



Annual Report | 2024

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This is the fourth annual report of the New Frontier GmbH. Here we provide an insight into the implementation of due diligence obligations in our sourcing of apparel in Asia. This includes our close cooperation with associations and initiatives that give us access to advice, systems and tools. We also report on incidents and complaints from our supply chain and how we have taken these into account when assessing human rights and environmental risks in our updated risk analysis.

This report contains many abbreviations and technical terms; for better understanding, you will find all words in italics in the glossary at the end of the document. All information relates to the calendar year **2024**, unless otherwise stated.

1 Statistics & Numbers

In **2024**, we worked with **22** production partners in **2** countries, **11** in Bangladesh and **11** in China. Of these companies, a total of **7** were fully integrated with their own dyeing and washing facilities. The longest business relationship has existed for **18** years and the shortest for **1** year. On average, the duration of cooperation with our production partners is **7** years. The onboarding and approval process was successfully completed with **2** further companies, a new one in China and an already known one in Bangladesh, so that they could be approved for production.

In addition to these **22** apparel manufacturers, our indirect supply chain includes **237** suppliers for the materials used in the garments. This includes the producers of yarns and fabrics as well as suppliers of a wide range of small accessories such as zippers, buttons and labels.

In **2024**, a total of **81** factory visits were made to our production partners by New Frontier CR employees and commissioned auditors, **26** of them in Bangladesh and **55** in China. Among other things, we were on site for **40** *social audits* and **4** *chemical management audits* as well as **14** training sessions for the employees of our production partners. In addition, *chemical management audits* were carried out at **2** strategic wet production facilities in China. We do not have a direct business relationship with these, but our production partners have been dyeing the fabric for our orders there for many years, this year for approx. **30%** of our production volume in China.

In the *New Frontier Social audits*, we were able to determine the success of the corrective measures introduced for **118** of the findings identified in the previous audit. However, we also identified a total of **218** new findings. In our *chemical management audits*, **41** findings were identified. The review in **2024** confirmed the correction of **29** findings.

Also, staff from our German Office visited again our production partners in Asia. This year, **2** employees from Product Management and Quality Development traveled to China to get a better understanding of the factories and exchange ideas with our local partners.

New Frontier GmbH has also been audited twice this year. In March by Control Union for the annual renewal of our product certifications *Global Organic Textile Standard (GOTS)*, *Organic Content Standard (OCS)*, *Global Recycled Standard (GRS)*, *Recycled Claim Standard (RCS)* and the *Responsible Wool Standard (RWS)*. We were one of the first companies to be audited according to the new *GOTS 7.0* version.

One month later, the next auditor was already at our door. After a year of preparation, we had Hohenstein® examine the due diligence measures we had implemented in our procurement process. The aim was to meet the demanding requirements of the new *OEKO-TEX® Responsible Business Standard*. The audit identified a number of points that we needed to improve, which we implemented in the following months. In October, we received confirmation that our efforts had been successful. New Frontier GmbH was the third company to achieve the *OEKO-TEX® Responsible Business* certificate.

2 Memberships & Engagements

We are actively involved in various associations and initiatives that focus on different aspects of due diligence in the supply chain and sustainable business practices.

2.1 amfori – Trade with purpose

Since 2009, New Frontier has been a member of amfori, a global business association that promotes sustainable trade and supports our ESG due diligence measures. amfori is the organization behind the *Business Social Compliance Initiative (BSCI)*, an audit system for improving working conditions, the *Business Environmental Performance Initiative (BEPI)*, an environmental impact assessment and improvement system, and the *Speak 4 Change (S4C)* grievance mechanism for workers in the supply chain. We actively use these systems provided by amfori to improve and further develop our production partners.



The amfori *BSCI audit* is at the center of our measures. In this audit, the following **13** performance areas of the amfori *BSCI Code of Conduct* are regularly reviewed by independent auditors at all production partners:

- Social Management System
- Workers Involvement and Protection
- The Rights of Freedom of Association and Collective Bargaining
- No Discrimination, Violence or Harassment
- Fair Remuneration
- Decent Working Hours
- Occupational Health and Safety
- No Child Labour
- Special Protection for Young Workers
- No Precarious Employment
- No Bonded, Forced Labour or Human Trafficking
- Protection of the Environment
- Ethical Business Behaviour

For a production company to work with us, it must undergo the two-year amfori BSCI audit cycle consisting of a full audit and a follow-up audit. Depending on the result of the full audit, a follow-up audit will be arranged within one year. If the result is good enough that a follow-up audit is not necessary, a new full audit will be arranged after two years latest. When evaluating the amfori *BSCI audits*, it is very important to note that the *BSCI standard* is not a certification. The audit result does not guarantee an actual state but only describes the situation on the audit day to then initiate a continuous improvement of the working conditions found. These audits are supplemented by online and offline training courses, which are available to members and production partners free of charge.

To enable the *amfori* member to assess the producer, each audit report includes a rating of the *Code of Conduct* implementation. The best rating is **A**, the worst is **E**. Critical violations, such as child labour, are additionally assigned a **Zero-Tolerance** rating. In these

cases, corrective measures are organized under the guidance of the *amfori* office in Brussels to remedy the violation as quickly as possible and provide compensation to those affected. We only work with production companies that achieve a **C** rating or higher.

In **2024**, a total of **17 BSCI audits** were carried out at our production partners. Of these, **53%** achieved an **A** or **B** rating and **47%** a **C** rating. There was no audit with a **D** or **E** rating and no case of **Zero Tolerance**.

For the past two years, we have systematically followed up on the corrective measures implemented following the *BSCI audits*. A comparison of the last two *BSCI audits* reveals the following picture: the success of the corrective measures is confirmed in the follow-up audit for approx. **25%** of the findings. However, in the same order of magnitude of approx. **26%**, new findings are identified. For around **49%** of the findings, the measures taken are not successful and the issue is reported again in the follow-up audit.

To complement *BSCI*, *amfori* has developed *BEPI*. A set of tools to measure environmental performance, identify potential risks and initiate improvement measures. The basis is the *BEPI Code of Conduct*, which includes the following 8 Environmental Performance Areas (*EPA*):

- Environmental Management System
- Energy and Climate
- Emissions to Air
- Water & Effluents
- Waste
- Biodiversity
- Chemicals
- Nuisances

We primarily use the *Risk Assessment Questionnaire (RAQ)*. This is completed by our production partners in the first quarter of each year. Based on the answers, the system then calculates a risk value, which we can use to initiate further measures. These include on-site inspections or attendance at *amfori* training courses.

