



## **The Transparency Act - Statement of due diligence assessments for Group 88 NUF.**

### **The business/General information**

Group 88 NUF

Nedre Slottsgate 8, 0157 Oslo

#### Number of employees

Group 88 NUF is a medium-sized company, consisting of 22 employees, spread over 4 physical stores.

There is a total of 149 employees in the group.

#### Introduction

Group 88 NUF's business is operation of retail stores selling bags, shoes, clothing, and accessories. The company operates 4 stores located in Nedre Slottsgate in central Oslo. The company is a branch of Group 88 A/S, which is a Danish-owned family business, founded in Copenhagen.

Group 88 A/S was established in 1988 with the rights to sell a wide range of international designer brands in Scandinavia. Group 88 was established and still operates as a family-owned group. The founder's sons are majority owners of the company and serve as Chief Executive Officer ("CEO") and Chief Operating Officer ("COO").

Group 88 deals with retail and wholesale sales of several international luxury brands through stores in Copenhagen, Aarhus, Stockholm, Gothenburg, Oslo, and Reykjavik. The group represents several international well-known brands such as Mulberry, Burberry, Gucci, Bottega Veneta, Saint Laurent, Balenciaga, Loewe and Valentino within various product groups such as clothing, shoes and accessories.

Group 88 is a Danish-based group with headquarters in Copenhagen, Denmark, where the entire management is located. Group 88 also has operational subsidiaries in Sweden, Norway and Iceland that operate several retail stores located in rented premises in pedestrian streets, airports, and department stores.

#### Purchasing

Through our purchases, we want to promote respect for human rights and decent working conditions. We want to be transparent and work strategically with continuous improvement and counteract any possible negative impact on human rights and decent working conditions in our supply chain.

As a responsible player, we are keen to enter long-term relationships and limit the number of suppliers. We want strong relationships through strategic partnership. Group 88 makes specific,



franchise agreements with each individual brand, some of them exclusive. Group 88 headquarter negotiates the agreements on behalf of all the Group subsidiaries. The work on human rights and decent working conditions will always be included in such contracts.

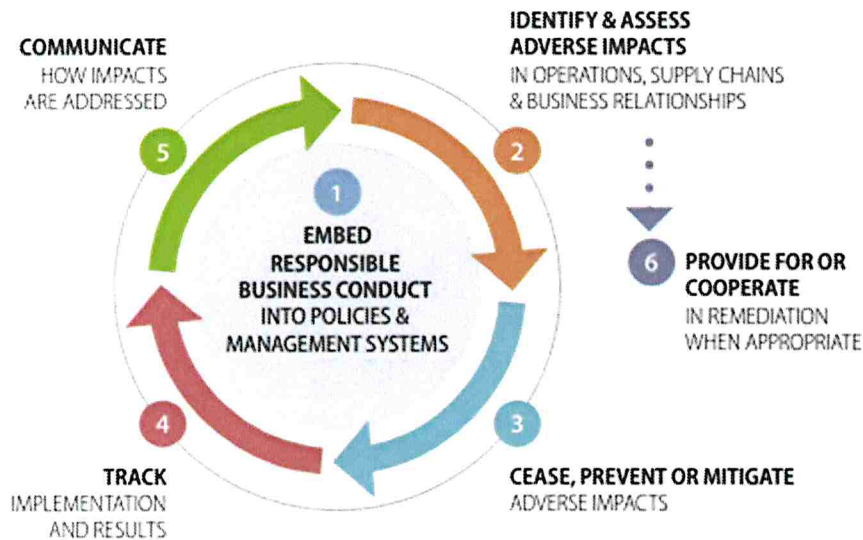
The Procurement department in Group 88 DK decides on, which goods shall be purchased from each brand and creates the orders on behalf of all the Group 88 entities.

Group 88 has no own production. All the suppliers are based in Europe. Group 88 has no direct contact with the manufacturers of the goods sold in the shops.

### Findings

In accordance with the requirements of the Openness Act, Group 88 NUF has carried out the due diligence assessments in line with the OECD's guidelines for multinational companies.

