RESPONSIBLE BUSINESS CONDUCT POLICY

MESSAGE FROM OBERALP

As a family business, we think long-term. We think about the world we're leaving behind for our grandchildren, and their grandchildren.

We believe sustainability is not some distant goal, but a mindset, reflected in our daily actions and choices. It is about how everyone of us chooses to do things. Every day.
We take responsibility for our actions, and are committed to doing business based on a culture of ethics and compliance.

Our values are part of who we are and what we stand for. Through the principle “mindfulness guides the future”, we think of success in terms of generations, not quarters. We act long-term, using resources consciously and keeping our impact on the environment as low as possible, in every business decision and in our daily actions, with the motto “contribute”. We strive for a better balance of social and living conditions around the world, and a reduction of our collective footprint on the environment and especially on climate change, where we aim to reach Net Zero by 2050. This cannot be achieved by our actions alone, we need the collaboration of each on our partners in our network and along the supply chain.

As a Company, our Operations are conducted with Responsible Business Practices and we expect our partners to do the same.

In each decision, the human factor is always taken in consideration, whether it is for our internal workforce or for external partners.

During hiring and promotion, we evaluate both competences and potential. We care for each one of our employees, according to their needs, and strive to enable and support their well-being and professional growth, taking into account the company’s strategic goals. Everyone has the same opportunities, according to their abilities.

We promote safe and fair working conditions by empowering workers inside and outside the company, and creating solid relationships with our partners. A main priority at Oberalp is the health and wellbeing of everyone who makes our products - not just our own employees.

Many of the factories where our products are made are far away from us, and it is harder for us to monitor each step of the process. So we dedicate time and resources to making working conditions at production units fairer and more equal worldwide. This entails integrating human rights due diligence (HRDD) in our policies and operations, choosing suppliers who are already committed to ensuring safe and fair working conditions in their factories, monitoring their environmental management and performance, and cooperating with them to make the necessary improvements and reach the high standards we expect. The suppliers we source from endorse our values and work in compliance with our Responsible Business Conduct Policy, which contains the principles we stand by, and how we work as a company to uphold them. Our goal is to improve together and have “best in class” partners.

We recognize the power of collaboration, among our teams, with our partners, suppliers, retailers, NGOs and with other brands. We are not alone in this journey; other companies share our vision, and only cooperation will bring actual progress in the assessment, prevention, mitigation, and remediation processes we need to go through.

We hold the protection of workers' rights and the environment in high regard, and count achieving a balance between economic performance, social and environmental responsibility among our objectives. So along with our financial statements, each year we report publicly on our actions, progress and challenges with a view to this responsibility.

We will regularly update our policies and procedures to enable the change towards a better supply chain, guarantee the alignment with international standards and requirements, and ensure accountability.

Version Control

Version	Date	Change
1.0	May 2024	First version
1.1	April 2025	Reference to the Common Framework for Responsible Purchasing Practices (CFRPP)

The following Oberalp Responsible Business Conduct Policy (hereinafter RBC) sets out the principles that guide Oberalp's business activities, while the Oberalp Code of Conduct, the Oberalp Environmental Policy and the Oberalp Chemical Policy outline the guidelines, standards and requirements for the supply chain. The above documents are updated periodically, and form an integral part of the Conditions of Purchase agreed between THE SUPPLIER[1], as identified at the end of this document, and OBERALP S.p.A.// DYNAFIT SPEED FACTORY-OBERALP DEUTSCHLAND GMBH//OBERALP AUSTRIA GMBH// OBER ALP SUISSE SA // SALEWA IBERICA S.L.// SALEWA FRANCE SARL// OBERALP POLSKA SP. Z O.O.// SALEWA CZECH & SLOVAKIA S.R.O// OBERALP NORTH AMERICA// EVOLV// Oberalp UK Limited, owner of the brands SALEWA, DYNAFIT, POMOCA, WILD COUNTRY, EVOLV and LAMUNT (in all documents and hereinafter, THE COMPANY) and shall apply to each and every stage of the production and delivery of all goods ordered by or made for THE COMPANY (in all documents and hereinafter PRODUCTS).

THE COMPANY is committed to making PRODUCTS that fulfil the highest technical standards. We acknowledge that the processes and PRODUCTS in our supply chain have both direct and indirect impact on people and the environment, and aim to reduce it, in cooperation with our partners and suppliers, through continuous improvement.

