

Norwex
S-211 Annual Report
2024



We have saved from landfills:

- 12+ million plastic bottles
- 1.8+ billion straws
- 415+ million plastic shopping bags
- 697+ paper towel rolls
and counting

Introduction

Norwex is committed to upholding and respecting human rights, and we recognize the important role we play in ensuring these rights are embedded and reinforced throughout our organization and value chain. We will continuously work to ensure that child labor and forced labor are prevented and eradicated from our supply chain.

This document has been prepared by Norwex Canada Ltd and its foreign parent, Norwex Holding AS, for the financial year ended December 31st, 2024 to meet the requirements outlined in section 11 of the Fighting Against Forced Labor and Child Labor in Supply Chains Act and sets out our global practices, policies and processes to help identify and remediate risks relative to child labor and forced labor within our operations and supply chain.

Norwex introduced a series of new policies, practices and procedures related to Environment, Social and Governance (ESG) in 2024. We created a training system on child and forced labor for our global employees and implemented it in Q4 2024. 242 global employees completed the survey at the end of 2024. The remaining employees will complete the training and survey in early 2025. We plan to conduct this training annually to ensure that employees at all levels in the organization understand this critical issue and how to report potential cases.

Additionally, we initiated development of a supplier manual and agreement which included self-assessment surveys around important ESG topics including child and forced labor. These measures are scheduled for implementation in 2025. We completed supplier audits and surveys to understand any potential risks to our ESG objectives and began using the SEDEX platform to help identify critical areas globally that we should prioritize for further assessment. Our focus with these supplier assessments was on human rights, child and forced labor, environment and working conditions in our own workforce and in our upstream value chain.

In addition, as the following disclosures covering the seven requirements outlined in subsection 11(3) will describe, we have previously made commitments and taken previous steps, and plan to take further steps in the future to enhance our level of diligence regarding child and forced labor in our activities and supply chains.

Corporate structure, activities, and supply chains.

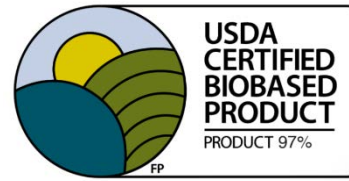
Collectively, the Norwex group of companies, which include our holding company in Norway and our subsidiary in Canada, is focused on the manufacturing, distribution, and sale of cleaning products for home cleaning and, personal, in several markets across the globe. Specifically, our subsidiary in Canada imports and sells our products for our customers in Canada.

At yearend 2024, the total headcount for Norwex Canada was 52 employees, of which 67% are female, 23% are male, and 10% declined to answer. There are 2 employees in our holding company in Norway.

Norwex's business activities are focused on providing product solutions designed to reduce our exposure to harmful chemicals. The core product categories are home care, personal care, and family care. Our products undergo a highly rigorous ingredient review and testing process to ensure no harmful chemicals are included. This process includes extensive review of the global regulatory environment around chemicals as well as finished product testing to ensure formulas are free from harmful processing agents or ingredient interactions.



In 2024, we initiated a review of our formulas from the American certification program called EWG Verified™. ([EWG Verified® : For Your Health](https://www.ewg.org/verified)) This program is conducted through an independent 3rd party certifier and certifies that our formulas are free from 1000s of potentially harmful chemicals and confirms our transparency relative to all ingredients as well as manufacturing processes.



resources. [BioPreferred](#)

Additionally, most of our household and skin care products are USDA Biobased certified indicating the percent of formula that is sourced from renewable

Our products are sold in Canada through a highly trained workforce of independent contractors. Our products are grounded in our mission of reducing harmful chemicals in our everyday lives and sharing a cleaner, safer way of living.

As part of that mission, sustainability has been foundational since our inception. **Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.**

The previous statement was coined by Gro Harlem Brundtland in 1987, a prime minister of Norway and Director of the World Health Organization (WHO). This statement is the guiding principle for how Norwex will work with sustainability. We aim to ensure future generations do not live on a planet with fewer opportunities or restrictions on how they can lead their lives. Our goal is always transparency in our work with sustainability, and we actively engage with our stakeholders. We believe that our values of **Integrity, Trust,**

Respect and **Kindness** should be reflected in the work we do, always.

