will continue to work on our biodiversity strategy. Our business model mainly depends on the input of raw materials (natural and synthetic fibers), freshwater for fabric manufacturing and energy for all production stages. At the same time, our business purpose as an outdoor company depends heavily on the intactness of (wild) nature and the great outdoors, so we might be affected more than other companies by biodiversity loss.

Our own operations (offices, production) do not have a material impact on endangered species. Except for one location, all of them are in urban areas. Our warehouses are located near or adjacent to natural parks and national wildlife refuges. We started looking into the impacts this implies. Our transportation could have an impact on endangered species using biofuels coming from agricultural sources that increase land use change or through carrying invasive species with freight or outside the carrier (e.g., outside of container ships). With regard to biofuel, we adhere to the RED II criteria, which should ensure that biofuels are only generated from agricultural and food waste. In 2025 we will develop a policy on biofuel sourcing to ensure compliance for biofuels produced outside the EU. Since our forwarders operate in an international environment, we expect them to comply with national and local legislation and to implement measures needed to prevent illegal trade of endangered species, and to provide pest and invasive species control.

The first analysis assumes that our severest impact on biodiversity and deforestation derives from our raw material purchases. Our fiber sourcing aims for the most sustainable fibers, meaning we source organic or regenerative fibers. By this, we reduce the risk for land use change, freshwater ecosystem use and change, soil and water pollution, which could threaten livelihoods of species and ecosystems.

Main animal-based materials are leather, wool and down, whereas cotton accounts for most plant-based fibers. Metals and other inorganics make up most of our trim materials. As in the years before, we deliberately use recycled, organic and recyclable materials to decrease



our impact on land-use change and pesticide usage. The main guidance for animal derived fibers is our publicly available Animal Welfare Policy. Hanwag sources leather from well-known and traceable sources, and the hides come from inside Europe or from known farms. The impact on deforestation is assessed as low risk. All brands have brand-specific material targets that are aligned with our PFL. Additional analysis needs to be conducted further down the supply chain for other tiers, especially fiber origin at the farm level. The risks also need to be evaluated more closely and accounted for in the envisioned biodiversity strategy.

We encourage our entities to source certified recycled or more sustainable packaging options.

In general, we see an opportunity to reach more people through our business model and bring them out in nature. This will inspire them to value and protect nature. On the other hand, we can support biodiversity restoration by sourcing regenerative fibers, which will as well increase our resilience against pests compared with common agricultural practices (conventional or organic).

### 2.5.2 Policies

The scope of the policies covers all Fenix Outdoor entities, and they are updated if necessary. Policies that guide and support our biodiversity work are the following:

- Fenix Outdoor Animal Welfare Policy (outlining our expectations toward farm-level suppliers with regard to farming practices and animal treatment).
- Preferred fiber list for apparel brands (outlines more sustainable material solutions and helps us to measure sourcing progress of “more sustainable” materials, inspired by using leading industry benchmarks (e.g., Cascalé’s Higg Index Material Sustainability Index and Textile Exchange Preferred Fiber Matrix).
- For Globetrotter in 2024 a funding guideline related to Nature Bonus was established which defines funding objectives, requirements and processes.

### 2.5.3 Actions

Ongoing and completed mitigation measures in 2024 include:

- Fjällräven increased its share of certified and traceable wool to 100% and increased share of recycled polyamide by 28% to 78% compared with 2023.
- Frilufts (private label) successfully recertified according to the Responsible Down Standard (RDS).
- Royal Robbins brand recertification according to the responsible wool standard (RWS) and Global Recycling Standard (GRS).
- Royal Robbins met their goal of 80% recycled polyester by 2025, sourcing 83% recycled polyester in 2024.
- Royal Robbins exceeded their goal of 50% certified, traceable wool by 19%, RWS certified wool accounted for 100% of wool used.
- Fjällräven, Royal Robbins and Frilufts (private label) participated in the public available Textile Exchange’s Corporate Fiber & Materials Benchmark survey.
- Nature Bonus continued in 2024 and was applied by three of our five Frilufts Retailers. Nature Bonus is a funding model where 1% of members’ revenues are used to support civil-society-based climate, environmental and nature conservation projects. The goal is to support projects that protect, preserve and restore local nature.
- For our own operations and a set of suppliers we conducted a risk assessment with the help of the WWF Biodiversity Risk filter, and we started with a first pre-assessment of our German warehouse. The first assessment showed that the actual ecosystem sensitivity of the adjacent area is of middle value (5 out of 10, mainly Greenland).

### 2.5.4 Targets

Biodiversity-related targets of 2025 in our cardinal direction “Nature” (Fenix Way, page 42):

Target	KPI	Status	Future action
To support conservation projects and develop a biodiversity impact assessment process	No KPI at this stage	On track; several conservation projects supported via Nature Bonus scheme at Frilufts Retail; first biodiversity assessment started	Finalize assessments and come up with action points; finalize biodiversity strategy and establish respective policies
Ensure that animals used for products (leather, wool, down, etc.) are not maltreated and ensure this through a control and management mechanism; traceability for leather, wool, down	1. Policies and processes in place 2. No. of cases of animal maltreatment reported through auditing or whistleblowing: zero	On track. 1. Policy is in place. 2. Zero cases reported in 2024 <sup>1</sup>	-

<sup>1</sup> After the cut-off date for the reporting period allegations by PETA regarding Fjällräven’s wool sourcing surfaced. The case is still under investigation.

## 2.6 RESOURCE USE AND CIRCULAR ECONOMY (E5)

### 2.6.1 Impacts, risks and opportunities

#### 2.6.1.1 Impacts

Our main impacts on resource use and the circular economy come from our operations and current business model. While producing and selling products, we deplete resources through our raw material consumption for fabrics and packaging, and we generate waste during production, transport and warehousing, and for the end-customer once a product has reached its end of life. This not only affects natural resources but at the same time can impact biodiversity and climate change negatively. These overarching impacts can only be mitigated if we transition away from today’s more linear business model and if we manage to decouple resource consumption from economic growth. However, circular business models can also come with trade-offs on transportation or chemical treatments of the garments.

With regard to waste generation, cutting spill is generated during the assembly of our products and is the main source of waste in our upstream supply chain. Depending on the country the textile waste goes to downcycling or landfill. Improper landfilling can cause textile waste spill into the surrounding nature or leakage of landfill gas. Paper and plastics from packaging are most often recycled in our production countries as well, while hazardous waste handling falls under legal national requirements. Impacts created by third-party waste handling companies have not yet been investigated. To prevent textile scrap ending up in landfill or being burned, we conduct waste management trainings with our suppliers and involve them in training and implementation projects whenever possible, to achieve more than minimal compliance and closed loop waste management.

Most of the waste in our own operations is generated by inbound shipments and ends up in our warehouses and stores. In those locations, we work with local waste removal companies to recover and dispose of the waste.

### 2.6.1.2 Risks

After taking first steps toward a more circular economy, we identified a couple of risks that could affect a successful and fast adaptation and upscaling:

- Increased demand for recycled and renewable fibers can lead to shortages in availability or higher prices.
- Traceability efforts need to increase to ensure that recycled and renewable materials comply with legal and company requirements, which will increase testing and internal costs.
- Increased penalties in case of regulatory breach.
- Unfavorable tax schemes.
- Reputational damage if circular services and products do not hold up to our high-quality standards.

### 2.6.1.3 Opportunities

In contrast, we also see opportunities to promote the circular economy:

- Strong market position as early adopter of fiber innovations and one-stop shop for innovative products.
- Open up to new customer base and increase revenue from circular business models.
- Strengthen customer interaction and drive traffic to our stores and website with positive side offerings beyond the regular assortment
- Reduce virgin material use, e.g., by refurbishing and reusing the old store interior.
- Close the loop within our own value chain and have full control over resource inflow.
- Decrease packaging volumes and global transportation flows by more localized operations.
- Use circular economy principles (recyclability, durability, reparability) as design guidance for our product development.

### 2.6.2 Policies

The scope of the policies covers all Fenix Outdoor entities if applicable, and they are updated if necessary. Our policies that target resource use and circular economy are:

- Interior Design Guideline for Frilufts Retail Stores
- Preferred Fiber List

### 2.6.3 Actions

To manage potential negative impacts and risks coming from our fibers, we have classified the main textile fibers we use into our own PFL consisting of four categories: excellent, good, OK if crucial and “do not use.” Using a preferred fiber, such as certified organic cotton, regenerative wool or certified man-made cellulosic fiber, is classified as excellent or good. Based on the 2024 fiber consumption for the Fenix Outdoor textile brands (Fjällräven, Frilufts-private label, Royal Robbins, Tierra) we are at a level of more than 77% of preferred textile fibers from the fiber types we have classified (2023: 70%). The main driver behind the increase is the ongoing shift to recycled nylon by Fjällräven as well as the increased adoption of recycled polyester and Lyocell by Royal Robbins. The share of more recycled materials is at 36% (2023: 27%).

Our inflow materials from the production of goods and consumption of stationary and sanitary articles (which includes office supplies and the like) are shown in Table N-6 and N-7.

Ongoing and completed mitigation measures on resource use and waste management in 2024 include:

- Running a pilot with a new traceability system to gain insights into supply chain of sustainable materials such as organic cotton

and recycled polyester which led to signing of an agreement with the system provider for 2025 until 2027.

- Increasing the recyclability of our receipts in North America, we introduced EcoChit Receipt Paper. EcoChit is BPA and BPS-free and is 100% recyclable. This means that we enable our customers to send less paper to the landfill as a company and also do not unnecessarily use potentially harmful chemicals.
- In the United States, diverting 2.72 tons of soft plastics, mostly polybags and shrink wrap from our stores and warehouse, from the landfill to responsible recycling through EcoCycle. EcoCycle is a local recycler in Boulder County, Colorado, USA, specializing in hard-to-recycle items. They work with Trex to recycle soft plastics into composite decking.
- Due to the operational challenges we encountered during our small-scale test, we decided to restart our polybag-free project with a global, end-to-end process perspective. This project will kick off in 2025 and will entail work streams from each business unit within Fenix Outdoor. However, we already have some established products being shipped successfully and without negative impact on our operations or sales without individual polybags. We found that Frilufts (private label) already shipped about 311,305 items (socks and hard goods; 2023: 118,000 items) without individual polybags to our warehouse in Ludwigslust. Royal Robbins continued to ship selected styles sold in Europe without individual polybags. In 2024 the program covered seven styles, shipping 47,239 items roll-packed (2023: 15,700 items).
- Two additional factories in Vietnam were trained on good waste management practices by our Social Compliance Auditor (23 in total since 2022), representing 75% of our Vietnamese Tier 1 factories. To deepen the understanding of the local context and foster implementation, 10 facilities joined the GIZ “Waste No More II Program” in Vietnam in 2024. The focus was on best practice sharing, connecting with waste contractors and recyclers. We will also broaden the conversation with our suppliers outside Vietnam.

To help customers to take care of unwanted or dysfunctional clothes or to prolong a product’s lifetime whenever possible, we established a couple of circular business models. We offer repair and care services through all major Frilufts Retail companies in our own repair centers in Sweden, Germany and our North American brand stores. In other regions we partner with external repair specialists. Since 2021 Globetrotter started buying and selling used equipment in all stores, and since 2022 another important milestone has been reached: Globetrotter customers can buy and sell used outdoor equipment online at [secondhand.globetrotter.de](https://secondhand.globetrotter.de). In 2024 we were able to develop and grow our offering of secondhand items in our stores and online, improve our care and repair services, improve the handling of claims and thus reduce the volume of product waste.

In addition, the Frilufts Retailers (except Trekitt) offered customers the rental of outdoor products through their store network. However, Globetrotter still is the only one so far to allow customers to also rent products directly online.

Ongoing and completed mitigation measures on circular economy in 2024 include:

- Around 19,089 pairs of Hanwag shoes were resoled in 2024 (2023: 17,818) at our factory in Vierkirchen, Germany, and our partner factory in Croatia.
- At Frilufts Retail the total amount of products cared or repaired was 43,041. After a strong increase in the year before, we saw



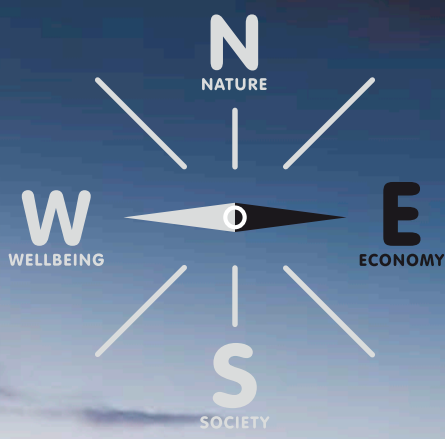
a decrease of 11% compared with last year. Looking at Globe-trotter the number of products serviced, either maintained or repaired, to prolong the lifetime of products increased by 16%.

- Another record year related to secondhand: In total 45,977 secondhand products were sold, up 94% from the previous year. With this, the secondhand model within Friluft's Retail continues to expand.
- In September 2024, Fjällräven launched Pre-Loved in the United States, a branded resale site that allows customers to buy and sell used Fjällräven products. The goal of the site is to extend the life of Fjällräven products, thereby reducing their impact. Already in 2024, 925 items were sold through the Pre-Loved site.
- At Friluft's Retail our final product and end of life solution is I:Collect. In 2024 the total take-back volume was 4.8 tons (up 14% from the previous year) and entered the I:Collect recycling stream. I:Collect follows the waste hierarchy approach. The aim is to uphold a high level of reuse and increase textile-to-textile recycling.

#### 2.6.4 Targets

Resource and circular economy-related targets of 2025 in our cardinal direction "Nature" (Fenix Way, page 42):

Target	KPI	Status	Future action
Develop and implement a recycling strategy; pilot projects for "cradle-to-cradle"; search for alternative or recycled materials	No. of projects running	Two projects completed, one in preparation – needs attention	To identify the right partners in our value chain, monitoring legal developments
Improve the eco-profile of materials used: 90% shall be labeled as "preferred" (e.g., organic, ecological, biodegradable, nontoxic)	% of preferred fibers according to PFL	77%, on track	
Develop an own eco-label to certify for products, sold in Fenix retail stores	Label applied	Achieved; A Greener Choice is adopted in all 5 retail entities	Make AGC standard future fit with regard to upcoming EU legislation
Monitor, analyze and reduce the discharge of waste with particular attention to hazardous waste; packaging reduction project - Reduction of 90% of single-use materials versus baseline year 2020. All remaining waste categories: minimum 90% in recycling systems (where possible); packaging reduction of 50%	Volumes per waste category. develop waste reduction program	Not on track; See Table N-8	





# 3. Economy and Governance (ESRS G1, S4)

In order not to duplicate efforts, we refer to the annual report for economic figures, in particular to the tables in the management report.

## 3.1 GOVERNANCE FRAMEWORK (ESRS 2)

Our corporate governance framework is designed to ensure transparency, accountability and ethical decision-making. It aligns with the principles of the Corporate Sustainability Reporting Directive (CSRD) and integrates best practices from the European Sustainability Reporting Standards (ESRS). Our governance structure includes:

- A Board of Directors responsible for oversight of sustainability policies and risk management.
- An Executive Leadership Team ensuring the implementation of sustainability initiatives.

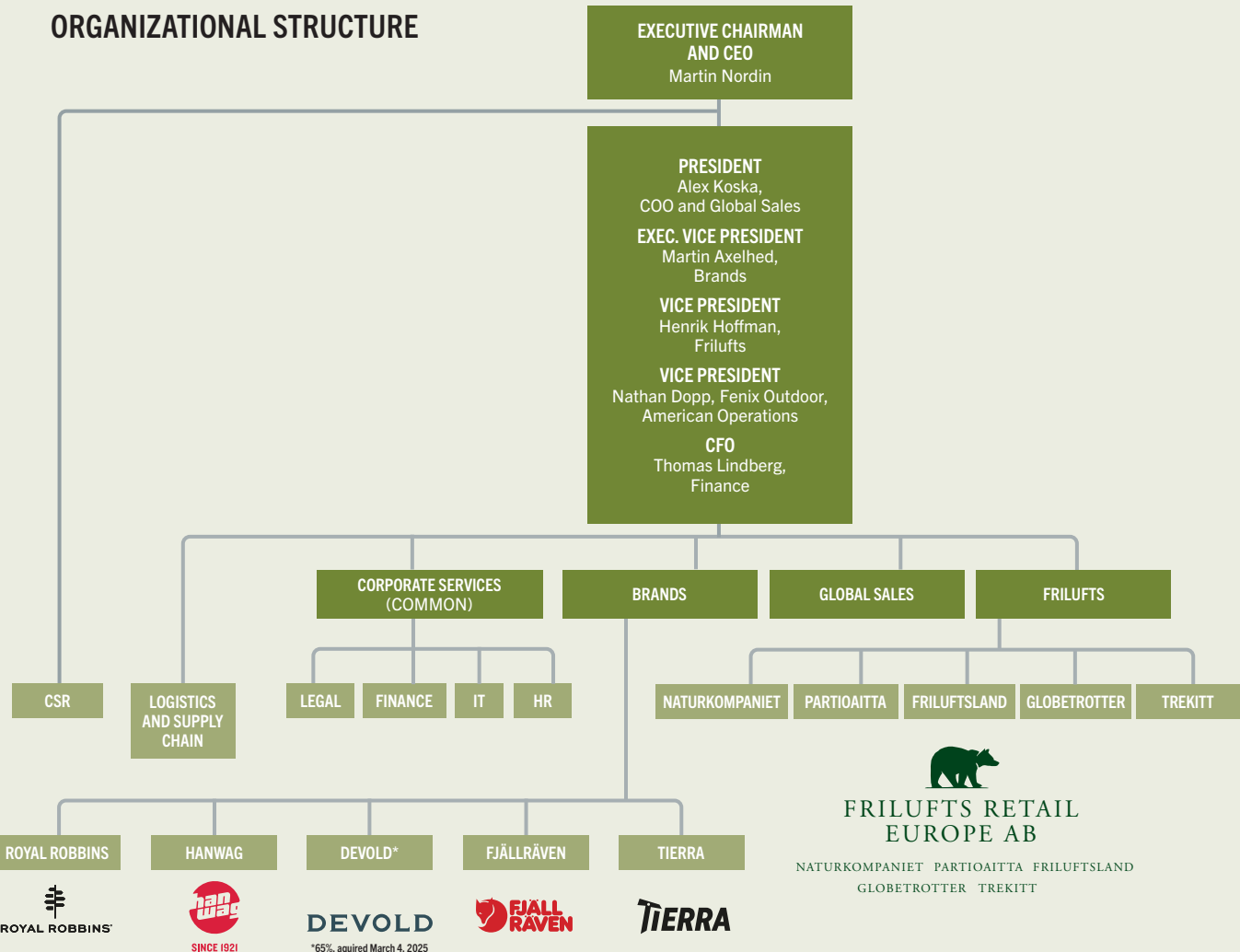
The oversight of the implementation and the progress made toward the goals of the sustainability strategy is an ongoing process at Fenix Outdoor and is executed by the Chairman of the Board

and CEO of the company. Twice a year, during our internal seasonal brands kick-off meetings, the CSO and his team update all participating employees on the progress made toward our sustainability goals. In 2024 this was done both in person and digitally. The hybrid version of the kick-off enables us to reach virtually the whole Fenix Outdoor organization, allowing for a wider spread of the messages and enhanced information flows. On emerging issues, we deliver information on an ad hoc basis directly to the affected departments and employees.