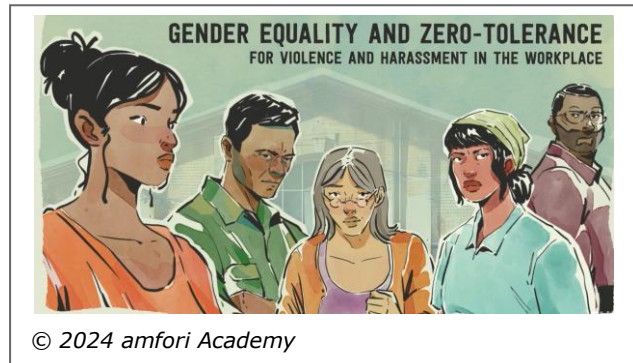
In particular, the annual consumption values for water and energy are also recorded at this point. In relation to the production figures (units or kg), efficiency benchmarks can be created and production sites with low or high consumption values can be identified.

In **2024**, our production partners completed 25 *RAQs*. There were 9 *EPAs* that were rated as high or very high risk at individual production sites. However, after evaluating the responses, these could be attributed to misunderstandings and wrong data entries by our production partners. We therefore did not initiate any additional follow-up measures in **2024**.

2.1.1 Promotion of equality & prevention of discrimination and harassment

In the revision of the *amfori BSCI* system, *amfori* has placed an important new focus on gender equality. To support producers with implementation, the new online training module **Gender Equality and Zero Tolerance for Violence and Harassment in the Workplace** was published in the *amfori Academy* in the summer of **2024**.

The training includes an eLearning for the HR and compliance managers of the producers, on how to set up a gender-equitable management system. This is supplemented by a 30-minute animated video, which should be presented to the workers in small groups. The video explains the various forms of discrimination



and harassment that can occur in the workplace, as well as the means available to those affected to get help. The various complaints mechanisms play a prominent role here, particularly the *Speak 4 Change* mechanism operated by *amfori*. There are two breaks in which the participants should discuss about questions provided in the video. To reach the widest possible audience, the short film is available in 13 different languages, including Mandarin and Bangla. Since October **2024**, it is checked in the *BSCI* audits, whether the training prepared by *amfori* or comparable training courses have taken place and also whether those responsible are informed about the corresponding *BSCI* requirements on gender equality.

It is a very important topic, so we have informed all our production partners about the training and asked them to start implementing it, regardless of whether a *BSCI audit* is due soon or not. To support our production partners in China with the implementation, we offered to carry out the training ourselves, which was accepted by all of them. From September to December, our commissioned auditor from Wuhan travelled to each of our production partners and conducted the training with the workers and managers in several sessions. In total, more than 1,000 people were reached.

In Bangladesh, the production facilities are much larger, and all producers have an HR department that can carry out the training by itself. By the end of the year, **6** of our production sites in Bangladesh had successfully completed the e-learning program and **2** had started showing the training videos to their workers. As there are an average of 3,000 employees per factory in Bangladesh, it will take considerably longer for the program to be completed with the majority of the workforce than in China.

2.2 International Accord for Health and Safety in the Textile and Garment Industry

We have been a signatory to the *Accord* since 2012 and have also signed all subsequent agreements, most recently *the International Accord* in November 2023.

In this contract, we commit to ensure that the buildings of our production partners in Bangladesh are safe. This safety applies to building safety, fire protection, electrical safety and since 2022 the safety of the boilers, which supply the steam for the ironing.

Although all of these areas are regulated by law in Bangladesh, compliance is not sufficiently monitored by the authorities. Until

2021 the *Accord* therefore maintained its own branch office in Bangladesh with over one hundred employees who were responsible for safety inspections. In 2021, the task was handed over to the *Ready-Made Garment Sustainability Council (RSC)* as a regional partner, which took over the employees and the systems developed by *Accord* in Bangladesh.

A total of **103** inspections were carried out by RSC safety inspectors at our **11** production partners in **2024**. Boiler inspections in particular were increased this year. However, as the final report is only available after the last inspection (visual inspection, hydrostatic test, functional test) of each boiler in a factory, we have only received two complete reports this year, although **45** boiler inspections have already taken place.

Since the start of the *Accord*, a total of **2,089** findings have been identified at our production partners, of which **1,761** have been verified corrected to date.



2.3 GermanFashion

New Frontier is a member of the fashion association *GermanFashion*. This business association supports its members with training and advice and offers expertise on regulatory, technical and economic issues in relation to clothing and textile production and fashion retail. In 2022 *GermanFashion* established a new sustainability department. In addition to training and consulting services the department organized a new working group on sustainability for interested members. The first meeting of that group was in 2023.

We were once again present at the third edition of this event in Cologne and exchanged views with other companies in the industry on current topics such as the upcoming *CSRD* reporting, the EU Ecodesign Regulation and the implementation of product-related risk analysis.

2.4 Zero Discharge of Hazardous Chemicals

The *Zero Discharge of Hazardous Chemicals (ZDHC)* initiative was founded in 2011 to improve the use of chemicals in the textile and clothing industry and thus reduce the environmental impact of wet processes such as dyeing, washing and printing. As a standard body, *ZDHC* is responsible for a *Manufacturing Restricted Substances List (MRSL)* for textile chemicals, which is used by a large part of the industry.

The standards defined by *ZDHC* have been part of the requirements for our production partners and their upstream suppliers with wet processes for several years. To make it easier to check compliance with the standards, we contacted *ZDHC* in December and asked about the requirements of membership. The exchange was very promising, so we are planning to apply for membership as a *Signatory Friend of ZDHC - Vendor* next year.

3 Grievance Mechanism & Complaints

Effective grievance mechanisms are one of the pillars of the *UN Guiding Principles on Business and Human Rights*. We do have a very diverse group of interested stakeholders for which we have to provide accessible systems. A telephone number in Bangladesh is just as little help to our own employees as an e-mail address on our website is to the workers of our production partners in Dhaka. To be able to allow different stakeholders to submit a grievance, we use five different mechanisms. For our own employees we have set up an external ombudsman's office, whose contact information is also published on our website. So, our neighbours or other organizations with a legitimate interest can also contact the Ombudsperson.

