



ASICS Norge AS – Transparency Act: Report on Human Rights Due Diligence F2025

1 Introduction

This report has been prepared for ASICS Norge AS ("ASICS Norge" or "ASICS") in accordance with the requirements of the Norwegian Transparency Act. The purpose of the report is to communicate ASICS Norge's due diligence process, our findings and future plans for promoting sustainable business with respect to human rights and decent working conditions.

The report provides an overview of our due diligence efforts from 1 January 2025 to 31 December 2025.

2 Organization, operations and supply chains

ASICS Group ("ASICS") is headquartered and publicly traded in Japan. The company manufactures, markets and sells footwear, apparel and accessories, as well as provides related services through ASICS-owned stores, e-commerce, via retail accounts, independent distributors, licensees and representatives worldwide. We reach more people through our business partners in the supply chain, sponsored events and connections to other stakeholders around the world.

ASICS Norway is a wholly owned subsidiary of ASICS Europe BV, which manages and supports the business in Norway. The Dutch company acts as the regional headquarters for ASICS in the EMEA region. ASICS Norway is therefore subject to the Group's management systems and policies and is covered by the work done within ASICS in terms of responsible business.

To read more about ASICS' international work on human rights and working conditions, we refer you to the ASICS Modern Slavery Statement, which is available in [Norwegian language](#) on our website.

3 Human Rights Due Diligence

3.1 Embedding responsible business practices

ASICS' commitment to sustainability is embedded in one of our strategic pillars in our VISION 2030 and our Mid-Term Plan 2026. This pillar supports efforts to reduce CO2 emissions, ensure responsible sourcing, respect human rights and increase our transparency.

Similar to the governance structure at our global headquarters in Kobe, Japan, a sustainability committee is operated for our European region. This regional committee, chaired by the CEO, oversees the regional sustainability strategy and advises on sustainability-related risks and opportunities, including supply chain risks.

Our regional sustainability team works on the day-to-day management of our sustainability activities, ensuring alignment between regional and global strategy, addressing social and environmental issues and facilitating the integration of sustainability into all aspects of our business. These business activities will in turn increase our engagement with customers and partners, enhancing not only ASICS' brand value, but also our contribution to a more sustainable world.

You can read more about our [human rights policy](#) and accountability governance structure in the ASICS [Modern Slavery Statement](#).

3.2 ASICS' process for risk-mapping

Through thorough due diligence, collaboration with business partners, customers and suppliers, as well as continuous monitoring, we strive to identify and manage all risks related to indecent working conditions and human rights violations in our business. Furthermore, we regularly review and update our guidelines and policies, conduct supplier audits and offer training and awareness programmes to employees and business partners.

We have assessed our suppliers individually to identify actual and potential risks of indecent working conditions and human rights at our suppliers. Following this mapping exercise, we have prioritised work with suppliers that pose a higher risk.

Read more about our due diligence in ASICS' Modern Slavery Statement and our Human Rights Policy. Please also refer to the Modern Slavery Statement for further details on risks identified in our operations and in our supply chain.

3.3 Identified negative consequences and significant risk of negative consequences in our supply chain

During ASICS' 2025 risk assessment, the CSR and Supply Chain teams mapped the company's supply chain to identify both direct and indirect suppliers. A severity and likelihood analysis revealed the most pressing risks related to human rights and decent working conditions in ASICS' value chain helping to prioritize areas where interventions are most needed.

ASICS has not uncovered any actual violations of human rights and decent working conditions in our supply chain. However, ASICS uncovered the following significant risks of human rights violations and indecent working conditions in our supply chain:

- forced labour
- child labour
- freedom of association
- occupational health and safety concerns
- risks affecting migrant workers.

These risks are influenced by country-level contexts, recruitment practices, and factory-level management systems, with audit findings highlighting issues related to fire safety, emergency preparedness, working hours, and chemical management.

3.4 Identified negative consequences and significant risk of negative consequences within our operations

ASICS conducts internal risk assessments to identify and address potential risks related to human rights and decent working conditions within its own operations. These assessments evaluate both the severity and likelihood of risks, enabling the company to prioritize areas where proactive measures are most needed.

Internal risk assessments in 2025 did not identify negative consequences or significant risks of human rights violations or indecent working conditions in the business of the Norwegian entity. However, recent evaluations have highlighted two areas that warrant close monitoring in other ASICS entities globally:

- i) the emergence of excessive overtime (recognized as a potential indicator of forced labour) in Japan, driven by structural or operational shifts that may result in unexpected and unmanageable working hours; and
- ii) the impacts of workplace harassment, including forms linked to power imbalance and inappropriate conduct.

These have been identified as the most critical risks for ASICS employees in regard to both indecent working conditions and human rights, ranking highest in both severity and likelihood within ASICS' operations. ASICS continues to strengthen its internal system to prevent, detect, and address such risks, recognizing their impact on employee wellbeing and labour rights.

