



Due diligence for responsible business conduct with regards to people, animals, society and the environment

# Account reporting year 2025 Holzweiler 2025 report

for Holzweiler Items AS

*Ethical Trade Norway has assessed the report of Holzweiler Items AS to meet the criteria of our Base Level. More information about our Base Level can be found [here](#).*

# SUSTAINABLE DEVELOPMENT GOALS



## To Readers Of The Report

Private enterprises, the public sector and organizations have a significant impact on people, society, the environment, the climate and animals. Enterprises contribute to development, innovation and improved living conditions, but their activities also entail risk and real harm. Enterprises therefore play a key role in efforts to achieve the UN Sustainable Development Goals and the Paris Agreement's 1.5-degree target. This work is most effective when done in collaboration.

Ethical Trade Norway is a membership organization and a multi-stakeholder initiative bringing together businesses, trade unions, employer organizations, civil society and the public sector to jointly address the complex challenges in global supply chains that no single company can solve alone.

Transparency, accountability and continuous improvement are fundamental to this work. This membership report can be used as a statement under the Norwegian Transparency Act, but it also covers broader topics such as climate, environment and anti-corruption. Our framework is based on the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance – internationally recognized standards that form the basis for Ethical Trade Norway's 13 principles for sustainable business practices. These principles cover human rights, decent work, environment and climate, animal welfare and anti-corruption.

All members of Ethical Trade Norway are required to carry out risk-based due diligence and to report annually on progress in their own work. Companies at our quality level Basic meet the requirements of the Transparency Act for due diligence reporting. Members can also strive to achieve the levels *Implementing* and, from 2026, *Leading*.

Due diligence is not about being "risk-free", but about being transparent and systematic: identifying risks, preventing and mitigating negative impacts, communicating openly about how these are addressed, and – where necessary – contributing to remediation.

I would like to thank all members for their efforts, openness and willingness to contribute to responsible supply chains. Together, we demonstrate how responsible trade can be in the best interests of people, animals, society and the environment.

**Heidi Furustøl**

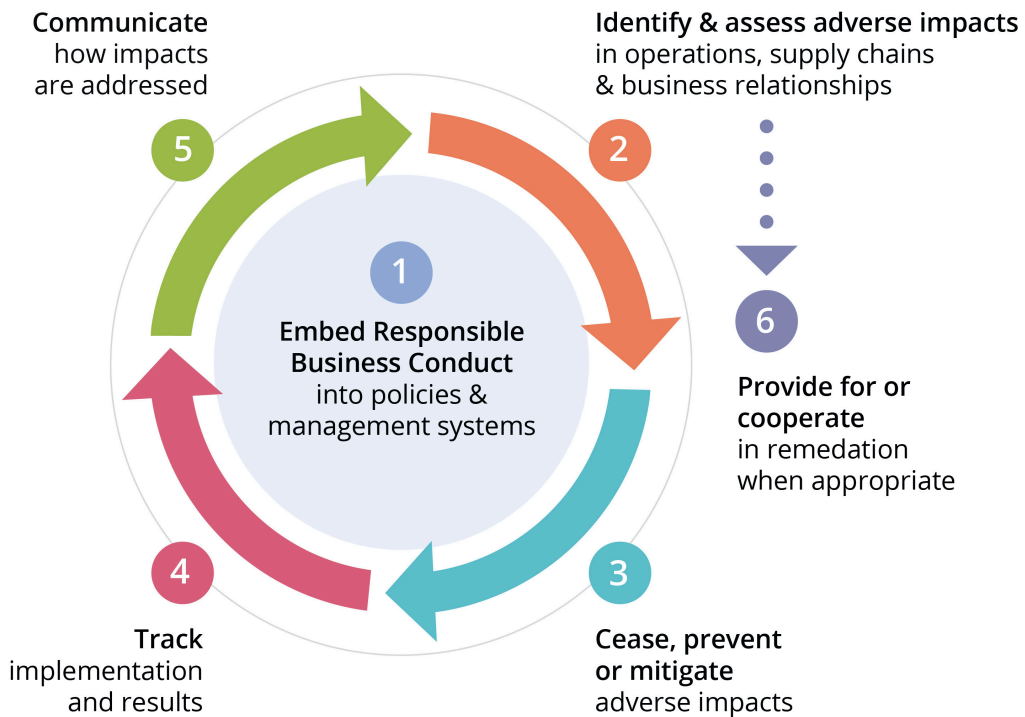
*Executive Director*

Ethical Trade Norway

# Due diligence

This report is based on the UN Guiding Principles on Business and Human Rights and the OECD model for Due Diligence for Responsible Business Conduct.

The model has six steps that describe how companies can work for more responsible and sustainable business practice. However, being good at due diligence does not mean no negative impact on people, planet and the society. It means that the company is open and honest about challenges faced and shows how this is managed in the best possible way in collaboration with its stakeholders. This report is divided in chapters following the OECD model.



# Preface From CEO

2025 makes the year of finalising several projects that has been the main topics in our work with sustainability for quite some time. Some of them will be continued as we have found more use cases to bring to life.

Our commitment to prolong our products lifecycle continues in several of the projects we have endured.

We have completed two year of work related to our innovation Norway supported project for Digital Product Passports (DPPs), where resale and repair are services to be found when scanning the unique DPP QR code in the care label. The Joint Research Centre (JRC) of the European Commission presented the 3rd Milestone Technical Report on Textiles as we started this reporting. This report sets the technical foundation for mandatory Digital Product Passport requirements under the Ecodesign for Sustainable Products Regulation (ESPR), and we see that we are already in alignment with the report.

Our collaboration with TISE second chance has grown to be an even greater part of our sustainability work. As goes for most brands, there are always some products that do not find an owner, and those products get´s a second chance with our partner Tise. This saves products from ending up in a warehouse, without a next destination.

Joining a working group exploring how Product Environmental Footprint (PEF) and Life Cycle Assessment (LCA) analyses works, we have learned a lot on data complexity and collection, and how this practically can be implementable for the textile industry. Key findings and practical learnings from the project so far, will be elaborated in this report.

Our supplier base has been updated, and some new suppliers have been welcomed onboard due to change in focus on categories. Moving forward we will have more denim products and denim suppliers, so that´s where we have put our focus in regards of risk assessment.

We are moving into 2026 with goals and measures to be explored and executed.

**" True responsibility in fashion is not just about how products are made, but how long they last and how safely they serve—supported by digital product passports that turn information into accountability. "**



Andreas Holzweiler, CEO and Chairman

Andreas Holzweiler  
CEO

# Board Signature

This report is electronically signed. See last page for verification.

Susanne Holzweiler  
Board member

Andreas Holzweiler  
CEO and Chairman of the board



# Enterprise information and enterprise context

## Key enterprise information

### Enterprise name

Holzweiler Items AS

### Head office address

Lysaker Brygge 23-25, 1366 Lysaker

### Main brands, products and services offered by the enterprise

Holzweiler designs, manufactures and sells products in the categories of clothing, shoes and accessories.

### Description of enterprise structure

Holzweiler head office and showroom are situated at Lysaker Brygge, just outside of Oslo. We also have an office in China. The Holzweiler group has five stores in the Oslo area, as well as one in Bergen, Stavanger and Trondheim. In our premises at Oslobukta and Hegdehaugsveien in Oslo, you will find Holzweiler stores, with Café Holzweiler as a part of the concept. Holzweiler Collage at Grünerløkka in Oslo, is a store selling stock from previous seasons.

Outside of Norway, one Holzweiler store can be found in Denmark (Copenhagen).

In 2025, Holzweiler had employees in England, China and Denmark, involved in sales, marketing, production follow-up and management.

Holzweiler's products are sold via own stores and webshop, but also wholesale in Norway and globally.

Key aspects include how management and responsibilities are allocated and how internal communication flows within the enterprise. How the enterprise has integrated the work with due diligence for responsible business conduct into their larger enterprise structure should appear clearly.

### Revenue in reporting year (NOK)

216 722 234

### Number of employees

109

### Is the enterprise covered by the Transparency Act?

Yes

### Major changes to the enterprise since last and current reporting period

No major changes in 2025

**Contact person for the report (name and title)**

Line Staxrud Eriksen, CSR manager

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**Email for contact person for the report**

line@holzweiler.no

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## Supply chain information

### General description of the enterprise's sourcing model and supply chain

Our collections are designed, developed and purchased by the Holzweiler's head office.

Holzweiler produces clothing (including outerwear) and accessories, and works with several supply chains and production lines, some of which are produced via an agent or intermediate and some are directly with the factory. Where we work with an agent or intermediate, we have permanent factories that we work with. Materials are mainly sourced by our suppliers and intermediaries, based on our requirements for sustainability, durability, certifications and type of material. We source some materials ourselves, directly from fabric suppliers.

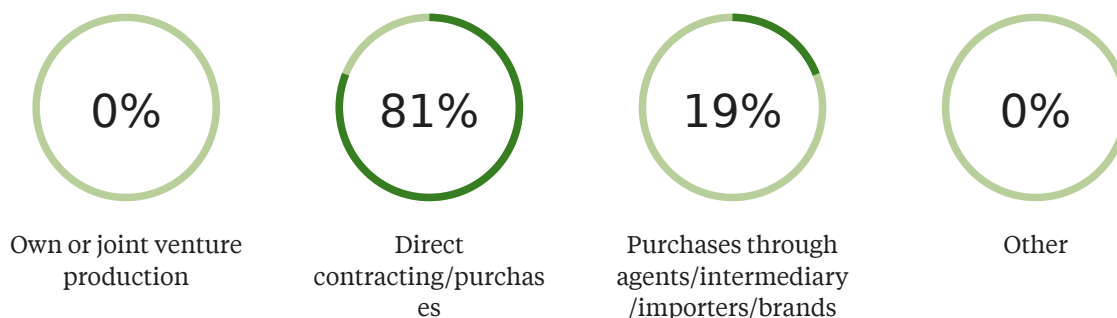
### Number of suppliers with which the enterprise has had commercial relations in the reporting year

20

### Comments

Counting suppliers and agent/intermediates we have direct business with.

