



**DALEMA**

Human Rights Due Diligence Statement 2025

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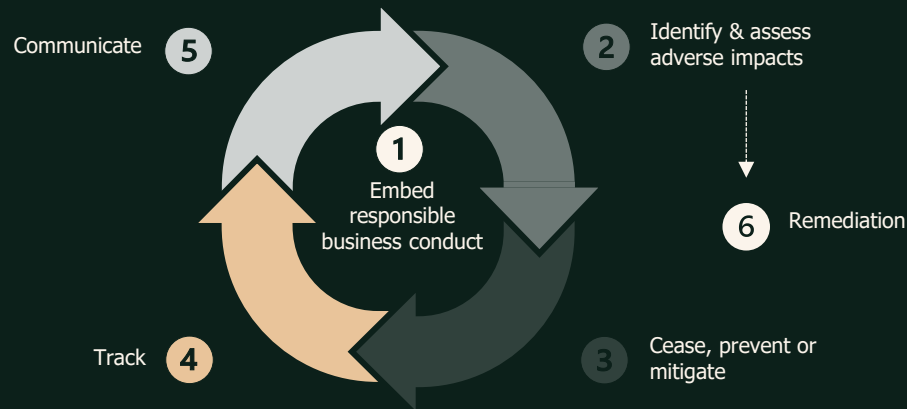
# Our approach to human rights due diligence

Dalema sources and procures products through a global network of suppliers and manufacturers, including in countries where the risk of labour and human rights violations is considered elevated. Our most recent risk assessments confirm that a significant share of this sourcing takes place in such regions.

In line with the Norwegian Transparency Act, Dalema conducts due diligence throughout the Group's supply chains to identify, prevent, mitigate and account for actual or potential adverse impacts on human rights and decent working conditions. This work is guided by the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (UNGPs), and is embedded in the Group's governance through clear ownership at management level.

Based on our most recent risk assessments, we have identified salient human rights risks requiring focused attention and follow-up. These relate primarily to working conditions in our supply chain, including working hours, health and safety, and sourcing from higher-risk regions.

This report outlines our key policies for responsible business conduct, describes the actions we have taken, and presents our forward-looking plans to improve our practices. It covers all relevant subsidiaries under the scope of the Transparency Act.



# About Dalema

Dalema Holding AS (“Dalema”) is a privately owned company operating out of Sandnes municipality, Norway. Our scope of activity is investing in a wide range of high-quality brands and B2B/B2C-oriented companies within the retail industry and real estate.

Dalema has a long-term, industrial perspective on its investments. We invest in companies where we can contribute to further value creation through our industry expertise and our large and efficient logistical infrastructure.

Our subsidiaries are based in Norway and Sweden, while our sourcing offices, operated through Opal, are located in China, India, Vietnam and Malaysia.

Dalema, as a parent company, has no employees, but the Groups<sup>1</sup> total number of full-time equivalents (FTE) is 623.

In 2025, the Group sold products and services for around NOK 2 billion.

## Industrial investments



## Financial investments



<sup>1</sup>The Dalema Group is the collective term for all businesses and companies in the group

# Industrial investments within the scope of the Transparency Act

The following section of this report showcases the scope of operations and key metrics from some of our larger subsidiaries subject to the reporting requirements under the Transparency Act.

CONSILIMO



HOUSE *of* YARN

**Kremmerhuset**  
INSPIRASJON | GAVER | INTERIØR

«ULTIMATE NORDIC

# CONSILIMO



## What we do

Consilimo is a brand house comprised of the following brands; Serviteur, Edelweiss, GUS, Blooms, Holmen, EasyLiving, Lene Bjerre, Martinsen, Simple Goods and Lauvring. These encompass design and production of products within retail packaging, interior (indoor and outdoor), decorative items for retail stores and the florist industry, and office supplies. In addition, Consilimo also do resale of external brands like Ambiente, Ester&Erik and Oasis.

Consilimo operates with B2B relations.

[Consilimo.no](https://www.consilimo.no)

## How we operate

### Organizational structure

Consilimo AS (org.no. 845 699 852) is headquartered in Tevlingveien in Oslo, with a regional office in Fredrikstad. In 2025, Lene Bjerre merged into Consilimo.

The management team, including managing director Hanne Klerck Nilssen, sales and marketing, customer service and procurement teams for Serviteur, Blooms, Holmen, EasyLiving, Simple Goods and Martinsen are in Oslo. Edelweiss and GUS products are designed and sourced from purchasers seated in Fredrikstad, while Lauvring and Lene Bjerre products are designed and sourced from purchasers seated in Denmark.