Workers in Bangladesh have access to the *RSC* grievance mechanism, *amfori Speak 4 Change* and our clients complaint mechanism. At our production partners in China, workers currently only have access to our client's complaint mechanism but will also have access to *amfori Speak 4 Change* in the future. We have also communicated access information to the *OEKO-TEX®* whistleblower form for our supply chain.

3.1 Received complaints

We did not receive any reports or complaints via our external ombudsman, *amfori Speak 4 Change*, the *OEKO-TEX®* whistleblower system or our clients' complaints mechanisms in **2024**. However, a total of **22** complaints were received through the *RSC* complaint mechanism in Bangladesh. Of these, **15** were processed directly by us. This means an evaluation of the documents and evidence submitted by the production facility, which either substantiates the



measures taken to resolve the complaint or in some cases also invalidates the complaint. In the case of some specific complaints, we also conducted interviews with the complainants to obtain further information about the facts of the case.

In one case, we contacted the *RSC* directly and asked for advice on how to assess the information we received from the production facility and the complainant. We received a very detailed response from the head of the *RSC* complaints mechanism, and the case was decided according to this procedure. For **8** complaints that were within the responsibility of the *RSC*, we only received the result of the *RSC* investigation and the subsequent

remedial action taken by the production site, and did not take any further action ourselves. In particular, the *RSC* directly investigated **4** cases involving allegations of workplace harassment. In **3** cases where allegations were substantiated, there were consequences under labour law for the accused. In particularly serious cases, especially one case of sexual harassment in the workplace, the accused were dismissed.

Almost two thirds of all complaints received, and all harassment complaints came from a single production facility. This accumulation prompted us to question the continuation of the business relationship. However, in all confirmed cases, remedial measures were initiated by the production partner, so that a will to improve was also recognisable. We have therefore continued the business relationship for the time being.

The following list provides an overview of the complaints received and processed in **2024**:

<u>No.</u>	<u>Year</u>	<u>Status</u>	<u>Comment</u>
17	2023	Closed	Allegation could not be confirmed.
19	2023	Closed	The trade union through which the complaints were filed has negotiated an agreement on severance payments with the production facility.
20	2023	Closed	
21	2024	Closed	
22	2024	Closed	Allegation could not be confirmed.
23	2024	Pending	Interpretation of Bengali labour law - pending in court.
24	2024	Closed	Allegation could not be confirmed.
25	2024	Closed	Allegation confirmed - Consequences under labour law for the accused
26	2024	Pending	Under review by the <i>RSC</i> .
27	2024	Closed	Allegation could not be confirmed.
28	2024	Closed	Allegation could not be confirmed.
29	2024	Closed	Allegation confirmed - Delayed payment of compensation made up for.
30	2024	Closed	Allegation confirmed - Consequences under labour law for the accused
31	2024	Closed	Allegation could not be confirmed.
32	2024	Closed	Allegation could not be confirmed.
33	2024	Closed	Allegation confirmed - Delayed payment of compensation made up for.
34	2024	Closed	Allegation could not be confirmed.
35	2024	Closed	The complaints relate to a wave of dismissals of 21 employees and managers. The conflict was settled with the involvement of the <i>BGMEA</i> . Severance payments have been agreed between the three parties.
36	2024	Closed	
37	2024	Closed	Allegation confirmed - Delayed payment of compensation made up for.
38	2024	Pending	Under review
39	2024	Closed	Allegation confirmed - Delayed payment of compensation made up for.
40	2024	Closed	Allegation confirmed - Consequences under labour law for the accused
41	2024	Pending	Under review
42	2024	Pending	Under review

Of the **22** complaints received in **2024**, only **4** related to a sector risk (discrimination and harassment or sexual harassment). The remaining **18** complaints relate in various

forms to disputes over severance payments after employees quit their job or were dismissed. These cannot be linked to a specific sector risk.

3.2 Continuous Improvement of the Grievance Mechanism

3.2.1 RSC-Complaint Mechanism

The RSC only follows up with a good third of all complaints received, as the majority are not about health and safety in the workplace. The Accord signatories, the trade unions, and the RSC complaints team itself want to extend the scope beyond workplace safety and process all complaints directly. To test the effects of expanding the mechanism, the RSC launched the pilot project *Comprehensive Complaint Mechanism (CCM)* on 11 March, which will run until 11 August **2024**.

During this period, all complaints received at 503 selected factories were processed directly by the RSC. We were involved in the pilot project through four of our production partners. Our overall experience with the revised system has been positive. The RSC Directorate will decide next year whether the CCM programme will be introduced. In a survey of Accord signatories, we have spoken out in favour of the expansion.

3.2.2 amfori Speak 4 Change

The *amfori Speak 4 Change* grievance mechanism was rolled out to Cambodia as a further country in **2024**. However, it was found that the system in its current form has reached its capacity limits, particularly in Bangladesh. The expansion to other countries has therefore been temporarily suspended from summer **2024** to March 2025. Instead, the existing mechanism has been evaluated to be able to process complaints received more effectively.

Independently of this, *amfori* is continuing to work with local stakeholders in China to prepare for an introduction of the program. Due to the size of the country and the special situation in China, an initial limited pilot project won't be done before the end of 2025, though.

4 Incidents & Events

The political and social events in Bangladesh have very much shaped the year **2024**.

4.1 Freedom of Association in Bangladesh

In May, we followed up on a report that a production partner in Bangladesh was actively suppressing freedom of association. To verify the allegations, we not only reviewed the statement provided by our production partner but also sought direct contact with the affected trade union representatives. Our CR team was able to speak with both parties involved. Additionally, we exchanged insights with other brands active at the factory, which also did their own investigation. At the same time, the RSC also launched an investigation and shared the final report with us.

The result of the investigations by us, the RSC and other brands showed that the incident to which the report referred had nothing to do with our production partner. As the allegations were unfounded, we did not take any further action.