From the beginning, Norwex has been dedicated to sustainability by creating high-quality products designed for longevity. This approach minimizes waste and reduces the environmental impact associated with the frequent production of new items

Our textiles are designed to last for years and are made from recycled materials, saving millions of plastic bottles from the landfill. Our packaging is made in part of recycled materials, and we have created product systems that include reusable containers and refills where feasible. We use Forest Stewardship Certified cardboard in our packaging to reduce our environmental impact. And our flagship product, microfiber textile for cleaning, is made of recycled material, diverting the equivalent of more than 12 million plastic bottles from the landfill. Product sustainability is an active project and journey as we continue to improve product sustainability.

Our goal is always transparency in our work with sustainability, and we actively engage with our stakeholders. We believe that our values of Integrity, Trust, Respect and Kindness should be reflected in the work we do, always. By being transparent and engaging with stakeholders we build **Trust**. By being honest and transparent in our reporting we show **Integrity**. By taking actions to remediate adverse

impacts, we **Respect** and show **Kindness** to the environment, people and communities that are affected.

Through sustainable conduct in our day-to-day operations, we **Respect** future generations by not compromising the ability for them to meet their own needs.

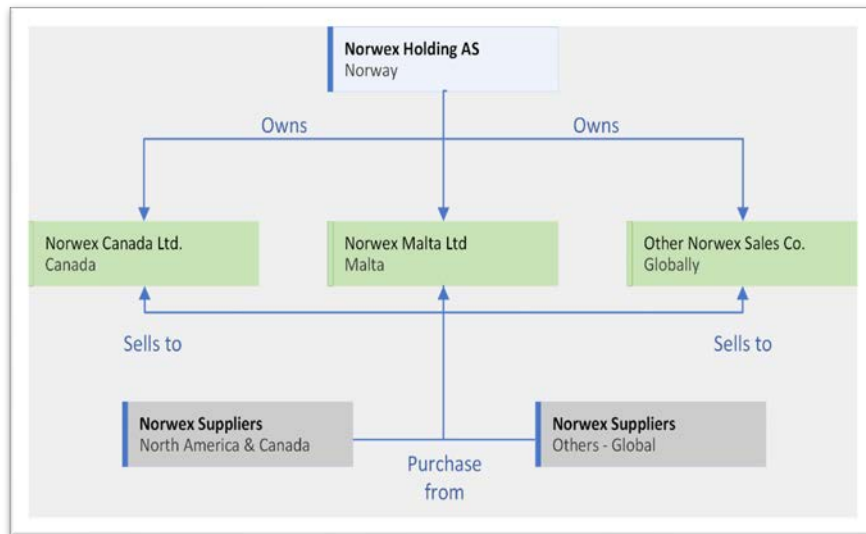
By grounding our approach to Responsible Business Conduct and Sustainability in our core values, we ensure that we conduct ourselves, not only as individuals, but as a company group, in a way that represents the culture in Norwex and the Norwegian Way.

Norwex is committed to adhering to and implementing the following standards when conducting our day-to-day operations:

- Complying with the **United Nations Global Compact (UNGC)** to live its principles and ensure to the extent it is possible that our value chain and stakeholders do the same.
- Actively to support and make efforts to contribute towards the **UN Sustainability Development Goals (SDGs)**.

- Understand, communicate, and implement **OECD Guidelines for Multinational Enterprises for Responsible Business Conduct.**

Supply Chain



Norwex Holding AS owns all Norwex companies, including Norwex Canada and Norwex Malta. Norwex Malta is the corporate head office and is responsible for purchasing goods from suppliers and selling said goods to all Norwex sales offices around the world. Norwex Canada imports goods from Norwex Malta which Norwex Malta has purchased from suppliers globally. Norwex Canada itself does not produce any goods and is purely a sales and marketing company with

supporting functions such as logistics and warehouse, finance, and HR.

Below is a breakdown of the categories of goods and import value to Norwex Canada from Norwex Malta. Household items include mattress cleaners, toilet cleaners, and laundry detergents. Personal care items include different creams and lotions for the skin and are produced mostly in North America. Textiles, hard goods, and some personal care items are produced globally and purchased via Norwex Malta from global suppliers. Locally produced products in Canada are sold directly to the Canadian sales entity. Other items are miscellaneous items such as catalogues and order forms.