### Type of purchasing/ suppliers relationships



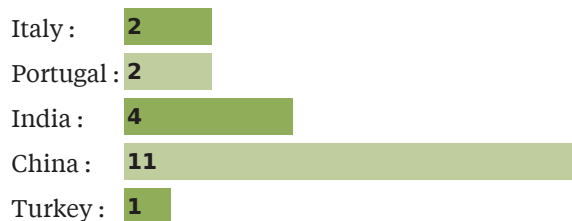
Sourcing volume % is calculated based on the quantity of manufactured goods in the reporting year.

We have defined the suppliers as direct when the suppliers owns fully or partially the factory or has full collaboration on the production planning.

Purchases through intermediaries are done when they have a crucial role in sourcing, planning and production, and in many cases also a financial and close business relation with the manufacturing unit.

The intermediary serves an important communication role in addition to several other tasks they manage like fabrics sourcing, production planning, QC etc. All factories directly involved in manufacturing the products (cutting, sewing, finishing, packing) are evaluated by Holzweiler.

**List of first tier suppliers (producers) by country**



Counting agent/intermediates and suppliers we have direct business with.

**State the number of workers at first tier producers**

**Number of workers**

1 453

**Comments to number of workers**

Number of workers are based on information in social audit reports.

**Key inputs/raw materials for products or services and associated geographies**

<b>Cotton/Organic cotton</b>	China Portugal Turkey
<b>Down and Feather (Responsible Down Standard)</b>	China
<b>Lambswool, Mohair, Alpaca</b>	China Italy
<b>Polyester/ Polyamid and Recycled polyester/Polyamid</b>	China
<b>EcoVero &amp; Lyocell Lenzing (TM)</b>	China
<b>Leather</b>	India

The above list reflects our tier 1 production

**Is the enterprise a supplier to the public sector?**

No

## Goals and progress

### Process goals and progress for the reporting year

1

#### 1. Climate and Environment

1.1 Increase number of products sold at full price through own retail and e-commerce.

1.2 Initiate projects related to deadstock and/or claims

**Goal:** 1.3 Prepare for accessible repair services globally through a products digital product passport

1.4 Launching a global resale solution, using digital product passports as the driver.

1.5 Conducting a full LCA analysis on 50 products in a project with Trimco Group and Green Score Capital.

#### 1. Climate and Environment

1.1 The reason for including a goal to sell products at full price, is due to our conviction that lower prices will inspire to higher consumption, which again might lead to increased textile waste. This goal was not reached in 2025, as we did a warehouse clean-up on products from previous seasons that was sold at reduced price. If the clean-up was not initiated, the environmental impact of unsold products would have been much higher.

1.2 In 2025 we have escalated our collaboration with Tise Second Chance on resale of stock items and complaint products with minor defects. During the past year, this initiative has given new life to 2349 products, which is estimated to approximately save 16443 kg CO<sub>2</sub>, 391.5 kg chemicals and 1.96 million liters of water, and prevent products to eventually end up as textile waste.

**Status:** 1.3 By scanning the product's unique QR code, you can find some of our trusted repair partner. For now, this has been solved as a service that links you to the nearest repair partner, available in parts of Norway and in Copenhagen. This service will be further developed. Our ambition here, is to collect repair data from DPP to more efficiently get information on return and complaint reasons.

1.4 A global resale solution is now available in the products digital product passport. There are still some improvements to be made in 2026, especially with regard to the user experience, but it is fully functional as it is today. By scanning the product's unique QR code, you can access a social selling resale opportunity for you to pass that exact product on to the next owner. This will occur as an event in the unique products lifecycle.

1.5 During 2025 we participated in this LCA project, conducting a PEF analysis.

We were taken through the 16 EU PEFCR impact scores generated for a diverse set of products. It was ambitious to plan for 50 styles in this project, for now we have conducted a full PEF analysis on four styles: Two jersey sweaters with different compositions, a fleece jacket and a sweater in wool mix. The results opened up for even more questions, and we saw that there's a great gap between this way of assessing a product and if we were to use The French Textile Eco-Score. This will be elaborated later in this report.

2

## 2. Human rights and Decent working conditions

Follow up the actions planned during the responsible purchasing practices project Holzweiler joined in 2023-2024.

### Goal :

2.1 Increasing capacity booking with suppliers for them to be able to plan better.

2.2 Map suppliers status on Grievance mechanisms, workplace dialogue and worker representation.

### Status :

2.1 This topic has been raised with some of our Chinese suppliers. The conclusion was that there are no issues for them related to this topic. Productions are planned through dialogue and based on the best interests of both parts. Our buying team and colleague in China are involved in planning and setting the timeframe together with our partners.

2.2 We updated our mapping on wages and status on grievance mechanisms, workplace dialogue and worker representation with four Chinese factories based on production volum. Three suppliers paid above living wage, the fourth was below living wage. The three paying above living wage also scored the highest on grievance mechanisms, workplace dialogue and worker representation.

Based on the audit document review with the fourth factory, we found that improvements in both wages and workplace dialogue must be conducted. This will be followed up with dialogue and result in an improvement plan together approved by us and our production partner in 2026.

3

## 3. Traceability and Transparency

3.1 Share information on factory, material supplier, dyeing- and printing facility.

### Goal :

3.2 All suppliers are onboarded to our Product DNA & certificate manager system and will report on their partners for each product.

3.3 Product data collected will be visible in Digital Product Passports.

3.1 and 3.3 This has been on top of our agenda for several years now, and information is shared in our products Digital Product Passports. We do this to ensure our customers know where the products they buy origins from. We also share the products composition, care instructions and We've been making some changes in data collection set-up and exploring how data can be transferred to the DPP platform in a more seamless way. As this work is ongoing there's a delay in uploading information on some styles. This will be finalised as this report is launched.

### Status :

3.2 Yes, except a few newly onboarded suppliers that are soon to be trained in the system. We are also making some changes in the data collection set-up to ensure that the correct data is being uploaded at the right place.

3.3 Yes, on the time of reporting most DPP's have supply chain data, care and content information and repair and resale solutions.

4

### Goal :

## 4. Customer engagement & Connectivity

4.1 By the end of 2025 all categories except accessories will have digital product passports.

4.2 Engage our costumers to take action on reuse, resale, care and repair, by using our platforms to inform and sharing data and solutions in DPP.

4.1 This target has been reached.

**Status :** 4.2 We share care and repair tips in DPP and care information on each product in our webshop. We have also shared information on our collaboration with Tise Second chance, promoting stock from previous seasons.

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## Process goals for coming year

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### 1. Climate and Environment

1.1 Our outdoor collection is growing bigger, so during the coming years we will be assessing and improving products for increased durability. In 2026 we will set the plan and initiate some improvements for the coming seasons.

1.2 Explore and initiate measures to get feedback on repairs and repair reasons from our repair partner. This will be conducted by dialogue, but also with the aim to collect information tracked as events in the products unique ID.

1.3 We launched a global resale solution, using digital product passports as the driver, in 2025. In 2026 we will work on some improvements in regards of the user experience and also conduct training with staff in our stores.

1.4 Conducting an Eco design assessment on the four styles that was a part of the PEF calculation project together with Trimco Group, Green Score Capital and some other Norwegian brands. Explore how can we use the result to make improvements in product development.

2

### 2. Human rights and Decent working conditions

2.1 Assessing and onboarding new denim suppliers to ensure compliance to our company's policies.

2.2 Follow up some of our suppliers on wages and worker representation to seek improvements.

3

### 3. Traceability and Transparency

3.1 Prepare for the EUDR regulation with our leather suppliers, ensuring traceability throughout the supply chain.

Share information on factory, material supplier, dyeing- and printing facility.

3.2 All suppliers are onboarded to our Product DNA & certificate manager system and will report on their partners for each product.

3.3 Product data will be visible in the product's Digital Product Passport.

4

### 4. Customer engagement & Connectivity

4.1 Add digital product passports to accessories, which is the only category that do not hold this yet.

4.2 Engage our costumers to take action on reuse, resale, care and repair, by using our platforms to inform and sharing data and solutions in DPP.

# 1

## Governance and commitment to responsible business conduct

Embedding responsible business conduct means that the enterprise should have strategies and plan, as well as relevant policies and guidelines for due diligence for responsible business conduct (hereafter due diligence) which are adopted by management. These should comprise the enterprise's own operations, its supply chain and other business relationships. Effective management systems for implementation are key to success, and due diligence should be an integrated element in enterprise operations. Clear expectations from senior management are crucial, as well as clearly assigned responsibilities within the enterprise, for the implementation of the steps in the due diligence process. Those involved need to know how to proceed. Transparency about commitments the enterprise has for itself, challenges they are facing, and how these are managed is fundamental

## 1.A Policy for own enterprise

### 1.A.1 Link to publicly accessible policy for own enterprise

<https://holzweilerslo.com/article/holzweiler-policies/>

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### 1.A.2 What does the enterprise say publicly about its commitments to respect people, animals, society and the environment?

Our Policies and guidelines for responsible business conduct are communicated in several documents setting requirements for our company and employees and for our suppliers and partners. All are available at <https://holzweilerslo.com/article/holzweiler-policies/>

The sustainability information on our website is regularly updated, and there you can find further information about how we work with sustainability, such as: preferred fibre overview, material guide, digital product passport, suppliers list, care and repair tips, our policies and guidelines, eco-design criteria, sustainability and other related projects and information.

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### 1.A.3 How has the policy/commitment been developed and how is it embedded in the enterprise?

Holzweiler's commitment to be a responsible employer and to respect workers and human rights is embedded in steering documents, policies and guidelines. These are made operational through an approach based on identification and management of risk and the concept of due diligence.

The Holzweiler Supplier Code of Conduct and relating human rights and sustainability policies are embedded in the organization and approved by the top management and the board. These documents are included as an appendix in the personnel handbook, which all employees are introduced to upon employment. In addition to this, all departments have received an introduction to the content of the policies and guidelines. All new employees receive the same when they are onboarded.