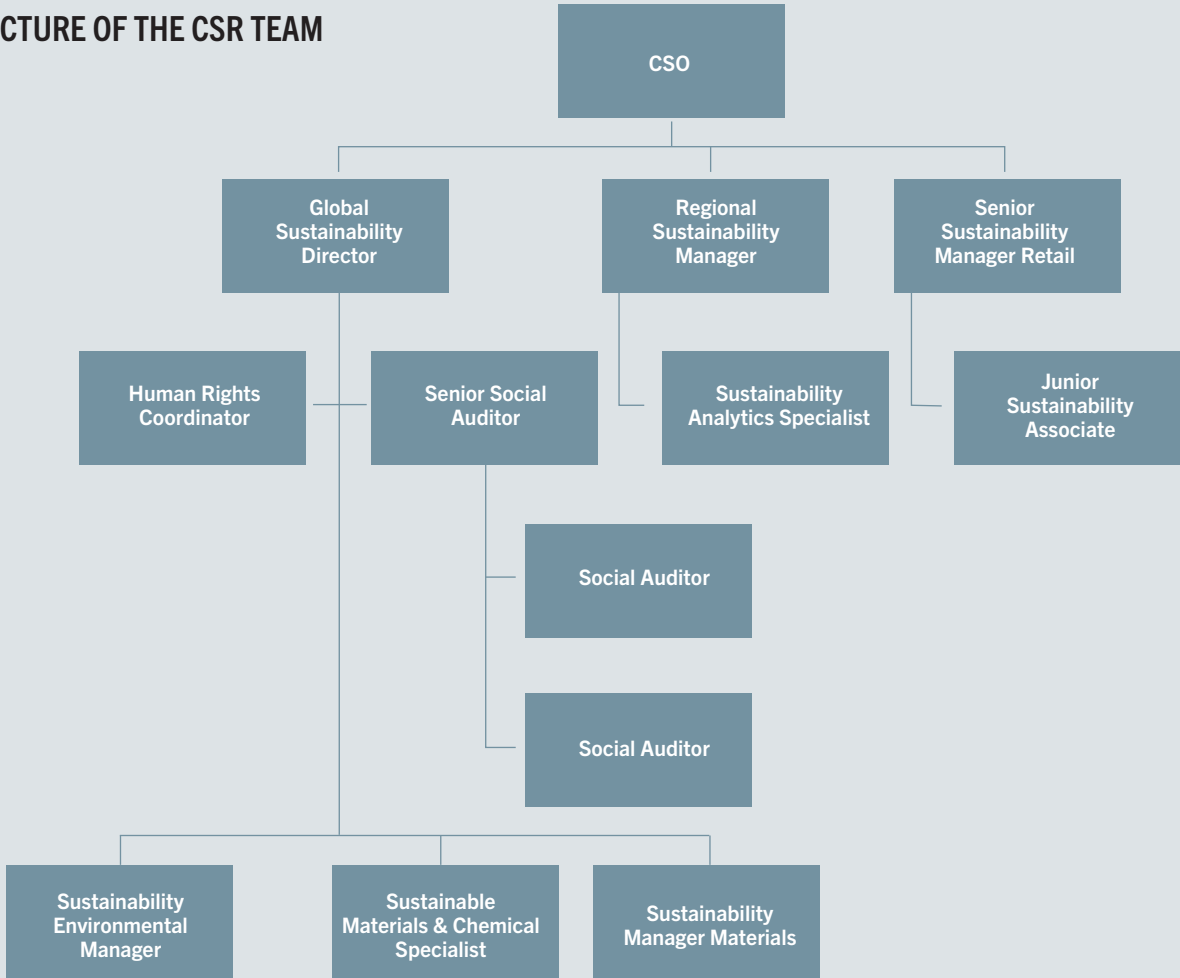
The CSO delivers a Sustainability Summary Report and the CCO delivers a Compliance Report once a year to the Board.

The CSO/CCO is entrusted with the implementation and communication of the sustainability and compliance strategy and goals within Fenix Outdoor. He is also head of the central CSR Department and the decentralized CSR team in the Friluft's Retail Europe organization.

## ORGANIZATIONAL STRUCTURE



## STRUCTURE OF THE CSR TEAM



Apart from annual briefings at the internal kick-offs, we also use other means of corporate communication such as general e-mails, an internal Sustainability site as an information resource, in-person as well as online training. Once a year we dedicate a whole month to Sustainability in our internal communication channels. We have also introduced a little monthly interview nugget, called “A Cup of CSR,” which featured 10-minute sustainability interviews with various representatives from the whole organization. The CSR reporting software, through which we collect information and data for the annual CSR Report in accordance with the Swiss Ordinance Art. 963ff and the EU CSRD/ESRS requirements, was changed in 2024. We now use the Novisto/Minimum suite which allows for more analytics and audit trails.

### 3.2 ETHICAL BUSINESS CONDUCT

Adhering to laws and regulations is central to how we conduct our business. We require compliance with our Code of Conduct (CoC), and we try to ensure that our employees and business partners share the same understanding of compliant behavior and business dealings. We introduced a compliance management system in 2012, and we are continuously improving and developing this system. The Fenix Outdoor CMS concept complies with the main prevailing standards, namely IDW PS 980 and ISO 19600. We are committed to conducting business with integrity and in compliance with all appli-

cable laws and regulations. Our Code of Conduct and Ethics outlines key principles, including:

- Anti-bribery and anti-corruption measures.
- Fair competition and market practices.
- Confidentiality and data protection policies.
- Responsible supply chain management.

Our Code of Conduct is embedded in “The Fenix Way”; a more specific Code of Conduct for suppliers has been updated and is published on our website available in various languages. All employees receive mandatory training on ethical business practices, and we have established a whistleblower mechanism to report any violations.

In 2024, we continued to operate the whistleblowing hotline in accordance with EU Directive 2019/1937. Through the “Ethicspoint hotline” anyone can raise concerns about and to Fenix Outdoor without disclosing their name or contact information. However, a dialogue function allows for interaction between the investigation team and the whistleblower. The hotline can be used in different languages such as Vietnamese, English and German and was communicated to internal staff and external stakeholders. We are also compliant with the national provisions in Sweden and Germany, for example, and encourage our employees to also use the governmental whistleblowing provisions if they feel they are not getting the appropriate attention through internal channels when it comes to breaches of laws.



Following the Compliance Guidelines, the Chief Compliance Officer (CCO) submitted his annual report to the board of Fenix Outdoor International AG in April 2024. As part of the compliance system, all managers of the Fenix Outdoor group are obliged to sign and declare on an annual basis that they are following the compliance rules and that their staff members are aware of the system. For 2024 a total of 38 (47) declarations were received (27 in 2023).

Compliance in Fenix Outdoor is not only a result of the ethical principles mapped out in the Fenix Way and other internal documents, it reflects also the owners' will to systematize the handling of ethical and legal matters. In 2024, the number of cases directly reported to the CSO significantly declined over 2023. In particular, the Whistleblowing Hotline was used less frequently. The number of reports received were 21, including chemical tests failing in 2024. Relevant complaints mainly focused on HR administration matters and two harassment cases were reported. Nonetheless, in 2024 we did not receive any complaints or hints through our Whistleblowing tool from our supply chain and business partners or other members of the public that identified any breach of EU laws or alike. However, some allegations and complaints were received in the US and through direct contacts with the Compliance and CSR Team. The cases we received are listed in Table E-1.

### 3.3 RISK MANAGEMENT AND INTERNAL CONTROLS

Risk management is an integral part of our governance strategy. We have a structured risk assessment framework that identifies, evaluates and mitigates potential risks related to financial, operational and sustainability concerns. Key elements of our internal controls include:

- Regular audits and compliance reviews in the upstream value chain and our own operations.
- Clear policies for risk assessment and mitigation as part of the compliance system.
- Cybersecurity and data protection measures to safeguard stakeholder information.

### 3.4 COMPLIANCE WITH REGULATORY REQUIREMENTS

Our organization ensures compliance with relevant national and international laws, including EU directives, environmental regulations and labor standards. We have internal compliance monitoring through the different departments and work cross-sectorally to ensure that we are aware of regulatory changes and ensure alignment with all applicable laws, in particular:

- The Corporate Sustainability Reporting Directive (CSRD).
- The General Data Protection Regulation (GDPR).
- German Supply Chain Due Diligence Law (LkSG).
- Occupational health and safety regulations.
- Financial and tax compliance requirements.
- Labeling and product safety regulations.
- Antitrust and unfair competition regulations.
- Carbon Border Adjustment Mechanism (CBAM).
- The EU Deforestation Regulation (EUDR).
- The Extended Producers Responsibility regulations (EPR).
- Packaging Directive
- Waste Regulations

### 3.5 ANTI-CORRUPTION

Since 2012 Fenix Outdoor has an elaborate Compliance program. The embedded Anti-Corruption Guideline describes the processes and behavioral requirements to prevent corruption in/with Fenix Outdoor. We enforce a zero-tolerance policy for corruption and unethical behavior. Our anti-corruption framework includes:

- Strict guidelines on gifts, donations and conflicts of interest.

- A whistleblower protection program ensuring anonymity and protection from retaliation.
- Regular internal training and external advice to uphold transparency and compliance.

Among other things we have a strict prohibition on offering gifts or benefits to government officials and a gifts and benefits policy for business dealings. All offerings of entertainment invitations, gifts and benefits need approval from the Compliance Office.

### 3.6 BOARD OVERSIGHT AND ESG INTEGRATION

The Chairman of the Board of Directors plays a key role in overseeing our ESG strategies and integrating them across all business functions. ESG considerations are embedded in our decision-making processes, with regular assessments of sustainability performance and goal alignment with international standards.

### 3.7 TAXONOMY

#### 3.7.1 Eligible Activities

Some of Fenix Outdoor's business activities are EU Taxonomy eligible:

- Operation of charging infrastructure for electric vehicles.
- Secondhand offerings.
- Care and repair services.
- Rental services.

In 2024 we invested 17,500 € in charging stations (CAPEX) and had 850 € (OPEX) maintenance costs.

Our turnover with rental services amounted to 106,538 €, Care and Repair 1,440,180 € and Secondhand offerings 2,124,205 €. In the U.S. we achieved a turnover in secondhand of 37,800 €, with an OPEX of 2,670 € in a three-month period. Our Care and Repair activities in North America just began to offer pay-for services in 2024. We took in about 14,000 pieces but a financial figure cannot be established. OPEX and CAPEX could not be established as the accounting system so far has not been able to distinguish them from other cost elements.

Operational costs for the CSR team and projects, which can be distinctly attributed to sustainability efforts, amounted to 1.7 million € in 2024.

#### 3.7.2 Aligned Activities

No activities were Taxonomy aligned.

### 3.8 DONATIONS AND SPONSORSHIP

In 2024 we gave back to society in donations of about 970,000 € and gave out goods and financial support in sponsorship agreements of about 201,000 €.

### 3.9 A GREENER CHOICE

A Greener Choice continued in 2024 to be our standard to evaluate the sustainability performance of products and to communicate qualifying products to customers. We sold 1,725,262 "A Greener Choice" products (2023: 1,938,176; 2022: 1,797,998).

Total<sup>1</sup> net sales with A Greener Choice amounted to 108,140,699 € and therefore A Greener Choice continues to represent a substantial part of total net sales. We engage in the industry initiative Sustainability Data Exchange Project to support efficiency in the data exchange between brands and retailers and in 2024 we have been able to utilize some SDEX data for A Greener Choice. To be able to meet the EU's Empowering Consumers Directive and the Green Claim Directive we created a manual for A Greener Choice evaluation and communication, and we will take further preparatory steps in 2025.

<sup>1</sup> not included: Trekitt and Friluftisland data as this information could not be extracted from the systems. A new ERP platform will help change that in the future. The amounts, however, may not alter the picture given in any significant way.

### 3.10 THE FENIX OUTDOOR PRODUCT EXAMPLES 2024 WITH A SUSTAINABILITY FOCUS

#### 3.10.1 Hanwag : Bever Gritstone II GTX, made with leftover materials

In 2024, Hanwag collaborated on a special project with Bever, a major outdoor retailer in the Netherlands and one of Hanwag's most important retail partners. Bever places great emphasis on sustainability and circularity – not only in the products they sell but also throughout the entire company. For example, they are currently building a new headquarters in Pijnacker, designed to be as environmentally friendly as possible. In November 2024, they reopened one of their stores in Utrecht, which, according to Bever's CEO Albert Scholte, is the most circular store in the world. All newly sold products in this store are sustainably produced. Additionally, they offer a wide selection of "tweede kansjes" (secondhand products). To celebrate the reopening of this unique store, the Hanwag Benelux team came up with the idea of creating a special edition of the popular Hanwag Gritstone II GTX, made entirely from leftover materials – specifically, a beautiful mix of surplus colored leather. This exclusive version of the Gritstone II

GTX is available only in Utrecht. According to the store's sales staff, customers from all over the country are traveling to purchase this special and sustainable edition. A great and successful example of upcycling and reusing leftover materials!



#### 3.10.2 Fjällräven: Samlaren continued: The Samlaren Field repair kit

Fjällräven is working hard to create durable and easily repairable products as part of the company's commitment to sustainability.

The Samlaren field repair kit is part of this mission. It is a first aid kit for everyone's gear – made to inspire and encourage people to repair rather than replace their outdoor equipment. Samlaren field repair is made from leftover fabric and has several essential items and space to add more so one will have what one needs to repair gear mid adventure.

It contains essential items for easy repairs out in the field, such as static cord for multi-functional repairs, tension strap with hook, tension locks, replaceable buckles G1000 fabric swatches and a gear aid to patch up the down jacket or sleeping bag. With this item Fjällräven continues its circularity journey – not only by offering a nice piece from leftover materials but also to enable customers to repair their gear themselves. It is another step toward longevity and reparability.







### 3.10.3 Tierra: Tolpa Jacket

Tolpa is a high-performance, sustainable shell jacket designed for year-round adventures. Made with Gore-Tex ePE, it offers durability, weather protection and breathability while remaining light and comfortable with its C-Knit lining.

Sustainability is at its core: 100% recycled polyester, made with material that underwent GRS and bluesign scrutiny, and is made without per- and polyfluorinated alkylic substances (PFAS). The solution-dyed lining reduces environmental impact during production, and thoughtful design ensures versatility across activities like skiing, climbing and paddling. With an adjustable hood, ventilation zippers and smart pockets, Tolpa is built for both performance and the planet.

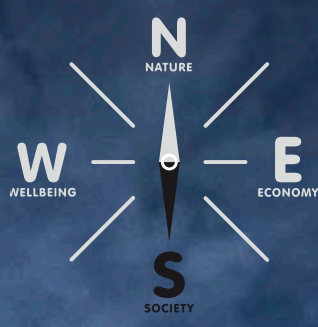


### 3.10.4 Frilufts: Villarrica socks

The Frilufts Villarrica socks are one of the bestsellers in the Frilufts assortment. The socks are made from 58% merino wool. The wool is certified by the NATIVA™ protocol. The certification covers the areas of animal welfare, land and environmental management as well as corporate social responsibility.

The socks also qualify as A Greener Choice product in the Frilufts Retail business by using over 30% more preferred natural materials, responsible chemical management, improved ecological footprint through use of over 50% lower-impact materials, production in a factory with a high social audit rating and production and knitting made in Europe.







## 4. Society (ESRS S2): Workers in the value chain

### 4.1 MATERIAL IMPACTS, RISKS AND OPPORTUNITIES INCLUDING PROCESS

As an outdoor company that takes responsibility very seriously, we are committed to ethical purchasing, sourcing and production; to respecting human rights and the environment we operate in and promoting the dignity of all those who contribute to our business; and most importantly to reducing the negative impact we create through our business.

We have assessed our global supply chain and found that workers in the value chain are in focus to drive change and reduce negative impact by promoting fair labor, decent work (supporting our defined SDGs No. 5, 8, and 10) and to enhance workers' rights (SDG No. 4). The governance of our positive and/or negative impact on our value chain is supported by several tools, internal and external policies, monitored by the social compliance staff, the human rights coordinator and the Human Rights Officer of the Fenix Outdoor Group, and actively embedded and driven by internal sourcing and material, purchasing and product development teams of each brand. The social compliance audits are conducted by our own team of three social auditors which is complemented outside of China and Vietnam and supported by a third-party service-partner, Lloyds Register Quality Assurance (LRQA). As mentioned in previous reports, we support the approach of SLCP (self-assessments powered by Social Labor Convergence Project) to share social audits by using a common framework for the industry and by reducing audit fatigue and costs working in collaboration with other brands. The SLCP was established within the context of the Global Framework Agreement of the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guideline for Multinational Enterprises to respect human rights. It covers therefore the key human right risks as outlined in the OECD Guidance.

The governance of our positive and/or negative impact on our value chain related to Friluft Retail takes a similar stance and is in line with the most important Global Framework Agreements such as the United Nations Universal Declaration of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights to Work. The tools, policies, processes and actions are specifically tailored to the characteristics of retail business, while the Human Rights Officer for Globetrotter oversees human rights due diligence.