The RBC reflects THE COMPANY's commitment to protecting and respecting the environment, the human rights and the dignity of every individual and community it comes into contact with, in business and within the supply chain, and improving living conditions while preventing, mitigating, and remediating any negative impact that THE COMPANY might cause, contribute to, or be directly linked to.

The RBC builds on International standards and International Human Rights Treaties[2] and especially the Core Conventions of the International Labour Organisation (ILO), the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration, 1977) and subsequent amendments, the United Nations Guiding Principles on business and human rights (UNGP, 2011) and the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector (2017).

THE COMPANY's purchasing practices are guided by the five core principles of the Common Framework for Responsible Purchasing Practices (CFRPP), which are continuously integrated into systems and processes to seek an equal and long-term partnership with selected SUPPLIERS who share the COMPANY'S values and goals, foster collaboration to achieve mutual benefit, and support fair payment terms through sustainable costing.

As far as workers' rights are concerned, it embodies the employment standards which should be universally recognized and respected, notwithstanding more relaxed standards which may be provided by applicable local laws in the countries where SUPPLIERS are located or where PRODUCTS are made. In case of differences or conflict between the RBC and the laws of the country of manufacture of PRODUCTS, the higher standard shall prevail.

Also environmental awareness and the protection of the environment are a priority for THE COMPANY. At the very minimum, THE SUPPLIER shall comply with all applicable environmental laws in the country

[1] Licensees are also covered by this RBC. Additional requirements and the nature of the business relationship are set in the License and Distribution Agreements.

[2] This RBC contains the most important provisions for the protection of the rights of workers as found in the 1948 Universal Declaration on Human Rights (UDHR), the 1965 International Convention on the Elimination of All Forms of Racial Discrimination (ICERD), the 1966 International Covenant on Civil and Political Rights (ICCPR), the 1966 International Covenant on Economic, Social and Cultural Rights (ICECSR), the 1979 Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), and the 1989 Convention on the Rights of the Child (CRC).

of manufacture[3] as well as internationally recognized standards, and act with a precautionary approach.

Where there is reason to believe that a process or activity in the production can have a negative impact on the environment, and especially on climate change, THE COMPANY will support the SUPPLIER in the assessment, development and implementation of policies to avoid or minimize it.
Legally binding requirements that are stronger or more detailed than this policy will supersede these and vice versa.

Each SUPPLIER of PRODUCTS agrees that, by accepting orders from THE COMPANY, it will conform to, and implement the terms of this RBC and demand the same from each of its subcontractors. The SUPPLIER acknowledges that, should he fail to fulfil the terms of this agreement, THE COMPANY will reevaluate its business relationship and possibly terminate it if the SUPPLIER is not prepared to implement effective and immediate improvements.

RISK ASSESSMENT PROCESS

Context

THE COMPANY's supply chain is fragmented, third party-owned and located in many countries worldwide, with different cultures and political systems, with uneven coverage or guarantees on legal protection and social security measures, and especially with different degrees of dialogue and circumstances enabling equal treatment or advancement of workers' living standards. Also, the standards for avoiding and preventing harm to the environment during and as a result of production processes vary substantially between countries and factories. Having a structured and effective sourcing policy (beginning, maintaining and ending the collaboration with suppliers and licensees) where human rights and environmental due diligence is fully integrated, is essential to make informed decisions, prevent and minimize risks and violations of the standards which THE COMPANY expects, along the supply chain of its PRODUCTS.

The most frequent risks identified by THE COMPANY can be clustered as follows:

A) Human rights
B) Environmental
C) Management Practices and Business

Even though possibilities are limited by geographical distance and economic circumstances, such as the size of THE COMPANY compared with the suppliers', it is important that the priorities and goals are shared, all the steps of the supply chain collaborate. THE COMPANY contributes by establishing and improving good management practices. To lead the change for the better, open discussion about the values and standards that must be upheld, and collaboration with competitor brands and stakeholders who want to improve our collective footprint on people and the environment, are essential.

Process

A global supply chain presents different risks, some specific to each country or region, and others common to all factories. Upon initiating the business relationship with THE SUPPLIER, as part of the due diligence process, a risk assessment at various level (country, sector and product, business model, sourcing model) is carried out by THE COMPANY, possibly in collaboration with other sourcing brands.

[3] The UNEP (United Nations Environment Programme) Law and Environment Assistance Platform (https://leap.unep.org/countries) provides updated information on the environmental requirements within the national legislation of the different countries.