### Procurement

Consilimo does not own any production units itself but instead work with independent manufacturers and external brand suppliers located in Scandinavia, Europe, Asia and USA. We estimate that around 60% of our private label production occurs in China. The rest mainly distributes between Denmark, Estonia, Germany, Netherlands and Turkey.

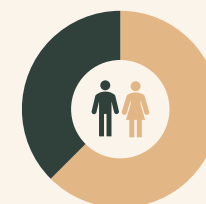
Each purchaser is directly responsible for managing their part of the supply chain. Productions in China are handled in close collaboration with our sourcing office Opal. This to ensure a more efficient human rights due diligence and product QC on the spot.

## Key 2025 metrics

Turnover:  
**283,7**  
NOK Million

Number of employees:  
**20**

Gender balance:



**40 % 60 %**

## How we operate

### Organizational structure

Feel (Rustika AS, legal entity no. 963 224 532) is a Norwegian retail chain consisting of 42 physical stores, primarily located in Southern Norway, as well as one online store. We employed 437 people at year-end 2025. Our head office is located in Sandnes, where procurement, customer service, graphic design, communication and marketing are based. The management team, led by Managing Director Christoffer Martinsen, is responsible for the company's overall business decisions. The warehouse serving our online store is located in Jevnaker.

Feel has been part of the Dalema Group since 1990.

### Procurement

All purchasing at Feel is managed from the head office in Sandnes.

Around 70% of Feel's products are sourced through Dalema companies from selected independent suppliers (manufacturers, agents and brand suppliers) in Asia and the EU/EEA. To support sourcing and supplier follow-up, Feel works closely with Opal, Dalema's sourcing partner, which has local teams in China, India, Vietnam and Malaysia. These teams maintain close contact with manufacturers and suppliers, supporting supplier development, quality assurance and responsible sourcing. Feel's procurement team works closely with Opal throughout the sourcing, product development and production processes.

Purchases from European suppliers, including both private label and external brands, are managed directly by Feel's procurement team. The remaining 30% of the assortment consists of products from established external brands. Requirements related to responsible business conduct are communicated through Dalema's Supplier Code of Conduct and contractual agreements with suppliers and other business partners.

## Key 2025 metrics

Turnover:

299

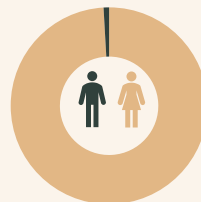
NOK Million

Number of employees:

437

Gender balance:

0,9 % 99,1%



## What we do

Feel is a Norwegian retailer offering a wide range of homeware products, including kitchen accessories, tableware, decorative items, textiles, food products and seasonal products.

The assortment consists of both products developed in-house and products from established external brands.

Our products are sold through our network of retail stores and our online store, [feel.no](https://www.feel.no).

# HOUSE of YARN



## What we do

House of Yarn is one of the leading suppliers of hand knitting yarn and knitting accessories in the Nordic region. Our primary customers are retailers serving both the consumer (B2C) and professional (B2B) markets.

Our portfolio includes more than 120 yarn qualities across our own brands (Dale Garn, Du Store Alpakka, Gjestal Garn and Bæstmor) as well as private label collections. We also offer a wide range of knitting needles and accessories from KnitPro.

In addition, we offer ready-to-wear knitwear collections through our own brands (A Northern Story, Arctic Circle, Norwool and Gjestal Exclusive), the Bæstmor brand and private label collaborations.

[Houseofyarn.no](https://houseofyarn.no)

## How we operate

### Organizational structure

House of Yarn AS (org. no. 911 993 503) is headquartered in Sandnes, where our in-house team manages procurement, product development, sales, communication and marketing. Our head office is also home to Managing Director Tor Henrik Knutsen and the company's management team. Our warehouse is located in Oltedal. Including our logistical operations, we currently employ 20 employees.

House of Yarn has been part of the Dalema Group since 2009.

### Procurement

House of Yarn does not own any production facilities. Instead, we work with a carefully selected network of independent manufacturers and brand suppliers in Asia, Europe and South America. Our products are primarily manufactured in Italy, Romania, China, Turkey, Peru and India.

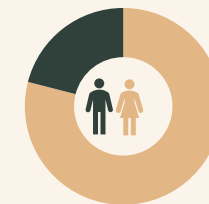
Our two-person procurement team is responsible for managing the supply chain. Around 60% of our production is inspected directly by our own team, while the remaining production is monitored through our sourcing partner, ITP Holding AS. ITP Holding AS is an ISO 9001-certified international sourcing company specializing in supply chain management and quality assurance. The company is also a member of Ethical Trade Norway.