4.2 Student protests & riots in Bangladesh

The second half of the year was marked by widespread student protests in Bangladesh, which culminated in a change of government. The unrest was accompanied by significant violence, resulting in numerous casualties. During this period, our local team in Dhaka worked remotely and kept us regularly informed about developments on the ground. With the end of violence and the establishment of a transitional government under the leadership of Nobel Peace Prize laureate Mohammad Yunus, there is renewed optimism for a more democratic and stable future in Bangladesh.

As a signatory of the Accord, we received a letter from the trade unions *IndustriALL* and *UNI Global Union* regarding our handling of the impacts of the student protests. The unions emphasized that factory closures and resulting production losses should not be borne by workers or suppliers. In our response, we honestly addressed the concerns raised and outlined both the measures we had taken and the limits of what was within our control. Following our reply, *UNI Global Union* expressed appreciation for our response as well as for our continued commitment to the *Accord* and to Bangladesh as a production country.

4.3 Strikes & Protests of garment and textile workers

Shortly after the change in government, Bangladesh once again experienced widespread protests — this time led by garment and textile workers demanding higher wages. Rising inflation has significantly increased the cost of living in Bangladesh, meaning that last year's minimum wage adjustment provided only limited real relief for households. Our production partners were directly and indirectly affected by these protests. On Septem-

ber 24, **2024**, an agreement was reached between worker representatives, the BGMEA, and the transitional government. The 18 demands put forward by the workers were accepted. Among other measures, the minimum wage — which was only revised in December 2023 — is scheduled for further review in the coming year. In addition, the legally mandated annual wage increase of 5% will be raised to a one-time 9% increase in 2025

The numerous closures caused by protests and strikes did not leave us unaffected. To support one production partner particularly impacted by the shutdowns, we approved the temporary subcontracting of specific orders to facilities with available capacity for the relevant product category. These subcontractors were authorized exclusively for this purpose and only for a limited period as part of this relief measure.

4.4 Boiler safety

The *RSC* boiler inspections identified serious safety hazards in **5** cases, requiring the shutdown of the affected boilers. Recommissioning is only permitted following reinspection and formal approval by the *RSC*. Repairs have already been completed on two of the boilers, and the *RSC* has granted clearance for their operation. The remaining **3** are currently at various stages of repair.

5 Risks & Measures

Since the beginning of 2021, we have conducted annual assessments of human rights and environmental risks associated with garment and textile production in our sourcing countries, China and Bangladesh. The original risk assessment system, as outlined in our *2021 Risk Report*, has been revised over the past two years and adapted to meet new requirements.

5.1 Risk assessment scope

The initial basis for our risk assessment was the country risk classification issued by *amfori*, which is based on the World Bank's *Worldwide Governance Indicators*. This classification provides an annual rating across six indicators, which are used to calculate a composite risk score ranging from 0 to 100. If the overall score falls below a threshold of 60, the country is classified as a risk country, and the implementation of due diligence measures is recommended. For this reason, our original risk analysis focused on our garment production in Asia and did not take into account downstream stages such as the transport of our goods within Europe.

In order to meet the standard requirements of the *OEKO-TEX® Responsible Business* certification, we now research, analyse, and assess potential human rights and environmental risks across the following stages of our supply chain:

- Own Business
- Transport in the Netherlands and Germany
- Garment production and wet process at direct business partner
- Material production at indirect business partner
- Raw material cultivation and extraction in the deep supply chain

Still not included are agencies and traders like e.g. cotton traders and also chemical production companies.

5.2 Risk identification

We collect information on potential risks from a wide range of external sources, including reports from NGOs, press articles, publications by *amfori*, the *International Accord*, and many others. For our **2024** risk assessment, we referenced a total of **51** new external sources. These sources provide us with an overview of the general conditions in our production countries and enable us to track both positive and negative developments.

Based on this, we have identified the following potential risks:

<u>Environment</u>	<u>Social</u>	<u>Governance</u>
<ul style="list-style-type: none"> • Greenhouse gas emissions • Discharge of untreated Wastewater • Hazardous Chemicals • Use of Chemicals with persistent organic pollutants • Use of Chemicals with Mercury • Water consumption and availability • Hazardous Waste • Air Pollution • Soil degradation 	<ul style="list-style-type: none"> • Unauthorized subcontract • Child Labour • Bonded Labour • Sever risk for occupational health and safety • Sexual Harassment • Discrimination and Harassment • Sourcing from home workers • Excessive Overtime • Non-payment of a living wage or living income • Systematic payment below minimum wage / systematic late payment • General health and safety • Freedom of association & collective Bargaining 	<ul style="list-style-type: none"> • Purchasing Practices • Bribery and Corruption

The identified risks apply to varying degrees across different stages of production; some risks are relevant to certain processes or countries.

5.3 Risk assessment

Our assessment system is aligned with the *OECD Due Diligence Guidance*. As a first step, we evaluate each identified risk based on the following three criteria, using a four-level scale ranging from **Low** to **Very High**:

- **Severity** – Wie schlimm sind die Folgen für den Betroffenen?
- **Range** – Wie viele sind potenziell betroffen?
- **Irreversibility** – Wie gut lassen sich die Folgen wiedergutmachen?

Based on the assessment, the **Impact** of each risk is calculated as the average of the three criteria. This evaluation is conducted initially as a baseline and is only adjusted if new information about the risk becomes available.

Based on the events of the previous year, we reassess the **Likelihood** of occurrence for each risk on an annual basis. Following this evaluation, our system calculates a **Risk prioritization** for each assessed risk by averaging the **Severity** and **Likelihood** scores. This **Risk prioritization** then serves as the basis for determining further measures.

We conduct this annual assessment separately for each country and each stage of the supply chain. If over the course of the year, we receive information indicating a fundamental change in the risk situation, we perform a reassessment accordingly.

5.3.1 Own business

For our own business operations, we identified and assessed **1** material risk.

Risk	Prioritization Germany
Purchasing practice and business model	Moderte

In our **2024** assessment, the **Likelihood** for the risk associated with *purchasing practices and business model* was rated **Low**.

Purchasing practices can have a significant impact on working conditions in production. Not only our requirements, but also our behaviour — such as last-minute changes or delays in approvals — can cascade through the supply chain and for example contribute to excessive overtime at production sites. As a trading company, we act as an intermediary between our clients’ visions and the realities of production. Every day, we work intensively to implement our clients’ wishes and requirements. Orders must be delivered on time, in the agreed quantity, and at the expected level of quality.