It is then updated on an annual basis, and constant analysis enables THE COMPANY to monitor due diligence, assessment, prevention, mitigation and remediation.
The risk matrix cross-references various sources of information, including stakeholder and NGOs reports, trainings, specific guidelines such as the UN and the OECD's, indicators from different channels, third-party audit reports, factory self-assessments, internal audit reports and supplier assessments. Other valuable sources of information include the analysis of the political context, conflict mapping, the results from constant dialogue with suppliers and on-site visits, engagement with local stakeholders, trade union and worker representatives, and the content of complaints and other grievance mechanisms.

Then, we prioritise. To decide when efforts might be required for the elimination, prevention or mitigation of an identified risk, each one is assigned a different degree of likelihood and severity: where likelihood is a measure that identifies the degree of probability that a given event will occur and severity measures the seriousness of the impact calculating its scope, scale and irremediability.

As for environmental risks, because each SUPPLIER has its own production process, with different degrees of likelihood and area of impact, THE COMPANY encourages SUPPLIERs to carry out an environmental review, and to standardize and certify their processes.

Reporting

THE COMPANY commits to publicly reporting relevant information on due diligence, significant risks identified, prioritization criteria, actions taken, and results achieved, with due regard for commercial confidentiality and other competitive or security concerns, through the annual sustainability and social reports available on THE COMPANY website and other publicly available sources.

RISK CLUSTERS

A) HUMAN RIGHTS

The most recurrent risks that need to be addressed within THE COMPANY's Human Rights Due Diligence (HRDD) process for its operations, relate to three macro categories:

1. Labour practices and working conditions

THE COMPANY is committed to promoting equality at work, a fair employment and remuneration policy, and working hours in accordance with international standards and applicable laws.
THE COMPANY strongly opposes the use of child labour and of any form of forced or bonded labour.
THE COMPANY condemns all forms of illegal and unethical labour that exploits the workforce, jeopardizes social security and which condones or allows unsafe or unhealthy workplaces.

2. Discrimination and harassment

THE COMPANY offers equal employment opportunities and does not tolerate discrimination, harassment, bullying, victimisation, or any kind of abuse, either by its staff or within the supply chain.
All persons are to be treated fairly, and their performance evaluated on the basis of objective metrics.
No direct or indirect discrimination based on any trait or personal decision, such as gender, marital status, age, national or social or ethnic origin, colour, religion and political opinion, disability, sexual orientation, employee representation or other status, is to be tolerated.
THE COMPANY supports the creation of mechanisms to protect against and prevent violence of all kinds.

3. Social Dialogue

THE COMPANY supports discussions, consultations, negotiations and joint actions involving organisations representing different sides of the industry. THE COMPANY engages with local trade unions and workers' representatives to promote social dialogue. Workers are free to join a trade union or organise associations to protect their rights and raise their concerns.

THE COMPANY's workers' voices are heard and taken into account, and their complaints investigated and resolved in a timely manner.
All persons inside THE COMPANY in every function, and those involved in the creation, design, making, repair of PRODUCTS are treated with respect and dignity and are free to speak out in case they experience or witness unethical, inappropriate, disrespectful or illegal behaviour inside THE COMPANY.

B) ENVIRONMENTAL

The COMPANY has identified the following macro categories of potential environmental impact on air, water and ground, within its operations:

1. **Waste handling**
2. **Choice and use of energy**
3. **Management of chemicals in the manufacturing process**

Whereas each SUPPLIER has its own production process (e.g. more or less energy intensive, wet vs dry, use of chemicals vs non-use) and can have more or less impact on each environmental action area, THE COMPANY encourages THE SUPPLIER to use the Oberalp Chemical Policy and the Oberalp Environmental Policy. These two documents form an integral part of this RBC. They are updated periodically and sent by THE COMPANY in their most recent versions, to provide context and guidelines, by explaining the risks and how to address them, and to create a basis for common understanding of the standards that both THE COMPANY and THE SUPPLIER should achieve and continuously improve.

C) MANAGEMENT PRACTICES AND BUSINESS

The most recurring risks related to management practices and business relate to four macro categories:

1. Integrity

THE COMPANY is committed to the highest standards of integrity, ethics and professional behaviour in all the steps of the supply chain. Corruption is prohibited in all its forms, including extortion, bribery and unethical benefits transfers to customers, suppliers, employees or agents of THE COMPANY, the SUPPLIER, or the government and political parties of any country.