4 Measures taken to prevent, limit and cease negative effects

In order to mitigate the above-mentioned significant risks in our own global operations, ASICS has implemented the following targeted measures:

- Improved and more frequent reporting of overtime, as well as planning and forecasting to limit the risk of overtime.
- To effectively combat risks of particularly indecent working conditions in the workplace, ASICS has implemented proactive training, policy enforcement, and workplace improvement strategies. These initiatives empower ASICS employees with the knowledge and tools needed to recognize and address risks.
- Since 2014, we have implemented an internal grievance mechanism that allows employees to raise concerns about non-compliance anonymously and confidentially. The whistleblowing channel is promoted on the website, boards and posters in factories and offices.

To mitigate risks of human rights violations and indecent working conditions in our supply chain, ASICS has implemented the following measures:

4.1 Standards & Policies

The ASICS [Supplier Code of Conduct](#) is included in our contracts with factories and sets out minimum standards that include prohibition of forced labour, bonded labour, harassment and discrimination and sets out requirements related to freedom of association, wages, working hours, HSE and environmental protection. In 2025, all our suppliers had signed our Supplier Code of Conduct.

4.2 Supplier Engagement and capacity building

In 2025, ASICS deepened its commitment to mitigating risks of human rights violations and indecent working conditions by strengthening supplier capabilities through ongoing engagement, education, and collaboration. This includes trainings for factory managers and supervisors through a combination of online and in-person events, targeted webinars, and participation in industry-led initiatives. In addition to encouraging partner factories to take part in external programs such as those offered by ILO Better Work, ASICS hosted a Global Supplier Partnership Summit in Vietnam in 2025, which drew participation from over 180 factory representatives, both in person and virtually.

4.3 New traceability program.

In 2023, ASICS launched a pilot project with the third-party digital platform TrusTrace. The platform supports the mapping of Tier 1 suppliers and nominated Tier 2 suppliers and enables the integration of audit outcomes, corrective action plans, and analysis of supplier performance data in a structured and accessible manner. In 2025, ASICS' traceability systems covered Tier 1 suppliers and nominated Tier 2 suppliers across key sourcing regions, supporting visibility over a significant share of the production volume. During the year, additional supplier sites and materials were onboarded as part of a phased expansion of upstream supply chain coverage. In 2026, ASICS plans to continue expanding the scope to additional materials and products, extending visibility beyond Tier 2 suppliers.

In general, ASICS strives to promote collective worker empowerment by maintaining direct communication channels between trade unions, ASICS human rights teams and factory management.

ASICS monitors progress on human rights and labour issues based on the following specific KPIs:

- Supplier code of conduct documents

- Annual supplier inspections
- Workers trained in our policies (with a focus on modern slavery prevention)
- Reported cases of modern slavery

ASICS' monitoring framework covers all Tier 1 and nominated Tier 2 manufacturing facilities.

ASICS complements audits with industry-aligned and data-driven tools. As a signatory to the Social & Labor Convergence Program (SLCP), ASICS contributes to industry efforts to enhance transparency, improve data consistency, and reduce audit duplication across the apparel and footwear sector. ASICS also uses SEDEX to access external risk intelligence and country-level data to identify trends and recurring non-compliances. In selected countries, ASICS participates in ILO Better Work, which provides independent factory assessments and supports ongoing compliance and remediation through social dialogue and capacity building. Read more about other preventive actions being taken, as well as planned actions for 2026 in the ASICS [Modern Slavery Statement](#) and Global Sustainability Report [2025](#).

5 ASICS' next steps

During 2025, ASICS focused on enhancing the consistency and effectiveness of existing processes and cross-functional collaboration, improving the use of data, and reinforcing expectations with suppliers. These efforts support the continued integration of due diligence considerations into sourcing decisions and inform the priorities outlined in the next section.

In 2026, ASICS is further refining how risks related to human rights and indecent working conditions are identified and prioritized, drawing on insights from human rights risk assessments, SAQs, audits, grievance mechanisms, traceability systems, and external risk intelligence. In the supply chain, priority will remain on Tier 1 and nominated Tier 2 suppliers, while gradually expanding upstream visibility where risk exposure is highest. Within its own operations, ASICS will maintain its focus on risks related to excessive working hours and workplace conduct, with emphasis on early identification of concerns and preventive action by relevant teams.

ASICS will expand its supply chain traceability systems in 2026 by onboarding additional supplier sites and materials, improving data accuracy, and strengthening the integration with audit planning, and remediation. These efforts will support more informed decision-making and closer coordination between sustainability, sourcing, and procurement functions.

Through these initiatives, ASICS is reinforcing transparency, worker protection, and ethical sourcing, strengthening its position as a responsible leader in the global apparel and footwear industry.

Hoofddorp, the Netherlands, June 30 2026

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