Our product managers in Germany, together with our local technician team and external technical specialists, closely monitor both the pre-production and production processes. Any issues that arise are communicated transparently and resolved in coordination with all parties involved. Change requests are carefully reviewed and only implemented if they are feasible within the given time frame and budget. We do not make unilateral decisions, nor do we demand arbitrary price reductions from our production partners to lower costs retroactively.

We do not know in advance for which products in what quantities we will receive orders, so we are unable to book production capacities with our production partners. However, we can partially offset this disadvantage by placing our orders well in advance. As a result, the effective planning timeline for our production partners is ultimately comparable to the traditional seasonal business model used by brands, which includes collection development, capacity booking, pre-orders, and disposition.

We also cannot predict the extent to which our production partners will be occupied by orders from other clients. As a result, the focus of our production shifts each year between our long-standing partners. In **2024**, 42% of our total production took place in facilities with which we have been working for more than 10 years, and an additional 33% was produced in facilities with which we have had partnerships for over 6 years.

5.3.2 Transport in the Netherlands and Germany

The majority of our goods are delivered to the Port of Rotterdam and transported from there by a long-standing logistics service provider.

For the logistics and transport sector in Germany and the Netherlands, we have identified and assessed **7** material risks.

Risk	Prioritization Germany	Prioritization Netherlands
Greenhouse gas emissions	Very high	Very high

In our **2024** assessment, the **Likelihood** for the critical risk associated with *Greenhouse gas emissions* was rated **Very High**.

This classification is based on the fact that the energy used to transport our orders is largely generated by fossil fuels, thereby contributing to global climate change. The **Severity** of the risk results in a **Very High** prioritization. As the extent of these emissions cannot currently be prevented or offset, we are not in a position to implement effective mitigation measures.

Risk	Prioritization Germany	Prioritization Netherlands
Forced & bonded labour	Moderate	Moderate
Sever risk for occupational health and safety	Moderate	Moderate
Discrimination & Harassment	Moderate	Moderate
Systematic payment below minimum wage / systematic late payment	Low	Low
Excessive Overtime	Moderate	Moderate
Freedom of association & collective Bargaining	Moderate	Moderate

In our **2024** assessment, the **Likelihood** for each of the different risks associated with the transport sector was rated **Low**.

This classification is based on the designation of Germany and the Netherlands as non-risk countries. For this reason, no further measures have been initiated

5.3.3 Production partner apparel and wet process

The focus of our risk assessment and our mitigation measures is still with our production partners. Based on the insights gained through our New Frontier audits, we can assess the actual risk situation with a high degree of accuracy. Our own internally collected data is supplemented by the detailed *BSCI audit* reports, which we can access as an *amfori* member, as well as the annually completed *BEPI RAQ*, wastewater test reports, *RSC* inspections, and information received through the grievance mechanisms.

For the area of garment production and wet processes, we have identified **21** material risks.

Risk	Prioritization Bangladesh	Prioritization China
Unauthorized subcontract	High	High
Sourcing from home workers	Low	Low

In our **2024** assessment, the **Likelihood** of the critical risks *unauthorized subcontract* and *Sourcing from homeworkers* was rated **Low**.

This classification is based on the preventive measures we already have in place. In addition to our on-site monitoring, this includes the option for approved subcontracting, subject to prior agreement with us. The active use of this option by our production partners in times of capacity constraints is, in our view, a confirmation that our existing measures are effective and that no additional actions are currently required.

Risk	Prioritization Bangladesh	Prioritization China
Forced & bonded labour	Moderate	Moderate
Sever risk for occupational health and safety	Moderate	Moderate
Child labour	Moderate	Moderate

In our **2024** assessment, the **Likelihood** of each of the critical risks *Forced & bonded labour*, *Severe risk for occupational health and safety* and *Child labour* was rated **Low**.

This classification is based on the information available to us about our production partners, which allows us to rule out these critical risks. We will continue to maintain our existing measures, including the careful assessment of new production facilities before order placement, as well as regular internal and external audits of our existing production partners.

Risk	Prioritization Bangladesh	Prioritization China
Greenhouse gas emissions	Very high	Very high

In our **2024** assessment, the **Likelihood** for the critical risk of *Greenhouse gas emissions* was rated **Very high**.

The energy used for the production and transport of our orders is largely generated from fossil fuels and contributes to global climate change. As the extent of these emissions cannot currently be prevented or offset, we are not in a position to implement effective mitigation measures.

Risk	Prioritization Bangladesh	Prioritization China
Discrimination & Harassment	High	Moderate
Sexual Harassment	High	Moderate

In our **2024** assessment, the **Likelihood** for the hidden severe risks of *Discrimination and harassment* and *Sexual Harassment* was rated **High** for Bangladesh and **Moderate** for China.

Our preventive measures have proven effective in that we were informed of incidents at one of our production partners through the *RSC* grievance mechanism, and remediation was provided. Due to the information received about these actual cases in Bangladesh, a higher prioritization of this risk has been applied for that region. As an additional preventive step, we have initiated the implementation of the *amfori* training on *gender equality and zero tolerance for violence and harassment in the workplace* at our production partners. See Chapters 2.1.1 and 6.1.1.

Risk	Prioritization Bangladesh	Prioritization China
Discharge of untreated wastewater	Moderate	Moderate
Hazardous waste	Moderate	Moderate
Water consumption & availability	Moderate	Moderate

In our **2024** assessment, the **Likelihood** for the severe risks of *Discharge of untreated wastewater*, *Hazardous waste* and *Water consumption & availability* was rated **Low**.

This classification is based on the information available to us regarding our production partners with wet processes. All of them operate functional effluent treatment plants to clean water contaminated through dyeing, printing, and washing before it is discharged back into the environment. In addition, all partners participate in the *ZDHC* program, which ensures not only compliance with local legal requirements but also alignment with the stricter parameters of the *ZDHC* Wastewater Guidelines. According to *BEPI* data, only one production partner is located in a region with high water stress. This facility reuses

its treated water, resulting in neither wastewater discharge nor significant freshwater withdrawal for production purposes. The resulting sludge is disposed of through local waste management providers. To gain deeper insight into this area, we are currently evaluating membership in the ZDHC initiative. See Chapter 2.4.