	<i>Household</i>	<i>Hard Goods</i>	<i>Personal Care</i>	<i>Textile</i>	<i>Other</i>
<i>Canada</i>	18%	0%	0%	0%	18%
<i>Globally</i>	9%	100%	27%	100%	5%
<i>USA</i>	73%	0%	73%	0%	77%

Table 1 Product origin breakdown

The Norwex Foundation



The Norwex® Foundation for a Brighter Future connects Norwex employees and Consultants from all over the globe and empowers them to make a positive impact right

where they live. By coming together, we're creating a brighter future for our communities, our environment, and future generations through the efforts of the people and the organizations we support.

Since the inception of our charitable giving program in 2013, our charitable donations have exceeded US\$2.5 million and have impacted thousands of people through hundreds of organizations across the globe. In addition to financial donations, we also donate Norwex products to those in need after natural disasters (fire, flood, hurricane, tornado) to assist in rebuilding their homes, and we donate excess product inventory to charities in need.

Due Diligence Processes

Environment Social Governance Risks

Norwex has identified, via SEDEX, potential industry segment risk in our supply chain worldwide. A more detailed analysis

was conducted to help identify any potential risks to adverse ESG sustainability impacts, current or potential, identified by SEDEX worldwide.

To summarize the results of this analysis, we did not identify any current significant adverse impacts in our global supply chain. In the event SEDEX, or any other NGOs, has identified an elevated risk to any ESG sustainability aspects, Norwex will reach out to the stakeholder to find ways to remediate, mitigate and/or reverse the possible, or ongoing, adverse impact. Norwex is committed to be compliant with the [OECD Due Diligence Guidance for Responsible Business Conduct](#) that provides the due diligence process and its supporting measures.

In 2024, Norwex has been enhancing its due diligence efforts. Norwex began in 2024 to create a more robust supplier agreement outlining our expectations for suppliers around Environmental Social Governance topics including child and forced labor, anticorruption and bribery, and diversity policies. We expect this agreement to be in place in 2025. We have conducted a broad sweep of our suppliers by means of an Environment, Social and Governance (ESG) survey and by analyzing risks in our supply chain using SEDEX.

Additionally, in 2024, we engaged with our suppliers through supplier visits and Norwex staff conducted a total of 28 supplier audits. Additionally, 51 of our suppliers engaged

with our self-assessment questionnaire around important issues of sustainability including child and forced labor, corruption, and bribery.

Through both supplier audits and suppliers' self-assessment, *no evidence of adverse impacts has been identified within our supply chain.*

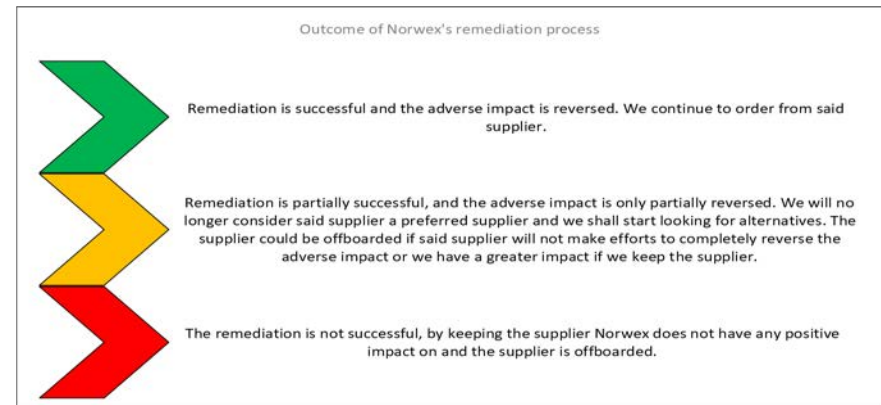
Remediation measures during 2024

Remediation processes and policies have been implemented in 2024 and will continue in 2025. The due diligence framework has been updated to be in line with the CSDDD from the EU released in 2024. (Corporate Sustainability Due Diligence Directive CS3D).

According to the updated policies, when an adverse impact has been identified or there is a risk of an adverse impact, we begin engaging with our value chain. Through discussions with stakeholders and those impacted by the adverse social effects, we will identify target areas and the specific gaps that must be addressed to remediate and reverse these negative impacts.