The following key steering documents guide our work:

- Responsible business Guidelines and Code of Conduct for suppliers and business partners : Outlines our expectations and requirements for business partners such as suppliers, sub-suppliers and factories.
- Responsible Sourcing Policy: Set out human rights due diligence as a key part of sourcing of new suppliers, business partners and markets for production.
- Policy for Responsible Business Conduct: Outlines the expectations to our own business conduct.

The above and other policies and guideline documents support the commitments in our sustainability strategy.

A list of all publicly available policies and guideline documents can be found in the appendix in our company sustainability report and on our website: <https://holzweilerslo.com/article/holzweiler-policies/>

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## 1.B Organisation and internal communication

### 1.B.1 How is the due diligence work organized within the enterprise, embedded in internal guidelines and routines?

The CEO and top management including the board, have the overall responsibility for the sustainability strategy, for approving company guidelines and decision making.

The CSR manager is responsible for advising the management on goals and strategies, to analyse risks and opportunities, to coordinate the implementation of goals and to communicate results. CSR manager work closely with the entire organisation on the implementation of the strategy and actions, and she also holds the day-to-day responsibility for due diligence.

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### 1.B.2 How is the significance of the enterprise's due diligence work defined and clarified for the employees through their job description (or the like), work tasks and incentive structures?

Sustainability is a well-established part of Holzweiler's strategy and is implemented in all departments, in the management and in the board. The commitment is consistent throughout the company, and all departments take responsibility within their field.

The CSR manager includes and has regular contact with departments such as Design, Product development, Merchandising, Purchasing, Production and IT, and engage with Marketing, Content, Sales, Supply Chain and Finance when relevant, depending on running projects and priorities. Each department is responsible for implementing process to follow up on tasks related to their area.

CSR, Sourcing, Buying and Production is working closely together on policies, documents, terms & conditions, onboarding of suppliers, as well as actions related to these areas. These are anchored in top management.

Holzweiler Policy for Responsible Business Conduct and Responsible Business Guidelines, are available for all on our intranet, and they are also informed about in the company onboarding program.

How we approach a sustainable business practices is communicated in monthly morning meetings with all employees, via newsletters, in training and onboarding and is in general a topic that is widely discussed within Holzweiler.

Some employees have dedicated tasks related to sustainability and due diligence in their positions, others work with concrete sustainability-related tasks on a project basis or have due diligence assessment as a natural part of their work.

For example, it is natural that the buyers work according to our purchasing practices, e-com works on sustainability communication on our website and the design team sources sustainable and durable materials for products.

### **1.B.3 How does the enterprise make sure employees have adequate competence to work on due diligence for responsible business conduct?**

The most important skills are developed through the work and experiences we do in our daily work and by that understand more in depth our supply chain and industry's challenges. Sustainability in the textile industry is not a trend but a licence to operate and what is right today is not necessarily the correct answer tomorrow. We experience steadily stricter requirements and regulations, higher expectations from stakeholders and the development of more sustainable solutions are going faster. It is therefore important to constantly be up to date on developments, regulations and initiatives, and to be able to assess this based on the experience we have gained and the needs we have in our supply chain.

Our competence is a combination of internal knowledge & experience, networks, courses, advice from stakeholders and participation in forums and conferences, focusing on sustainability and responsibility within the textile industry.

We are still using learnings from the Responsible Purchasing Practices project we joined in 2023-2024. We have explored and increased our knowledge on how we can work on and ensure a more responsible purchasing practice. This project has given us valuable input to how we can adjust our practices, how to evaluate our critical path and how to collaborate closer with the suppliers, as well as some defined targets for the coming years.

The recent years our Production & Buying Manager attended Responsible Purchasing Practice course with Ethical Trade Norway. We have joined multiple courses and workshops with them during the past years, on risk mapping, prioritization and improvement, Workers Representation, among others. In addition, we have participated in several events via NF&TA, in the field of extended producer responsibility, circular economy, sustainable communication, blockchain technology, Digital Product Passports, sustainable packaging and more.

Collaboration is important to increase competence and to spar and share knowledge with others. We participated in the following initiatives:

- Digital Product Passport working group, initiated by NF&TA (cluster for the Norwegian textile industry), and joined by other parts of the DPP ecosystem, like providers of systems (ERP, data collection, DPP), NGO's (Svanemarket, Etisk Handel Norge, GS1) and textile brands. The working group shared a industry manual for DPP in 2023, based on the groups work.
- Holzweiler participated in a project related to PEF regulation in 2025

We have also shared our knowledge on DPP by presenting on Ethical Trade Norway's yearly conference, on Oslo Innovation week and on GS1 virtual conference and will again present our progress on use cases related to Digital Product Passports on GS1 Nordic Summit 2026.

We obtain information from the Ellen MacArthur Foundation about the circular economy. We read and listen to Business of fashion and Innovation Forum, we read newsletters and relevant issues from Ethical Trade, and other organisations. We subscribe to Ecotextile news and the bi-monthly magazine which is covering a lot of relevant topics and articles within sustainability in the textile industry.

In addition to this, we spar with others who work with sustainability in the same or other industries, and with our contact at Ethical Trade Norway.

## 1.C. Plans and resources

### 1.C.1 How are the enterprise's commitments to respect people, animals, society and the environment embedded in strategies and action plans?

Holzweiler will run a profitable business on the right ethical and responsible terms. The work with sustainability is a high priority and encompasses all departments in the company, in addition to the board.

The work is anchored through Holzweiler's sustainability strategy, where the main features of what we will work for are described. The strategy is attached to this report, and here follows a brief summary:

Sustainability is a natural part of what Holzweiler does. A great internal commitment is the driving force in the work we do.

This commitment will give creative power and an opportunity to positively contribute to a more responsible fashion industry, where the main goal is continued growth on the right terms.

Our strategy is created around these four pillars:

- Climate & Environment,
- Human Rights & Decent Working Conditions,
- Traceability & Transparency
- Customer Engagement & Connectivity.

Read more on our strategy in our website: <https://holzweilerslo.com/article/sustainability-statement-2023/>

Holzweiler will implement a number of initiatives that will support the strategy and objectives, approved internally and backed with a budget and resources to achieve the target.

- We will continue to collaborate with suppliers to map the need for actions in our supply chain and in our own business.
- We will focus on workers wages and representation, by collecting data and consider measures.
- We will improve how products are designed and produced, including what they are made of, according to Holzweiler eco-design criteria.
- We will continue to focus on care and repair of products and increased knowledge about the maintenance of the products, both internally and for customers.
- We will increase the number of products that will live long in stores without being sold with discount.
- We will implement global solutions for resale and repair.
- We will make sure all products come with a digital product passport.
- We will reduce our GHG emission by measuring and initiate actions.
- We will trace our supply chain step by step towards raw material.
- We will constantly evaluate our own practices and improve runningly

The design and collections must reflect what Holzweiler stands for, and thus create a more holistic sustainable concept.

Holzweiler will be an attractive brand for a target group that increasingly shares our values.

### **1.C.2 How are the strategies and action plans for sustainable business conduct followed up by senior management and the board?**

Objectives, action plans and progress are based on the company's strategy, and presented to and approved by senior management and board members. Our 2026 action plan is put in progress, and also attached to this report.

It is particularly important for the management that we work strategically towards regulations and are in alignment with EU's textile strategy, the Transparency Act, The Green Deal, ESPR and upcoming legislations, as well as meeting our clients increased demand for reporting, and that we can show improvement on the areas agreed on.

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## 1.D Partnerships and collaboration with business relationships

### 1.D.1 How does the enterprise communicate the importance of responsible business conduct in its business relationships?

The importance of responsible business practices is a topic in the very first meeting with a possible supplier or partner, and is equally valued with other topics such as quality, price, volumes and how we experience the dialogue. We share information about our sustainability strategy and the requirements we set in it, as well as our purchasing practices and the processes we work with through design, production and delivery. Our guidelines for suppliers can be found here: <https://holzweileroslo.com/en/sustainability/holzweiler-policies>

#### **We have developed minimum criteria for suppliers and business partners.**

The minimum criteria provide the groundwork necessary for the pre-qualifying of and cooperation with suppliers we choose for Holzweiler production or services. Some criteria will be general and apply to all suppliers and partners, whereas other will be more specific, based of prioritized risk within the company's supply chain. **The main steps to identify and address risks in the supply chain are:**

- Supplier qualification criteria and contract terms that include human rights, labour and environmental conditions.
- Screening and assessment of performance of all suppliers before initiation of cooperation.
- Improvement work and remediation activities to close gaps towards our requirements when needed (next step might be possible capacity building activities to facilitate sustained improvements).
- Continuous tracking of activities and impact.
- Communication and dialogue with relevant stakeholders on identified risk, measures taken and strategies to address them jointly.

#### **The minimum criteria defined until now (but not limited to);**

General minimum criteria for suppliers and business partners:

- The supplier provides information such as company profile, social audit report + CAP status (must be less than 2 years old), certificates, policies or other relevant documentation for us to evaluate.
- Factories with BSCI social audit must minimum have score C. (Rating from highest to lowest: A, B, C, D, E, none).
- The supplier has replied to supplementary questionnaire when necessary.
- The supplier must comply with Holzweiler's Responsible Business Guidelines and Supplier Code of Conduct, Chemical guide and General Terms and Conditions by familiarizing themselves with the content and confirm that our requirements will be followed for all our productions, with a signature.
- The supplier has provided us with a contact person for following up our Code of Conduct for suppliers.
- The supplier can show a management system for supervising the Code of Conduct for suppliers.
- Access: the supplier provides us or partners access to place of production and relevant belonging buildings, such as the canteen and dormitories.
- Production processes that reduce negative environmental impact
- Access to sustainable materials and production processes – preferably with relevant certifications
- Dialogue and the willingness to cooperate on improvement areas.
- Gut feeling, easy to communicate with, good fit for our size, references from other customers/brands, etc.
- The Supplier is willing to share information from their supply chain, such as relevant certificates, audits and answer our questionnaires on how they work with sustainability, covering ethics, social and environmental management. It is of high importance that the supplier has an overview over, and shares information about where the different parts of a certain product are produced, as well as where the raw materials come from.
- Other minimum criteria from design, buying & production and finance are defined in separate documents.