Risk	Prioritization Bangladesh	Prioritization China
Hazardous chemicals	High	Moderate

In our **2024** assessment, the **Likelihood** for the severe risks of *Hazardous chemicals* was rated **Moderate** for Bangladesh and **Low** for China.

This classification is based on the fact that hazardous chemicals with varying risk potentials are generally used in the wet processes of textile production. This includes chemicals that comply with the *ZDHC Manufacturing Restricted Substances List (MRSL)*. Therefore, safety precautions such as comprehensive chemical management are essential to mitigate risks to people and the environment. In China, we work exclusively with one vertically integrated facility with wet processes, which is *OEKO-TEX® STeP* certified. To gain further insight into this topic, we are currently evaluating membership in the ZDHC initiative. See Chapter 2.4.

Risk	Prioritization Bangladesh	Prioritization China
Use of chemicals with persistent organic pollutants	High	High
Use of chemicals with mercury	Moderate	Moderate

In our **2024** assessment, the **Likelihood** for the severe risks of *Use of chemicals with persistent organic pollutants* and *Use of chemicals with mercury* was rated **Low**.

This classification is based on our information from the annual wastewater and sludge testing. These are conducted by independent laboratories in accordance with ZDHC requirements and there has been no contamination with persistent organic pollutants or mercury detected. This is further supported by chemical inventories available to us via the *BHive* platform. To gain a deeper insight into this area, we are currently evaluating membership in the ZDHC initiative. See Chapter 2.4.

Risk	Prioritization Bangladesh	Prioritization China
Systematic payment below minimum wage / systematic late payment	Low	Moderate

In our **2024** assessment, the **Likelihood** for the severe risks of *Systematic payment below minimum wage / systematic late payment* was rated **Low** for Bangladesh and **Moderate** for China.

This classification is based on the information available to us indicating that all our production partners in Bangladesh implemented the new minimum wage from day one. During our regular reviews throughout the year, we did not identify any instances of non-compliance. Wages were also paid during the periods of factory closures. Among our production partners in China, we likewise found no violations of minimum wage regulations. However, there are still shortcomings in the implementation of mandatory social security contributions.

Risk	Prioritization Bangladesh	Prioritization China
Bribery & Corruption	High	Moderate

In our **2024** assessment, the **Likelihood** for the hidden severe risk of *Bribery & corruption* was rated **Very High** for Bangladesh and **High** for China.

This classification is based on the country assessments provided by Transparency International. We have no information indicating actual cases of bribery; however, given the widespread nature of corruption—particularly in Bangladesh—we cannot interpret the absence of such reports as an absence of risk.

Risk	Prioritization Bangladesh	Prioritization China
General occupational health and safety	High	High

In our **2024** assessment, the **Likelihood** for the systemic risk of *General occupational health and safety* was rated **Very High**.

This classification is based on internal New Frontier social audit reports as well as *BSCI* audit findings. Each individual assessment continues to identify deficiencies in occupational health and safety. To bring about long-term improvements, we actively support the continuous development of our production partners. See Chapter 2.1 and Chapter 6.1.2.

Risk	Prioritization Bangladesh	Prioritization China
Excessive overtime	High	High
Non-payment of a living wage	High	Moderate

In our **2024** assessment, the **Likelihood** for systemic risk of *Excessive overtime* and *Non-payment of a living wage* was rated **Very High** and **High**.

The number of overtime hours worked by factory workers in Bangladesh and China is excessively high, regardless of the standard applied. In Bangladesh, this results from the low level of the statutory minimum wage, which can only cover basic living costs through overtime work. However, the gap is so significant that even with 14-hour workdays, a living wage is still not achieved. In China, the gap between the minimum wage and a living wage is much smaller, and in some cases, the living wage is effectively met or surpassed. However, most workers are paid on a piece-rate basis. To reach sufficient income levels, large quantities must be produced, which can lead to extensive working hours. Our ability to intervene in this issue is very limited. As a first step, we aim to improve our understanding of the actual situation. See Chapter 6.1.3.

Risk	Prioritization Bangladesh	Prioritization China
Freedom of association & collective bargaining	High	High

In our **2024** assessment, the **Likelihood** for systemic risk of Freedom of association & collective bargaining was rated **Very High**.

This classification is based on the information available to us regarding legal restrictions on freedom of association and the right to collective bargaining in both Bangladesh and China. Although there are *Participation Committees* present at our production partners, these are not an equivalent substitute. We are not in a position to implement measures in this area.

5.3.4 Material production

The risks identified in our production countries apply not only to garment manufacturing but also to the local material production. In addition to China and Bangladesh, materials are also sourced from a yarn producer in India, so we consider a total of three countries. Further to the country-specific risk there are additional risks related to the specific production processes of the materials, such as the use of hazardous chemicals in the production of polyurethane or paper.

Through our supply chain mapping, we have a good overview of the material producers for our products. However, we have significantly less concrete information available, so we can only estimate the **Likelihood** very roughly. Our primary sources of information about the actual presence of risks and existing mitigation measures are certifications such as *GOTS* and *GRS*, as well as social audit reports. Where *BSCI audits* are available, we gain better insight into the situation, as we have direct access to the comprehensive reports with all details on the *amfori* platform. Overall, audit reports or certificates are available for **43%** of our indirect material suppliers.

<u>Standard</u>	<u>All material supplier</u>	<u>Fabric & Yarn</u>	<u>Accessory</u>
BSCI audit report	17%	24%	8%
Other social audit	2%	4%	1%
Certification	32%	57%	8%
Total	43%	73%	15%

Because most our material suppliers neither are certified nor have been audited by a third party, we must generally assume a higher **Likelihood** for the various risks.

For the area of material production, we have identified and assessed **21** significant risks.