The Transparency Act entered into force on 1 July 2022 to prevent violations of human rights and indecent working conditions. We have carried out due diligence assessments based on OECD guidelines and have achieved this as part of our evaluation of new suppliers. We work exclusively with brand owners and authorized dealers to ensure authenticity and quality in everything we sell.



<https://mneguidelines.oecd.org/OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf>

First step of the due diligence assessment is about internal anchoring. The concept of «responsible business life» is rooted in the management. We have an obligation to respect human rights and decent working conditions. Group 88 NUF has defined principles for good personal behavior, good business



practice and notification and handling of any breaches of the guidelines which apply to all employees. This was formalized in 2022 with the Whistle Blower Scheme.

Second step of the due diligence assessment concerns the mapping and assessment of actual and potential consequences for basic human rights and decent working conditions that the business has either caused or contributed to.

To meet the requirements of The Transparency Act, we have invested in software from House of control.

House of Control's cloud-based solution is tailored to help meet the requirements of the Transparency Act. The starting point is a full overview of all suppliers, subsidiaries, and other partners. With the software, you map conditions and identify conditions with a potentially negative impact on human rights, working conditions and the environment.

The solution includes, among other things:

- Supplier register
- Smart surveys
- Storage of important documentation
- Change log and reporting function.

We have made a mapping of all our main suppliers who deliver goods for resale in our stores.

The purpose of the mapping of the suppliers was primarily to gain a better understanding of the value chain, get an overview of the suppliers' production, identify actual negative consequences and risks of negative consequences, and thus get an idea of which areas in the supply chain pose the highest risk of negative impact on human rights and decent working conditions.

Via the solution, we have sent out surveys, where we ask our suppliers to explain where goods ordered by us are produced. In addition to this, we have asked for more information about how suppliers work with human rights and decent working conditions.

The first survey was sent out via email on 18 August 2023. As we only got a response from a single supplier out of 10, we chose to follow up with a new survey on 9 November 2023. We did not receive any responses to this survey. Since then, we have received a response from a new supplier who was added in January 2024.

Our stores are operated as a franchise on behalf of international high-end luxury brands, and we can therefore neither replace nor buy goods for resale from suppliers other than the brand itself.

Group 88 does not have much opportunity to influence our supplier's decisions or guidelines.



All our suppliers have their own websites, which contain information about the products and, as a rule, also their history, social responsibility, craft traditions, production, and other current mentions.

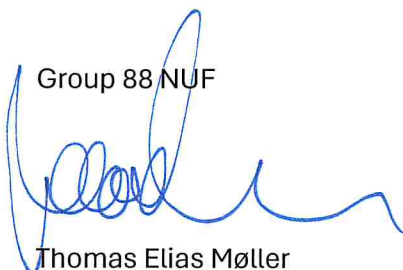
A low risk of violations of human and employee rights has been revealed internally in Group 88 NUF. The company is subject to regulations and legislation, and we have routines in place for handling should a breach nevertheless occur (Whistleblower scheme).

We perceive that we also have a low risk of violations of human rights and decent working conditions through the supply chain. The company has not uncovered any violations. We are committed to maintaining and improving our practices to ensure continued compliance with these important principles.

### **Actions**

We will regularly follow up on both existing and new suppliers. As a rule, we have little influence on large global companies, but must use the influence we have to influence them and ensure that they take measures to prevent and reduce risk. It is important that suppliers establish processes to manage risks that have been identified and address systemic weaknesses. An important measure is to get a better overview of the existing supply chain. Another important point is to ensure good systems for receiving and handling complaints. These are requirements that we will make clear in our dialogue with our suppliers.

Group 88 NUF has a special responsibility for running our business in a responsible and sustainable manner. The work with sustainability is a continuous process, and this is reflected in due diligence assessments. It is important to work systematically, together with our employees and our partners. We will continue the mapping of risks by expanding our due diligence assessments to identify products or suppliers with a particularly high risk and take measures to prevent violations of human rights and decent working conditions.

Group 88 NUF  
  
Thomas Elias Møller

CEO