



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

# Account reporting year 2024 - The Norwegian Transparency Act

for Mediq Norge AS



*Ethical Trade Norway has assessed the report of Mediq Norge 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

Enterprises and the public sector have a great impact on people, society, the environment, climate, and animals and can both contribute positively to development, or negatively by causing harm. Enterprises therefore hold a central role in achieving UN's Sustainable Development Goals (SDGs) and the Paris Agreement's 1,5-degree target.

This report can be used as an account for the Transparency Act, but it has a broader scope with climate and the environment, circular economy, and anti-corruption indicators also being included. Our members are obligated to carry out due diligence and report annually on their work. Base level1 members also meet the Transparency Act's due diligence duty, and partially the Act's information duty.

Ethical Trade Norway's concept of responsible business conduct equals OECD's terminology and due diligence methodology. This is the systematic effort that enterprises do to identify, prevent, or mitigate adverse impacts and explain how they manage their risks of negative impact, as well as provide remediation to people, animals, society, and the environment where this is required – is called due diligence. Norwegian authorities expect all enterprises, regardless of their size, to carry out due diligence on society, the environment, and animals in accordance with the UN's Guiding Principles for Business and Human Rights (UNGPs) and OECD's Guidelines for Multinational Enterprises. This applies to enterprises, the public sector, and organisations.

Ethical Trade Norway's Declaration of Principles (our Code of Conduct) for Responsible Business Conduct covers the areas of decent work, human rights, environment/climate, anti-corruption, and animal welfare. This report is done in full transparency and in line with UNGP and OECD's guidelines. The reports of all members are publicly accessible on Ethical Trade Norway's website.

**Heidi Furustøl**

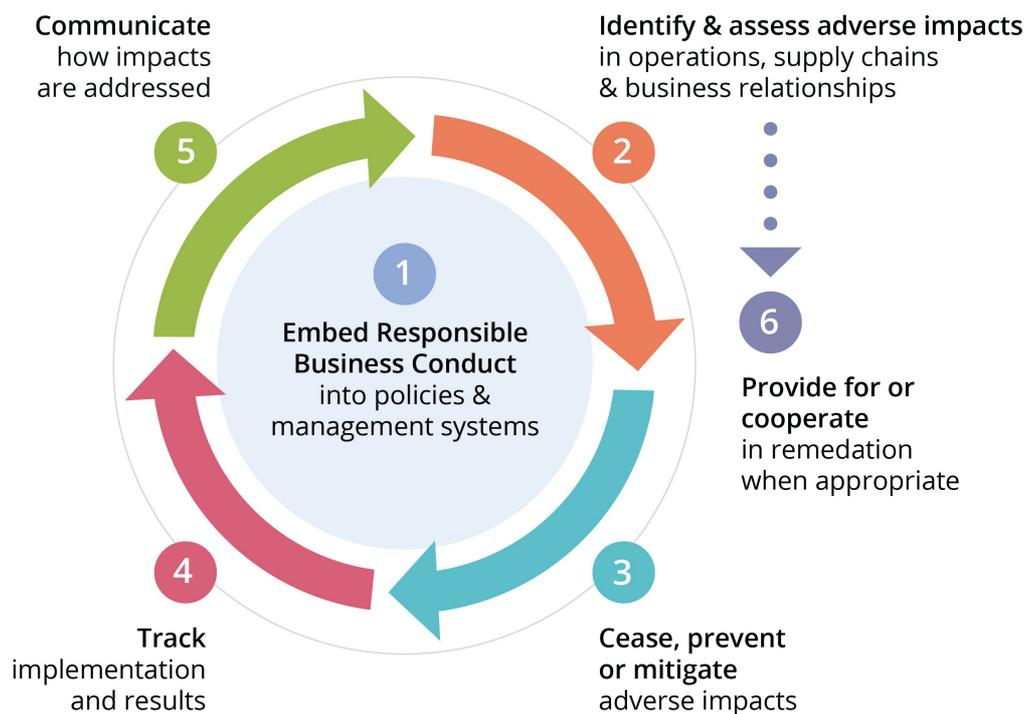
*Executive Director*

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 Managing Director

As a leading supplier of medical devices, Mediq Norge is naturally engaged in UN Goal 3 “Ensure healthy lives and promote well-being for all at all ages”. Our success relies on trust, transparency, and a commitment to sustainable and responsible practices. We examine the positive and negative environmental and social footprints we leave behind.

Our strategy is structured around four key pillars, aligned with relevant UN Sustainable Development Goals:

- Our products
- Our services
- Our operations
- Our people

Our ESG Strategy goes hand in hand with our core values:

- Caring heart
- Customer drive
- Champion spirit

We invite you to learn more about our ESG strategy through reading this report.