## Key 2025 metrics

Turnover:  
**234,5**  
NOK Million

Number of employees:  
**20**

Gender balance:



**20%** **80%**

## How we operate

### Organizational structure

Kremmerhuset (Kremmerhuset Ting & Sânt AS (legal name); org.no. 975 965 120) operates 56 retail stores across Norway as well as one online. The head office is located at Tevlingveien in Oslo, where procurement, design, communication, marketing and other support functions are based. The management team, led by Managing Director Christoffer Martinsen, is responsible for the company's overall business decisions.

Kremmerhuset employs 454 permanent and temporary employees. These are both permanent and temporary employees. Our logistics operations are based at our central warehouse in Hensmoen, Hønefoss.

Since September 2021, Kremmerhuset has been part of the Dalema Group.

### Procurement

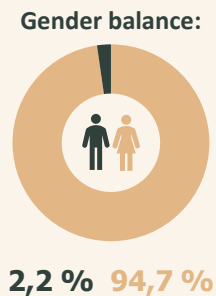
We do not own any production facilities. Instead, we source products from selected independent manufacturers, agents and brand suppliers in Asia and the EU/EEA.

Kremmerhuset's procurement team in Oslo works closely with Opal, Dalema's sourcing partner, which has local teams in China, India, Vietnam and Malaysia. Opal supports supplier selection, product development, quality assurance and supplier follow-up, while maintaining close day-to-day contact with manufacturers throughout the production process. This collaboration helps ensure that products meet our quality requirements and supports the evaluation and improvement of working conditions at supplier sites where necessary. Purchases from European suppliers, including both private label and external brands, are managed directly by Kremmerhuset's procurement team.

## Key 2025 metrics

Turnover:  
**340**  
NOK Million

Number of employees:  
**454**



## What we do

Kremmerhuset is a Norwegian homeware retailer offering a wide range of products for the home. Our assortment includes home décor, textiles, kitchenware, tableware, lighting, furniture and seasonal products. We sell directly to consumers through our network of retail stores across Norway and our online store, Kremmerhuset.no

Our assortment consists of both in-house developed products and products from well-established external brands, including A&C, Amundsen Spesial and Meraki.

[Kremmerhuset.no](https://www.kremmerhuset.no)

## How we operate

### Organizational Structure

Ultimate Nordic AS (org. no. 910 123 068) is headquartered at Tevlingveien in Oslo. The company manages a portfolio of well-established brands. Brusletto & Co AS was merged into Ultimate Nordic AS with effect from January 2024, followed by the merger of Ultimate Nordic Bikes AS into Ultimate Nordic AS with effect from January 2025.

Our procurement, brand management, e-commerce, sales and customer service teams are based at our head office in Oslo. Managing Director Espen Vikanes is also based there. In addition, we have offices in Horten (Norway) and Solna (Sweden), where employees support our bicycle business and the Swedish market. Our logistics operations are managed from our warehouse in Hensmoen, Ringerike.

Since 2018, Ultimate Nordic AS has been a part of the Dalema Group.

### Procurement

Approximately 90% of our assortment consists of products from well-established external brands. The remaining products are private label products manufactured by selected independent suppliers, primarily located in China, Taiwan, Turkey, India, Italy, Romania and Poland.

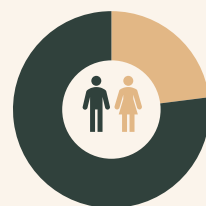
Ultimate Nordic does not own any manufacturing facilities. For private label sourcing and supplier follow-up in Asia, we work closely with Opal, Dalema's sourcing partner, which has local teams supporting supplier development, quality assurance and responsible sourcing. Opal maintains close day-to-day contact with manufacturers throughout the production process, while Ultimate Nordic's procurement team manages supplier relationships and sourcing activities from Oslo. This collaboration also supports our human rights due diligence processes.

### Key 2025 metrics

Turnover:  
**569**  
NOK Million

Number of employees:  
**43**

Gender balance:



**81,8 % 18,2 %**



## What we do

Ultimate Nordic is a multi-brand distributor and retailer operating within the Sports & Outdoor, Industrial and Premium Corporate Gifts segments. We serve both B2B customers and consumers through selected online stores.