2. Materials of animal origin

THE COMPANY uses some materials of animal origin, due to their technical properties. THE COMPANY is aware of risks around these materials, mainly related to cruelty in the breeding stages and in obtaining the materials, and traceability issues to exclude this unethical behaviour. THE COMPANY allows THE SUPPLIER to select and manage suppliers involved in the choice of materials and production processes of its own supply chain, where at earlier stages, or in semi-finished products or components, materials of animal origin are required. In every case, THE SUPPLIER shall guarantee that PRODUCTS are be made only with materials where cruelty to animals is excluded.

3. Subcontracting

THE COMPANY attaches great importance to the origin and processing of PRODUCTS, including materials and components. THE COMPANY chooses and nominates most of its suppliers directly, and is supported by THE SUPPLIER in the choice and management of other suppliers involved in the production processes, and in gathering the information for THE COMPANY to manage it and make it available in a transparent manner to other stakeholders, upon request.

4. Organisation and communication

THE COMPANY believes that the foundation of any sustainable and lasting improvement is transparency and cooperation between parties. THE COMPANY is committed to creating an environment that allows for an easy and transparent flow of information, encourages collaboration among its employees and with its partners, and supports training to improve and update these skills.

To ensure that all employees feel free to speak out if they notice or become aware of unethical, unlawful, illegal and/or fraudulent facts and behaviour in the course of their daily work, THE COMPANY has established an anonymous whistleblowing procedure.

VERIFICATION AND CONTINUOUS IMPROVEMENT

THE COMPANY is built on continuous improvement. To keep this RBC and the standards and expectations set in the Operations policies relevant and effective, they will be reviewed and updated periodically. Best practices and new risks will be incorporated as identified by our stakeholder network, (see RISK ASSESSMENT PROCESS) including industry associations, current legislation around the world and scientific literature. Recognising that THE COMPANY's direct control over the supply chain is limited, the selected partners will play a key role in enabling adaptation to change and in raising the bar as we go along.

To guarantee that rights are respected, to assess working conditions and to protect the environment, THE COMPANY monitors its operations carrying out human rights and environmental due diligence processes, conducting frequent audits and visits directly or through third-party organizations, and cooperating with partners as part of the sourcing model. The frequency of such verifications depends on the risks and the severity of non-conformities.

To mitigate any unintended consequences and remedy violations, after each factory audit and visit, a corrective action plan (CAP) with no gendered impact will be drawn up and shared with management and employee representation, and a timetable for improvements is agreed upon. THE COMPANY will cooperate with THE SUPPLIER in carrying out the respective improvements towards compliance, enforcement or termination measures.

Implemented actions shall be closely monitored in cooperation with THE SUPPLIER, other sourcing brands and stakeholders, and root cause analysis conducted for the main recurring findings, in order to ensure effective remediation and prevent their recurrence.

REQUIREMENTS FOR SUPPLIERS

THE SUPPLIER shall provide the necessary support and cooperation for the internal understanding, dissemination among its relevant staff, implementation and monitoring of this RBC, and maintain, prepare and provide the requested relevant information, and accompany the personnel selected by THE COMPANY during audits and allow them to interview the workers if necessary.

THE SUPPLIER shall ensure that all locations are aware of this RBC and conduct due diligence to identify, prevent, mitigate and remediate potential and actual negative impacts on people, environment or society.

THE COMPANY will only do business with SUPPLIERS who make PRODUCTS in factories where the standards contained in the Oberalp Code of Conduct, Oberalp Environmental Policy and Oberalp Chemical Policy are acknowledged and endorsed[4]; and in case they do not already meet them, commit to undertaking the necessary steps and improvements for reaching them.

[4] THE COMPANY conducts risk assessment to identify the potential hazards in its supply chain and their likelihood. Although the risks may differ depending on the context, THE COMPANY expects that these standards are respected everywhere.

CONSEQUENCES OF NON ENDORSMENT OR APPLICATION OF THIS RBC

In case THE SUPPLIER fails to provide the requested information to carry out risk assessment and due diligence; does not cooperate with internal staff or third-party auditors; does not implement the suggested actions to prevent and limit likely and severe risks and negative effects highlighted during the risk assessment; is unwilling to cooperate and remediate violations; is conducting business in a fraudulent manner; is found to be hiding information about its production locations or operating through unauthorized manufacturing sites or subcontractors, THE COMPANY may terminate the business relationship.

Withdrawing is the last resort when no more effect on solving the issues can be gained from other strategies. The economic stability of THE SUPPLIER is of outmost importance, THE COMPANY will communicate the decision in a timely manner and will terminate the business relation in accordance with a responsible-exit strategy.