We at Fenix Outdoor strongly agree that safe and fair working conditions shall be the standard, not the exception. That is why we became a member in 2013 and have been an accredited member of the multistakeholder organization Fair Labor Association (FLA) since 2018<sup>1</sup>. Our affiliation at the FLA supports us advancing our

Human Rights and Environmental Due Diligence (HREDD) risk management approach constantly to (new and upcoming) requirements such as the German Supply Chain Due Diligence Act ("Lieferkettensorgfaltspflichtengesetz / LkSG"), the Ordinance on the due diligence and transparency duties of Swiss companies with respect to minerals and metals from conflict zones and child labor (DDTrO) and/or the EU Corporate Sustainability Due Diligence Directive (CSDDD). To be compliant and go beyond, we constantly adapt our HREDD risk management according to new requirements.

Fenix Outdoor, its brands and retail are therefore committed to identifying, assessing and managing material impacts, risks and opportunities related to workers in our value chains. This process is aligned with ESRS S2 requirements and follows a structured approach based on due diligence, stakeholder engagement and risk analysis frameworks.

#### 4.1.1 Impacts

Through our double materiality analysis, we systematically reassess actual and potential positive and negative impacts on value chain workers, considering ESRS sub-topics on working conditions, equal treatment and opportunities for all and other work-related rights such as:

- Labor rights and working conditions such as wages, working hours, occupational health and safety.
- Living wages and fair compensation by ensuring suppliers and partners provide adequate compensation.
- Social protections and benefits, for example having access to healthcare, paid leave and insurance.
- Human rights and responsible sourcing with topics such as forced and/or child labor, discrimination and freedom of association.
- Grievance mechanisms and worker representation: Availability of secure channels for reporting concerns.
- Environmental risks that might occur due to climate change.

We assess these possible impacts through our due diligence processes which include:

- Supply Chain Mapping and ESG-risk profiling including data from our third-party system partner LRQA with EiQ<sup>2</sup>: Evaluating currently Tier 1 and Tier 2 suppliers, if data is available.
- Conducting and/or monitoring second- or third-party audits or verified assessments such as SLCP to prevent or mitigate possible ESG risks.
- Grievance data analysis: Identifying patterns from possible worker complaints and concerns. Incoming grievances are handled confidentially and with high priority. Find the process description [here](#).



<sup>1</sup> The FLA promotes human rights at work. It is an international network of companies, universities and civil society organizations collaborating to ensure that millions of people working at the world's factories and farms are paid fairly and protected from risks to their health, safety and well-being.

The FLA Accreditation is a rigorous, multi-year process, based on five milestones, that evaluates a company's systems to improve labor conditions in its Tier 1 and owned manufacturers. Each milestone represents key building blocks of an effective social compliance program that improves working conditions and worker well-being. Member companies are expected to maintain and update social compliance programs as FLA standards are updated.

<sup>2</sup> EiQ is a so-called end-to-end supply chain ESG due diligence platform, which allows us to map HREDD issues on country level – even zoom in on provinces and specific product categories. This system gives us the possibility to screen the severity of risks on country level and therefore the most negative impacts for the workers. The database is updated annually.

- Stakeholder engagement: Direct feedback from our suppliers, or value chain workers reaching us through our grievance channel or through our own local staff, or the WE program – our current dialogue program we partnered up with – and other possible channels through NGOs or the like. Not part of the enumeration. We have identified the following impact for workers in our value chain through our materiality analysis:
- Excessive overtime due to short-notice changes or order placements
- Lack of work due to cancellations
- Unfair payment practices due to price pressure
- Subcontracting due to capacity shortages in a supplier (planning).

We are also aware of several risks and human rights violations due to sub-developed standards in some countries regarding workplace safety, a healthy workplace and recruiting practices. We know about certain practices in one country that may be seen as “forced” or “bonded labor” practices such as the recruitment, treatment and payment of migrant workers.

#### 4.1.2 Risks

To measure the impact, Fenix Brands and Frilufts Retail conduct regular ESG due diligence including risk assessments to identify and evaluate the adverse impact. For that, we use a variety of tools to cease, prevent or mitigate possible ESG risks:

- Country risk screening: We run regular internal screenings of risks in the production countries where we as well as our partners are manufacturing by analyzing different criteria (e.g., ESG risks, corruption, etc.).
- Results of HREDD-audits and verified assessments which we cluster in different grades (A and B are preferred, C is acceptable but needs remediation, D is not acceptable and signals an urgent need to remediate or stop the partnership).
- Internal risk assessments per brand by using factors such as the purchased volume (FOB), order quantities, EiQ country risk score and HREDD audit results.
- Event-related risk assessment for retail brands according to LkSG risk categories: type and scope of business activity, ability to influence the direct cause and our contribution to the potential cause, severity and probability of human rights violation.
- Sustainability scorecard results on facilities of Tier 1 supplier.
- Wage documentation received and filled out by our Tier 1 supplier.

We use the following tools to measure those risks:

- Risk scores including environmental impacts from EiQ and other internationally recognized parties.
- HREDD audit or verified assessment results, remediation efforts, feedback from the local WE team facilitator.
- Internal ESG risk assessments and sustainability scorecard on Tier 1 factory level build into our PLM-system.
- FLA wage dashboard.
- Internal systems and external resources such as industry reports and statements, news, benchmarks, etc.

Here is one example of a case from 2024:

We conducted a verified SLCP at one of our supplier factories in Southeast Asia which exposed internal harassment and unfair working practices. This high risk for workers was handled with great care by including our partner, the WE program, who set up dialogues with affected workers and the factory management. The risks could therefore be lowered and the working conditions stabilized again.

The identified extreme risks for workers in the value chain of Fenix Brands in 2024 are presented in table S-3 and S-4.

#### 4.1.3 Opportunities

Fenix Outdoor actively pursues opportunities to enhance worker well-being and drive sustainable value creation in our supply chain.

Frilufts Retail strives to have 100% of all vendors, which in this case are known reputable brands, explicitly committed to our human rights requirements, as well as other ESG requirements. By making ESG parameters a contractual obligation and by engaging with partners on these provisions, there is great opportunity to align forces toward promoting worker welfare and to facilitate sustainable value creation across our supply chain and industry. Upon analyzing our retail portfolio, we observed that not all partners are yet involved in preferred multi-stakeholder initiatives such as the FLA or FWE. This presents a significant opportunity: Joining such initiatives can enhance social management and HREDD by offering structured frameworks, tools and guidance to identify and mitigate human rights risks in supply chains. Participation can also enable these partners to align with international labor standards, strengthen internal policies and proactively manage social risks for improved compliance and impact. Additionally, our internal ESG brand performance check serves not only as an internal risk assessment tool but also provides brands with valuable insights into potential areas for improvement. We therefore share these results and offer guidance on how to address these opportunities for growth.

Looking at the Fenix brands, one opportunity is driving capacity training and enhancing worker engagement in the value chain of Fenix brands. That is why we started proactively to engage with the WE program by selecting two strategic Tier-1 suppliers in Vietnam.

In addition to that, we continued analyzing worker wages to mea-

## Fostering Meaningful Dialogue:

In 2024 Fenix Outdoor kicked off with the WE program to improve working conditions in our supply chains. WE believe the key to improvement lies in dialogue between all the parties involved to change relationships and ways of working in a way that protects human rights.

The WE program is a dialogue-based program that runs in factories all over the world. During their factory visits the WE facilitators design sessions on human rights enhancement, creating a safe space to generate dialogue with management and workers. They come together to hold courageous conversations on human rights in their factories, and together they come up with solutions to improve working conditions.

The WE program works with self-sustaining local teams, who understand the complex realities on the ground deeply. Huan Nguyen Doan and Khuyen Nguyen are facilitators for the WE program in Vietnam. In the factories they work with a factory WE team consisting of workers and managers. We talked with them about their first year with Fenix Outdoor:

#### Where was your main focus when the WE program started in the factories?

**Khuyen:** “Our main focus was to build up a trustful relationship with the management and to ensure that we had workers in the room during our WE sessions. Both these goals caused some tension initially. During our first management meeting, we noticed there was this feeling that we came on behalf of the brand to check on them. People were not open to share. We were told everything was fine and there were no topics to have dialogue on.



sure the living wage gaps by using available benchmarks such as the Global Living Wage Coalition (GLWC). These results are embraced by our internal purchasing teams which use the data to negotiate and calculate order prices with the respected supplier to ensure fair wages to value chain workers. Find the results in table S-5.

Next to that, we engage in multi-stakeholder organizations by staying an accredited member of the Fair Labor Association since 2018 and engage with NGOs regarding ethical labor practices.

Climate change is always on our mind. Therefore, we invest in different collaborative programs to support our supply chain partners to transform to a more environmentally friendly future. More details are explained in the previous chapter Nature.

We constantly monitor and improve our due diligence approach by tracking the number of HREDD assessments we have conducted (view tables S-1 and S-2); the number of reported labor rights violations and their resolved cases; and the feedback we receive from programs such as the WE program.

## 4.2 POLICIES

The commitment through our internal management instruments – the Fenix Way Management Compass® – and our alignment with international principles such as the UNGC, the UNGPs, the OECD Guidelines for Multinational Enterprises, as well as the UN SDGs, which ensures that our human rights understanding extends to all individuals who are impacted by Fenix Outdoor including colleagues, customers, suppliers, workers within our supply chains, and the communities in which we operate.

Fenix Outdoor brands are obliged to use one aligned due diligence

process when it comes to protecting human rights, and responsibilities for the environment in the supply chain are determined in the internal Corporate Fenix Outdoor Due Diligence Policy. This also applies to the Frilufts Retail operations.

As part of the due diligence, our suppliers must sign our publicly shared Supplier Code of Conduct (CoC), which is well aligned with the benchmark of the FLA and is available in different languages. In 2024, our updated CoC was sent to and signed by almost all our direct and nominated indirect suppliers.

Fenix Outdoor has a strict internal policy about its production countries. Before entering a new country, we investigate different parameters around corruption, human rights (including forced and/or child labor, minimum wages, etc.), political and environmental risks as well as business opportunities. Annually, we re-evaluate the production countries we are in by doing ESG-driven risk analysis. This internal guidance is available to dedicated persons and is shared on a yearly basis as a part of the sustainable supply chain activities.

Additionally, we have internal social compliance and human rights guidelines next to our internal responsible purchasing and production policy which are mandatory for our brands operations to follow. Both policies were updated in 2024 to embrace new requirements of due diligence and strengthen responsible purchasing. Furthermore, the brands in 2024 developed internal documents regarding a responsible onboarding and exiting process for direct contract partners. All requirements were summarized in an updated version of the vendor manual and shared with the value chain partner.

The topic of fair compensation is defined in our publicly available policy.

# The WE Program's First Year

When we found out that only team leaders had been selected for the factory WE team, we said we could not go along with that and wanted to hear from workers themselves during our meetings. The sessions we had during our kick-off meeting with workers and managers proved to be a turning point in terms of trust and benefits of the program.”

## Why is it so important to have everyone in the room during WE sessions?

**Huan:** “During our kick-off meeting, attended by managers and workers, we asked them if they had dialogue in their factory. Management said yes, but upon further questioning we found out the only topic being discussed once a year was production. When we asked people to interview each other in small groups about their major concerns, one topic emerged: the recently introduced piece rate system. In follow-up sessions we found out it put a lot of stress on workers, because they were afraid about not meeting targets and having their pay reduced. They came to work very early, went home very late and some of them kept working during their lunch break. In ensuing conversations, we found out the team leaders in the factory had not shared that workers would get at least the minimum payment. They kept that information to themselves, thinking it would motivate workers to work harder. The management of the factory wasn't aware of this. We had at least three rounds of dialogue about payment and working hours to solve these issues, discussing the risk of worker exhaustion in this system, but also the fact that it resulted in competition between workers and an increase in mistakes. After the dialogue, the factory figured out a new way to set up communication

with the workers and they adapted the piece rate system in such a way that it increased workers' income.”

## What difference have the factories noticed since they started with the WE program?

**Huan:** “Management shared with us that they can listen more to workers and understand more from their perspective. They feel very proud about the dialogue that's taking place now. People can talk, share ideas and co-create meaningful change. I think we came at the right moment. One of the factories has a 10% worker turnover and they really wanted to know why people left. The other factory, which had recently opened, had a serious problem with harassment and we have worked with them on establishing a grievance channel through which people can report these things.”

## How does the WE program bring hidden issue to light?

**Khuyen:** “One of the factories was reluctant to work with us. Their audit grades had been good the past years and they delivered quality and compliance and everything. It was only through dialogue that severe issues surfaced, that Fenix and even the management itself were not aware of. In many Vietnamese factories dialogue happens only once or twice a year, very often in the form of a Q&A session that is conducted by the management. What you can establish in one or two hours per year is very limited. The factory visits by WE program take place three or four times a year. Dialogue takes at least three hours and we deep dive into one or two topics. Meanwhile, in between visits, the factory WE team works on these topics, because we want to create ownership of the program.”

Our annually updated statements on Modern Slavery and Human Trafficking and of Compliance with California Transparency in Supply Chain Acts support our collective approach to protect the rights of workers throughout our global value chain.

To ensure further transparency we provide all external stakeholders with our online reporting grievance channel for complaints and reports of human rights violations and share the description of the process.

We publish our Tier 1 manufacturers on our own website as well as update the data annually on the Open Supply Hub website.

A key element of the due diligence process for the retail brand partners related to protecting human rights and responsibilities for the environment is the Frilufts Retail Brand Supplier Code of Conduct (CoC) and a corresponding internal implementation policy. All brand partners need to explicitly agree to the requirements as part of their contractual obligation.

Annually, we update our Statement on the German Supply Chain Due Diligence Act (LkSG) as well as the statement on the Norwegian Transparency Act.

For the sake of full transparency toward stakeholders, in addition to the statements as well as CoC, we provide access to Fenix's Ethics Points and a report on our human rights due diligence on our retail websites.

### 4.3 ACTIONS

The brands of Fenix Outdoor take proactive and measurable actions to address material impacts, risks and opportunities related to workers in our value chain. These actions focus on preventing adverse impacts, ensuring compliance with international labor standards and creating positive social outcomes.

Therefore, we continuously strive for strengthening our HREDD and risk management approach by:

- Assessing risks for workers on supplier level
  - o Conducting regular HREDD audits and monitor verified SLCP-assessments (table S-1).
  - o Mitigating and remediating findings of assessments through our own social compliance staff.
  - o Running Brand-specific risk assessment taking different criteria as purchasing volumes and FOB, country risk criteria as audit results into account to identify high-risk suppliers.
  - o Driving the use of internal supplier scorecards which embraces social and environmental criteria (table S-6).
  - o Using feedback from NGOs and shared public information to identify systematic labor and environmental risks.
- Enhancing responsible purchasing practices by
  - o Integrating fair practices into supplier agreements.
  - o Improving internal policies, e.g., onboarding documents, responsible purchasing policy, etc., describing the HRDD process and environmental engagement.
  - o Using the evaluation results of FLA's assessment.

Other actions we took in 2024 to keep on improving working conditions in our supply chain are:

- Integrating the WE program at two strategic Tier 1 suppliers as a capacity-building program going beyond audit results as mentioned in chapter 4.1.3 Opportunities.
- Promoting trainings especially in Vietnam in 2024 to enhance the knowledge of fair labor practices in 2024: Two suppliers participated in a workshop led by the GIZ about grievance management and strengthening of a respectful and fair working culture. Another supplier took part in an advisory project on HREDD led by the local Responsible Business Helpdesk together with

the GIZ. During the project they could not only enhance their internal risk identification through active involvement of workers during the risk assessment but also develop and implement a comprehensive self-assessment tool kit allowing the supplier to evaluate compliance with labor standards systematically. Engaging workers in the process increased awareness and ownership of compliance practices at all levels. Two other suppliers attended the WE workshop on two-way communication and effective grievance mechanisms.

- Improving internal knowledge: Joined a HREDD training offered by the GIZ in Vietnam; trained internal staff about RPP and Fair Compensation, tested online trainings on forced labor and GHG with our partner LRQA.
- Collaborating with the FLA and our supply chain partner to implement fair wages by collecting data, analyzing it regarding international living wage benchmarks (e.g., GLWC) and integrating it into purchasing practices. See table S-5.
- Working within industry collaborations as the FLA and AAFA (Apparel & Footwear Industry Commitment) to drive systemic change by signing the "Commitment to Responsible Recruitment" – a proactive industry effort to address potential forced labor risks for migrant workers in the global supply chain.
- Interacting with a U.S.-based NGO by remediating with industry partner severe migrant worker labor conditions.
- Kicking off the living wage journey of owned factories by starting data collection through the FLA Fair Compensation Toolkit.
- Understanding the knowledge regarding grievance mechanism in our supplier chain by sending a yearly survey to our Tier 1 and 2 suppliers:
  - o Occurrence of Grievances (T1 & 2 supplier): 75% reported that they have not had any grievances; 19% indicated that they have experienced grievances, 6% did not provide an answer
  - o Provided trainings on grievance mechanism: 78% reported that they did conduct internal training on the grievance mechanism, 16% indicated that they did not have such training, 6% did not provide an answer).
  - o Measuring training effectiveness: A large portion of respondents (31%) reported conducting tests or quizzes after their training to measure the effectiveness. Other forms are employee surveys as well as direct feedback through questions or interviews of the training participants.
  - o Information channels: Nearly half of the respondents (46%) reported that they inform new workers in introduction and orientation trainings about the grievance mechanism. Other channels are annual trainings (9%), handbooks (2%), verbal instructions and management instructions (6%), posters (3%), notice boards (2%) and other forms of information.

All impacts of our actions are reported on a yearly basis in the CSR Report of Fenix Outdoor as well as with internal stakeholders such as the management teams during ongoing internal reports. Already in 2023, we started to write an excerpt of the holistic CSR report for the brand Fjällräven and continued it in 2024. Other Fenix brands as Hanwag will most likely follow Fjällrävens' actions.

On a monthly basis, current social compliance audit results, CAP statuses, upcoming audit dates, sentinels and such are being shared with dedicated colleagues and decision makers. We use internal systems like the PLM to share assessed data like the sustainability scorecard on factory level within the company. These also have access to the EiQ system.