Our portfolio includes more than 60 well established Nordic and international brands, alongside several internally developed brands. These include: Alpina, Axelda, Brusletto, Buff (industrial only), Camelbak, Cocoon, Coghlan's, Compeed, Crispi, Diadora, Giant, Hällmark, Injinji, Leatherman, Ledlenser, Lifesystems, Lifeventure, Molten, Nordic Grip, Orack, Ortovox (Sweden only), Pedag, Reusch (goalkeeper gloves only), Rode, Sealskinz, Sof Sole, Sportdoc, Sportquip, Stanley, and Trangia.

# Embedding respect for human rights in our business

At Dalema, we believe that respect for human rights is fundamental to responsible business conduct. We recognize that human rights due diligence is not a one-time activity, but an ongoing process embedded in our daily operations.

## Group-wide policies

All subsidiaries and offices in the group follow a unified [Code of Conduct](#), while all suppliers are required to sign our [Supplier Code of Conduct](#). These documents set clear expectations regarding human rights, working conditions, environmental impact, anti-corruption, and traceability.

## Commitment and responsibility

We apply the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance across all Group companies. These principles are embedded in our management system through group-wide policies, procedures, work instructions and digital due diligence tools that support responsible sourcing, supplier management and product compliance. Our Supplier Due Diligence System enables us to register suppliers, perform risk assessments, collect documentation, monitor corrective actions and maintain ongoing oversight of supplier performance.

## Local sourcing through Opal

Through our sourcing company Opal East Trading Co., Ltd., we maintain a local presence in China, India, Vietnam and Malaysia. Opal supports supplier development, documentation reviews, factory visits, audits and corrective actions, strengthening both product quality and responsible sourcing.

## Applying our supplier due diligence process

Dalema collaborates with business partners across Europe, Asia and North America. Our supplier due diligence process is aligned with the OECD Due Diligence Guidance for Responsible Business Conduct and is designed to identify, assess and prioritize risks related to human rights and decent working conditions throughout our supply chains. The process is illustrated below.

### Supplier Due Diligence System

All private-label suppliers are registered in our Supplier Due Diligence system, where we maintain information about production sites, products and raw material sources.

The process begins with supplier verification and screening, followed by risk analysis and completion of a Supplier Self-Assessment Questionnaire (SAQ).

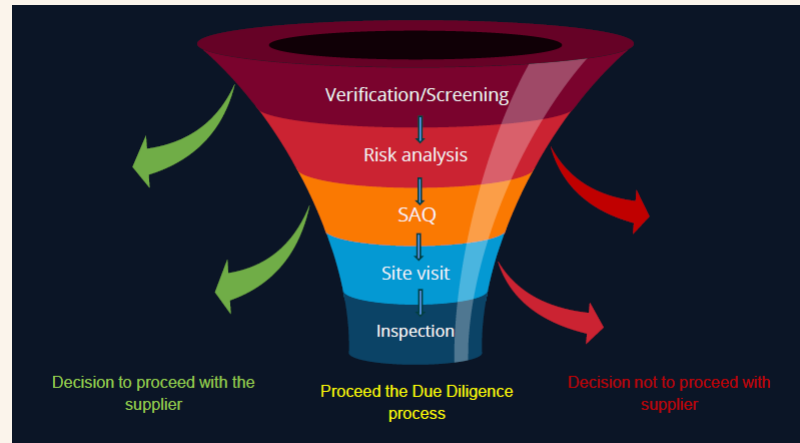


Illustration of Dalema's supplier due diligence process

Suppliers are screened and risk assessed based on country risk, product category, production method and previous performance. Higher-risk suppliers complete a Self-Assessment Questionnaire (SAQ) and may be subject to site visits and inspections before approval or continued cooperation.

Where risks are identified, corrective action plans are established and monitored until satisfactory improvements have been implemented. Our ESG Working Group and procurement teams review supplier risks annually to ensure that due diligence activities remain aligned with our procurement strategy.

Our Supplier Due Diligence Questionnaire contains more than 100 questions covering governance, human rights, labour conditions, occupational health and safety, environmental management, business ethics and supply chain transparency. Responses are used together with country risk, product risk and supplier performance to determine the level of due diligence required.

The information collected through the supplier due diligence system enables us to identify high-risk relationships and direct our due diligence efforts where they are most needed.

To support compliance, we require that production takes place in factories that are either certified according to recognized social standards, apply an established social responsibility management system, or have undergone a third-party social compliance audit—or an audit conducted by our sourcing office, Opal East Trading. These requirements apply to all production located in countries classified as high-risk.

