

Norwegian Transparency Act

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Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (Transparency Act)

This document has been prepared in accordance with the Norwegian Transparency Act. It sets out the human rights due diligence processes carried out by Mango to identify, prevent, mitigate, remedy, monitor and communicate potential or actual human rights impacts that may arise from business operations.

The due diligence process is defined in accordance with the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and are aligned with Mango's commitment outlined in its Human Rights Policy.

This Statement constitutes Mango Group Norwegian Transparency Act Report for the Financial Year 2024 and refers to both MANGO MNG HOLDING SAU and its subsidiaries, including MANGO NORGE, AS.

1. Organizational structure and business

Mango MNG Holding, S.A.U. is the parent company of a group of companies with design and creativity at the core of its business model and a strategy based on constant innovation, the pursuit of sustainability, and an ecosystem of channels and partners that have led it to become one of the leading groups in the global fashion industry and one of the most significant companies in the sector by the number of countries in which it operates.

The principal purpose of the business is the design, manufacture, distribution and marketing of clothing and accessories, as well as other categories such as decoration and homewear. Although Mango was created with a focus on Woman's fashion, the company has developed other business lines including Man, Kids, Teen, and Home.

Mango was founded in 1984 by Isak Andic and opened its first store on Passeig de Gracia in Barcelona before beginning the international expansion of the company. Following the passing of

Isak Andic in December 2024, in January 2025, the Board of Directors of Punto Fa S.L. (currently MANGO MNG SA, due to a recent corporate change), the company that encompasses Mango's business, unanimously approved the appointment of the current CEO of the company, Toni Ruiz, as President. Mango continues to be a family business whose top executive body is the Steering Committee, made up of eleven members who represent and manage key areas of the company. Mango sells its products in more than 120 markets through company stores (844), franchises (2000), and its online channel. The company gathers a team of over 16.400 employees around the world and facilitates stakeholder engagement through multiple digital marketplaces and external channels.

Mango continues its commitment with transparency as it is key to building strong relationships and to continuously improving the performance of the supply chain. In 2024, Mango worked with around 400 suppliers. In terms of production volume, the main supplier market for Mango continues to be China, followed by Bangladesh,

Cambodia, and Türkiye. Moreover, the company has continued to advance in the traceability of its value chain, collaborating with over 2.676 factories and contributing to the employment of more than 1 million people in 32 countries. Since 2022, Mango has published its factory list on its corporate website and at the Open Supply Hub (OSH), where the list can be publicly checked.

For Mango, the value chain encompasses all the steps involved in delivering Mango products to customers. This includes everything from the initial design concept and selecting and obtaining materials, to the processes of making, distributing, selling, and using the products. It also involves what happens throughout the lifecycle of its products from creation to end-of-life.

Mango is committed to respecting human rights and fundamental freedoms throughout its value chain to guarantee their enjoyment and ensure the well-being of all workers and their communities. Through its Human Rights Policy (published in 2024) and due diligence procedure, Mango supports and develops its commitment to the UN

Guiding Principles (UNGPs) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct by assuming responsibility for respecting and promoting human rights and for ensuring access to effective remediation mechanisms in the event of any negative impact. Mango integrates Responsible Business Conduct through various governance documents of the Group. All Mango's business partners accept and undertake to comply with Mango's sustainability policies. The Human Rights Policy along with the Code of Ethics and the Code of Conduct for Product Suppliers and Manufacturers (updated in 2024) its strengths show Mango's commitment to respecting human rights, promoting ethical practices, and fostering accountability in partnership with business partners and other stakeholders.

The Human Rights Policy can be found here (<https://www.mangofashiongroup.com/en/compliance-en>).

The Code of Conduct for Product Suppliers and Manufacturers can be found here (<https://www.mangofashiongroup.com/en/compliance-en>).

2. Traceability of the supply chain

Traceability is an essential aspect of understanding the operational context and identifying the real and potential impacts on human rights. It allows tracking the journey of products throughout the entire supply chain, which is crucial for detecting and managing possible risks at each stage.

Mango's Sustainable Vision 2030 strengthens its commitment to the supply chain through solid and transparent relationships with its suppliers, based on traceability and strategic collaboration. With these initiatives, Mango seeks to build a resilient and responsible network, fully aligned with the company's values and sustainability objectives.

Each season, product suppliers declare the production factories they use on Mango's traceability platform. In 2024, Mango began working with the Textile Genesis platform, which, after its full implementation in the upcoming years, will become the company's main product traceability tool. The pla-

tform is enhancing the company's ability to track products, providing detailed transparency for each article from fiber to retail, and extending deeper knowledge into the supply chain to identify risks on human rights and the environment.