When it comes to further preparing our partners (indirect and direct) for upcoming HREDD legislation, we use annual questionnaires, webinars, meetings and our own sustainability newsletter to



share knowledge. In doing so, we want to support our partners to reflect on their own actions and support them to become compliant.

However, if we do face any high-risk violations of HREDD obligations, we will not stop discussing the topics until we find acceptable solutions with our suppliers or, in the worst case, we will have to end our relationship. When this step needs to be taken, we follow a fair retrenchment process aligned with the FLA principles.

Another way to be transparent about our actions is being part of the first cohort of FLA members to share publicly results of our annual evaluation. In 2024, we were assessed on FLA's principle one: Top Management Commitment (result: 98%), principle two: Responsible Purchasing and Production Practices (result: 87%) and principle three: Head Office Training (result: 95%). The results will be added to the FLA website sometime in 2025.

Within our retail operations we have taken proactive, measurable steps to address key impacts, risks and opportunities concerning human rights in the supply chain related to our brand partners. These efforts are aimed at preventing negative outcomes, ensuring adherence to international labor standards and fostering positive social results. Actions in 2024 included:

To enhance due diligence and specifically meet the requirements outlined in LkSG §9 Abs. 3, we conducted an event-related risk analysis for products "Made in" in Myanmar. The analysis identified 14 brands, accounting for 1.6% of total sales volume.

In the evaluation we applied four risk categories, each assessed on a scale from 1 to 3, where 1 represented the lowest and 3 the highest risk. Hence, a maximum score is 12, with a threshold of 7 points set as the level requiring further investigation.

The analysis was conducted using the following risk categories:

- Type and scope of business activity.
- Depending on the overall sales volume, we categorized them into low (annual turnover is less than an average daily store turnover), medium (annual turnover up to the daily turnover of all stores) and high (above the thresholds).
- Ability to influence the direct cause and our contribution to the potential cause.
- Severity and probability of human rights violations.

Following the internal evaluation process, the results indicated that four brands achieved a total of 5 points, six brands scored 6 points, and three brands attained 7 points. The three brands with the highest scores were selected for further follow-up. Online meetings were conducted with each of these brands, during which they outlined their activities and were requested to provide detailed information about their efforts to mitigate the risks of human rights violations in the production of their products in Myanmar. As a result of these discussions, it was confirmed that for one of the brands there will be no future orders involving products manufactured in Myanmar. The other two brands provided sufficient information to demonstrate that measures are in place to address human rights concerns specific to the production environment in Myanmar.

Another action was the support of a call to action for responsible business conduct in Bangladesh. Political instability in Bangladesh, marked by violent demonstrations and nationwide protests starting in July 2024 and culminating in the resignation of the prime minister, has significantly impacted the local garment industry. These events have led to adverse effects on workers, including reduced wages and overtime.

To mitigate these challenges and safeguard the rights and well-being of garment workers during this turbulent period, leading industry initiatives have released a joint statement emphasizing the importance of responsible business conduct in Bangladesh.

The statement outlines key recommendations to address potential adverse impacts on workers and uphold ethical practices within the industry. It serves as a guiding framework for businesses to navigate the current challenges while ensuring the welfare of their workforce.

In alignment with these principles, we have identified all 32 brands within our assortment that source products from Bangladesh. Each has been provided with the joint statement and urged to prioritize vigilance and a firm commitment to implementing its recommendations. By fostering adherence to these ethical guidelines, we aim to support sustainable and responsible practices across our supply chain during this critical time.

To assess the risk exposure associated with noncommercial goods, the Finance Department provided transaction data from the past several years, encompassing a total of 12,000 entries. These transactions were filtered based on the Group's Country Risk List, leaving only 21 relevant positions.

Among these, only three positions originated from 2023 and 2024. Two of these were expense entries unrelated to noncommercial goods, while the third was identified as a service, likely associated with a social audit.

Based on this analysis, there is no evidence of direct human rights risks arising from noncommercial goods. This finding supports the Group's overall human rights strategy, which prioritizes addressing risks related to the Group's own brands and, subsequently, external brands within the retail assortment.

As one of the first companies, we reported our HRDD activities to the Federal Office of Economics and Export Control (BAFA). On [globetrotter.de](https://globetrotter.de) we made this report available to the public as well as a general statement on human rights in the supply chain, the Frilufts Retail Brand Supplier CoC and a link to the Group's Ethics Point.

#### 4.4 TARGETS

**Targets of 2025 in our cardinal direction "Society" (Fenix Way, page 43):**

Taking on societal responsibility includes not only being a good corporate citizen but also assisting in improving and developing communities as well as adhering to a high level of business ethics.

1. **Stakeholder engagement** – Hold stakeholder dialogues on a regular basis. KPI: At least one meeting every other year; at least one survey every third year.

Results in 2024:

- We held several internal meetings regarding sustainability topics with various attendees.
- We engaged in different public forums (e.g., ISPO, Scope 3 forum by Innovation forum, Outdoor Magazin, GLWC webinar, etc.).
- We shared sustainability news through a newsletter with our value chain partner and engaged through meetings, audits, supply chain programs and an annual survey.
- We were involved in various conversations with non-governmental organizations and end-customers.

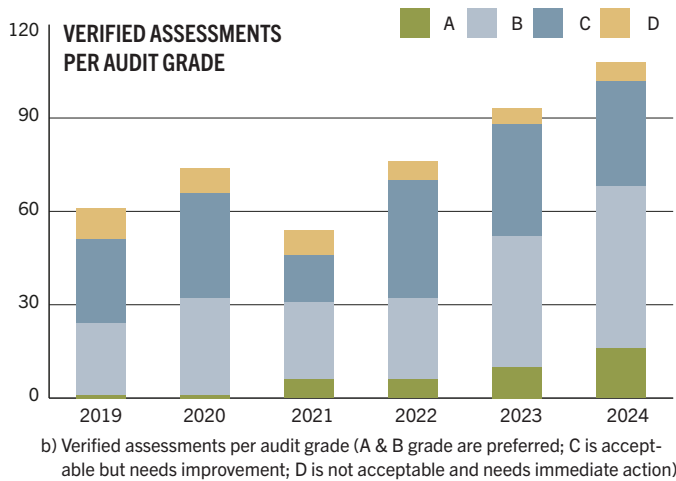
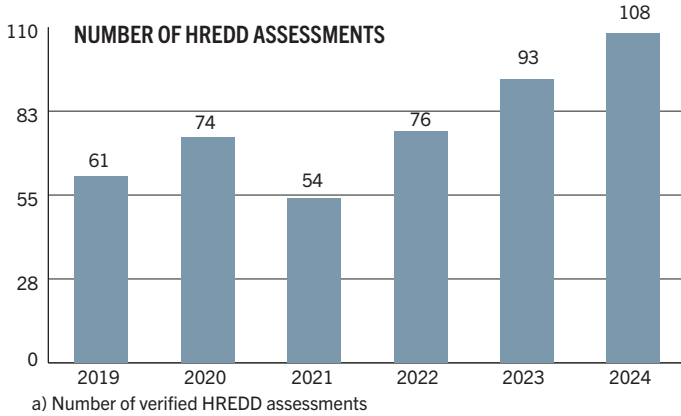
Future focus:

- Identify and prioritize stakeholders based on influence, interest and impacts.
- Strengthen the communication and transparency, e.g., two-way dialogues with interactive discussions.
- Localize the engagement and conduct business-unit-specific forums.
- Improve feedback loops.
- Widen the collaboration with external partners.

**2. Human rights** – Conduct regular human-rights-related activities. KPI: Ongoing human rights (and environmental) assessments and trainings; zero incidents in each year.

Results in 2024:

The total number of verified HREDD assessments increased over time. However, there was a decrease in 2021 due to Covid-19 restrictions. Due to the increase, the audit findings also went up. The share of preferred A and B Grade results also advanced (2023 = 57%, 2024 = 63%).



Future focus:

- Broaden the assessment scope to Tier 2 and Tier 3 by gaining more transparency through traceability.
- Further involve risk focus through analysis by country, purchasing volume and ESG-identified risks to focus on high-risk suppliers.
- Continuously roll out the WE program and other value chain improvement programs to strategic suppliers to enhance worker engagement.
- Implement country risk assessment for onboarding retail brand partners and further use of ESG Brand performance check to identify brand partners with higher risk profiles and to prevent and/or mitigate negative impacts and risks.

**3. Product responsibility** – Monitor incidents related to use of safe handling of Fenix Outdoor products. KPI: Reported incidents as ratio number of cases/new products per relevant category, target: zero incidents

Results in 2024:  
No reported incidents.

Future focus:

Due to the change from GRI to CSRD reporting, this question has not been added since it is not a requirement of the ESRS. We plan to add this criterion to the next report.

**4. Business ethics** – Train all staff and supplier on the CoC. KPI: > % of staff / supplier trained target: 100% trained staff; 80% trained suppliers (Tier 1 & 2).

Results in 2024:

The Supplier CoC was updated in 2024. Therefore 100% staff and contracted value chain actors had to be trained.

Percentage of retail brand suppliers that have signed the CoC: 97.5%

Percentage of Fenix brand suppliers that signed the CoC:

- 100% of traders
- 85% of T1 suppliers
- 57% of T2 suppliers

Percentage of Fenix brand suppliers that signed the latest CoC update in 2024:

- 75% of Tier 1 suppliers
- 36% of Tier 2 suppliers

Future focus:

- Do regular refresher trainings on the Supplier CoC.
- Keep pushing suppliers to sign the latest version of the Supplier CoC.
- Constantly update the content of the Supplier CoC in alignment with updated requirements.

**5. Business Ethics** – Zero incidents of corrupt behavior, bribes or embezzlements. KPI: Zero reported incidents.

Result in 2024:

1 reported incident on Tier 1 level.

Future focus:

Do regular refresher trainings on our Fenix Way values including corrupt behavior, bribes and embezzlements.

**6. Transparency** – Transparency of products and materials. KPI: Full transparency for own products and materials representing 80% of brand value.

Result in 2024:

Not achieved. Target will be moved to the strategy 2030. However, we ran a successful pilot with a new system provider in 2024 tracing six defined styles down to Tier-n level (in most cases 3 or 4).

Future focus:

In 2025, we plan to start scaling up our traceability endeavor together with identified system partners focusing especially on textile products and materials which are more sustainable (e.g., recycled polyester, organic cotton, etc.). We plan to gain 100% traceability in the defined textile scope by the end of 2027.





Hanwag production site,  
Hungary.



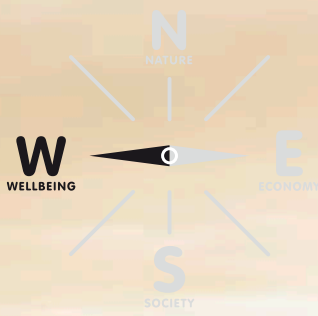
Hanwag production site,  
Hungary.



Hanwag, production site,  
Vierkirchen.









# 5. WELL-BEING (ESRS S1)

## 5.1 OVERVIEW

This section provides an overview of our organization's commitment to social responsibility concerning our own workforce, in compliance with the European Sustainability Reporting Standards (ESRS S1) under the Corporate Sustainability Reporting Directive (CSRD). Our approach ensures transparency in workforce-related matters, including working conditions, diversity and inclusion, health and safety, and employee engagement.

## 5.2 MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

### 5.2.1 Impacts

We have identified the following impacts through our materiality analysis:

- Job creation and providing an income that is above minimum wages and allows for a discretionary income
- Adherence to legal provisions in legislation where we operate (mainly Europe, North America and China)
- Health and safety at the workplace
- Commute
- Fair treatment of employees (non-discrimination, non-harassing environment)
- Social protection (e.g., social security like health insurance, sick leave, parental leave etc.)
- Work-family-life balance
- Personal and professional development
- Right to collective bargaining

### 5.2.2 Risks

The main risks we have identified are:

- Low productivity due to high number of sick days/absences
- Insecurity/fear among employees due to layoffs and through changes/reorganizations/economic downturn
- High employee fluctuation
- Conflicts in the workplace

### 5.2.3 Opportunities

Actions and internal proceedings but also the establishment of a trusted and long-term corporate culture like our Fenix Way positively impact our own workforce and result in opportunities we may benefit from:

- Employee satisfaction/engagement
- Individual development plans
- Internal staffing of management positions
- Support for employees with children and relatives in need of care (retention)
- Positive effects of good working conditions (e.g., adequate pay)
- Diversity through inclusion (e.g., corporate integration management)

The above-mentioned impacts, risks and opportunities are generally valid and widespread. However, the individual scale and scope are dependent on the specific country or geographical area as well as the type of operation the employee is working in (e.g., manufacturing, warehouse staff, sales, back-office, etc.). Certain impacts (e.g. family-related leave) affect specific groups (e.g., women) in particular.

There are no operations at significant risk of incidents of child labor or forced and bonded labor in our own operations. Our policies apply company-wide and globally (unless otherwise noted).

### 5.2.4 Workforce Composition and Structure

In 2024, Fenix Outdoor employed 2,790 FTEs in our various entities and countries (2023: 2,972; see Table W-1). This is a decrease of about 6.1%. Most of our employees are permanently employed but we employ seasonal workers in retail and warehouse operations during peak seasons.

We employed 29 female and 34 male apprentices in the year 2024. By doing so we provide the opportunity for young people to learn a profession. Since all apprentices were hired in Germany, one has to acknowledge the German dual educational system. Apprentices will get a school education tailored toward their profession and on-the-job-training with us. This way, young people and beginners in a job receive a thorough two to three years of education and are well equipped afterward for the global job markets.

For 2024, the picture is a bit mixed. The staff turnover rate in 2024 (defined as all employees who left versus total number of employees) over all operations including the retail business is 35.24% (2023: 17.5%). The ratio between females and males leaving Fenix Outdoor remained to be virtually equal at F/M 1.2:1 (2023: ratio F/M 0.99:1), meaning that roughly 55% of staff members leaving were females (50% in 2023). We define significant fluctuation as 25% or more employees leaving. The reason for the increase is mainly due to downward economic trends and some operational reorganizations in North America and disinvestments. When it comes to temporary and seasonal workers, significant fluctuations can be detected. We see peak and low seasons in warehouses and stores and therefore have more or less temporary non-employees in our operations. A concrete figure is difficult to establish. A possible alarming signal or operational risk does not stem from this fact.

All eligible staff members are entitled to parental leave (i.e., parents with children under a certain age); the definition differs from country to country, so an overall percentage value has limitations in validity. Using the Novisto system's consolidation, 82.5% of our employees are eligible to take family leave (2023: 909 individuals based on reported data). In 2024, 2.1% of those took family-related leave, including 1.65% of females and 0.35 % of males. After 12 months, all (2023: 192 individuals returned after 12 months based on reported data) were still employed. Since parental leave is regulated differently in various countries, the figures are not comparable to any specific time frame as in particular in Europe prolongations or shifts in time-off are commonly agreed upon between the individual and the employer. Therefore, we are unable to assess how many of those who did not return after 12 months or do not show up in the statistics prolonged their leave or left Fenix Outdoor.

Other metrics and KPIs referring to our own workforce (ESRS S1) can be found in the following tables:

- W - 2: Breakdown by employment type (permanent, temporary, full-time, part-time, etc.)
- W - 3: Workforce segmentation by job category and seniority levels
- Representation of minority groups: no data available. Our company

respects and protects the rights of our employees. That personal information is not to be shared publicly.

- W- 4: Key workplace safety statistics (e.g., accident rate, lost time injury frequency rate)
- W – 5: Total hours of training provided per employee
- Investment in upskilling and reskilling programs: no data available – see personnel costs in annual report
- W – 6: Various KPIs: Workforce covered by collective bargaining agreements; Payment Ratios; Pay Gap
- W – 7: Working hours and flexibility at the workplace.

### 5.3 POLICIES

Fenix Outdoor has developed into one of the leading outdoor companies in Europe with global representation. We have grown organically and inorganically over the past decade. This led to several organizational adjustments and changes, and we are continuing this journey in the years to come. Our north star, however, remains our Fenix Way with its Fenix Management Compass®. The Fenix Way is a guidance tool that also describes and defines our corporate culture and serves as the reference point in times when insecurity and lack of orientation seem to govern.

Within the Fenix Way we have clearly expressed our commitment to respecting human rights, including labor rights, safe and healthy workplaces and a discretionary income for our employees. We are taking responsibility for the company's business activities throughout our value chain. The Fenix Way is built on our commitment to

- The International Declaration of Human Rights.
- The UN Guiding Principles on Business and Human Rights.
- The Principles of the UN Global Compact.
- The UN Sustainable Development Goals.
- The ILO Core Labor Conventions.
- The respect for and protection of nature.
- The UN FCCC Fashion Charter for Climate Action.
- The societies in which we operate and for which we produce, practicing good corporate citizenship and upholding the highest standards of ethical integrity.
- Human well-being, in particular for the well-being of our employees all over the world who deserve a safe and healthy working environment, and our customers and other stakeholders who should not suffer any harm from our products.
- The economic development of our company as well as the societies we are operating in.

The globe whistleblowing hotline and ombudsman's office are open to all employees and business partners.

Fenix Outdoor is also committed to observe the international obligations, resulting from our global business presence, such as our regular update of the Statement on Modern Slavery and Human Trafficking as well as the Statement of Compliance with the California Transparency in the Supply Chain Act (SB 567). See also Chapter 4, Society.

In our Code of Conduct, which builds on our aforementioned commitments, we express zero tolerance regarding child labor, forced and bonded labor as well as zero tolerance regarding corrupt and unethical business practices. The values and principles of our Code of Conduct must always be observed and adhered to by all employees and managers of the company. Every Fenix Outdoor employee needs to sign the Code of Conduct and our ethical principles upon recruitment. The signatures are filed by our Human Resources Department and are the basis for the contractual relationship.

Depending on the jurisdiction, we have a number of complemen-

tary and more in-depth rules that are applicable during the employment period and form part of our Compliance Program. Certain HR-related policies are either based on legal requirements, or form part of an employee handbook. The documents outline the regulations that employees, managers and the HR department must adhere to in order to ensure legal and ethical practices within our organization. The policies cover a range of topics including equal employment opportunity, working hours, freedom of association, minimum wages, etc.