Minimum criteria for prioritized areas of risk:

- Suppliers must have a worker committee or at least a worker representative with direct communication with the

management.

- Grievance mechanisms that allow employees to escalate grievances must be established. Information about grievance channels and procedures must be communicated to all employees.
- Suppliers must make sure that there are efficient use of resources and that all waste from the facility is sorted and recycled.
- Suppliers should have an environmental management system to measure, assess and reduce the impact from their production.
- Suppliers can show specific certifications that handles certain raw material risks (for example but not limited to GOTS, OCS, GRS, RWS, RMS, Fairtrade, PEFC, FSC, EU Ecolabel).
- Suppliers are willing to share information about minimum tier 1 and 2 suppliers involved in the production of each product delivered to Holzweiler, including materials, dyeing and printing.

These are the steps we follow when evaluating a new supplier:

Holzweiler provides the supplier with " Holzweiler´s way of working", including our onboarding program and our policies.

Holzweiler´s way of working:

At Holzweiler, we are committed to be a responsible and liable partner for our suppliers. We´re also committed to make positive change in the way we design, produce, and transport our goods. Holzweiler´s Policies including Supplier code of conduct, sets requirements for both our suppliers and for us as a partner.

Transparency and traceability are key elements in our work. We aim to trace our items from final product and all the way down to raw material, by 2030.

This requires a good relationship with all our suppliers on information sharing. Partners must also allow for Holzweiler to publicly name the factory and other parts of the supply chain.

In addition, our goal to become Net-Zero in 2040 also requires our partners commitment and that we work together to achieve this.

Onboarding program:

- The supplier provides information such as company profile, audit report, certificates, policies or other relevant documentation for us to evaluate.
- Holzweiler send out supplementary questions to the supplier when necessary.
- Holzweiler evaluates this data before moving on to the next steps.
- The supplier must comply with Holzweiler´s Supplier Code of Conduct, by familiarizing themselves with the content, and confirm that our requirements will be followed for all our productions, with a signature.
- The Supplier will be onboarded to our erp systems, where they supply data on their supply chain, upload certificates and information to document how they work with sustainability, covering ethics and social and environmental management.

How we evaluate:

After receiving all documentation, the potential partner will be evaluated after the following criteria:

- A total assessment of the supplier´s compliance with our Code of Conduct, put in context with local laws and risks in the country of production.
- Willingness to share information on subcontractors and production processes.
- Policies and measures in place to ensure decent working conditions.
- Production processes that reduce negative environmental impact.
- Access to sustainable materials.
- How the cooperation would affect on our sustainability targets.
- Dialogue and the willingness to cooperate on improvement areas.

CSR and buying team maintains dialogue with suppliers throughout this process collecting information

and following up documentation.

The buyers talk to the suppliers about price, volume and delivery time. They work according to our responsible business conduct and sourcing policy, which states that Holzweiler shall not operate in a manner that leads to a breach of our own policy.

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## Indicator

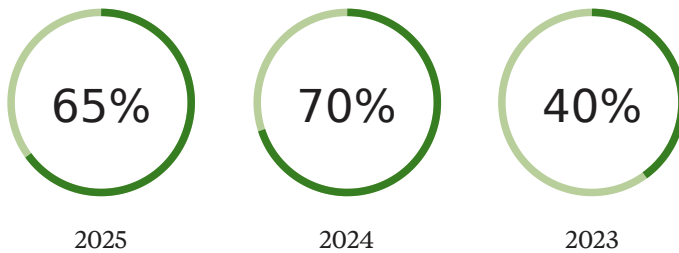
### Percentage of the company's suppliers that have accepted guidelines for suppliers



These are agents/intermediates and manufacturers from whom we trade directly.

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### Percentage of the company's suppliers with whom the company has had a business relationship for more than three years



General comment: These are agents/intermediates and manufacturers from whom we trade directly. We have worked with some of these ever since we started production in 2012. There are also several manufacturers and suppliers further down the supply chain that we have worked with for many years.

## 1.E Experiences and changes

### 1.E.1 What experiences have the enterprise encountered during the reporting period concerning responsible business conduct, and what has changed as a result of this?

In the past years, the amount of reporting to our clients has increased enormously, taking up a lot of resources from CSR. It's a lot more looking backwards, and less time for progression. The requirements are mainly product specific data, some of it which our suppliers are not used to document or share. As a result, we have spent much resources on improving our system to be able to collect and share what's required. At the time of reporting, this work is still in progress.

The importance of transparency has become even more clear and we see that the implementation of Digital Product Passports (DPP) has pushed us to get more knowledge and control of our supply chain. Exploring our suppliers' supply chain, has given us new and valuable information.

We've continued our focus on purchasing practice and learned that there are measures that can be done to support our suppliers, that is neither complicated or too time consuming to address. We are pleased to hear from our suppliers that they appreciate our collaboration and that the timelines we set together with them, suits them well.

## 2

### Defining the focus for reporting

# Identify and assess the enterprise's impact on people, animals, society and the environment

“Identify and assess” is about identifying the enterprises's risk for, and actual negative impact on, people, animals, society and the environment, including in the supply chain and through business relationships. As a first step the enterprise should get an overall risk picture, before subsequently prioritising further mapping and measures where the risk of negative impact is the greatest, i.e. salient issues. The enterprises's involvement in the negative impact on people, animals, society and the environment is central to determine which measures the enterprise should implement in the next step of the due diligence model. Involvement of stakeholders, especially those affected, is central when assessing risks. It is also important to consult with stakeholders when implementing measures to manage the negative impact.

## 2.A Mapping and prioritising

### PRIORITISED ACTUAL OR POTENTIAL NEGATIVE IMPACT ON PEOPLE, ANIMALS, SOCIETY, AND THE ENVIRONMENT

*Prioritising one or more risk areas on the basis of severity does not mean that some risks are more important than others, or that the company should not take action on other risks, but that risks with the greatest negative impact are prioritised first. Mapping and prioritisation are a continuous process.*

#### 2.A.1 List prioritized significant risks and/or actual negative impacts on people, animals, society and the environment.

Salient issue	Related topic	Geography
Transforming the design process to facilitate longevity and circularity, and safe inputs	Environment Animal welfare Emission Waste Water Use of materials	Global Norway
Water and Chemical use in production	Occupational Health and safety Environment Water	Global
Choice of materials and fibers	Environment Emission Energy Waste Use of materials	Global
Textile waste	Environment Waste	Global
Greenhouse gas emissions	Environment Emission	Global
Animal welfare	Animal welfare	Global
Worker representation & Freedom of Association	Freedom of association and collective bargaining	Global China
Supply chain traceability	Forced labour Child labour Discrimination Occupational Health and safety Wages Working hours	Global

	Regular employment Marginalized populations Corruption Greenhouse gas emission Waste Water	
Wages, insurances and overtime	Freedom of association and collective bargaining Wages Working hours	Global China

The risks described as “global” in the table above represents the salient risks we partially or fully identify in the industry, country or region where we source. It might vary the extent and level of risk but we listed the risks to keep focus on assessing and address the risks. Where specific country is mentioned, it is representing where we have the largest size of spend/volume and therefore prioritised our efforts. See more on how we prioritise the risks below under 2A2.



## JUSTIFICATION FOR THE PRIORITISATION OF RISKS OF NEGATIVE IMPACT ON PEOPLE, ANIMALS, SOCIETY, AND THE ENVIRONMENT

**2.A.2 Describe: a) the enterprise's routines for mapping and identifying risk and show how the negative impact was identified and prioritized b) activities or sections of the enterprise not covered in this report , if any (product groups, own products, departments etc.), and why c) how the information was gathered, what sources were used, and which stakeholders have been involved d) whether you have identified areas where information is lacking, and how you are planning to proceed to collect more information about this.**

About Due Diligence:

Holzweiler shall conduct due diligence for responsible business conduct. This involves conducting risk assessments to identify potential negative impact on people, animals, society and the environment and to stop, prevent and reduce such impact. The measures put in place will be monitored and their effect evaluated. The measures will be communicated to those affected by our actions. If our activities are found to cause or contribute to negative impact on people, society or the environment, we will stop the activities and seek to provide remedy. If our supplier is responsible for the negative impact, the supplier is responsible for providing remedy.

We contribute to the UN's Sustainable Development Goals and have prioritised to focus on:

Goal 8 Decent work and economic growth

Goal 12 Responsible consumption and production

Goal 13. Climate action

Goal 17. Partnership for the goals

This is a predominant focus through our due diligence assessments, in the assessments we make during our purchasing and in collaboration with suppliers and business partners.

Below we have elaborated on the topics in the order of the indicated letters;

How we describe the following questions:

a) the company's routines for mapping and identifying risk and show how the negative impact was identified and prioritised in this period:

c) how information was gathered, what sources were used, and which stakeholders have been involved/consulted:

Mapping and identifying risks are a process that is constantly ongoing. In an industry that is known for a large negative impact on climate and environment, complex supply chains and poor working conditions, and where new guidelines, risks and truths constantly become part of the overall picture, it is not difficult to uncover conditions that needs to be addressed.

Due diligence assessment is done by analysing and evaluating data from the supply chain on our main product groups and the assessment includes country specific risk indicators. By this we have recognised several challenges in the textile supply chain affecting people, animals, society and the environment. By sourcing materials or fibres with third party certifications like GOTS, GRS, RWS, RDS and we reduce some of the inherent risks.

The mapping of risks starts with an assessment of the textile industry's challenges in the countries where our production is located. These can vary greatly from country to country, both in terms of what the biggest risk is and how serious the risk is. We have linked this information up to the largest volume of products and raw materials and assessed them through the value chain by using ETN template for risk mapping.