If Norwex uncovers any current or potential adverse impacts, we will initiate our due diligence process immediately to try to remediate, and reverse, the impact. If it is not successful, we will offboard said supplier immediately.

Figure 1. Outcome of remediation efforts



Norwex does not under any circumstance approve of any adverse impacts on the environment and social and governance practices.

We believe in trying to make improvements before we offboard a supplier because in doing so, we can help to reverse the adverse impact.

We offboard a supplier only if we have a greater influence by offboarding the supplier than we would have if we kept the

supplier and tried to continue the work to remediate the impact.

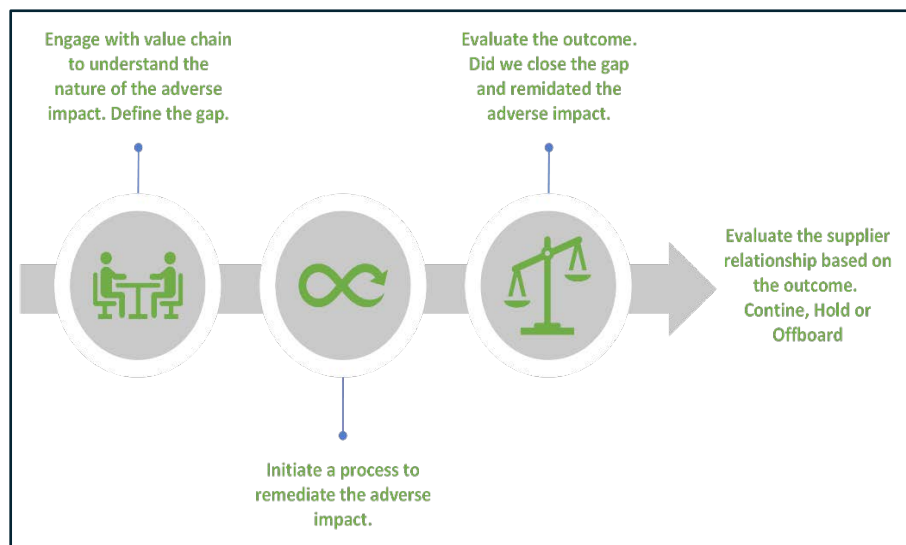


Figure 2 Remediation process

Training

In 2024, Norwex placed a strong emphasis on Environment, Social and Governance training, particularly concerning child and forced labor, for our internal workforce. We provided content and information about our policy on child and forced labor for all employees. Training our value chain's workforce is important to our goals, and we will include training, information, and material to our value chain on key ESG sustainability topics.

This training is important for our workforce to understand the impact these issues have on the individual and local community when children are deprived of their education and a normal upbringing. Forced labor is not accepted and the impact can be far reaching, not limited to the impacted individuals, but to families and communities.

Governance training

As part of implementing our policies, Norwex will conduct training on governance matters with a focus on child and forced labor as well as anti-corruption and bribery during 2025.

Assessing effectiveness

We are currently using the SEDEX platform, which will provide the foundation for enhanced due diligence going forward with our suppliers.

Our goal is to measure our effectiveness and performance, including identifying the number of supplier audits conducted and the number of people who have received training across our group companies.

Policy framework

We plan to review our policies, practices, and processes annually. In 2025, we will roll out policies on modern slavery and anticorruption and bribery.

Social sustainability

At year-end 2024, the total headcount for Norwex was 353 employees and 7 in Norway. We do not have any office in Norway and our staff works remotely. We have offices in USA, Canada, Malta, Taiwan, Australia, and New Zealand.

Engagement with staff

Employee satisfaction surveys were held during 2024 to inform and elicit feedback from staff.

We take issues regarding the wellbeing of both our own and our supplier’s workforce seriously. We consider any violations of the UN Global Compact 10 principles an adverse impact on our social sustainability responsibility. If any violations are suspected among our own staff, Norwex will aim to investigate the situation to determine if the suspicion is valid or not. Should we determine that our own staff is responsible for any violations of the UN Global Compact, it will lead to an evaluation of the staff’s employment.

If we suspect any violations of the UN Global Compact 10 principles by a supplier of Norwex, we will initiate our due diligence process to try to remediate any adverse impact and to put an end to the inappropriate behavior. Should a supplier

not respond appropriately, it could lead to the supplier being offboarded.