We adhere to legal requirements in all jurisdictions we are operating in to foster a fair, respectful and secure working environment.

We view diversity within our teams as a unique strength, bringing together individuals with varied experiences, beliefs, backgrounds and perspectives. Diversity and respect are also integral aspects of our Fenix Way and comprise multiple dimensions, such as gender, age, ethnicity, religion and personal beliefs, regional origin, sexual identity, disability and social background. Our group-wide Anti-Discrimination Policy is binding to ensure that no employee is subject to any kind of discrimination. Our equal opportunity and recruiting principles underline our commitment to treating all employees fairly and equally and making qualifications, skills and experience the basis for the recruitment. Our globally accessible career platform provides up-to-date records on recruitment.

Our policy is to promote equal opportunities for men and women, and our board expressly demands equal opportunity recruitment into managerial positions. The proportion of female middle managers that Fenix Outdoor currently employs is proportional to the previous year (2023: 44%). The Executive Management is 25% female (0% in 2023). Our board is 17% female.

Fenix Outdoor has committed to Freedom of Association and recognizes the right to collective bargaining as a universal right.

While we know that the main risks regarding our own workforce are related to possible health and safety risks, stemming from the day-to-day operations (such as back pain, vision impairment, risk of stumbling over ill-secured cables and the like), Fenix Outdoor adheres to a mix of international, national and industry health and safety regulations. We conduct risk assessments, implement preventive measures and train employees, using especially designated safety representatives. State labor safety bodies enforce compliance through the imposing of fines that we were not subject to in 2024. Continuous monitoring, procedure updates and employee involvement are vital for successful risk awareness and management. In particular in the EU, we have established the legally required workplace environment and health and safety committees. In the United States we follow the recommendations and inspection reports issued by OSHA. In other locations, local managers and by delegation employees are entrusted with the adherence to high health and safety standards.

In several locations we offer voluntary health and fitness opportunities, such as individual fitness plans and healthy nutrition recommendations, and we enable employees to practice and improve skills and widen their view when taking part in our events such as the Fjällräven Classic, which enables our employees to truly experience the outdoors while using our own products and gear. This way we encourage a healthy lifestyle and collect user experiences, which in turn will influence the construction and functionality of the next generation of products.

All our policies and offerings have been communicated to our employees and frequent training and refreshers, mandatory as well as voluntary, are offered and provided on a regular basis through in-person meetings but also via our eLearning tools.









#### 5.4 PROCESSES

We actively promote continuous, open and transparent communication at all levels. Engagement takes various forms, both informal and formal, including annual performance reviews, employee surveys, workshops and interactions with workers' representatives, such as the Work Councils. The internal engagement surveys (employee net promoter score, eNPS) allow the management teams and heads of departments to assess the effectiveness of our initiatives and their respective outcomes and shed some light on the level of commitment of our workforce to the company and its values and goals.

#### 5.5 ACTIONS

Our aim is to enable all our employees to stay up to date with recent developments in technical developments and legal changes. Therefore, we offer a wide array of training and development opportunities. Training hours for all employees are not logged in centrally, nor do we have a system according to which reliable data can be obtained. This has been a problem in the past, and as a result the figures given cannot be compared. However, in an unweighted and very rough estimation (number of hours given on average per person per reported entity) we can establish that about 40.29 hours in training were given to female and male employees in 2024 (2023: 21.9 hours for female employees and 23.9 hours for male). The figures vary dramatically in detail, not so much by gender but more because the overall number of employees in each job category or region is very different and not all categories are present in all markets. Therefore, a high variability in training data is pertinent. These courses include professional training, e.g., product and skills training for sales staff but also training on sustainability, compliance and the like. We also offer employee development programs, such as our Graduate Program to enable and equip employees with the needed skills and experience to further their professional careers. But not only that: in many locations we offer schooling and individual personal development opportunities, depending on the legal framework and business needs.

Performance reviews are part of our development assessment process but vary widely from country to country. No group-wide data processing protocol exists. However, as a general recommendation, all managers and employees should meet once a year to discuss the goals and tasks and achievement levels of the

past year, the development needs for the year ahead, the overall way of working together including the review also of the manager's performance in leadership and communication and inter-team and interpersonal relationships. These files are logged and will serve as the basis for the review of the coming year. In addition, new tools like Perdo for Objective Key Results (OKRs) and KPI tracking are introduced to facilitate the review and become less driven by individual assessments or assumptions rather than measurable facts. Due to the lack of systematic support, there is no reliable data on the percentage of performance reviews that took place. An educated guess for the main operations would be 75% to 85% coverage.

Through deliberate actions and steering by the Board and Management, Fenix Outdoor is steadily increasing the number of female leaders on various levels.

#### Working hours, wages and benefits

We adhere to the laws when it comes to working hours. At a minimum we adhere to the International Labor Organization conventions regarding rights at work and apply them to both internal and external service providers. In 2024, 3,380,224 hours (n = 2,790) were worked (2023: 3,372,943 hours, n= 2,972) by own employees. The number of non-employees and the number of hours they worked for our company could not be established this year. Collection of information on these types of employees (often employed through agencies and support staff in stores and warehouses during peak seasons) is a manual process and not recorded in systems. Therefore, the completeness and validity of data is poor, and we therefore decided not to present it this year. In 2023 we were able to identify 119 persons not employed by us but working for us.

Our wage levels are competitive, and we offer several benefits to our staff. In various locations we offer different benefits for employees such as health club memberships, subsidized tickets for public transportation, pension and retirement insurance schemes (covering various entities in all regions to different degrees), external advice on psychological and physical health, life insurance, health care or health insurance (where not legally required), invalidity coverage, child daycare or financial support to parents with children, free or subsidized meals, staff discounts, employee clothing and the like. These differ from entity to entity and depend on legal or negotiated frameworks. Data for Board compensation and its composition can





be found in the annual report under the related heading of the management report chapter.

A good outdoor spirit and understanding of what and what not to do in the wilderness are important to Fenix Outdoor, and on a case-by-case basis we encourage our employees to participate in outdoor activities such as educational outdoor trainings or the Fjällräven Classic event. In most locations, business operations permitting, we offer flexible working hours. However, we see ourselves as an “in office company,” with four mandatory days in the office per week in

2024 and one flex/home office day per week in accordance with the team’s needs. In addition, and working conditions permitting, every employee is entitled to two times five days (five per half year) per year to “work from anywhere.”

Fenix Outdoor strives to take a non-discriminatory approach by paying equal wages to men and women, and by exceeding the minimum wage levels where possible. This also applies to employees not employed by Fenix Outdoor but working for us on our premises. We hire local managers for the operations in the respective countries.

## 5.6 TARGETS

In our Fenix Way, the targets 2020 – 2025 according to ESRS S1 (see page 43) are defined as follows:

Compass Area	Issue	Description of 2025 Target	KPI	KPI Target
With respect to our staff members our aim is to ensure that they enjoy a high level of safety and health at the workplace and that they are inspired and passionate	Child Labor Forced and compulsory labor	Zero incidents in our production lines and processes	No. of incidents	Zero incidents
	Health and Safety	Regular monitoring	No. of audits; no. of incidents	incidents / audit: < 1,5
	Health and Safety	Safe workplace	No. of incidents	No. of ioncidents / employee
	Health and Safety/ Supply Chain	Monitoring and audit results from supply chain visits	No. of “major non-compliance finding”/no. of audits	below 0,5
	Training and staff satisfaction	Conduct staff surveys, provide education/training opportunities		Surveys and results reflected in corporate policies and strategies; target: great place to work awards as of 2025
	E-learning	Global E.-learnings on sustainability	Ratio: participants to Group FTE	Target ratio 1:1 per e-learning unit

At the end of 2024, we see that we are on track and keep the set boundaries as targeted for 2025. However, a deeper look reveals that we are weak in the areas of employee engagement when it comes to corporate decisions and personal development options, and we lack discipline in some learning and development areas. There are manifold reasons for this – among others, an overwhelming number of new rules and regulations and internal as well as external frameworks which require attention all at the same time. In fact, mandatory e-learnings on anti-corruption or data protection are provided but they are down-prioritized by individuals and teams if similarly mandatory learnings for the day-to-day job are offered at the same time. However, we can establish that about 600 employees underwent an e-learning on sustainability or com-

pliance during 2024, and since some employees tend to learn and work in groups (partly also due to the lack of individual computer access rights), we are confident that the target groups have been reached.

The year ahead will mark the end of our five-year sustainability journey, and we will take honest account of what we were able to initiate or achieve when it comes to our responsibility toward our own employees. In a politically volatile environment with insecurity and several unknowns, as well as changes in direction on virtually a daily basis, we do not know yet what this year will hold for us. But one thing is very clear to all of us at Fenix Outdoor: we stand strong in our values and our commitment to creating a life-worthy, sustainable and adventurous natural world that we will all love to live in and enjoy.

# 6. Performance Metrics and KPIs

## N-1 ENERGY CONSUMPTION AND MIX

Energy consumption and mix	2024	2023
(1) Fuel consumption from coal and coal products (MWh)	0	0
(2) Fuel consumption from crude oil and petroleum products (MWh)	42	54
(3) Fuel consumption from natural gas (MWh)	2,135	5,431
(4) Fuel consumption from other non-renewable sources (MWh)	0	0
(5) Consumption from nuclear products (MWh)	0	0
(6) Consumption of purchased or acquired electricity, heat, steam, and cooling from non-renewable sources (MWh)	5,528	5,210
(7) Total non-renewable energy consumption (MWh) (calculated as the sum of lines 1 to 6)	7,705	10,695
<b>Share of non-renewable sources in total energy consumption (%)</b>	<b>31</b>	<b>39</b>
(8) Fuel consumption for renewable sources (including biomass, biogas, non-fossil fuel waste, renewable hydrogen, etc.) (MWh)	2,524	318
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	17,897	16,735
(10) The consumption of self-generated non-fuel renewable energy (MWh)	0	0
(11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)	20,421	17,053
<b>Share of renewable sources in total energy consumption (%)</b>	<b>69</b>	<b>61</b>
<b>Total energy consumption (MWh) (calculated as the sum of lines 7 and 11)</b>	<b>28,126</b>	<b>27,748</b>

## N-2 GHG REMOVALS AND STORAGE

	2024	2023
Total volume of carbon credits cancelled in reporting year (t)	20,780	20,822
Share of removal projects (%)	3	0.8
Share of reduction projects (%)	97	99.2
Share of credits from Verra (%)	77	84.9
Share of credits from Gold Standard (%)	19	14.9
Share of credits from Climate Action Reserve (%)	3	0
Share of credits from American Carbon Registry (%)	0	0
Share of credits from Puro (%)	0	0
Share of credits from Reverse (%)	1	0
Share of credits from Plan Vivo (%)	0	0
Share of credits from Carbon Standards International (%)	0	0.3
Share of credits from OxCarbon (%)	0	0
Share of credits from ISO 14064 (%)	0	0
Share of credits that are not registered (%)	0	0
Share from projects in EU (%)	0	0
Share of credits with corresponding adjustment (%)	0	0
<b>Total volume of carbon credits purchased for future retirements (t)</b>	<b>3,220</b>	<b>4,000</b>



### N-3 GHG BREAKDOWN ABSOLUTE

Base year (2019)	Absolute 2023 (tCO <sub>2</sub> e)	Absolute 2024 (tCO <sub>2</sub> e)	Absolute reduction vs base year (tCO <sub>2</sub> e)	Relative reductions vs base year (%)	Explanation of progress	2025	2030	2050	Annual % target vs. Base Year*
<b>Scope 1 emissions</b>									
Gross Scope 1 GHG emissions (tCO <sub>2</sub> e)	1,353	1,083	-270	-20	Mainly through decrease in gas consumption from our warehouse in Almere, the US and better data availability in Germany; after Biogas certificates have been deducted, 556 tCO <sub>2</sub> e Scope 1 emissions are left (-51% reduction).				
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	0	0	0	0	Not applicable	40% reduction absolute for Scope 1 & 2 combined (market-based)			9%
<b>Scope 2 emissions</b>									
Gross location-based Scope 2 GHG emissions (tCO <sub>2</sub> e)	14,645	11,706	-2,939	-20	Includes CO <sub>2</sub> e emissions from CH <sub>4</sub> and N <sub>2</sub> O				
Gross market-based Scope 2 GHG emissions (tCO <sub>2</sub> e)	3,758	828	2,930	-72	Includes CO <sub>2</sub> e emissions from CH <sub>4</sub> and N <sub>2</sub> O				
<b>Scope 3 emissions</b>									
Purchased Goods and Services	63,707	52,522	-17,620	-28	Higher percentage of renewable electricity sourcing by suppliers and higher proportion of actual data; less raw material usage due to less product produced. Increase of recycled Nylon within Fijliraven.		Approval expected in 2025		
Capital Goods	-	-	-	-	Relevant, first calculations will be done in 2025	50% reduction per product produced			13%
Fuel- and Energy-Related Activities Not Included in Scope 1 or Scope 2	925	880	-112	-37					
Upstream Transportation and Distribution	5,013	4,116	-1,376	-27	After adoption of marine biofuel certificates (331 tCO <sub>2</sub> e removals); 3,527 tCO <sub>2</sub> e; w/o RFI 2.7		Approval expected in 2025		
Waste Generation in Operations	20	53	72	360	Increase due to higher data transparency and completeness.				
Business Travel	3,898	2,597	-1,884	-48	Increase in electric and hybrid cars, incl. RFI 2.7				
Employee Commuting	1,353	1,476	180	13	Survey participants in 2024; 577 (2023; 674); fewer employees				
Upstream leased assets	NA	NA	NA	NA	Not applicable				
Downstream Transportation and Distribution (paid by customer)	NA	129	-	-	Before, emissions from downstream T&D have been included in upstream due to lack of transparency.				
Processing of sold products	NA	NA	NA	NA	Not applicable				
Use of Sold Products	-	-	-	-	No baseline calculation yet due to lack of data availability from use phase				
End-of-Life Treatment of Sold Products	30,216	33,499	24,374	-19	Calculatory mistake in baseline calculation leads to an overstated reduction				
Downstream Leased Assets	NA	NA	NA	NA	Not applicable				
Franchises	-	-	-	-	Due to very few Franchises -5 included in Scope 1 and 2				
Investments	NA	NA	NA	NA	Not applicable				
<b>Total gross locations based emissions (tCO<sub>2</sub>e)</b>	<b>121,110</b>	<b>106,074</b>	<b>29,968</b>	<b>-25</b>					
<b>Total gross market based emissions (tCO<sub>2</sub>e)</b>	<b>110,223</b>	<b>96,950</b>	<b>29,689</b>	<b>-27</b>					
Biogenic emissions outside of scopes (tCO <sub>2</sub> e) from biogas consumption	0	63	502						
Emissions that have been calculated but not included in the inventory because base line data was not available:									
Emissions from Frijulfs Retail Assortment (excl. Fenix brands, tCO <sub>2</sub> e)		42,251							
Emissions stemming from Website sessions (tCO <sub>2</sub> e)		134							

Emissions have been calculated in line with the Greenhouse Gas Protocol and reporting requirements from STICA whenever possible. Please find detailed information on emission factors, data impairments and caveats in Chapter 7 in this report.

\*Including growth rate

**N-4 GHG BREAKDOWN INTENSITY**

N-4 GHG intensity per net revenue	2024	2023	YoY comparison (%)
Total GHG emissions (location-based) tCO <sub>2</sub> e	91 412	106 074	-14
Total GHG emissions (market-based) tCO <sub>2</sub> e	81 334	96 950	-16
Total GHG emissions (location-based) per net revenue (tCO <sub>2</sub> eq/Monetary unit)	133	143	-7
Total GHG emissions (market-based) per net revenue (tCO <sub>2</sub> eq/Monetary unit)	119	131	-10
Net revenue used to calculate GHG intensity (MEUR)	686	740	-7
Net revenue (other)	-	-	
Total net revenue (in financial statements)	686	740	

**N-5 POLLUTANTS**

Other emissions in kg	2024	2023
NO <sub>x</sub>	15,385	14,728
SO <sub>2</sub>	3,843	10,564
NMHC	3,188	1,292
PM10	849	1,044

**N-6 CONSUMABLES**

MATERIALS	Amount conventional (kg)	Amount more sustainable (kg)	Amount recycled (kg)	Amount CO <sub>2</sub> e compensated (kg)
<b>MARKETING</b>	<b>395,324</b>	<b>637,724</b>	<b>51,564</b>	<b>559,318</b>
Cardboard	2,648	4,010		
Glue	2			
Glue (glue stick, tape)	2,494			8,856
Ink	9,189	3,732		32,218
Iron	5			
Paper	37,473	629,302	50,544	517,318
Plastic	599			3
Polyester	7			
Polyethylen (XPE)	350			
PVC	649	32		138
(Stainless) Steel	92			
Textile	1,897	12		
Wood	887	55		428
Other Materials	2,012	581	1,020	339
Other Metals	19			19
<b>OFFICE SUPPLY</b>	<b>9,003</b>	<b>9,344</b>	<b>1,092</b>	
Cardboard	731	493	14	
Cleaning Products	463			
Glue (glue stick, tape)	350	2	0	
Metals	111	8		
Paper	4,133	8,777	875	
Paper Towels	1,249			
Plastic	1,357	19	107	
Toner/Ink	49	27	61	
Other Materials	560	19	35	



**N-6 CONSUMABLES (CONTINUED)**

<b>PACKAGING</b>	<b>624,214</b>	<b>15,053</b>	<b>622,048</b>	
Cardboard	278,171		436,846	
Glue (glue stick, tape)			693	
Kraft paper			13,381	
Paper	34,989	13,468	22,400	
Plastic	286,677		5,753	
Polycarbonate	8			
Polyethylene	11,939		22,229	
Polypropylene (e.g. straps, tapes)	7,441	198	30	
PVC	46	4		
Recycled polyethylene (GRS)			112,678	
Uncoated paper			1,756	
Wood free paper sticker	43		6,276	
Other Materials	4,898	1,384	6	
<b>SHOPPING BAGS</b>	<b>9,605</b>	<b>13,151</b>	<b>10,632</b>	
Multi use plastics			1,415	
Single use plastics			813	
Paper	9,442	13,151	8,404	
Other Materials	163			
<b>Total all consumables</b>	<b>1,038,146</b>	<b>675,272</b>	<b>685,336</b>	<b>559,318</b>