The risks described as "global" in the table above represents the salient risks we partially or fully identify in the industry, country or region where we source. It might vary the extent and level of risk but we listed the risks to keep focus on assessing and address the risks. Where specific country is mentioned, it is representing where we have the largest size of spend/volume and therefore prioritised our efforts.

We have prioritised the risks based on several considerations where the major points are (but not limited to):

- 1. where the salient risks are of medium to high level and concern
- 2. relevance to the size of spend and volume – higher spend and volume represent a bigger impact than where

the spend/volume are lower

- 3. where we consider having the best possibility to influence positively
- 4. where we can support the work with the resources we have internally or together with relevant external partners.
- 5. where stakeholder engagement or dialogue with industry peers have set the focus on topics which need to be addressed

The salient issues are often of an extensive and complex nature and requires us to approach them step by step by setting our focus on some selected areas and moving to the next. Sometimes new or coming regulations are drivers in our prioritisation. We seek dialogue and support with stakeholders if we need to get advise on how we should prioritise.

For example our vision to create long-lived products resulted in Holzweiler Eco design criteria, our wish to connect with our customers resulted in Digital Product Passport and our wish to be a good partner to our suppliers resulted in the work on reviewing and evaluating and our purchasing practices.

In production related due diligence topics, Holzweiler local office in Shanghai is an important player to gather information and engage locally with suppliers or stakeholders. In addition, they contribute with their perspective, which gives us a greater understanding of how and why things are the way they are when it comes to manufacturing in China.

When the overall supplier risk mapping is done, the next step is to survey and assess conditions at our production sites. We're using our digital platform for supplier and factory follow-up, data acquisition and supply chain tracking to gather upstream data as well as documentation like audit reports and certificates. By collecting data through the platform, all information will be stored in one place and is easily accessible. We expect this tool to cover more of the areas we need to map going forward, and to assist us with all upcoming demands for reporting.

We've continued our supplier evaluations for existing suppliers. CSR performance is equally weighted alongside input from design, production, quality, logistics. The suppliers and factories with high level of performance on social and environmental aspects are highlighted for the departments involved in supplier relations.

Other sources and information for conducting Due Diligence in the supply chain: Business of Fashion (BOF)'s annual sustainability index is a great source to get valuable information on where the fashion industry is moving - and where it should be moving. It covers all the areas in our sustainability strategy. Same goes for the EU sustainable textile strategy, setting the path for the textile industry. We use sources recommended by ETN and we request their advice and input when questions occur. Other sources we find useful for working more in depth with risk topics and mapping further are (but not limited to): BOF's State of fashion report, Ilo.org, transparency.org, Fair Wear Foundation Country studies, MVO Risk checker, The Danish institute for human rights guidance and Gender responsive due diligence. In addition we read relevant publications and have discussions with other textile businesses, forums or organisations.

b) eventual aspects of the company that have not been covered in this report (product groups, own products, departments etc.) and why you not chose to prioritize these in the continued work:

Indirect services like office material and warehouse services in Norway and Sweden are not included in the due diligence assessment due to considered as low inherent risk.

d) whether you have identified areas where information is lacking in order to get an overview, and We work closely with our partner, Trimco, who holds our care label system as well as traceability system. They conduct training in local language for all suppliers and share user manuals.

In general there is rarely a lack of documentation from production sites. The biggest challenge we see is being able to validate whether the information we gather is 100% correct. We struggle to find better methods for this, as well as initiating measures for validation beyond tier 1 and 2. We do share 2nd and 3rd tier suppliers, we started this data collection when launching the digital product passport. We will step by step expand the range of

products and supply chains we will gather such information for.

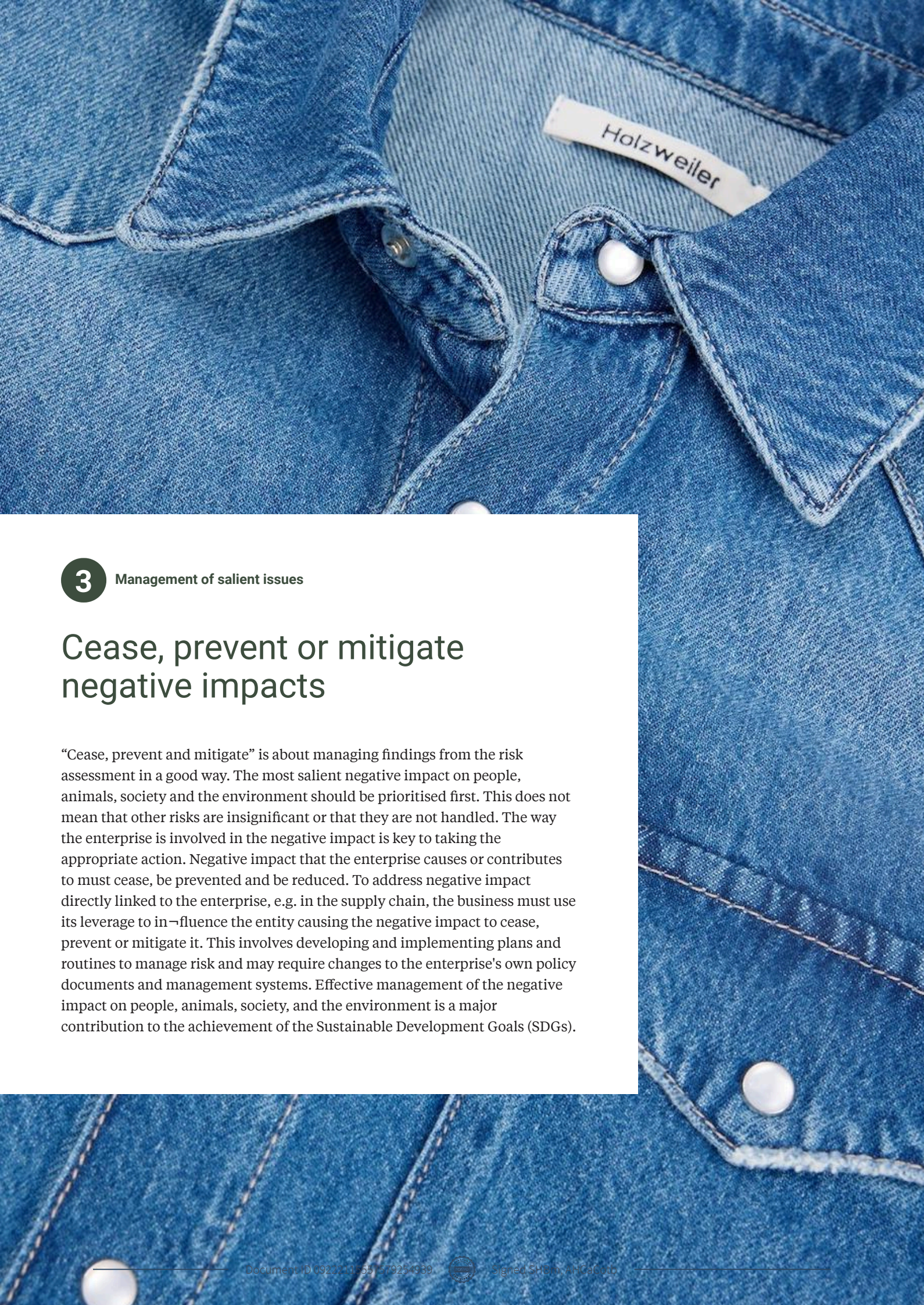
So far the areas we need to work more in depth on understanding how we can improve issues related to workers' wages, insurance and coverage, worker representation and grievance mechanisms. This work will continue and is also embedded in other related topics like for instance purchasing practices.

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## ADDITIONAL SEVERE IMPACTS

### **2.A.3 Describe other risks of negative impacts on people, animals, society and the environment that were identified but not prioritized, and how these have been handled.**

Fair wages and insurances has been a high priority for us to investigate - and it still is. In 2025 we updated wage data on some selected suppliers, to be able to follow up if needed.



### 3

### Management of salient issues

## Cease, prevent or mitigate negative impacts

“Cease, prevent and mitigate” is about managing findings from the risk assessment in a good way. The most salient negative impact on people, animals, society and the environment should be prioritised first. This does not mean that other risks are insignificant or that they are not handled. The way the enterprise is involved in the negative impact is key to taking the appropriate action. Negative impact that the enterprise causes or contributes to must cease, be prevented and be reduced. To address negative impact directly linked to the enterprise, e.g. in the supply chain, the business must use its leverage to influence the entity causing the negative impact to cease, prevent or mitigate it. This involves developing and implementing plans and routines to manage risk and may require changes to the enterprise's own policy documents and management systems. Effective management of the negative impact on people, animals, society, and the environment is a major contribution to the achievement of the Sustainable Development Goals (SDGs).



### 3. A Cease, prevent or mitigate

#### 3.A.1 Describe goals and progress status for the measures you have implemented to reduce the enterprise's prioritized negative impact

	<b>Transforming the design process to facilitate longevity and circularity, and safe inputs</b>
<b>Goal :</b>	Implement Eco-design criteria in all design processes
<b>Status :</b>	Ongoing
<b>Goals in reporting year :</b>	Implement eco-design processes on some products.

#### Describe already implemented or planned measures :

In 2023 our design and production team was trained in Holzweiler eco-design criteria. The criteria is based on four pillars: Design with safe inputs, Design for longevity, Design for material cyclability and to Enable circulation.

In 2024 we focused on our down jackets, which has the highest volume of all categories.

We looked at return reasons and claims, and invited our Norwegian repair partner, Luga, to join us in a meeting, resulting in valuable input on repair reasons, and feedback on how we can adjust the design for easier repairs.

Implementing these changes in the design process will be done in 2025, we expect this to result in more long-lived jackets.

in 2025 we participated in a PEF/LCA group, initiated by Trimco Group and Green Score Capital, supported by the Norwegian Fashion & Textile Association (NF&TA), and funded by Innovation Norway. In collaboration with leading Norwegian brands, we presented key findings and practical learnings from the project, offering valuable perspectives on PEF & LCA data strategies and implementation pathways for the wider textile and fashion community.