Since 2020, the company has been a pioneer in Spain by annually publishing the list of its finished product factories, as well as its fabric and trimming factories and, since 2022, also part of its spinning mills.

Since 2024, Mango has registered its list of factories in Open Supply Hub, a non-profit organization that assigns unique identifiers to factories from various industries. This enhances transparency and facilitates traceability in its supply chain, in addition to optimizing the internal management of its database.

3. Human rights due diligence

Human rights due diligence (HRDD) is the process through which companies can identify, prevent, mitigate, and account for how they address their

existing and potential adverse impacts on human rights within its operations and value chain. It is an ongoing exercise that recognizes that the risks of harm may change over time as the company's operations and operating context evolve.

Mango conducts due diligence on its own activities and on its suppliers throughout its supply chain and other business relationships, promoting sustainable development, social dialogue and meaningful engagement with affected or potentially affected groups and other stakeholders.

For the development of the company's due diligence procedure, the following documents and regulatory frameworks have been primarily considered:

- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- OECD Guidelines for Multinational Enterprises throughout the supply chain
- OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector

- Corporate Sustainability Due Diligence Directive (CSDDD)

The essential elements of the due diligence process are as follows:

4. Risk and impact management

The analysis and identification of real and potential adverse impacts on human rights is the core of the HRDD. Taking that into account, Mango works on an impact, risk and opportunities approach, with the aim of guaranteeing ethical and responsible business conduct within the organization as it is a key issue. Mango is committed to its responsibility to identify and assess actual or potential adverse human rights impacts with which it may be contributing to, as the starting point for determining appropriate action plans to prevent and mitigate adverse human rights impacts or remediate, if needed.

Being conscious of its key role in the private sector, in 2024, Mango conducted its first double materiality analysis, strengthening its commitment

to transparency and sustainability. This approach provides a structured framework to determine the sustainability topics that are most relevant to both the company and its stakeholders. One of the most significant topics identified were those related to the labour conditions, work-related rights, and the well-being of supply chain workers.

Moreover, in 2024 Mango carried out its first analysis of Salient Issues on Human Rights. The aim of this analysis is to identify and evaluate the most important and urgent issues that may have a significant impact on human rights among Mango's stakeholders. After completing the exercise, 7 priority human rights risks for Mango were identified. These risks affect the workers and communities in its supply chain and fall under the following risk areas:

- Child labor
- Health and safety
- Wages, benefits, and compensation
- Discrimination, inequality, and abuse
- Overtime
- Forced labor

- Climate change and responsible environmental management

This exercise allows Mango to accurately identify and prioritize the most severe issues to manage in regard to human rights within its supply chain and it is intended to periodically being updated to ensure alignment with changes in operational contexts.

Mango, together with the Mango Chair in CSR (ESCI- UPPF), updates every year a map of social and environmental risks that classifies manufacturing countries according to their level of risk. This information is highly valuable for assessing the risk of suppliers located in different countries, supporting due diligence procedures. The standards of reference used are, among others, statistics and studies of the International Labour Organisation (ILO), Children's Rights & Business Atlas, World Risk Poll and the Global Gender GaD Index. In 2024, Mango started conducting country specific risk analysis to better understand and manage these risks in the supply chain of specific

countries where the company operates. In 2024, Mango carried out a Human Rights Impact Assessment (HRIA) in Türkiye in collaboration with The Center for Child Rights and Business and plans to expand this analysis to other countries and to implement concrete actions plans to prevent, mitigate or remediate those impacts.

Mango is aware that it is within its supply chain where the highest risks and adverse impacts on human rights are. Because of that, Mango is also committed to prevent or mitigate the real or potential adverse impacts on its supply chain and that is why is consistently managing, monitoring and reporting on worker related human rights' risks. The company is committed to respect human rights, and it expects the same from the business partners in its supply chain.

Before starting a business relationship with the company, all product suppliers and manufacturers accept and commit to complying with all the points specified in the Code of Conduct, which is attached to the contract signed when starting the business relationship. This Code of Conduct

includes the prohibition of forced labor, prohibition of violence and harassment, freedom of association, among others.

Sourcing, Sustainability and Quality departments work together to evaluate the production centers proposed by suppliers before any order confirmation. This ensures that all the actors involved in the production process meet Mango's sustainability and quality requirements. As a main requirement, all finished product factories must have a valid social audit conducted by a third party at the time of production.