**N-7 RAW MATERIAL INFLOW**

<b>Materials</b>	<b>Amount conventional (kg)</b>	<b>Amount more Sustainable (kg)</b>	<b>Amount recycled (kg)</b>	<b>Total CO<sub>2</sub>e (t)</b>
<b>PLANT-BASED FIBERS AND MATERIALS</b>				
Coconut	84			<1
Corozo	360			<1
Cotton	14,721	324,708		2,653
Hemp	23,135			308
Paper	20			<1
Wood	3,418			4
Other plant-based fibers and materials				
<b>ANIMAL DERIVED</b>				
Alpaka				
Bees wax	1,450			1
Down		23,174		37
Leather	79,925	116,000		1,537
Silk	233			21
Wool	2,861	100,695	1,132	3,728
<b>MAN-MADE CELLULOSIC FIBERS</b>				
Lyocell	92	16,156		184
Modal	8,500			123
Viscose	1,729			26
Other man-made cellulosic fibers	347			6

## N-7 RAW MATERIAL INFLOW (CONTINUED)

Materials	Amount conventional (kg)	Amount more Sustainable (kg)	Amount recycled (kg)	Total CO <sub>2</sub> e (t)
<b>SYNTHETICS FIBERS AND MATERIALS</b>				
ABS plastics	162			1
Acrylic	18,648			272
Elastane	17,703			154
ePE/PU	2,876			11
ePTFE	1			<1
Fiber glass reinforced plastic (FRP)	3,274			63
LDPE			6,276	34
PLA	250			1
Polyamide (Nylon, etc.)	112,323		267,655	3,872
Polyester	278,775		747,658	8,410
Polyethylene	2,921			11
Polypropylene	95,937			366
Polyurethane	16,331			186
Polyvinyl chloride	4			<1
POM	26,482			145
Thermoplastic Elastomere	15			<1
Thermoplastic Polyurethane	9,161			70
Tritan	801			6
Other synthetic fibers				
<b>METALS AND INORGANIC</b>				
Alloy	20,146			52
Aluminium	4,656			43
Brass	55,526			51
Stainl. Steel	3,445			13
Steel	18,388			44
<b>FOAMS</b>				
Polyurethane foam	41,119			220
<b>RUBBER</b>				
Butyl rubber				<1
Other rubber	147,986			1,040
<b>OTHER MATERIALS AND SUBSTANCES</b>				
Glue	59,847			299
Paraffine	11,687			8
Silica Gel	14,964			23
Silicone	12			<1
Vinylon F	123,141			2,492
Other materials and substances	179			<1
<b>Total</b>	<b>1,214,401</b>	<b>580,733</b>	<b>1,013,485</b>	<b>26,357</b>



**N-8 WASTE BY COMPOSITION, IN METRIC TONNE**

Waste composition	Waste generated (t)	Waste diverted from disposal	Waste directed to disposal	Percentage of non-recycled waste
Biodegradable waste	142	149	0	0.00%
Chemicals (hazardous)	0	0	0	0.00%
Chemicals (non-hazardous)	0	0	0	0.00%
Glass	0	0	0	0.00%
Metal	4	4	0	0.00%
Mixed commercial waste	124	17	108	87.10%
Other	3	0	2	66.67%
Other Hazardous (Batteries, WEEE, ...)	0	0	0	0.00%
Paper and Cardboard	1,652	1,645	7	0.42%
Plastic	105	48	57	54.29%
Residual waste	78	4	73	93.59%
Wood	13	13		0.00%
Total waste	2,121	1,880	247	11.65%

Local standards are used for metric conversion. Although data quality is improving, the data sets are most likely not showing the full picture. Amounts smaller 1 t are not shown in the table but considered for GHG accounting.

**BREAKDOWN TRANSPORT EMISSIONS**

Modality Inbound transport	2024 t CO <sub>2</sub> e	2023 t CO <sub>2</sub> e
Truck	1,371	1,559
Sea (after deduction of SMFB certificates)	46	619
Air (w/o RFI 2.7)	1,132	509
Air (with RFI 2.7)	3,056	1,374
Rail	30	232

**FOOTPRINT PER FTE**

KPI	2024	2023
CO <sub>2</sub> e (t)*	2.24	2
kWh	10,080	9,340
Travel (km)	1,041	1,840
Paper (kg)**	5	11
H <sub>2</sub> O (m <sup>3</sup> )	60	21

## E-1 COMPLIANCE CASES 2024

Case	Description	Action	Closed/ Pending
Administrative Offence	Violation of German NSG-VO	Matter is still pending	Pending
Car Policy	Request for revision of Policy	Suspension of car policy until 12/2024	Closed
CBAM	clarification if CBAM applies	CBAM applies to tentpoles and keyrings in FJR	Closed
Chemicals	Chemical Test fail	Supplier contacted, correctiv action demanded	Closed
Chemicals	Chemical Test fail	Supplier contacted, correctiv action demanded	Closed
Chemicals	Reach Request came in via Compliance	> Chemical team	Closed
Chemicals	Question regarding exemptions from RSL/ Chemical Guideline	Risk Analysis conducted: Exemptions approved	Closed
Chemicals	var. Chemical test fails	Supplier contacted, correctiv action demanded - Prop65 labeling in the US initiated	Closed
CoC violation	Request for CoC exemptions	Risk Analysis conducted: Exemptions approved	Closed
CoC violation	Unauthorized production for GT	Corrective action required: Sale of products stopped; after provision of required documentation, released	Closed
Conflict of Interest	question regarding possible conflict of interest	analysed and approved. No Col detected	Closed
Discrimination	Website accessibility (ADA)	three cases of website accesibility - legal settlement (70,000 USD)	Closed
Discrimination	Employee complaint	Employee complaint racial discrimination. IL Dept. Of Human Rights assessment. Case found not being justified	Pending
Discrimination	Employee complaint	Employee complaint sexual discrimination. NY Dept. Of Human Rights assessment but employee has withdrawn complaint.	Closed
EPR	non-compliance with NL EPR legislation	Legal/compliance check - corrective action: external consultations	Closed
Fraud & Theft	company theft and fraud in the Nordics	Police investigation, dismissal of employees after theft detection	Closed
GDPR	German Federal Police Order	Approved by Legal and DPO	Closed
GDPR	various discussions and requests regarding data access	Legal Dept and DPO assessed each case and decided on a case-by-case basis	Closed
Gifts & Benefits	Invitation to Taiwan	not approved because too many benefits granted	Closed
Gifts & Benefits	Invitation to Norway	CoC guard rails: approved, only under conditions	Closed
Gifts&Benefits	Invitation (football match)	Compliance Check, Guardrails set: not approved	Closed
Harrassment	Resignation/Conflict at the workplace	HR & Trade Unions SE involved; case resolved	Closed
Harrassment	Unappropriate behavior of HR Manager during X-mas party SWE	hearing and dismissal - sexual harrasment	Closed
Harrassment	grievance directly to CSR Team: supplier employee in VN	investigation of case, involvement of trade union, manager and local legal service; WE program offered	Closed
HinSchG	Complaint about not following HinSchG in Fenix Outdoor	Legal check: unjustified claim - responded to complaining party	Closed
IP Rights	Complaint: possible trademark infringement	removal of possible trademark infringements from websites and marketing materials	Closed
IP Rights	Counterfeit/ copy of Fenix Outdoor product	settlement (products removed from market)	Closed
IP Rights	Trademark infringement	settlement removal of trademarked item	Closed
Labelling	Check regarding product labelling: mosquito proof	checked and legal check performed: permissable in the US	Closed



## E-2 TAXES PER COUNTRY

	Total tax	Norway	Sweden	Netherlands	Switzerland	USA	Germany	Finland	Denmark	Other
EUR	-20,657,005	-472,553	-9,066,374	-1,750,165	-226,863	-4,488,386	-2,287,618	-596,023	-681,831	-1,087,195
Of total tax	100 %	2 %	44 %	8 %	1 %	22 %	11 %	3 %	3 %	5 %
		Diff	Exist Internet	AS						
	Sum per company									
9305 Total Net sales *	685,581,382	-1	735,089	1,362,130	3,632,165	178,032	3,972,319	20,307,473	1,290,431	
9308 Total other operating income, external *	13,218,635	27,293	15,785	14,944	14,868	128,817	677,462	168,337	14,278	
9309 Total other operating income, internal *	-3	-227,462	1			20,822,142	368,923	187,986	6,620	
9310 Total income *	698,800,013	699,000,183	1,377,915	3,647,109	14,868	21,128,991	34,018,704	20,663,796	1,311,329	
9457 Profit/loss before income tax *	35,271,644	188,403	12,986	-598,633	4,904,687	-4,178,053	801,591	3,837,565	20,541	
8910 Current tax on profits for the year	-19,020,370	-19,020,369	-2,781			-175,255		-835,665	-2,360	
8940 Deferred tax	-1,549,880	-1,549,883	113,740					-8,280		
8941 Deferred tax (IFRS16)	75,321	75,321	0			-55		-1,468	284	
8920 Adjustment for current tax of prior periods	-107,255	-107,255	0					-48,949		
8980 Other taxes	-54,821	-54,822	1			546,652		-5,699		-22,384
9460 Total tax	-20,657,005	-20,657,008	-2,781	113,740	-738,007	-5,754	-225,672	-843,661	-24,744	
9499 Net P&L for the year *	14,614,639	188,403	10,205	-484,893	4,166,680	-4,183,807	575,919	2,993,904	-4,203	
EUR	-19,182,446	-575,256	-11,122,854	-2,022,278	-231,461	50,034	-2,373,057	-594,440	-670,718	-1,642,186
Of total tax	100 %	3 %	58 %	11 %	1 %	-0 %	12 %	3 %	3 %	9 %

**S-1 NUMBER OF HUMAN RIGHTS AND ENVIRONMENTAL BRAND AUDITS (HREDD)**

Audit Grade	Tier 1 suppliers	Tier 2 suppliers	Summary in percentage
A	13	3	15%
B	41	11	48%
C	26	8	31%
D	4	2	6%
<b>In total</b>	<b>84</b>	<b>24*</b>	<b>108</b>

\* additional 5 migrant worker assessments without grading

**S-2 AUDIT COVERAGE BRAND TIER 1 SUPPLIERS PER YEAR**

Year	Audit coverage
2023	45%
2024	53%

**S-3 HREDD RISK ANALYSIS OF FENIX OUTDOOR BRANDS PRODUCTION COUNTRIES (MAIN FOCUS: TIER 1 SUPPLIERS)**

Production countries (not displaying all production countries, only audit-related)	Tier 1 & 2 level		Only Tier 1 level		
	Country risk score according to LRQA's EiQ (Risk key: extreme, high, medium, low)	Number of received HREDD assessments (vSLCP & audits) in production countries	Number of Tier 1 factories	Main Tier 1 production countries with highest purchase volume marked with "x"	No. of Tier 1 facilities classified as high-risk according to internal ESG risk analysis
Bulgaria	Medium	1	5		
China	High	36	54	x	2
Croatia	Medium	1	1	x	
Finland	Low	1	1		
India	High	1	1		
Indonesia	High	8	5	x	3
Italy	Medium	8	8		
Japan (only Tier 2 audited)	Low	1	0		
Lithuania	Medium	2	6	x	
Philippines	High	1	2		
Portugal	Medium	3	9		
Romania	Medium	2	2		
Serbia	Medium	3	3		1
South Korea (only Tier 2 audited)	Medium	4	0		
Taiwan (5x migrant worker assessments through AAFA/FLA working group)	Medium	13	2		1
Turkey	High	1	1		
Vietnam	High	27	30	x	3



**S-4 OVERVIEW OF NUMBER OF FINDINGS PER ASSESSMENT TOPIC AND SEVERANCE LEVEL**

Assessment Topic	Zero Tolerance	Critical	Major	Moderate	Minor	Total Share
1. Transparency & Business Integrity	1	4				<0%
2. Management System				106	34	16%
3. Hiring, Disciplinary & Termination			5	4	4	1%
4. Young Worker & Child Labor			2	1		<0%
5. Forced Labor		2	2			<0%
6. Harassment & Abuse					1	<0%
7. Discrimination				3		<0%
8. Freedom of Association & Grievance			21	7	10	4%
9. Wages & Benefits			46	36	3	10%
10. Hours of Work		1	24	19	27	8%
11. Health & Safety			178	243	73	56%
12. Environment			16	5	7	3%
13. Subcontracting	1					<0%
<b>Total share</b>	<b>0%</b>	<b>1%</b>	<b>33%</b>	<b>48%</b>	<b>18%</b>	

**S-5 WAGE DATA COLLECTION AND EVALUATION**

Production country	Number of 2023 wage data sets collected	Average minimum wage of factories	Average net GLWC estimate	Average net wage of evaluated data sets	Average net living wage gap in %	Number of factories above the living wage estimate	Number of factories below the living wage estimate
China	22	2,051 RMB	3,314 RMB	3,051 RMB	8	n/a	n/a
Vietnam	7	4,085,714 VND	7,073,673 VND	6,722,675 VND	5	3	4
Other countries in Europe	2	n/a	n/a	n/a	n/a	n/a	n/a

**S-6 STATUS OF TIER 1 SUPPLIER FACTORY SCORECARDS REGARDING SUSTAINABILITY CRITERIA**

Year	2024	2023
Average score of sustainability criteria	40.47%	34.86%
Total number of created scorecards	132	127

**W-1 TOTAL NUMBER OF EMPLOYEES IN FTE**

	2024			2023		
	Number of employees (FTE)	Of whom men	Of whom women	Number of employees (FTE)	Of whom men	Of whom women
Sweden	496	206	290	582	256	326
Norway	66	30	36	128	52	76
Denmark	110	61	49	110	63	47
Finland	153	60	93	147	55	92
Germany	1,099	619	480	1,097	625	472
Austria	5	3	2	6	4	2
Holland	91	53	38	91	61	30
England	43	29	14	45	31	14
Switzerland	15	6	9	21	8	13
Hungary	70	12	58	78	14	64
Americas	430	221	209	461	233	228
China	25	10	15	27	11	16
Other countries	187	84	103	179	82	97
<b>Total, Group</b>	<b>2,790</b>	<b>1,394</b>	<b>1,396</b>	<b>2,972</b>	<b>1,491</b>	<b>1,481</b>

**W-2 WORKFORCE BY EMPLOYMENT TYPE**

based on headcount

Country	Gender	Permanent employees		Temporary employees		Hourly paid employees	
		number	%	number	%	number	%
Germany	Female	457	36.0%	105	8.3%	0	0%
	Male	569	44.8%	139	10.9%	0	0%
Sweden	Female	374	49.2%	51	6.7%	179	24%
	Male	292	38.4%	43	5.7%	142	19%
Finland	Female	128	57.4%	15	6.7%	116	52.0%
	Male	77	34.5%	3	1.3%	54	24.2%
Denmark	Female	106	35.7%	12	4.0%	90	30.3%
	Male	160	53.9%	19	6.4%	126	42.4%
Norway	Female	51	52.0%	8	8.2%	41	42%
	Male	33	33.7%	6	6.1%	24	24%
Netherlands	Female	21	37.5%	1	1.8%	0	0%
	Male	34	60.7%	0	0.0%	0	0%
Switzerland	Female	9	90.0%	0	0.0%	0	0%
	Male	3	30.0%	0	0.0%	0	0%
Hungary	Female	57	100.0%	0	0.0%	0	0%
	Male	11	100.0%	0	0.0%	0	0%
China (JV)	Female	0	0.0%	186	100.0%	0	0%
	Male	0	0.0%	27	100.0%	0	0%
Asia (other)	Female	59	51.8%	55	48.2%	0	0%
	Male	53	60.0%	36	40.0%	0	0%
USA/Canada	Female	194	90.7%	10	4.7%	10	4.7%
	Male	217	93.9%	7	3.0%	7	3%



## W-2.1 WORKFORCE FENIX OUTDOOR GROUP

(from 2023 data sets, without JV)

	Full-Time		Part-Time	
	number	%	number	%
Female	888	44.0%	1,128	56.0%
Male	1,120	57.9%	815	42.1%

## W-3 WORKFORCE SEGMENTATION (BASED ON HEADCOUNT)

		Europe		Asia		North America		
		Female	Male	Female	Male	Female	Male	Nonbinary
Executive Team	Under 30 years	0	0	0	0	0	0	0
	30 to 50 years	1	3	0	0	0	0	0
	Over 50 years	1	2	0	0	0	1	0
Top Management	Under 30 years	0	0	0	0	0	1	0
	30 to 50 years	3	10	3	0	5	4	0
	Over 50 years	2	16	0	4	2	5	0
Middle Management	Under 30 years	1	2	0	1	10	15	0
	30 to 50 years	18	27	8	6	9	22	0
	Over 50 years	12	14	0	3	1	4	0
First Line Managers	Under 30 years	7	13	1	0	13	12	0
	30 to 50 years	52	70	28	30	2	5	0
	Over 50 years	18	27	0	1	1	1	0
Associates	Under 30 years	38	29	4	0	105	89	5
	30 to 50 years	197	217	21	14	28	37	0
	Over 50 years	104	129	2	1	5	0	0
Workers	Under 30 years	386	371	42	11	5	5	0
	30 to 50 years	393	324	166	36	12	13	1
	Over 50 years	184	124	0	10	5	7	0

**W-4 KEY WORKPLACE SAFETY STATISTICS**

Total result	
Categories	Number of work-related injuries
Injuries during work / office hours	110
High consequence work-related injuries (excluding fatalities)	0
Work-related fatalities	0
Lost days because of injuries and occupational diseases	532

The nature of work, executed in our own operations are:

- office work
- warehouse work
- store sales and restocking
- own production of shoes

The majority of incidents happen:

- on the way to/from work
- warehouse
- office

**W-5 TOTAL HOURS OF TRAINING PER EMPLOYEE**

Category	Male hrs/year/person	Female hrs/year/person	Nonbinary hrs/year/person
Workers	32	32	80
Associates	40	40	80
First line Managers	45	45	0
Middle Management	16	14	0
Senior Management	24	24	0
Executive Management	8	0	0

Global average: 40.29 hours

Total hours invested: 112,409

**W-6 WORKFORCE COVERED BY COLLECTIVE BARGAINING AGREEMENTS**

Europe	Asia	Americas
85,90%	0%	0%

Signed Code of Conduct by Employees	
Goal	100%
2024	99.5%

**W-8 PAYMENT RATIOS: GENDER PAY GAP AND HIGHEST PAID INDIVIDUAL / LOWEST PAID INDIVIDUAL**

EUROPE			
Country	Gender Pay Gap	Annual Total Rem. Ratio	Ratio highest vs lowest income
Germany	12.7%	7.9	10.1
Sweden	17.9%	8.7	26.7
Denmark	5.7%	3.9	5.2
Norway	11.8%	2.3	3.1
Netherlands	31.3%	4.3	5.4
Switzerland	-20.9%	1.2	1.3
ASIA			
all countries	5%	n/a	1.3
AMERICAS			
all countries	12%	30.44	5.53

**W-7 WORKING HOURS AND FLEXIBILITY**

Category	Number of employees
Flexible working hours	800
Job-share	0
Sabbatical	0
Telecommuting	800
Trust-based working hours	450
One day home office	1,500

Working Hours follow local laws; we base our calculation on a 40 hrs work week.