### Grievance mechanisms

Dalema maintains open and accessible grievance mechanisms that enable workers, suppliers and other stakeholders to report concerns confidentially and, where permitted by law, anonymously. These mechanisms allow for dialogue, investigation, and, where necessary, remediation. All reports are assessed, investigated and, where relevant, escalated through our internal governance process.

## Key salient human rights risks identified in our value chain

Risks are prioritised based on the severity and likelihood of adverse impacts, taking into account country risk, sector risk, product category and supplier-specific information, in line with the OECD Due Diligence Guidance.

Based on our 2025 risk mapping and supplier assessments, we have identified several salient human rights risks at production sites, particularly in high-risk countries. While these risks represent the most critical findings in this reporting period, we acknowledge that other risks may also exist. Our due diligence processes are continuous and evolving.

### Group-level risk overview

Dalema's supplier due diligence system contains 825 suppliers across all Group companies registered in the system. Screening and risk analysis had been completed for approximately 60% of these. The supplier base is geographically concentrated in higher-risk regions, with approximately 60% of suppliers located in China and additional suppliers located in India and other Asian countries. These regions are recognised by established international risk indices as having an elevated risk of adverse impacts on human rights and decent working conditions. This geographic concentration is the principal driver behind how we prioritise our due diligence.

Through ongoing monitoring we have identified registered deviations and opened corrective action plans, and we have identified a backlog of expired social audit certificates. We give particular priority to the certificates we require through our own policies — amfori BSCI and SMETA — which document working conditions at supplier sites, rather than treating all expired certificates equally. The expired social audits are concentrated among higher-risk suppliers in China and India.

This report covers the five subsidiaries subject to mandatory reporting under the Norwegian Transparency Act, described on pages 6–10 (Consilimo, House of Yarn, Kremmerhuset, Feel and Ultimate Nordic).

The detailed supplier findings set out below are based on the 41 suppliers within these five companies that completed the Supplier Self-Assessment Questionnaire (SAQ) in 2025. We acknowledge that the SAQ response rate is currently low, which we address as a priority improvement area (see "Tracking progress").

Our assessment combines country risk, sector risk and supplier-level data. The respondent base is concentrated in higher-risk sourcing countries, with 63% located in China and 11% in India, which reinforces the salience of the risks outlined.

Excessive working time remains one of the most significant risks in our supply chain. Of the suppliers assessed, 14% reported a normal working week exceeding the ILO threshold of 48 hours, and 14% permit weekly overtime above the ILO limit of 12 hours. In addition, 20% had either no rule limiting consecutive working days or allowed more than six consecutive days before a rest day, contrary to the ILO principle of one day of rest in every seven.

### Wages.

Only 11% of assessed suppliers set wages according to the living-wage principle, while the majority rely on national minimum wage or individual bargaining. This indicates a risk that wages may not cover workers' basic living costs.

### Forced labour indicators.

Four suppliers reported having retained workers' original identity documents (such as ID cards or passports) on at least one occasion. The retention of original documents is a recognised indicator of forced labour under the ILO Forced Labour Convention and is treated as a high-priority finding. Related concerns were identified in disciplinary practices: 11% of suppliers reported keeping employees on site to "contemplate behaviour" and 14% applying wage deductions as disciplinary measures.

### Freedom of association.

76% of assessed suppliers reported no trade union presence at the workplace. While the absence of a union is not in itself proof of a violation, it may indicate limited freedom of association and collective bargaining, particularly in regions where these rights are restricted.

### Occupational health and safety.

26% of suppliers had not appointed a person responsible for health and safety, 9% did not provide health and safety training, and one supplier required workers to fund their own personal protective equipment. No supplier reported fatalities or major work-related accidents in the past three years.

### Child and young workers.

No supplier reported employing workers under the age of 15. One supplier reported employing workers under 18 on evening shifts; none reported assigning hazardous work, heavy work or night shifts to workers under 18. These findings are consistent with the elevated country and sector risks associated with textile, interior and consumer-goods manufacturing in Asia, and they directly inform the mitigating actions set out on the following page.

## Our actions to mitigate and prevent human rights risks

Ensuring respect for human rights throughout Dalema's supply chain is an ongoing effort. Our mitigation actions are adapted to the level of risk and the capacity of suppliers. The following summarizes key actions implemented and planned to address the most salient risks identified so far:

### **Strengthening supplier governance and policy.**

Our assessment shows that supplier-level governance is still maturing: 41% of suppliers have a Code of Conduct in place and a further 41% are developing one, while 59% have a designated person responsible for sustainability. We continue to require suppliers to sign Dalema's Supplier Code of Conduct and are prioritising follow-up with suppliers that lack basic governance structures.