Risk	Prioritization Bangladesh	Prioritization China	Prioritization India
Greenhouse gas emissions	Very high	Very high	Very high
Unauthorized subcontract	High	High	-
Forced & bonded labour	Moderate	Moderate	Moderate
Sever risk for occupational health and safety	High	Moderate	Moderate
Child labour	High	Moderate	Moderate
Discrimination & Harassment	High	High	High
Sexual Harassment	High	High	High
Hazardous Chemicals	High	High	Moderate
Use of chemicals with persistent organic pollutants	Very high	Very high	-
Use of Chemicals with Mercury	Moderate	High	Moderate
Hazardous Waste	High	High	-
Discharge of untreated wastewater	Moderate	High	-
Water consumption & availability	High	High	Moderate

Risk	Prioritization Bangladesh	Prioritization China	Prioritization India
Systematic payment below minimum wage / systematic late payment	High	Moderate	Low
Bribery & Corruption	High	Moderate	High
General health and safety	High	High	High
Excessive Overtime	High	High	High
Non-payment of living wages	High	High	High
Freedom of association & collective Bargaining	High	High	Moderate
Sourcing from home worker	Low	Low	Low
Air Pollution	Low	Low	-

In our **2024** assessment, the **Likelihood** for the different risk related to the production of material was rated variously. However, due to our limited ability to influence this stage of the supply chain, we are not providing a detailed individual analysis of each risk.

As a preventive measure, our production partners have, as a first step, committed to establishing a separate due diligence agreement with their respective material suppliers in order to cascade our requirements throughout the supply chain. See Chapter 6.2.2.

As a measure to improve our information base and to better assess potential environmental risks, we have additionally started to invite key material suppliers to join the *am-fori* platform and requested them to complete the *BEPI RAQ*. See Chapter 6.2.1.

5.3.5 Raw material cultivation and extraction

At the beginning of our supply chain is the extraction of raw materials. For the majority of materials used in our products, we currently have no available information regarding this production stage. To be able to carry out a risk assessment of the raw material stage, we have decided to limit our evaluation to a specific material type. The following supply chains are therefore not included in this assessment:

- Recycled animal fibres
- Chemical fibres, paper and upstream industries
- Synthetic fibres, plastics, chemicals upstream industries as well as crude oil extraction
- Metals, upstream industries and mining

Instead, we focus on the supply chain of the natural fibres we use — cotton and virgin wool. For the raw material stage of natural fibres, we have identified and assessed **12** risks as material.

5.3.5.1 Fibres – Cotton

Risk	Prioritisation India
Non-payment of a living income	High

In our **2024** assessment, the **Likelihood** for systemic risk of *Non-payment of a living income* was rated **Very High**.

Risk	Prioritisation India
Sever risk for occupational health and safety	High
Hazardous Chemicals	High
Use of Chemicals with Mercury	High
Child labour	High
Forced & bonded labour	High
Excessive Overtime	High
Discrimination & Harassment	High
General risk for occupational health and safety	High
Systematic payment below minimum wage / systematic late payment	High

In our **2024** assessment, the **Likelihood** for the various risk related to the cultivation of cotton was rated **High**.

Risk	Prioritisation India
Water consumption & availability	High
Soil degradation	High

In our **2024** assessment, the **Likelihood** for the risk of *Water consumption & availability* and *Soil degradation* was rated **Moderate**.

These assessments were based on information from external sources and *NGO* reports concerning cotton cultivation in India and global cotton farming practices. We currently do not have specific information about the origin of the cotton used in our supply chain. The only exceptions are orders certified under *GOTS*, *OCS*, or *Fairtrade®*, for which we know the country of origin of the cotton used in our products. In the case of *Fairtrade®* orders, we also know the name of the cotton cooperative and the ginning facility. As an initial step, we have therefore decided to enhance our knowledge base by requesting origin information for the cotton used in every order. See Chapter 6.3.1.

5.3.5.2 Fibres – Virgin Wool

Risk	Prioritization Product
Animal welfare	Moderate

In our **2024** assessment, the **Likelihood** for the risk of *Animal welfare* was rated **Low**.

This assessment is based on our decision to certify our wool product lines under the *Responsible Wool Standard (RWS)*, which we took already in the initial product development stage. The *RWS* sets clear requirements regarding the breeding, keeping, and shearing of sheep and is founded on the Five Freedoms of animal welfare. This applies also to virgin wool sourced from Australia, where the practice of *mulesing* is still in use—an approach we explicitly exclude for our products.

6 Measure & Objectives

We have set specific objectives and defined key performance indicators (KPIs) for our measures to monitor and evaluate the progress of their implementation and effectiveness.

6.1 *Production partner apparel and wet process*

For direct suppliers, we have defined **3** specific objectives.

6.1.1 *Equality and Zero Tolerance for Discrimination and Harassment in the workplace*

Since informing our production partners in Bangladesh and China about the new amfori training in August **2024**, we have been systematically tracking its implementation

Progress - Training Equality at the workplace



Until the end of 2025 we want that **100%** of our production partner have completed the e-learning for the HR responsible and started the worker training.

Since November **2024** the related training records have been checked in the *BSCI* audits. This includes if the responsible in the factory is aware about the requirement and if there were already training for workers.

Already two of our partners already had a *BSCI* audit in **2024** in which the training implementation was checked and confirmed.

Progress – BSCI audit check



Unfortunately, the *BSCI* audit report only indicates whether the training has taken place, but not whether the content has been effectively communicated and understood. In the case of large production facilities with a high number of employees, the report also does not specify how many training sessions have already been conducted.

We aim to close this information gap through our own New Frontier social audits. For the second half of 2025, we are planning to introduce additional interview questions specifically addressing this topic. The development of these questions is currently still in the concept phase.

Progress - New Frontier social audit check



We want to complete this check with all production partners by the end of the first quarter of 2026.

6.1.2 Corrective Actions after BSCI Audits

In December **2024** we had information about the corrective actions our production partners implemented for **100%** of the BSCI audit findings of this year.

Progress - BSCI Corrective Action



We want to achieve this again in 2025.

For **62%** of all *BSCI* audit findings identified in **2024**, we have received the corrective action proofs within required timeline.

Progress – Processing time of BSCI corrective actions



For 2025 we want to increase this to **70%** of all identified BSCI audit findings.

6.1.3 Evaluation of the overtime situation of our production partner

A high level of overtime is a systemic risk in the apparel and textile industry.