## W-9 COMPENSATION REPORT SUMMARY

COMPENSATION BOARD OF DIRECTORS 2024 TEUR (audited)	Base salary	Benefits and other remuneration	Consultant fee	Pension contributions	Social costs	Variable compensation related to and accrued in 2024, incl. soc. cost	Total	Total in TCHF EUR/CHF 0,9531729
Martin Nordin, Executive Chairman	734	37	-	18	66	-	855	815
Susanne Nordin	204	13	-	-	27	-	244	232
Ulf Gustafsson	-	28	54	-	-	-	82	78
Mats Olsson	-	28	-	-	-	-	28	27
Sebastian Von Wallwitz	-	28	-	-	-	-	28	27
Rolf Schmid	-	28	63	-	-	-	91	87
<b>Total</b>	<b>938</b>	<b>162</b>	<b>117</b>	<b>18</b>	<b>93</b>	<b>-</b>	<b>1,328</b>	<b>1,265</b>
<b>Total fixed compensation</b>	<b>938</b>	<b>162</b>	<b>117</b>	<b>18</b>	<b>93</b>	<b>-</b>	<b>1,328</b>	<b>1,265</b>

COMPENSATION BOARD OF DIRECTORS 2023 TEUR (audited)	Base salary	Benefits and other remuneration	Consultant fee	Pension contributions	Social costs	Variable compensation related to and accrued in 2023, incl. soc. cost	Total	Total in TCHF EUR/CHF 0,9531729
Martin Nordin, Executive Chairman	721	36	-	7	70	-	833	809
Susanne Nordin	200	13	-	7	20	-	240	233
Ulf Gustafsson	-	27	46	-	-	-	72	70
Mats Olsson	-	26	-	-	-	-	26	25
Sebastian Von Wallwitz	-	26	-	-	-	-	26	25
Rolf Schmid	-	26	59	-	-	-	86	83
<b>Total</b>	<b>921</b>	<b>153</b>	<b>104</b>	<b>13</b>	<b>90</b>	<b>-</b>	<b>1,282</b>	<b>1,245</b>
<b>Total fixed compensation</b>	<b>921</b>	<b>153</b>	<b>104</b>	<b>13</b>	<b>90</b>	<b>-</b>	<b>1,282</b>	<b>1,245</b>

COMPENSATION BOARD SENIOR EXECUTIVES 2024 TEUR	Base salary	Benefits and other remuneration	Pension contributions	Social costs	Variable compensation related to and accrued in 2024, incl. soc. cost	Value of options at grant date	Total	Total in TCHF EUR/CHF 0,9711551
President	441	65	-	-	92	-	598	570
Senior Executives	1,654	65	378	401	212	-	2,710	2,583
<b>Total</b>	<b>2,094</b>	<b>131</b>	<b>378</b>	<b>401</b>	<b>304</b>	<b>-</b>	<b>3,308</b>	<b>3,153</b>
<b>Total fixed compensation</b>	<b>2,094</b>	<b>131</b>	<b>378</b>	<b>401</b>	<b>304</b>	<b>-</b>	<b>3,004</b>	<b>2,863</b>

COMPENSATION BOARD SENIOR EXECUTIVES 2023 TEUR	Base salary	Benefits and other remuneration	Pension contributions	Social costs	Variable compensation related to and accrued in 2023, incl. soc. cost	Value of options at grant date	Total	Total in TCHF EUR/CHF 0,9711551
President	432	64	-	-	-	345	841	817
Senior Executives	1,304	174	261	291	-	1,037	3,066	2,978
<b>Total</b>	<b>1,736</b>	<b>237</b>	<b>261</b>	<b>291</b>	<b>-</b>	<b>1,382</b>	<b>3,907</b>	<b>3,795</b>
<b>Total fixed compensation</b>	<b>1,736</b>	<b>237</b>	<b>261</b>	<b>291</b>	<b>-</b>	<b>-</b>	<b>2,525</b>	<b>2,452</b>

## NOTE 5 ANNUAL REPORT 2024

2024	Gross salary	Benefits and other remunerations	Pension contributions	Total
Executive chairman, Martin Nordin	734	37	18	789
President, Alexander Koska	441	65	-	506
Other Senior Executives and Susanne Nordin	1,858	78	378	2,313
<b>Total</b>	<b>3,032</b>	<b>180</b>	<b>396</b>	<b>3,608</b>

# 7. About the Report (ESRS 2)

## 7.1 GENERAL

Fenix Outdoor is pleased to present its 2024 Sustainability Report. We always strive to engage our stakeholders and want to uphold our commitment to transparency and corporate responsibility. Our sustainability reporting takes place on an annual basis. This report has been prepared in accordance with the Corporate Sustainability Reporting Directive (CSRD) to provide a comprehensive overview of our organization's environmental, social and governance (ESG) performance. The report aims to ensure transparency, accountability and compliance with the European Union's sustainability disclosure requirements. Through this document, we seek to offer stakeholders – investors, customers, employees, regulators and the broader community – insights into our sustainability initiatives, impacts and strategic commitments. This report has not been yet verified but will be spot-checked during the course of 2025.

## 7.2 SCOPE AND BOUNDARIES

The scope of this report covers the financial year 2024 and includes all relevant business units, subsidiaries and operational sites where we have significant control or influence. The report provides both qualitative and quantitative data on key ESG factors, assessed against applicable regulatory frameworks, international standards and our internal sustainability goals. In part, we also include the information from our joint venture in China.

## 7.3 REGULATORY AND REPORTING FRAMEWORKS

This report aligns with the CSRD, incorporating the European Sustainability Reporting Standards (ESRS) as prescribed by the European Financial Reporting Advisory Group (EFRAG). Additionally, we have referenced other globally recognized frameworks, including:

- Global Reporting Initiative (GRI)
- United Nations Sustainable Development Goals (UN SDGs)
- OECD Guidelines for Multinational Enterprises

Our disclosures are designed to ensure compliance with double materiality principles, addressing both financial and impact materiality.

We also aligned our reporting according to Swiss Ordinance 964a through 964c.

The Content Index lists the indicators as defined by the ESRS that have been applied. Material topics addressed were raised in Fenix Outdoor's Materiality Matrix 2023 and reassessed in 2024. In light of the ESRS requirements, we streamlined it to be compliant with respect to the double materiality requirements. The respective indices are easy to find with page references, and there are further comments for those who need any clarifications. The previous Sustainability Report was published in April 2024, and we will continue to publish on an annual basis for the foreseeable future.

## 7.4 METHODOLOGICAL INFORMATION

The reporting period is the business year 2024. The report also discloses information on key events and data from previous years for comparison. If at the time of publication, the final figures of 2024 were not yet available, comparable annual figures for 2023 or a comparable time range of 12 months (e.g., October 2023 through October 2024) have been used as the basis for calculation. Certain datasets are constantly used with a year's delay (e.g., water and heating figures for stores in Germany). These are marked accordingly in the report or further described in the section about the methodologies used for environmental data. As some data are location and market-specific but have been summed up, the indication of data not corresponding with the actual business year is not possible. Some data only refer to a portion of the business year, since the location was not in operation for a full 12-month period. Where no specification for electricity consumption data was available, the country average mix was used or the data from the year before. Since not all emission factors were available for all locations for the recent year, older datasets were also used, preferably from publicly available scientific or governmental sources. However, the most recent conversion factors are used. In contrast to the annual report, the CSR Report also includes data from Chinese locations (JV). Supplier data are integrated, as far as available, and treated as "own," where suppliers exclusively are working for Fenix Outdoor. Subsequently, personnel datasets are also to some degree on a different basis than in the annual report.

Relevant CO<sub>2</sub>e emissions from some exclusive suppliers have been included in the offsetting data. Gas consumption data for 2024 for Hanweg (Germany) are based on the period from May 2023 to April 2024. Some emission factors were calculated internally. Some data have been extrapolated and estimates are based on a conservative behavioral assumption (e.g., per-capita data from statistical handbooks for the respective region or country). Hence, some data are likely to be overstatements. The reporting entities cover more than 99% of the corporate value generation and 99% of the Group's employees. However, where needed, calculation and extrapolation of data was done, in order to give a fair and realistic picture and to represent the aforementioned coverage.

In most instances we used the overall FTE average given in the annual report; for some data (e.g., water consumption and emission from travel or staff training hours) FTE data is not suitable; therefore, we used headcounts or internal survey results. Where other bases for calculations are used, this is stated separately (e.g.,  $n = x$ , where  $x$  is the reference group size). We define full-time equivalents (FTE) on the basis of a working week of 40 hours. To establish the number of working hours we calculate an eight-hour day on 220 days per year as working days.

Around 75% of the nonfinancial data is checked internally, and all financial data is checked externally, giving a reasonable yet still not fully satisfactory level of confidence for all information provided in this report.

Transportation figures and CO<sub>2</sub>e emission data were supplied by travel agencies, shipping companies and external service providers, as well as suppliers. They therefore constitute a reasonable overview of Scope 1, 2, and 3 emission data. We have adjusted the data using the RFI factor of 2.7 for certain datasets as stated. In this report we have fully relied on the accuracy of the sources' data collection and checked only for the data's plausibility. In the United States, Sweden, the Netherlands and Germany we relied increasingly on our own datasets, which are available through our IT system. The calculation of emissions data was based on the Greenhouse Gas Protocol wherever possible; German and Swedish locations showed the actual energy mix on the invoices or were directly communicated by the supplier (e.g., reference year: 2023). The fleet information was provided by shipping companies and internal sources. In some cases, assumptions were made based on the fuel consumption of certain locations. Data on business travel and commutes were calculated on available information within the Group and provided by individual staff members and carriers.

Other bases of calculation are stated separately. Data for economic factors and personnel information cover all of the Group's consolidated companies. If not listed in full-time equivalent (FTE) numbers, details concerning employee structure are based on numbers of employees. Both refer to the cut-off of data (December 31, 2024) unless otherwise indicated. Capture efficiency is more than 90%. According ESRS we focused on entities with 50 and more employees. Other entities are reflected from time-to-time (e.g., always in Chapter 2 but only sporadic in Chapter 5) but not highlighted in tables or texts. However, data on seasonal staff and interns is only available in an overview list, so no analysis of this staff group was possible.

#### 7.4.1 Methodology on Environmental KPIs CSR Report 2024

The following is a description and a more in-depth explanation of the methodologies we applied for the 2024 CSR Report of Fenix Outdoor International AG. We will focus on specific environmental- and emissions-related information but also explain other aspects as we deem necessary.

##### Data Collection and extrapolation

Data is collected via our newly implemented web-based sustainability reporting tools Novisto and Minimum.

Data gaps are filled by the following hierarchy:

- Data owners/providers fill data gaps with average data based on the specific dataset for which they are responsible for (e.g., stores and average kWh/m<sup>2</sup>)
- Missing datasets from locations/entities are filled by the person responsible for environmental accounting based on comparable locations/entities when the first-year data is missing
- Missing data for consecutive years is taken from prior years
- Main emission factor sources are:
  - o AIB and CaDI databases for electricity
  - o DEFRA for biogenic carbon, gas and district heating if local emission factors are not available
  - o DEFRA for Scope 3 emissions except transportation and raw materials
  - o EcoTransit for transportation
  - o MSI data base for raw materials if fabric-specific information is not available
  - o Friluft's Retail assortment-related emission factors as well as emission factors for end-of-life treatment are derived from an internal study conducted by MyClimate.

##### Scope 1 and 2 emissions

Primary energy for Globetrotter in 2024 is based on 2023 invoices. Gas consumption for Friluft'sland in 2022 was corrected. Missing datasets were filled with prior data for Friluft'sland in Denmark, our company flat in Ludwigslust and Globetrotter in Germany. Prior numbers have also been used as estimates for gas consumption and adoption of biogas certificates.

District heating data from Globetrotter is always based on the year before except for one location. For Naturkompaniet and Partioaitta data is partially estimated based on m2. Emission factors have not been updated over the years. Missing emission factors have been filled up with DEFRA emission factors for heat.

Renewable energy accounting methodology changed for renewable energy purchases. Before 2022, life-cycle emissions from renewable energy consumption were accounted for in Scope 2. From 2022 onward, LC emissions are accounted for in Scope 3, category Fuel- and Energy-Related Activities Not Included in Scope 1 or Scope 2. For target tracking this was adjusted for all years back to 2019 but is not corrected in the past CSR Reports.

Franchise stores (currently one store) are included in Scope 1 and 2 emissions due to the internal accounting system. Partner stores in Asia, South America and Europe are run by local distributors and are therefore out of our control and out of scope.

Other GHGs (CH<sub>4</sub> and N<sub>2</sub>O) from electricity consumption are calculated explicitly for the first time in 2023 for past years up to 2019 based on DEFRA emission factors for the respective years. Emission factors used to calculate emissions from gas and district heating have been based on CO<sub>2</sub>e. For electricity, we assume that provided emission factors are only based on CO<sub>2</sub>, so we added the CO<sub>2</sub>e from CH<sub>4</sub> and N<sub>2</sub>O to get CO<sub>2</sub>e from electricity. Renewable electricity is accounted for as zero for all three GHGs (CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O).

CO<sub>2</sub> emissions Outside of Scopes from bioenergy are calculated for biogas usage and based on DEFRA emission factors. CO<sub>2</sub>e emissions from biogas stem from CH<sub>4</sub> and N<sub>2</sub>O, which are not absorbed during growth (unlike CO<sub>2</sub>).

##### Scope 3 emissions

###### Category 1: Purchased goods and services

Supply chain emissions resulting from energy consumption during manufacturing of our products are collected through an annual supply chain survey at the beginning of the year from all known suppliers (all tiers) as well as from completed FEM/vFEM for the past year. For calculations, only data from Tier 1 and vertical suppliers is used. Actual data is extrapolated to the total of all Tier 1 suppliers. However, emissions vary depending on the subset of suppliers taking part in the survey. Number of suppliers is based on data received for the calendar year 2024 (cutoff December 31, 2024).

Emissions from raw materials are calculated with the Higg MSI and with specific LCA data. In case a material is from recycled or more sustainable resources but not certified by a third-party standard, (GRS, OCS), conventional emission factors have been used. Material consumption from Hanweg excludes material usage for direct-on products. Trims data from Tierra is missing and only partially available for Royal Robbins but accounted for less than 2% of the inventory last year.

Emission factors for silica gel and paraffin changed and were adopted for the past years to ensure comparability.

The latest packaging data from Almere is from 2021. However, operations in Almere have decreased since 2021, so the figures must be taken with caution. Data does not include transport carton pack-



aging from any of the brands but is reflected in the waste emissions.

Activity data for toner/ink as part of office supply is available, but due to missing emission factors we did not calculate them in our reporting scope (<1% of weight of all reported office supply).

To calculate our events' emissions, we used the MyClimate Online Event Calculator. However, many of the requested parameters (e.g., heated, or cooled space, amount of mineral water, etc.) do not entirely apply for an outdoor event. Data was not available for the 2024 Globetrotter Festival events, so 2023 numbers were used.

For the first time we included website sessions and purchased goods in the Friluft's Retail assortment (excluding Fenix Outdoor Brands) in the inventory. Due to lack of data, there is no baseline calculation, but both values are used for prior years for comparability's sake. Website emissions have been calculated based on our site visits and an emissions per site figure taken from the online tool website-carbon.com. Assortment emissions have been calculated based on an average emission factor per product category derived from a project with MyClimate. During the project, a methodology was developed to calculate Globetrotter's Scope 3 emissions from the assortment.

#### **Categories 4 and 9:** Upstream and downstream transport and distribution

Inbound and outbound transportation CO<sub>2</sub>e emissions have been calculated and determined as per the latest GLEC-framework (v3.1). Standard emission factors have been used for all modalities for inbound and outbound freight unless specified by the transport partner and according to our chosen framework. 100% of our transportation partners delivered data.

The GLEC framework itself lists numerous shortcomings for the emission factors per modality type. Please refer to the actual framework at: <https://www.smartfreightcentre.org/en/our-programs/global-logistics-emissions-council/calculate-report-glec-framework/>

The GLEC framework currently does not provide CO<sub>2</sub> or other emissions for parcel transport/deliveries. Therefore, emission factors as they have been provided by the parcel carriers themselves have been used, also when these were not calculated according to the GLEC methodology for parcel distribution.

Well-to-wheel emission factors have been used for all modalities. Shortest Feasible Distance (SFD) distances have been assumed for all movements in case distance was not provided by the transport partner. In case there are a multitude of destinations within one delivery country but all for the same brand, the distance has been determined based on the average distance to destinations that together represent at least 80% of the total moved weight.

In case the emissions other than CO<sub>2</sub>e for road distribution (excluding parcel) were not available or reported by transport partners, these have been calculated in-house based on average emissions per ton-kilometer. These averages have been derived from the Hellmann Logistics road distribution numbers, which is according to GLEC methodology and has a sample size of 228 shipments.

It 2022 we calculated other emissions than CO<sub>2</sub>e for the first time on our own, in case they were not reported by service providers. This explains the deviation from prior reporting years.