### **Addressing working time and wages.**

Where excessive working hours or wage-setting below the living-wage principle are identified, these are recorded as findings and followed up through corrective action plans and supplier dialogue. Working time and remuneration are given particular attention in our follow-up of high-risk suppliers in Asia.

### **Acting on forced-labour and disciplinary findings.**

The retention of original identity documents and the disciplinary practices identified are treated as priority cases. These are escalated for corrective action and, where necessary, factory follow-up through our sourcing office, Opal East Trading.

### **Improving supplier follow-up in the chain.**

Our data shows that only 31% of suppliers currently include sustainability requirements in contracts with their own sub-contractors, and 34% have no established follow-up mechanism for their suppliers. We are working to extend due diligence expectations further down the supply chain, supported by our requirement that production in high-risk countries takes place in factories that are certified to a recognised social standard, apply a social responsibility management system, or have undergone a third-party or Opal-led social compliance audit.

### **Reinforcing certification and audit coverage.**

Among assessed suppliers, 63% follow amfori BSCI and 37% SMETA, while 21% follow no recognised standard. We monitor the validity of social audit certificates (in particular BSCI and SMETA, which we require through our policies) and prioritise renewal where certificates have expired, especially for higher-risk suppliers.

### **Strengthening grievance access.**

66% of assessed suppliers maintain a grievance channel for their own employees and 45% for external stakeholders. We encourage suppliers to establish accessible and, where permitted, anonymous reporting channels, in line with our own grievance mechanism.

## Tracking progress

Dalema acknowledges that more systematic tracking of our due diligence efforts is required, and we have identified several priority areas for improvement in the coming period.

### **Increasing SAQ response rates.**

The current response rate to our Supplier Self-Assessment Questionnaire (SAQ) is low, and not all suppliers across our reporting subsidiaries had been fully registered in our Supplier Due Diligence system at the time of this report. As a result, the 2025 SAQ results do not yet provide complete coverage of all reporting subsidiaries. Improving this is a priority, as broader supplier registration and a higher response rate give us a more complete basis for identifying and acting on risks. In the coming period, we will complete the registration of outstanding suppliers and strengthen our follow-up routines — including reminders and prioritised outreach to suppliers in higher-risk countries — so that all reporting subsidiaries are covered on an equal basis.

### **Closing corrective actions.**

A number of corrective action plans remain open or have not yet been completed. We are working to improve the rate at which corrective actions are submitted, followed up and closed, so that identified deviations lead to verified improvements.

### **Renewing expired social audits.**

We are prioritising the renewal of expired social audit certificates — in particular amfori BSCI and SMETA — among higher-risk suppliers, as these document working conditions at supplier sites and are required through our own policies.

### **Conducting site visits.**

No physical site visits were carried out during the reporting period. Given the concentration of suppliers in higher-risk regions, we will assess where on-site visits and audits can add the most value and plan these accordingly.

## Remediation and escalation

If Dalema's own operations are found to cause or contribute to negative impact on people or the environment, we will stop the activity and take steps to provide remedy. Where a supplier is responsible, they are expected to carry out remediation. Dalema companies may also offer support—such as guidance or local expertise—where this improves outcomes and builds long-term supplier capacity.

We follow a structured escalation model when non-compliance is identified, which includes:

- Corrective action plans
- Factory visits and follow-up
- Contractual consequences, including termination if needed

## Expanding our due diligence scope

During the current reporting period, our due diligence efforts have primarily focused on supplier-related risks. While risks within our own operations have been assessed at an overall level, we will further strengthen this work in future reporting periods. We will also expand our due diligence to include national-brand suppliers.

## Responsibility statement

We confirm that, to the best of our knowledge, this statement of our due diligence on human rights for the year ended 31 December 2025 has been prepared in accordance with the Norwegian Transparency Act. It provides a true and fair representation of the Group's policies, procedures, and actions related to human rights and decent working conditions in line with the requirements of the Act.

Stavanger, 30.06.2026

### Tor Henrik Knutsen

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Tor Henrik Knutsen  
CEO  
Boardmember  
Dalema Group

### Dag Leo Martinsen

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Dag Leo Martinsen  
Boardmember  
Dalema Group

### Christoffer Martinsen

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Christoffer Martinsen  
Boardmember  
Dalema Group



DALEMA