

## **Response Nordic AS Transparency Act Statement - Annual Report 2025**

### **1. General Information (Introduction)**

According to the Norwegian Transparency Act, we at Response Nordic are required to include a statement in the annual report that describes how we work with social responsibility, environmental responsibility, and ethical conduct. This statement is available on our website ([Åpenhetsloven Active](#) and [Åpenhetsloven Electronics](#)) and is publicly accessible to all stakeholders.

Response Nordic AS is a leading player in both the sports and electronics industries. We represent a portfolio of several major brands, including GoPro, Segway-Ninebot, Haibike, Woom, Volcom, Nitro, Faction, Phaenom and Traeger, as well as various smaller and up-and-coming brands. We supply markets in Norway, Sweden, Finland, Denmark, Iceland, the Netherlands, Belgium, and Luxembourg, with headquarters in Trondheim and branch offices in Oslo, Sweden, Denmark, Finland, the Netherlands, and Belgium.

### **2. How We Work with the Transparency Act**

Response Nordic continues to prioritize the principles outlined in the Norwegian Transparency Act. The Board of Directors has maintained its mandate for adherence to the UN Guiding Principles on Business and Human Rights and the ILO conventions. Responsibility for implementation lies with the company management.

Our Code of Conduct remains in force and sets the ethical foundation for collaboration with suppliers and partners. It outlines clear expectations related to labor standards, human rights, health and safety, environmental protection, and business ethics. All suppliers are required to sign our Code of Conduct or submit their own for assessment. The same standards are applied internally within our organization.

We carry out due diligence processes in line with OECD guidelines, including risk assessments, supplier evaluations, and follow-up actions. And in 2025, we have further strengthened our tools for follow-up by investing in CEMAsys and its Supply Chain Control Module. CEMAsys is a leading provider of ESG reporting and supply chain risk management systems. This tool enables us to systematically map and monitor our supply chain and will help streamline the distribution of surveys to suppliers regarding responsible business conduct in accordance with the Transparency Act. The system supports our long-term commitment to improving transparency and accountability.

### **3. What We Have Done**

#### **Supplier Collaboration:**

We continue to work closely with suppliers through digital and physical meetings. In March 2025, we conducted on-site visits to six tier-1 suppliers in China. These visits were not audits but served as dialogue platforms to discuss transparency, traceability, and the EU's new Ecodesign for Sustainable Products Regulation (ESPR). The visits also aimed to improve awareness around the Digital Product Passport (DPP) initiative and responsible production practices.

During the trip, suppliers were briefed on the ESPR and encouraged to begin preparations for traceability and environmental impact assessments. All six tier-1 suppliers showed a willingness to improve, particularly regarding environmental compliance and traceability efforts further down the supply chain.

#### **Audits and Assessments:**

We have not reviewed new BSCI (Amfori BSCI Code of Conduct), or WRAP (certification for socially responsible manufacturing) audit reports this year, but we have followed up on findings from previously assessed suppliers. One example is one of our key producers of garments. While this supplier had not yet completed a social audit at the time of reporting, they have initiated the process. The supplier has demonstrated excellent performance in product quality and transparency, and we have requested that they complete their audit within an agreed timeline.

We are also continuing to support the development of traceability templates and guidance to improve tracking on SKU level and to establish direct collaboration with selected tier-2 suppliers to improve material sourcing transparency.

#### **4. What We Have Found**

Through our ongoing collaboration with suppliers and insights from recent visits, we have not identified any direct breaches of human rights or decent working conditions. However, improvement areas remain, especially in relation to:

- Lack of formal social audits (e.g. garment producer)
- Absence of international-standard environmental audits among tier-1 suppliers
- Challenges in tracking tier-3 suppliers and SKU-level traceability

Suppliers have shown a clear willingness to address these challenges. Environmental audit awareness is increasing, and our producers are cooperating in efforts to enhance component-level traceability. This development is crucial in light of new regulatory expectations such as the ESPR and DPP frameworks.

#### **5. Summary**

In summary, Response Nordic AS remains committed to transparency and responsible business conduct. Our efforts to comply with the Transparency Act and ensure ethical conduct throughout our supply chain are ongoing and have received positive feedback from our suppliers. They appreciate our focus on social and environmental responsibility, and we see that in the time to come this will be a competitive advantage.

By maintaining thorough procedures and open communication, we aim to mitigate risks and enhance the overall sustainability of our supply chain. We look forward to continuing our work with all stakeholders to promote ethical business practices.

This statement will be updated and published by June 30th each year, in accordance with the requirements of the Transparency Act. Significant changes in the company's risk assessments will also be followed up with updated information in the statement.

Response Nordic AS, a part of the Spex Group, handles all operations, compliance, and reporting responsibilities on behalf of all sister and daughter companies within the Spex Group. This includes but is not limited to the adherence to the Norwegian Transparency Act, ensuring social and environmental responsibility, and maintaining ethical business practices across all entities.

The statements, commitments, and procedures described in this report apply to Response Nordic AS and extend to all associated companies within the Spex Group. As the central managing entity, Response Nordic AS ensures that all Spex Group companies align with the same high standards of social responsibility, environmental stewardship, and ethical conduct.

We sign this statement in accordance with the rules of the Accounting Act § 3-5.

For SPEX GROUP, Trondheim, 12.06.2025



**Stein Grønnerøe**

**CHAIRMAN OF THE BOARD**



**Are Pedersen**

**CEO**