Only the emissions have been reported for transportation for which Fenix Outdoor was responsible according to the INCOTERM 2020 applicable for each transport (Inbound: EXW, FCA and FOB, Outbound: DAP, DPU and DDP).

For container and air-freight transport, year 2024 has been defined based on the arrival date (so it could have departed in, for example, November 2023). For outbound transport data, if known, the loading or "ship" date has been used to determine the year. If a shipment departed a Fenix entity in 2024, it has been considered as

in scope for 2024 reporting, as well as when the goods arrived at the final destination in 2025.

In terms of the allocation of emissions to the different brands in the Fenix Outdoor group, in case it could not be derived from the data itself, transportation emissions have been allocated to each brand relative to the number of shipments.

Primus transport data was considered for all shipments during the months of January to April 2023. In 2024, the divestment from Primus was complete and no transport was recorded. For the first time we included outbound transportation movements from our Swiss company Bus Sport as well as for care products from Hanwag.

In terms of completeness, transport between sites for Hanwag and warranty/resoling cases that were conducted in Vierkirchen and sent out via parcel had not been captured, but these emissions are now included. For 2023 we only reported from production site to DC and from DC to customer. These emissions make up approximately 86mt of CO<sub>2</sub>e for just under 26,000 parcels (based on 2024 data).

In 2024 we trialed the purchase and use of biofuels in our inbound transportation movements for the first time. This was in the form of Sustainable Marine Biofuels (SMBF) which we procured via our primary forwarder Flexport and their SMBF provider GoodShipping. These biofuels have been procured for the Fjällräven brand to reduce our Scope-3 emissions. The reduction of our emissions could be achieved through fuel switches with biofuels. All biofuels supplied are compliant with the sustainability criteria listed in article 29 of RED II and certified under an EU RED-approved voluntary scheme such as ISCC, RSB or REDCert. All feedstocks are 100% waste or residue according to EU RED II Directive Annex 9 A+B. Biofuel suppliers are also certified under one of these schemes. These reductions through the purchase of these biofuels cannot be claimed by another entity. Proof in the form of certificates is available.

Downstream emissions have been allocated for e-commerce shipments to the respective business units based on share of shipments that were paid by the end-customer.

#### **Category 5:** Waste generation and water withdrawal

Waste generation from Partioaitta was based on reported waste for one store location and extrapolated based on units sold in 2024. Data was missing for Naturkompaniet and Globetrotter locations, so it was extrapolated from Friluft's and Partioaitta data using a waste per product sold average. Data is missing from our Solna office, and a handful of smaller brand stores. Waste fractions smaller than 1 ton are not shown in the waste tables but are considered for GHG calculations.

Water withdrawal and discharge data is partially available. Missing data was not estimated until 2022. For 2024, we estimated the water consumption for Naturkompaniet and Partioaitta based on an average value per employee derived from data from Friluft'sland. A similar method was employed for our Alpen International locations in South Korea, using average water use per person per day to estimate the total annual figures based on employee count. For some smaller locations that reported water consumption in past reports but are missing data in the current reporting period, the past year's data was used.

#### **Category 6:** Business travel

Since 2023 we streamlined the use of our emissions factors. Air travel includes RFI as per the data set from DEFRA.

#### **Category 7:** Employee commuting

We designed our own survey to collect commuting data from our employees. Since we are working in a hybrid model, emissions are calculated based on the survey and extrapolated to all employees.

The total number of employees is not reduced by a certain share of employees working from home anymore, since most working days have been spent in the office and working-from-home emissions have been calculated separately.

CH<sub>4</sub> and N<sub>2</sub>O greenhouse gases have been calculated based on DEFRA emission factors and are available upon request. The emission factor used for commuting represents CO<sub>2</sub>e.

#### **Category 12: End-of-life treatment of sold products**

Emissions from end-of-life treatment of our products have been calculated based on an average emission factor derived from a project with MyClimate. Although the emission factor is global and not specific to a certain disposal method but rather worst-case scenario (incineration), we deem it appropriate to get an understanding of the impact of our products after use.

The number presented in the report is based on sold products from Fenix Outdoor Brands and Friluft's Retail (including external brands). Due to a calculation mistake, the prior years, including the baseline 2019, were miscalculated and are a bit overstated. However, improvements with regard to textile or shoe recycling technologies cannot be shown as of today. Different emission factors were applied for Primus and Brunton (metals and plastics).

#### **Unaccounted and excluded Scope 3 categories**

The following Scope 3 emissions are assumed to be relevant. However, emissions cannot be calculated as of today, for various reasons (lack of resources, missing data, lack of industry-specific methodology and emission factors).

- 3.2 Capital Goods
- 3.11 Use of sold products
- 3.15 Investments

The following Scope 3 categories have been excluded from our inventory because they are not relevant, not material or not applicable for our business operations:

- 3.8. Upstream leased assets
- 3.10 Processing of sold products
- 3.13 Downstream leased assets

# ESRS CONTENT INDEX 2024

Indicators		Reference Page or Comment	Status*
GRI/ESRS	The Organization and Its Reporting Practices		
GOV 2-1	Organizational details	7, 52	
GOV 2-2; ESRS 2 BP-1	Entities included in the organization's sustainability reporting	5, 52	
GOV 2-3	Reporting period, frequency and contact point	52	
ESRS 2 BP-2	Restatements of information	53	
GOV 2-5	External assurance	None; spot-checks in 2025	
	Activities and Workers		
2-6; ESRS 2 SBM-1	Activities, value chain and other business relationships	5, 28–29	
2-7; ESRS 2 SBM-1; ESRS S1-6	Employees	33–37	
2-8; ESRS S1-7	Workers who are not employees	36	
	Governance		
2-9; ESRS 2 GOV-1; ESRS G1-5	Governance structure and composition	5, 19	
2-10	Nomination and selection of the highest governance body	According to Swiss law	
2-11	Chair of the highest governance body	3, 5, 19	
2-12; ESRS 2 GOV-1, ESRS 2 GOV-2	Role of the highest governance body in overseeing the management of impacts	19	
2-13; ESRS 2 GOV-1; ESRS 2 GOV-2; ESRS G1-3	Delegation of responsibility for managing impacts	19, 21	
2-14; ESRS 2 GOV-1, ESRS 2 GOV-5, ESRS 2 IRO-1	Role of the highest governance body in sustainability reporting	19	
2-15	Conflicts of interest	None (page 44)	
2-16; ESRS G1-1, ESRS G1-3, ESRS 2 GOV-2	Communication of critical concerns	19	
2-17; ESRS 2 GOV-1	Collective knowledge of the highest governance body	19	
2-18	Evaluation of the performance of the highest governance body	Annual Report, page 25f	
2-19; ESRS 2 GOV-3, ESRS E1 GOV-3	Remuneration policies	Annual Report, page 53f	
2-20; ESRS 2 GOV-3	Process to determine remuneration	Annual Report, page 53f	
2-21; ESRS S1-16	Annual total compensation ratio	50f	
	Strategy, Policies and Practices		
2-22; ESRS 2 SBM-1, ESRS 2 BP-2	Statement on sustainable development strategy	6f	
2-23; ESRS 2 MDR-P, ESRS S1-1, ESRS S2-1, ESRS S3-1, ESRS S4-1, ESRS G1-1	Policy commitments => Precautionary Principle or approach	Fenix Way, page 14; see also chapter 2–5 of this report	
2-24; ESRS 2 GOV-2, ESRS 2 MDR-P, ESRS S1-4, ESRS S2-1, ESRS S2-4, ESRS S3-4, ESRS S4-4, ESRS G1-1	Embedding policy commitments	Presented in each chapter of this report	
2-25; ESRS S1-1, ESRS S1-3, ESRS S1-17, ESRS S2-1, ESRS S3-1, ESRS S4-1	Processes to remediate negative impacts	Presented in each chapter of this report	
2-26; ESRS S1-3, ESRS S2-3, ESRS S3-3, ESRS S4-3, ESRS G1-1, ESRS G1-3	Mechanisms for seeking advice and raising concerns	e.g., 5, 19, 33	
2-27; ESRS 2 SBM-3, ESRS G1-4, ESRS E2-4, ESRS S1-17	Compliance with laws and regulations	21	
2-28; ESRS G1-5	Membership associations	6–7	
	Stakeholder Engagement		
2-29; ESRS 2 SBM-2, ESRS S1-1, ESRS S1-2, ESRS S2-1, ESRS S2-2, ESRS S2-3, ESRS S3-1, ESRS S3-2, ESRS S4-1, ESRS S4-2	Approach to stakeholder engagement	5, 25	

\*No data point was verified at the point of publication. We therefore do not present a color coding for this reporting year.



2-30; ESRs S1-8	Collective bargaining agreements	36, 50	
3-1; ESRs 2 BP-1, ESRs 2 IRO-1	Process to determine material topics	6; according to law	
3-2; ESRs 2 BP-2, ESRs 2 SBM-3	List of material topics	Presented in each chapter of this report	
3-3; ESRs 2	Management of material topics	Presented in each chapter of this report	
	<b>Economic Performance</b>		
201-1; ESRs 2 SBM-1, ESRs E1-6	Direct economic value generated and distributed	Annual report, pages 30–40	
201-2; ESRs 2 SBM-3, ESRs E1-9, ESRs E1 SBM-3, ESRs E1-3	Financial implications and other risks and opportunities due to climate change	10, 11	
201-3	Defined benefit plan obligations and other retirement plans	Annual report, pages 31, 38	
201-4	Financial assistance received from government	Annual report, page 32	
	<b>Market Presence</b>		
202-1; ESRs S1-10	Ratios of standard entry level wage by gender compared to local minimum wage	No change; see CSR Report 2023, page 52; ratio between 1: 1.5 to 1:4	
202-2	Proportion of senior management hired from the local community	100 %	
	<b>Indirect Economic Impacts</b>		
203-1; ESRs S3-4	Infrastructure investments and services supported	None	
203-2	Significant indirect economic impacts	None	
	<b>Procurement Practices</b>		
204-1	Proportion of spending on local suppliers	Local; CSR Report 2023, pages 38–39	
	<b>Anti-Corruption</b>		
205-1; ESRs G1-3	Operation assessed for risks related for corruption	100 %	
205-2; ESRs G1-3	Communication and training about anti-corruption policies and procedures	21, all employees	
205-3; ESRs G1-4	Confirmed incidents of corruption and actions taken	n/a	
	<b>Anti-competitive behavior</b>		
206-1	Legal actions for anti-competitive behavior, antitrust and monopoly practices	n/a	
	<b>Tax-related Impacts</b>		
207-1	Approach to tax	Annual report, pages 30, 32, 34	
207-2	Tax governance, control and risk management	Annual report, pages 30, 32, 34	
207-3	Stakeholder engagement and management of concerns related to tax	n/a; whistleblowing hotline	
207-4	Country-by-country reporting	45	
305-1; ESRs E1-4, ESRs E1-6	Direct (Scope 1) GHG emissions	39	
305-2; ESRs E1-4, ESRs E1-6	Energy indirect (Scope 2) GHG emissions	39	
305-3; ESRs E1-4, ESRs E1-6	Other indirect (Scope 3) GHG emissions	39	
305-4; ESRs E1-6	GHG emissions intensity	40	
305-5; ESRs E1-3, ESRs E1-4, ESRs E1-7	Reduction of GHG emissions	39	
305-6	Emissions of ozone-depleting substances (ODS)	none	
305-7; ESRs E2-4	Nitrogen oxides (NOx), sulfur oxides (SOx) and other significant air emissions	39	
	<b>Waste</b>		
306-1; ESRs E5 IRO-1, ESRs E5-4, ESRs 2 SBM-3	Waste generation and significant waste-related impacts	42	
306-2; ESRs E5-2, ESRs E5-5	Management of significant waste-related impacts	12, 42	
306-3; ESRs E5-5	Waste generated	42	
306-4; ESRs E5-5	Waste diverted from disposal	42	
306-5; ESRs E5-5	Waste directed to disposal	42	
	<b>Environmental Compliance</b>		
307-1	Non-compliance with environmental laws and compliance; Significant spills	n/a	
	<b>Supplier Environmental Assessment</b>		
308-1	New suppliers that were screened using environmental criteria	100 %	
308-2; ESRs 2 SBM-3	Negative environmental impacts in the supply chain and actions taken	12	
	<b>Employment</b>		
401-1; ESRs S1-6	New employee hires and employee turnover	33	

401-2; ESRS S1-11	Benefits provided to full-time employees that are not provided to temporary or part time employees	34	
401-3; ESRS S1-15	Parental leave	33	
	<b>Labor/Management Relations</b>		
402-1	Minimum notice periods regarding operational changes	Minimum one month; local differences apply	
	<b>Occupational Health and Safety</b>		
403-1; ESRS S1-1	Worker representation in formal joint management-worker health and safety committees	33–37	
403-2; ESRS S1-3	Types of injury and rates of injury, occupational diseases, lost days, absenteeism and number of work-related fatalities	34	
403-3; ESRS S1-1	Workers with high incidence or high risk of diseases related to their occupation	none	
403-4	Health and safety topics covered in formal agreements with trade unions	34	
	<b>Training and education</b>		
404-1; ESRS S1-13	Average hours of training per year per employee	49	
404-2; ESRS S1-1	Programs of upgrading employee skills and transition assistance programs	34–36	
404-3; ESRS S1-13	Percentage of employees receiving regular performance and career development reviews	36	
	<b>Diversity and Equal Opportunity</b>		
405-1; ESRS S1-6, ESRS S1-9, ESRS S1-12, ESRS 2 GOV-1	Diversity of governance bodies and employees	33	
405-2; ESRS S1-16	Ratio of basic salary and remuneration of women to men	50	
	<b>Non-discrimination</b>		
406-1; ESRS S1-17	Incidents of discrimination and corrective actions taken	44	
	<b>Freedom of Association and Collective Bargaining</b>		
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	25–29	
	<b>Child Labor</b>		
408-1; ESRS S1 SBM-3, ESRS S1-1, ESRS S2 SBM-3, ESRS S2-1	Operations and suppliers at significant risk for incidents of child labor	25–29	
	<b>Security Practices</b>		
410-1	Security personnel trained in human rights policies or procedures	n/a	
	<b>Rights of Indigenous Peoples</b>		
411-1 ; ESRS S3-1, ESRS S3-4	Incidents of violations involving rights of indigenous peoples	none	
	<b>Human Rights Assessment</b>		
412-1	Operations that have been subject to human rights reviews or impact assessment	100 %	
412-2	Employee training on human rights policies and procedures	All relevant employees	
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	n/a	
	<b>Local Communities</b>		
413-1	Operations with local community engagement, impact assessments and development programs	25–29	
413-2; ESRS 2 SBM-3, ESRS S3 SBM-3	Operations with significant actual and potential negative impacts on local communities	25–29	
	<b>Supplier Social Assessment</b>		
414-1	New suppliers that were screened using social criteria	100 %	
414-2; ESRS 2 SBM-3	Negative social impacts in the supply chain and actions taken	25–29, 47	
	<b>Public Policy</b>		
415-1; ESRS G1-5	Political contributions	none	
	<b>Customer Health and Safety</b>		
416-1	Assessment of the health and safety impacts of product and service categories	100 %	
416-2; ESRS S4-4	Incidents of non-compliance concerning the health and safety impacts of products and services	none	
	<b>Marketing and Labeling</b>		
417-1	Requirements for products and services information and labeling	Limited and legal: EU, USA, China etc.	
417-2; ESRS S4-4	Incidents of non-compliance concerning product and service information and labeling	none	
417-3; ESRS S4-4	Incidents of non-compliance concerning marketing communications	none	
	<b>Customer Privacy</b>		
418-1 ; ESRS S4-3, ESRS S4-4	Substantiated complaints concerning breaches of customer privacy and losses of customer data	none	

	Socioeconomic Compliance		
419-1	Non-compliance with laws and regulations in the social and economic area	44	
ESRS	General Disclosure Requirements		
GOV-4	Disclosure of mapping of information provided in sustainability statement about due diligence process	See each chapter of this report	
2 IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	5, 52	
ESRS	Climate Change		
E1-1	Transition plan for climate change mitigation	Refer to website	
E1 IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	10	
	Pollution		
E2-3	Targets related to pollution	13	
E2-5	Substances of concern and substances of very high concern	12	
E2-6	Anticipated financial effects from material pollution-related risks and opportunities	Not yet quantified	
	Water and marine resources		
E3 IRO-1	Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities	13	
E3-1	Policies related to water and marine resources	13	
E3-2	Actions and resources related to water and marine resources	13	
E3-3	Targets related to water and marine resources	14	
E3-4	Water consumption	14	
E3-5	Anticipated financial effects from material water and marine resources-related risks and opportunities	Not yet quantified	
	Biodiversity and Ecosystems		
E4 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	14	
E4 IRO-1	Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, dependencies and opportunities	14	
E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	n/a	
E4-2	Policies related to biodiversity and ecosystems	15	
E4-3	Actions and resources related to biodiversity and ecosystems	15	
E4-4	Targets related to biodiversity and ecosystems	15	
E4-5	Impact metrics related to biodiversity and ecosystems change	14ff	
E4-6	Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities	Not yet quantified	
	Resource Use and Circular Economy		
E5-1	Policies related to resource use and circular economy	16–17	
E5-3	Targets related to resource use and circular economy	17	
E5-4	Resource inflows	15–17, 41–42	
E5-6	Anticipated financial effects from material resource use and circular economy-related risks and opportunities	Not yet quantified	
	Business Conduct		
G1-6	Payment practices	According to law/ agreement (30 – 90 days)	

#### CONTACT INFORMATION:

**Aiko Bode**  
Chief Sustainability Officer

Fenix Outdoor International AG  
Weidstrasse 1a  
6300 Zug  
Switzerland  
Mailing address:  
Fuhlsbüttler Straße 29, 22335 Hamburg,  
Germany  
aiko.bode@fenixoutdoor.com

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# FENIX

OUTDOOR International AG

Fenix Outdoor International AG, Weidstrasse 1a, 6300 Zug, Switzerland

Phone: +46-(0)-660-26 62 00, [www.fenixoutdoor.se](http://www.fenixoutdoor.se), E-mail [info@fenixoutdoor.se](mailto:info@fenixoutdoor.se)

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