Social audits are the current mechanism for monitoring the social sustainability performance of direct suppliers and their alignment with the Code of Conduct. After completing the social audits, the results are evaluated, and factories are rated using a methodology created by the Group to determine factories to be categorized by their level of risk, performance, and degree of compliance. In order to measure effectiveness and to promote continuous improvement one of the main tools that Mango has is the Corrective Actions Plans

that are developed under the scope of the social audits. Mango always encourages suppliers to implement corrective measures in the production facilities which will serve also as a tool for suppliers to resolve the non-conformities identified during the audit process and to improve processes.

Additionally, Mango team and representatives of the Global Framework Agreement (GFA) that Mango has with the Spanish trade union CC.OO. Industria which was signed in 2018 and is affiliated with Industrial and Global Union (the international trade union federation), may organize joint visits to selected factories to

To address the key vulnerabilities of specific groups, Mango develops and implements dedicated protocols to identify and meet their specific needs. Recognizing that migrant workers are one of the groups most susceptible to abusive practices, in 2024 Mango started developing the Migrant Worker Protocol, a guide for Mango's product suppliers and manufacturers, to address the challenges posed by current migration flows in the supply chain and promote respect for the human

rights of all migrant workers and their families. To ensure human rights are respected, Sustainability and Sourcing teams conduct capacity building sessions both internally and externally. These sessions are designed to provide training for Mango's staff, suppliers and production factories on human rights, decent working conditions and social risk management; and are essential to ensure that key actors in the value chain are aligned with the company's values and committed to human rights and sustainability.

Since 2014, Mango has been an active member of the Business and Human Rights Working Group within the Spanish network of the Global Compact. As part of this initiative, Mango's Sustainability teams receive training in human rights topics and build knowledge, participating, for example, in the Accelerator for Human Rights and Businesses in 2024.

Starting in 2023 Mango has been organizing the Vendor Summit, a yearly event for suppliers that highlights the importance of working together towards a more responsible and sustainable futu-

re. This event fosters meaningful stakeholder engagement, covering key discussions about topics related to sustainable supply chains, human rights and plans to adopt more responsible practices. Verifying, monitoring and validating progress on due diligence and its effectiveness is one of the key steps of the due diligence process. Sustainability and Sourcing teams monitor suppliers' social performance and the conditions in their own factories and subcontractors.

At the same time, Mango tracks all cases that arrive through the grievance channels, as well as the allegations it receives from international human rights organizations. The Sustainability Department regularly reports to the Sustainability Committee, providing insights into the current status and proposing actions to adjust or implement the strategy as needed.

To ensure that Mango complies with the highest ethical and sustainability standards, it periodically reviews, internally and externally, its strategic plan through a third party. Moreover, Mango par-

ticipates in sustainability rankings such as S&P CSA, BRM or Fashion Transparency Index to keep assessing its performance on sustainability and improving it.

5. Access to remedy

Effective grievance mechanisms and remediation processes are essential to uphold human rights, as they enable affected individuals to raise concerns, ensure accountability, and provide a path for restoring rights where harm has occurred. Mango has available multiple grievance and complaint channels to all individuals involved in its operations and supply chain, including staff, supply chain workers, suppliers, and consumers. These channels are designed to address any non-compliance issues, establish necessary corrective actions, and ensure access to remedy. Mango's Ethical Channel allows anyone associated with the company to easily report potential misconduct.

Find out more about the Ethical Channel here (<https://mango.edenuncias.com/Inicio.aspx>).

Mango is also part of other grievance initiatives such those provided by the International Accord, Müdem or amfori (Speak for Change), which provides workers in the supply chain with a platform to submit their complaints and access to remedy.

Additionally, Mango has a Global Framework Agreement (GFA) with the Spanish trade union CC.OO. Industria which was signed in 2018 and collaborates with organizations such as The Center for Child Rights and Business. Both organizations have alert systems. In these cases, the resolution of the human rights violations is managed jointly between Mango, potential stakeholders involved and these organizations.

Results and detailed information concerning human rights and due diligence across Mango's value chain and other commitments and initiatives related are publicly disclosure in the Sustainability Report published every year on its corporate website ([Our sustainable path - Mango Fashion Group](#)).

Ultimately, the Sustainability Committee oversees all initiatives and is responsible for giving final approval to the strategy.

This statement was prepared by Mango and was approved by the Board of Directors as of June 2025.

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