#### Describe actual or expected results of the measures, as well as goals and activities for the coming reporting year :

We believe that using our design criteria to prolong the lifetime of our products, including design for longevity and repairability, will in the end reduce textile waste.

In 2025 we used our experience in the PEF/LCA working group to set targets for the coming year. The results of our choices during the product development will be significantly related to our PEF score.

In 2026, we will investigate how to use the impact data for improvements. With that said, it becomes quite complex when the PEF calculation and French Eco-Score delivers a sever difference in the results on the same product. The dataset for PEF is not something we agree on, as this calculation favours synthetic fibers

over natural fibers. If we were to look at this with the eye of the French Eco-Score, the result is more on the opposite side. We will explore how we can make the data we have today useful for future product developments, or put our focus fully on design for durability. ADDE DOWN JACKETS IMPROVEMENTS?



	<b>Water and Chemical use in production</b>
<b>Goal :</b>	Reduce water and harmful chemicals in production
<b>Status :</b>	Ongoing
<b>Goals in reporting year :</b>	Remove PFAS from our outerwear collection

**Describe already implemented or planned measures :**

In 2024: we made a decision to remove PFAS from our outerwear, an ingredient in the fabric coating to make it water resistant.

In 2025: We have successfully removed PFAS and we are mainly sourcing GOTS certified organic cotton.

**Describe actual or expected results of the measures, as well as goals and activities for the coming reporting year :**

Reducing use of fibers highly reliant on water will affect water scarcity positively. Investigating options for less harmful chemicals will promote better health, safer products and have a less negative impact on people and planet.

For 2026, we will continue focusing on fibers with reduced water and chemical impact, focusing on denim, which is a growing category.

	<b>Choice of materials and fibers</b>
<b>Goal :</b>	Source more sustainable materials (with less social and/or environmental impact) that also meet our criteria for quality and durability.
<b>Status :</b>	Ongoing
<b>Goals in reporting year :</b>	Increase the share of more sustainable materials (less impact materials) that are rated good in our preferred material list, and at the same time ensure our requirements for quality and durability are followed.

**Describe already implemented or planned measures :**

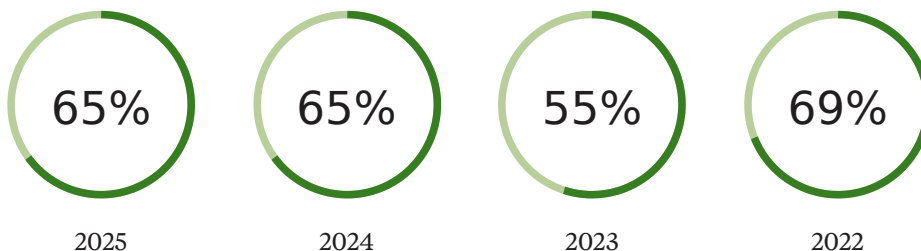
In 2025, we stayed steady on the use of certified materials and materials with less negative impact. A slight decrease due to extension of our outerwear category, where we see durability as the most sustainable measure we must ensure.

**Describe actual or expected results of the measures, as well as goals and activities for the coming reporting year :**

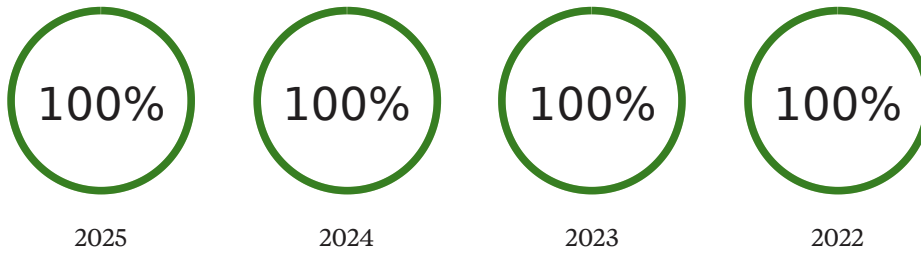
The result of these measures are less negative impact on the environment. Investigating options and seek the best solution for each product, is our way forward. To be able to continue improving, we need our customers onboard as well. Better choices often come with a higher price. In 2026 we will continue to seek out opportunities on how to optimise our outerwear collection, focusing on durability. On other categories we will continue to seek materials with less negative impact.

**Indicator**

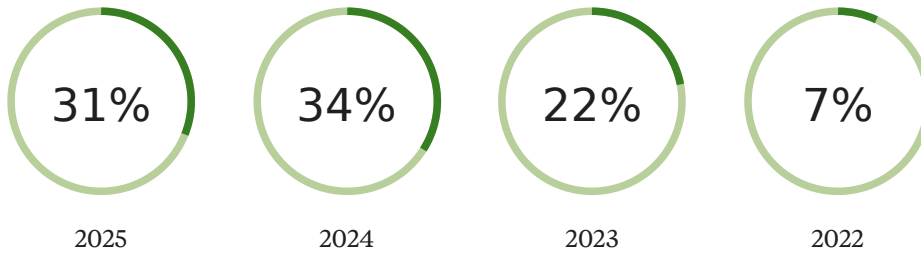
**Share of certified organic cotton (GOTS and OCS), based on total cotton consumption.**



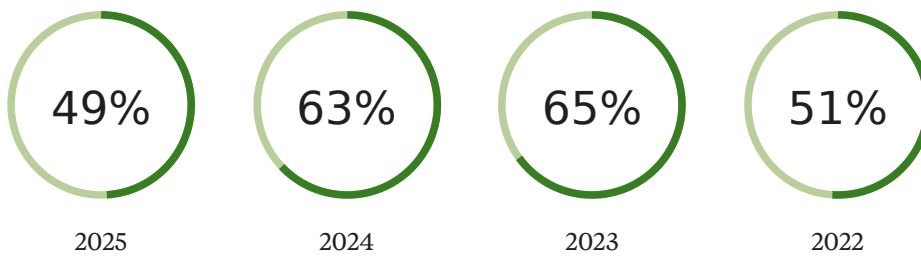
Share of Responsible Down Standard (RDS) down, based on total down consumption.



Share of Lenzing fibers of total viscose fibre consumption.



Recycled polyester and Nylon/Polyamide



	<b>Textile waste</b>
<b>Goal :</b>	Reduce waste from our productions and sampling process, as well as ensure that Holzweiler products do not end up as waste.
<b>Status :</b>	Ongoing
<b>Goals in reporting year :</b>	Bring new life to stock from previous seasons, and make sure products with minor defects get a second chance.

**Describe already implemented or planned measures :**

We have implemented several measures to ensure that products from previous seasons will continue it's journey and not end up in a warehouse or as textile waste:

- At our Collage store at Grünerløkka you can find products from previous seasons.
- We have evolved our collaboration with Tise Second chance, selling excess inventory and defect products through their platform. This has been a huge success, that we will continue.
- Samples and excess inventory are also sold at our collection sales.
- We have further expanded the digitisation of the design process using the CLO 3D tool, to minimise number of samples.
- A resale solution is available for our customers, in the products digital product passport (DPP). This can be found when scanning the QR code on the care label.
- In DPP you can also find some of our trusted repair partners.

**Describe actual or expected results of the measures, as well as goals and activities for the coming reporting year :**

Making sure all our products get to the market and are being used, not ending up in a storage or hanging unused in someone's wardrobe, is our key driver on this topic.

2026: We will continue to seek out solutions and collaborations to facilitate the longevity of the products we place on the market.

	<b>Greenhouse gas emissions</b>
<b>Goal :</b>	Reduce Greenhouse gas emissions
<b>Status :</b>	Ongoing
<b>Goals in reporting year :</b>	Consider multiple measures and decide the way forward. Decision will be based on the effect and the possibility to implement the measure. We will be evaluating type of transport for shipments and the possibility to steadily reduce our reliance on coal as an energy source, as well as exploring how this will affect on an LCA.

**Describe already implemented or planned measures :**

This has been on hold in 2025, so we are still in progress of evaluating and collecting data.

**Describe actual or expected results of the measures, as well as goals and activities for the coming reporting year :**

We will set the activities in 2026.



	<b>Animal welfare</b>
<b>Goal :</b>	Ensure ethical treatment of animals in the wool and leather industry
<b>Status :</b>	Ongoing
<b>Goals in reporting year :</b>	Continue sourcing certified leather and strive to use as much certified wool as possible. We often struggle with minimum quantities on wool, and must choose between certified yarn or producing only the quantity we need. We will keep communicating our animale welfare policy and ensure compliance from suppliers.

**Describe already implemented or planned measures :**

2023: We have implemented an animal welfare policy and sent it to all relevant suppliers.

2024: We use several sustainable/ethical certifications for animal derived materials and they are included in our preferred material list. All down used in our products are Responsible Down Standard certified. We strive to increase the use of certified responsible wool and mohair when the production volume allows for that. Collecting evidence, like a transaction certificate, is not always easy with due to volumes. Sometimes we get it, but in those cases it only referes to the wool supplier and not the knitting facility.

2025: All leather sourced is from tanneries certified by Leather Working Group.

**Describe actual or expected results of the measures, as well as goals and activities for the coming reporting year :**

By choosing certified animal derived fibre we ensure a better welfare for the animals and reduce the risk for bad animal welfare practices. The amount of certified animal fibers is to be found above under Choice of materials and fibres.

We will strive to increase the share of certified animal fibers to reduce potential negative risks and to collect evidence.

2026: We will explore Sustainable Cape Wool Standard.

	<b>Worker representation &amp; Freedom of Association</b>
<b>Goal :</b>	Ensure that Worker Representation, Freedom of Association and/or the right to collective bargaining is established with our suppliers.
<b>Status :</b>	Ongoing
<b>Goals in reporting year :</b>	Assessing worker representation at existing suppliers and ensure mapping of this area with new suppliers.