Table 2 Supplier audits

supplier categories	audit	Visit/ Quality checkup	self-assessment for Sustainability Due Diligence
textile FG	2 (1 is a new supplier)	6	totally 51 suppliers finished this survey, and all have not uncovered any sign of child or forced labor
hardware FG	1	10	
dyeing	1 (it's a new supplier)	2	
printing	2		
weaving	1		
accessory(ribbon, label, sponge)	1	2	
	8	20	51

As part of our commitment to social sustainability and responsible business conduct, Norwex is committed to the UN Global Compact and OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. Norwex will engage with our suppliers to ensure compliance with the UN Global Compact and its 10 principles internally and externally.

Social sustainability violations

Norwex takes issues regarding the wellbeing of our workforce seriously, including both our own and our supplier employees seriously. We consider any of the below situations an adverse impact to our social sustainability responsibility. If any of these events are suspected among our own staff, Norwex will

investigate the situation to determine if the suspicion is valid or not. Should we determine that our own staff is responsible for any of the below, it will lead to an evaluation of the staff's employment.

If we suspect any of the below to be happening at a supplier of Norwex, we will initiate the due diligence process to try to remediate any adverse impact and to put an end to the inappropriate behavior. Should a supplier not respond appropriately, it will lead to the supplier being

Forced labor and child labor risks

Norwex Canada imports goods via Norwex Malta. We identified potential industry segment risks in our global supply chain through SEDEX. Following this, a more detailed analysis was conducted to assess potential risks related to child and forced labor.

The analysis did not identify any risks in our global supply chain due to child labor or forced labor. In the event SEDEX, or any other NGOs, has identified an elevated risk to any social sustainability aspects, including child and forced labor, Norwex will reach out to the stakeholder to find ways to remediate, mitigate and/or reverse the possible, or ongoing, adverse impact.

Norwex conducted 28 on-site audits during 2024 (see **Feil! Fant ikke referansekinden.**) and have not identified any occurrences of any form of child or forced labor in our supply chain.

In 2024, we strengthened our due diligence around child and forced labor. We have conducted a broad sweep of our suppliers by means of an Environment, Social and Governance (ESG) survey and by analyzing risks in our supply chain using SEDEX. No evidence of child or forced labor was found in 2024.

Also, in 2024 we engaged with our most at-risk suppliers in Asia through supplier visits, and Norwex staff conducted 28 supplier audits. Additionally, we conducted a self-assessment survey on Sustainability Due Diligence. Fifty-one suppliers responded and no evidence of child labor or forced labor was found in 2024. In 2025, we have expanded this survey to all suppliers outside of Asia (lower risk) to ensure no instances of child or forced labor. Additionally, we encourage our suppliers to complete the Self-Assessment Surveys on SEDEX and will be mapping our suppliers inside the SEDEX platform for those suppliers that are on SEDEX.

During supplier audits, and our suppliers' self-assessment, we have not uncovered any sign of child or forced labor in our supply chain.

As part of our commitment to social sustainability and responsible business conduct, Norwex is committed to the United Nations Guiding Principles on Business and Human Rights, UN Global Compact, and OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

Remediation of loss of income

If we discover child or forced labor in our value chain, Norwex will engage with our suppliers and other stakeholders to

ensure proper compensation is given to anyone forced to work or any child labor. The form of compensation may include back pay as one-time compensation, increased wages to a livable wage, above the minimum required by law. If Norwex has benefited from lower purchase prices due to forced or child labor, Norwex will provide a part of that compensation together with the supplier. Norwex will offboard a supplier should the supplier refuse to reverse the impact by refusing to provide compensation, refusing to stop using child and forced labor or refusing to increase wages above minimum wage.

In accordance with the requirements of the Act, and in particular section 11 thereof, we attest that we have reviewed the information contained in the report for the Entities listed above, and that it has been approved by the governing body of the Entities. Based on our knowledge, and having exercised reasonable diligence, we attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

For Norwex Holding AS

Full name: Beate Hjeltnes
Title: CEO/Director
Date: May 28th, 2025



Signature

I have the authority to bind Norwex Holding AS.
Ltd.

For Norwex Canada Ltd.

Full name: Beate Hjeltnes
Title: CEO/Director
Date: May 28th, 2025



Signature

I have the authority to bind Norwex Canada



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