Progress - Evaluation of the status quo



By the end of 2025, we aim to evaluate the current situation regarding overtime at **6** of our production partners in Bangladesh and China. The evaluation will include interviews with the directly affected workers. It will also seek to determine the extent to which New Frontier GmbH, or other customers of the production facility, contribute to the level of overtime hours. Following this assessment, we plan to engage in a dialogue with *amfori* to develop potential approaches and strategies for improvement.

6.2 Material production

For indirect suppliers, we have defined **2** specific objectives.

6.2.1 *BEPI RAQ*

As an *amfori* member, we use the *BEPI Risk Assessment Questionnaire (RAQ)* to gather information on how our suppliers manage specific environmental risks and to collect consumption data. All of our production partners complete the *RAQ* annually. We have also started to integrate key strategic material suppliers into the *amfori* platform and request that they complete the *RAQ* as well.

Progress – RAQ completed by strategic material supplier



By the end of the year 2025, at least one strategic material supplier of each of our production partners has been successfully onboarded to the *amfori Sustainability Platform* and has completed the *BEPI Risk Assessment Questionnaire*.

6.2.2 *Cascading due diligence in the supply chain*

In August **2024**, we provided new requirements to our production partners. A new key provision is the cascading of our requirements throughout the supply chain via specific pass on clauses. These include the values and standards defined in the *BSCI* and *BEPI Codes of Conduct*, the *ZDHC MRSL*, our *RSL*, and access information for the external *OEKO-TEX®* complaint mechanism. To monitor the implementation of this cascading approach, we collect the signed agreements. To date, we have received **12%** of signed due diligence agreements between our production partner and their material supplier.

Progress – Cascading of our requirements



By the end of 2025 we want to have received the signed due diligence agreements for at least **25%** of our indirect suppliers.

6.3 Raw material

For the deep supply chain, we have defined **1** specific objective.

6.3.1 *Origin of cotton*

For each of our order our production partners provide us the information of their direct suppliers. In the fabric supply chain, we require details on key processing stages such as spinning, weaving, knitting, dyeing, finishing, washing, printing, and embroidery regardless, if this process is taking place at a direct supplier. Depending on the product, these steps may take place at our production partner, their direct supplier, or further upstream in the supply chain.

For cotton-based products, we aim to go one step further by systematically tracking the country of origin of the cotton. Until now, this information has only been available for orders with certified supply chains, such as those certified to the *Global Organic Textile Standard (GOTS)*. For orders where our production partner sources yarns from affiliated spinning mills, or where the spinning mill is a direct supplier, we expect to receive reliable information without major difficulty. However, for orders where the spinning mill is a sub-supplier of a sub-supplier, obtaining this information will be a significant challenge. We initiated this process in **2024** and, including certified orders, we have already obtained origin information for **13%** of our orders

Progress – Information about the origin of cotton



Our goal for 2025 is to obtain information on the cotton cultivation area for **100%** of our orders, which have cotton is the main fabric.

7 Glossary

Accord	The International Accord for Health and Safety in the Textile and Garment Industry is a multi-stakeholder initiative with the aim of making garment and textile factories safer. The initiative is active in Bangladesh and Pakistan. The International Accord emerged from the Accord for Health and Safety in the Textile and Garment Industry in Bangladesh.
amfori	amfori is a business association that promotes sustainable trade.
amfori BEPI	The Business Environmental Performance Initiative is a collection of tools to measure and improve the environmental performance of factories.
amfori BSCI	The Business Social Compliance Initiative is amfori's social audit program.
amfori Speak for Change	The Speak for Change Programme is a grievance mechanism for supply chains.
Chemical Management Audit	Chemical management audits are generally carried out at production sites with wet processes, as these processes—such as dyeing and finishing—typically involve significant use of chemicals.
CR	Corporate Responsibility is the comprehensive concept of corporate responsibility for every impact that a company's activities have on society and the environment.
ESG	The abbreviation ESG stands for Environmental, Social, and Governance. These are criteria and frameworks established by the United Nations (UN) and financial institutions to integrate environmental, sustainability, and social considerations into the governance of companies, public bodies, governments, and authorities.
GermanFashion	GermanFashion is a German business association based in Cologne for apparel and garment businesses.
GOTS	The Global Organic Textile Standard is a product certification for the use of fibers grown according to organic standards (e.g. cotton). The standard also includes very detailed requirements for all stages of the supply chain.
GRS	The Global Recycled Content Standard is a product certification for the use of material obtained from recycling. The standard includes additional requirements for all stages of the supply chain.
LkSG	The Supply Chain Due Diligence Act is based on the UN Guiding Principles and has applied to large companies in Germany since 01.01.2023.
IndustriALL	Die Gewerkschaftsföderation IndustriALL vertritt 50 Millionen ArbeiterInnen in verarbeitenden Industrien in allen Teilen der Welt.
Wet process	The term wet process covers all production steps that generate wastewater. This includes dyeing and washing as well as certain types of printing.
NGO	Non-governmental organization
OCS	The Organic Content Standard is a product certification for the use of fibers grown according to organic standards (e.g. cotton, linen, wool).
OECD	Organization for Economic Cooperation and Development
OECD-Due Diligence Guidance	The OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Industry
OEKO-TEX® Responsible Business	The OEKO-TEX® Responsible Business Standard is a company certification. The standard contains requirements for a company's due diligence obligations.
OEKO-TEX® Standard 100	The OEKO-TEX® Standard 100 is a product certification to ensure chemical limit values.
OEKO-TEX® STeP	The OEKO-TEX® STeP Standard is a company certification for textile and clothing producers. The standard includes both social and environmental requirements.
RCS	The Recycled Claim Standard is a product certification for the use of recycled materials.
RSC	The Ready-Made Garment Sustainability Council is a non-profit limited company in Bangladesh. The RSC is responsible for implementing the requirements of the Accord.
RWS	The Responsible Wool Standard is a product certification for compliance with animal welfare criteria in sheep farming.

Sozial Audit	A social audit is conducted to assess working conditions, focusing on the adherence to national labour laws and the core labour standards as defined by the International Labour Organization (ILO).
UN-Guiding Principles	The United Nations Guiding Principles on Business and Human Rights is a global standard adopted in 2011 to prevent and remedy human rights violations in connection with business activities.
UNI Global Union	UNI Global Union is a global trade union federation representing 20 million workers in the service sector worldwide.

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