**Describe already implemented or planned measures :**

This subject is set as a part of our Supplier Code of Conduct and our Minimum criteria for sourcing suppliers and business partners. Our lowest requirement is worker committee or worker representative, and in those cases we will strive to support our suppliers to escalate their focus on this topic.

We are mapping and gathering data on worker representation (WR), Freedom of Association (FoA) and the right to collective bargaining from our supplier’s or factory’s social audit reports. This topic was embedded in the project we joined on responsible purchasing practice, where useful resources were shared and dialogue cross brands gave us broader insights. We are continuing to seek improvements based on these learnings, and through dialogue and data collection we strive for improvements.

We will initiate dialogue with three selected suppliers during 2026, based on performance and production volume.

**Describe actual or expected results of the measures, as well as goals and activities for the coming reporting year :**

WR, FoA and right to collective bargaining are complex areas that need continued focus. The result of improving any of these measures, might lead to better conditions and better dialogue for workers. We expect from our suppliers that they will join in on exploring opportunities on this topic, and our goal in 2026 will be to use the information collected to create improvements.

We will initiate dialogue with three selected suppliers/factories during 2026, based on performance and production volume.

**Indicator**



**Suppliers/factories in China that has implemented one or more of the following; worker representation (WR), Freedom of Association (FoA) and the right to collective bargaining**

Information is based on suppliers we engaged with in 2025, with evidence from social audit reports and from our suppliers. The missing two percent is due to missing evidence.

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	<b>Supply chain traceability</b>
<b>Goal :</b>	100% traceable supply chain
<b>Status :</b>	Ongoing
<b>Goals in reporting year :</b>	<p>Continue the implementation of a more efficient system for data collection for Digital Product Passport, as well as for transparency in general and internal awareness.</p> <p>100% traceability on supplier, manufacturer and sewing facilities, most fabric yarn/suppliers (tier 2), and multiple dyeing and printing houses (tier 2).</p>

**Describe already implemented or planned measures :**

In 2024 we started onboarding suppliers to our Product DNA & Certificate manager, that is linked to our care label booking system, meaning our suppliers already login to this system to book care labels. In the products Digital Product Passports we share information on supplier, factory, material supplier, and often dyeing and printing facility. All garments we place on the markets has a DPP with this data. This work continued throughout 2025.

**Describe actual or expected results of the measures, as well as goals and activities for the coming reporting year :**

We believe in openness and sharing what we know with our customers, so they can make a purchase decision on the right premises. in order to do so, we put a lot of effort in traceabilty and being transparent.

2026: Focus on traceable supply chains with our newly onboarded denim suppliers.



	<b>Wages, insurances and overtime</b>
<b>Goal :</b>	Work towards fair wages / living wages in our supply chain.
<b>Status :</b>	Ongoing
<b>Goals in reporting year :</b>	Yearly investigations on wage levels and make priorities based on the result.

**Describe already implemented or planned measures :**

We have obtained information from suppliers, via self-assessments, audit reports and other documentation shared by the supplier. We acknowledge that cooperation on this topic is essential, both cooperation with suppliers, other brands, NGOs and other players.

2025: We evaluated wage levels with focus on high volume suppliers In China. We saw that it was much easier and less intensive to split the evaluation by country and/or category to make it feasible to follow-up on.

**Describe actual or expected results of the measures, as well as goals and activities for the coming reporting year :**

2026: Working with one supplier on creating an improvement plan towards living wage. This supplier is of great importance for our company, so we will seek their collaboration to achieve this together.



## 3.B Other actions related to management of negative impact

### 3.B.1 Reduction of nature- and environmental impact

To seek out opportunities to reduce our nature- and environmental impact, we joined Trimco Group and Green Score Capital in a two year project together with a few more Norwegian brands and NF&TA (the Norwegian branch organisation), on LCA analysis based on PEF calculation. PEF shows environmental impact within the EU's specific areas:

Climate change / Land Use / Fossil resources/ Mineral & metal resources/ Freshwater, marine and soil eutrophication/ Fines particles, disease incidence / Water consumption/ Ionizing radiations/ Human toxicity carcinogenic and non[1]carcinogen/ Oceans acidification/ Aquatic ecotoxicity/ Photochemical ozone formation/ Ozone depletion.

In this project, we sought to gain knowledge about where, what and how we need to make changes to achieve and improve climate footprint. We chose four styles to be included in this project, and two Jersey styles were picked out for the assessment by Green Score Capital.

Our two Jersey styles scored as follow:

1. Jersey sweater, made in 100% Organic Cotton in Portugal. Score: 6136
2. Jersey sweater, made in 70% Organic Cotton and 30% Recycled Polyester. Score: 3031

The lower score, the better result.

We question the outcome of the assessment, as this calculation favour synthetic fibers, while our believe is that natural fibers should be favoured. The use of recycled polyester gave a better score than 100% organic cotton, which makes sense, but for the other brands that included both fully synthetic inputs and fully natural inputs, the score was immensely higher on the nature fiber (meaning a more negative result).

So, we used the products and assessed them with the same areas as we did with PEF, using the French Eco-score, and the result was turned for the fully synthetic inputs and fully natural inputs, in favour for natural fibers.

We cheer for the French Eco-Score in the way they score products.

Other general measures to prevent and reduce negative impact on nature and environment:

- Climate accounting to get an overview of today's emissions and be able to prioritise actions and measures with the aim to reduce emissions.
- The lifetime of the products with a focus on quality, raising competence internally and with the consumer, and by implementing solutions for reuse. The purpose of this is to facilitate more uses and reduce the need to buy new clothes.
- Implemented ecodesign processes on some products. The different strategies has dissimilar effect; Design on chemical and water usage, certified materials, as well as facilitating creation of products that are made to be repaired, made to be durable and made to be recycled.
- Choice of materials that have a lower negative climate and/or environmental impact.
- Increase use of Lenzing Ecovero Viscose, made from certified renewable wood sources using an eco-responsible production process.
- Digital product passport to be transparent on our work and to enable the customer to have relevant information to make conscious buying decisions, and to facilitate resale and repair.
- Established routines for internal and external testing of products through the development process to ensure that products are made in compliance with Holzweiler quality standards.

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### 3.B.2 Reduction of greenhouse gas emissions

See information in 3.B.1

Our material sourcing impacts on the result of our climate accounting. We find that sometimes we need to choose between low impact materials or durability. Sometimes the more sustainable materials do not always prove to be as long-lasting in quality as the less sustainable ones, especially recycled fibers. On balance, we have a responsibility to design for longevity and keep seeking out materials that are more sustainable, and which meet our own quality standards for durability.

We have set some internal rules to ensure that high-volume products always will be made with less impact materials, either for environmental, human or animal protection.

In Portugal, where our jersey and sweats are made, the suppliers we work with have implemented measures like solar panels, energy efficiency, waste water treatment, reusing production scrap, amongst other.

We will continue mapping our emission and look at measures that can be implemented with our high volume suppliers.

Our headquarter and stores are run by renewable energy.

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### 3.B.3 Improvements in own purchasing practices

Our suppliers and business partners can expect from Holzweiler that our business and purchasing practices strengthen, and do not undermine, their opportunity to deliver on our policies and requirements related to people, animals, society and the environment. Holzweiler always seeks collaboration to achieve responsible business conduct. We strive towards lasting supplier relationships with suppliers who show a particular willingness and ability to create positive developments in the supply chain.

We have developed internal Guidelines for responsible purchasing practises and we consider responsible purchasing practices to be one of our most important tools for responsible business conduct.

This includes:

- Continuously working to improve our policies and practice to enable our suppliers to be able to meet their commitments as outlined in our policies and requirements.
- Treating suppliers with respect and consideration in the relation and communications.
- Communicating clearly, promptly and accurately on all issues concerning orders.
- Never negotiating a price that will negatively impact on the wages and working conditions of workers.
- Staying with our current supplier if a higher price will ensure decent wages and working conditions for workers, rather than moving our business elsewhere purely based on price.
- Placing orders with leadtimes that do not trigger excessive working hours or sub-contracting. Always having a dialogue with the suppliers regarding lead times.
- Refraining from changing orders repeatedly and with short notice. If changes are unavoidable, amending target delivery times accordingly.
- Providing material and practical support to our suppliers in striving to meet their obligations in our policy.
- Taking wages and working conditions into consideration when reviewing business relationship with suppliers, rather than ending a business relationship purely on the grounds of price or quality.

We participated in an international working group on Responsible Purchasing Practices (2023/2024), with an internal working group including representatives from CSR, purchasing, production and commercial team. The framework, consisted of 5 principles on which we delve:

1. Integration and reporting
2. Equal partnership
3. Collaborative Production planning
4. Fair payment terms
5. Sustainable costing

In 2023 we developed a questionnaire about our purchasing practices which we invited 3 key suppliers to fill in. The findings were shared internally with the design and production team. Production planning and communication were key issues we looked into how to improve based on the feedback from the suppliers. Improvements on these areas was done in 2024.

in addition, we focused on:

- Improved joint business calendar
- Implemented Range plan - works well and used in dialogue with suppliers
- Supplier survey to 3 suppliers – feedback shared
- Vendor management – strategic suppliers to be prioritised
- Capacity booking - planning of capacity is more convenient for us and the suppliers
- Leaner collections - Size refence adjusted
- Nominating suppliers – joint decision by design, CSR, production and buying department
- Supplier evaluation regularly including input from design, production and buying, logistics
- PLM up a running as main platform for tech packs communication with suppliers
- Have regular video meetings with suppliers to do tech pack handover, to allow for queries and clarification
- Increasing capacity booking with suppliers

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### **3.B.4 Choice of products and certifications**

Holzweiler favours certified materials as far as we can include that in our designs. Certified materials contribute to reducing the environmental, social and ethical impact from raw material production, fibre and fabric processing and garment production.

The preferred material list is guiding us and in addition we have implemented eco design processes.

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### **3.B.5 Actively support free trade union organisation and collective bargaining, or where the law does not allow it, actively support other forms of democratically elected worker representation**

When participating in LIC - Responsible Purchasing Practices Learning and Implementation Community, we spent time investigating our own practice and how that could affect suppliers, which is equally important as the role of the supplier. We are collecting information from audits and information shared from the suppliers. We conducted an updated mapping of worker representation, collective bargaining and wages with some selected suppliers, where we saw the need for updated information.

Freedom of association and the right to organize and collective bargaining, is supported in our Policy, Code of Conduct and specified in our minimum criteria shared and confirmed with all our suppliers.

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### **3.B.6 Contribution to development, capacity building and training internally and of suppliers and workers in the supply chain**

Capacity building through our participation in a project related to responsible purchasing practices, including several departments.

Our staff's competence is a combination of internal knowledge & experience, networks, courses, advice from stakeholders and participation in forums and conferences, focusing on sustainability and responsibility within the textile industry. Our staff participate in training and courses relevant for their responsibility and position and we share professional information internally on topics we get access to or gather from external resources .

Participating in internal and external projects also contributes to capacity building and increased knowledge & awareness. For example (but not limited to) the two projects we participate in on responsible purchasing practices and living wages.

Our CSR manager conducts training for our stores on sustainability related topics. The digital product passport is a great tool for them to get product specific data to share with customers. We build awareness on regulations and relevant industry topics.

We are joining industry working groups, webinars and joining forces with other brands to seek progression together, and to learn from each other.

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### **3.B.7 Combatting corruption and bribery in own enterprise and supply chain.**

Requirements for anti corruption and bribery is communicated in our guidelines for suppliers and Code of Conduct. We have an internal policy which is communicated to employees as part of the onboarding.

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### 3.B.8 Other relevant information concerning the enterprise's work to reduce, prevent, and manage negative impact

We have continued our focus on technology and innovation and in 2025.

With the aim to facilitate circularity, transparency and traceability, engage with our customers and enable them to make conscious purchasing decisions, we launched Digital Product Passport(DPP) on a few products in march 2023. The products digital ID, which is a unique QR code for each singel garment, keeps us connected to the product after point for sale. By end of 2025 all garments were delivered with DPP.

When scanning the QR code, information on supplier, factory/sewing-, dyeing-, printing- and material facility, as well as certifications, dyeing and printing process and chemical compliance, will be shared, as well as care & repair information.

Supported by Innovasjon Norge's program, Kreativ teknologi ut i Verden (KUV), we have further developed our work on DPP, focusing on easy accessible global resale and repair serviced through the product's unique ID, as well as working on catching the first point of sale (POS) to "start" the product's journey, and find a more compliant way to verify data that is shown in DPP.

In near future we hope to collect valuable information on the usages of our products through events like resale, repair and other possibilities that lies in DPP.

## 4

# Track implementation and results

Tracking implementation of actions and results relates to measuring the effects of the systematic approach and own work in each step of the due diligence process, showing whether the enterprise conducts sound due diligence work. The enterprise needs to have procedures and routines in place in order to uncover and critically assess own conclusions, prioritizations and measures that have been made as part of the due diligence process. For example, is mapping and prioritisation of salient issues done in a scientifically sound and credible way? Does it reflect the actual conditions in the supply chain? Do measures aimed at ceasing, preventing and reducing the enterprise's negative impact work as intended? Is negative impact remediated where relevant? This may apply to measures taken by the enterprise alone or carried out in collaboration with others. The enterprise's experiences from working on due diligence should be used to improve procedures and routines in the future.

## 4.A. Track and assess

### 4.A.1 Describe a) assignment of responsibility for tracking the effect and result of implemented measures, as well as how the tracking is carried out in practice, b) who is responsible for evaluating the enterprise's implementation and work with due diligence, and how the evaluation is carried out in practice.

A) The CSR manager has the main responsibility for tracking the effect of implemented measure. As sustainability measures are conducted in several departments, is the CSR managers job to follow up and gather information. This is mainly done in meetings with the responsible person or the responsible team. As an example; information on how our production and buying team have delivered on targets related to responsible business practices, has been collected and evaluated. These actions and results will be updated in our yearly action plan, which is enclosed in this report.

B) We are working on defining KPI's which we will measure and track progression in the four pillars in our sustainability strategy.

The measures we have set in our sustainability strategy and the risk areas we have assessed in the due diligence process are first priority to measure and track.

The suppliers are followed up by relevant surveys and gathering other relevant information (such as audits, certificates, sub suppliers). Based on the information provided we have dialogue with the suppliers. When visiting suppliers we encourage Holzweiler staff to use the visual observation form to assess the suppliers facilities. We aim to visit suppliers on a regular basis, and with the production & quality team in Shanghai we have more resources and capacity on site.

The data is collected in the various departments. For example, Supply chain keeps an overview of transport methods, design reports on the number of products designed in 3D, e-commerce reports on green shipping and claims and the sustainability team reports, among other things, on the number of suppliers who have been through the entire screening process, certified factories and the number of products that can be traced to different tiers in the supply chain.

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### 4.A.2 Describe how you track the effect, and/or demonstrate the probability of effect, of measures taken to reduce negative impact.

A major focus for us in the the two recent years has been to continue working on increasing the products' lifespan and number of wears. This includes choosing high quality materials, trims & accessories, best practice for good fits, solutions for resale and rental, as well as training staff and customers awareness on how to take care of their clothes. It is difficult to measure the effect of this today, but we believe that these are good measures that clearly have an effect and reduces overall textile waste. The choice of materials plays an important role, and we are increasing the use of less harmful materials. These choices can lead to a reduced negative impact on animals, people and/or the environment. Here, progress is measured from year to year.

Digitization of the follow-up process by suppliers leads to more efficient information gathering, and that information is accessible in an orderly manner. This is still work in progress, but we already see great results from this.

Our Shanghai team is a great resource in this process. They advise in local language and follow up on questions on an ongoing basis.

## 5

# Communicate how negative impacts are addressed

A prerequisite for good external communication on due diligence for responsible business conduct is that it builds on concrete activities and results. Enterprises should make relevant documents concerning due diligence publicly accessible, i.e. policies, codes of conduct, guidelines, processes and activities related to identifying and handling the enterprise's actual and potential negative impacts on people, animals, society and environment. Communication should include information about how the risks have been identified and handled, as well as the effect of the measures/activities. The Transparency Act (Åpenhetsloven) §5 requires companies to publicly account for their human rights due diligence on an annual basis.

## 5.A External communication

### 5.A.1 Describe how the enterprise communicates with affected stakeholders about managing negative impact

Where we find negative impact, we request information about how they are working on remediation and how the employees are involved, for example through worker representation or HR.

In most cases, suppliers are already working on the measures proposed in the audit report, and we follow progress on the actions taken to improve the corrective action plans.

As of today this work is done when onboarding new suppliers and randomly during the year.

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### 5.A.2 Describe how the enterprise publicly communicates its own work on identifying and managing negative impact/harm

We communicate publicly about identification of risks and how those are managed in our annual reporting to Ethical Trade Norway, which can be found on their and our website. On our website you can find documents, policies and more information: <https://holzweilerslo.com/en/sustainability>

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### 5.A.3 Describe the enterprise's routines for answering external inquiries related to the information requirement imposed by the Transparency Act

All external inquiries from stakeholders related to information on Holzweiler business ethics are received by our customer care team or CRS manager.

As of today we have answered three requests relating to the Transparency Act. These request have been answered within the given timeframe.



## 6

### Provide for or cooperate to ensure remediation when appropriate

Once an enterprise has identified that it has caused or contributed to negative impact on people, animals, society or the environment, the enterprise must provide for, or cooperate in, remediation. Remediation may involve financial compensation, a public apology or other ways to remediate the negative impact. Another aspect of remediation is that companies should provide for, or cooperate with legitimate complaint mechanisms, to ensure that workers and/or local communities can raise complaints and be heard.

## 6.A Remediation

### 6.A.1 Describe the enterprise's policy for remediation of negative impact

If our operations directly or indirectly cause harm to people or the environment, we commit to remediation support, provide for or cooperate in remediation when appropriate. This is set in our Company Code of Conduct, the Policy for Responsible Conduct and in the Responsible Sourcing Policy:

If we should find a breach of our requirements during an inspection, audit or other source, we will clearly communicate the issue with the factory management. The factory management shall then input their perspective on how the issue will be handled and resolved within a realistic timeline. The focus is on long-term improvement and development to meet our sustainability standards.

Some breaches may be more severe and require a proactive and systemic approach. A key part of our due diligence process is remediation support. We commit to follow up any situation closely and provide assistance where possible to resolve the case. If remediation support is necessary, we consider this on a case-by-case basis. We will establish cooperation with expert-organizations that contribute to remediation support if a serious breach is identified at one of the factories producing for us.

If a case that will require remediation occurs, or need to be evaluated for remediation, CSR will include buying and management team, as well as Ethical Trade Norway, to review this case and make a decision on how to act on it. This routine will also take place if the supplier has caused harm and not taken responsibility for it. As of today, no remediation has taken place.

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### 6.A.2 If relevant, describe cases of remediation in the reporting year

No remedy was initiated in 2025.

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## 6.B. Ensure access to grievance mechanisms

### 6.B.1 Describe what the enterprise does to ensure that employees and other stakeholders, especially impacted workers and local communities have access to whistleblowing systems and grievance mechanisms

We have communicated our requirements to all suppliers in our Code of Conduct and set this a minimum criteria for new suppliers:

We did follow up on this topic with some suppliers in 2024 and will conduct a full mapping and dialogue in 2026, due to newly onboarded suppliers. The mechanisms used varies among our suppliers. Suggestion boxes are often in place in larger facilities and dialogue with management in smaller. Worker representatives have been reported from most, but we see some have not mentioned this in the social audit report they share with us.

Grievance mechanism in own organisation is established and is described in the Holzweiler employee manual. Everyone is encouraged to report objectionable conditions. The routine shall help uncover any objectionable conditions at the Holzweiler group. An information leaflet with the grievance routine is informed all employees during onboarding.

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