**" By doing business responsibly and sustainably, we are what we are today, a trusted partner to healthcare professionals, payors, patients and suppliers. Our business principles are founded on integrity: we do the right thing. "**



Joachim Warnberg  
Managing Director

Joachim Warnberg  
*Managing Director, Mediq Norge AS*

# Board Signature

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

Joachim Warnberg  
Managing Director

Philip Nadelmann  
Chairman, Board of Directors

Janke Berntsen Eriksen  
Board member, Board of Directors



# Enterprise information and enterprise context

## Key enterprise information

### Enterprise name

Mediq Norge AS

---

### Head office address

Brynsveien 14, 0667 Oslo

---

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

Mediq Norge sell and service medical devices and consumables to both public and private institutions and companies. We represent Mediq Own Brand products, like Klinion, Curion, Absorin and Cenaman. The Mediq Own Brand products are manufactured by our sister company, Medeco. We also represent a number of A-brand suppliers, such as: Werfen, Tactical Medical Solution, Sterisol, ROPOX, Solventum, Care of Sweden, Teleflex, Semperit and Boston Scientific.

---

## Description of enterprise structure

Mediq Norge AS imports, markets, sells and distributes Medical Devices, as well as install, service and maintains Medical Devices to the Norwegian market. Mediqs customers are primarily healthcare service, public and private institutions and companies. Like hospitals, healthcare institutions, general practitioners, army, police, wholesalers, first aid dealers and retail companies.

Mediq Norge AS is part of the Mediq Group with activities in 14 countries with 3000 employees.

The Mediq Group is owned by the private equity company Advent International.

Within Mediq Group, Medeco BV is the only company that has the Manufacturer role. Medeco is the Manufacturer of the Mediq Own Brands. Medeco chooses the products, contracts third-party producers and follows up the supply chain for the Mediq Own Brand products.

Mediq Norge acts as an Importer and Distributer of a large range of products from ~300 different suppliers. Medeco being one of them.

Our ESG policy and strategy are set by Top Management in Mediq Group. Top Management are supported by the ESG committee on Group level. The ESG committee consists of Top Manager representatives from Category, Sourcing, Supply Chain and HR. Committee is lead by Group ESG Manager. Ambitions related to PRODUCTS, SERVICES, OPERATIONS and OUR PEOPLE are set in our ESG strategy. (Further description in 1.C.1)

Road Map 2030 are developed to set actions in order to reach our ambitions set in our ESG Strategy.

The Top Manager representatives are responsible for cascading the ambitions and related actions through the chain of command.

Mediq Norge are closely linked to our mother and sister companies. Mediq Norge is based in Oslo. Warehouse is operated by our sister company Mediq Sverige based in Kungsbacka, Sweden. Several functions are organized cross-Nordic or on global level.

Such as; Supply Chain, Sourcing, Category Management, IT, HR, Finance, Masterdata and Tender & Contract.

For Mediq Norge, our Managing Director is overall responsible for ESG in Norway.

ESG related responsibilities are found across our organization:

- Finance is responsible for setting budget according to our ESG Strategy.
- HR is responsible for ESG training programs and Equality & Diversity programs.
- Sourcing is responsible for performing Due Diligence of Suppliers, as well as developing the Supplier relationship to improve sustainability and ethical trade.
- Supply Chain is responsible for Sustainable operations.
- Category/Product Management is responsible for Sustainable products in our assortment.
- Demand Planning is responsible for analyzing demand data to optimize order predictability.
- Supply Planning is responsible for executing regular ordering to suppliers based in forecast/demand data.
- Tender & Contract is responsible for positioning sustainable products with suitable product information in tender biddings, to enable customers to choose the more sustainable option.
- Marketing is responsible for publishing product information (i.e in webshop) to enable customers to choose the more sustainable option.
- Quality/Regulatory is responsible for assisting management in anchoring policies and developing processes related to ESG. And to support local organization in ESG issues.

---

## Revenue in reporting year (NOK)

442 029 000

---

**Number of employees**

61

---

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

Yes

---

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

During the calendar year of 2024 there were no new acquisitions or mergers for Mediq Norge.

---

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

Kari Solhus, Quality Manager / ESG coordinator

---

**Email for contact person for the report**

kari.solhus@mediq.com

---



## Supply chain information

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

Mediq Norge AS is 100% owned by Mediq BV, a European market leader which proudly serves more than one million customers.

The sourcing department, which is organized as a cross-Nordic function, as mentioned above, has a clear description of all the activities and decision-making authorities. Across the Nordic countries, we share many of the same suppliers.

Sourcing owns the relationship with suppliers within Mediq and negotiates prices, terms and conditions. Even if Sourcing owns the overall agreements with supplier, there are many different points of contact between Mediq and the supplier:

- Demand Planning evaluates the forecasts and sets the overall demand
- Supply Planning handles all purchase orders
- Finance handles supplier invoices
- Product Management evaluates the products

Mediq Norge has a well established internal Code of Conduct. "Policy for responsible business conduct" can be found on our website.

Based on our internal policy, we have developed a Supplier Code of Conduct which suppliers have to commit to. Ensuring that the Supplier signs and commits to our Supplier Code of Conduct is one of the responsibilities that Sourcing has.

---

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

310

---

### Comments

Commercial suppliers for Mediq Norge during the reporting year consists of 310. 264 of these suppliers are considered tail end suppliers (20% of spend).

---

### Type of purchasing/ suppliers relationships

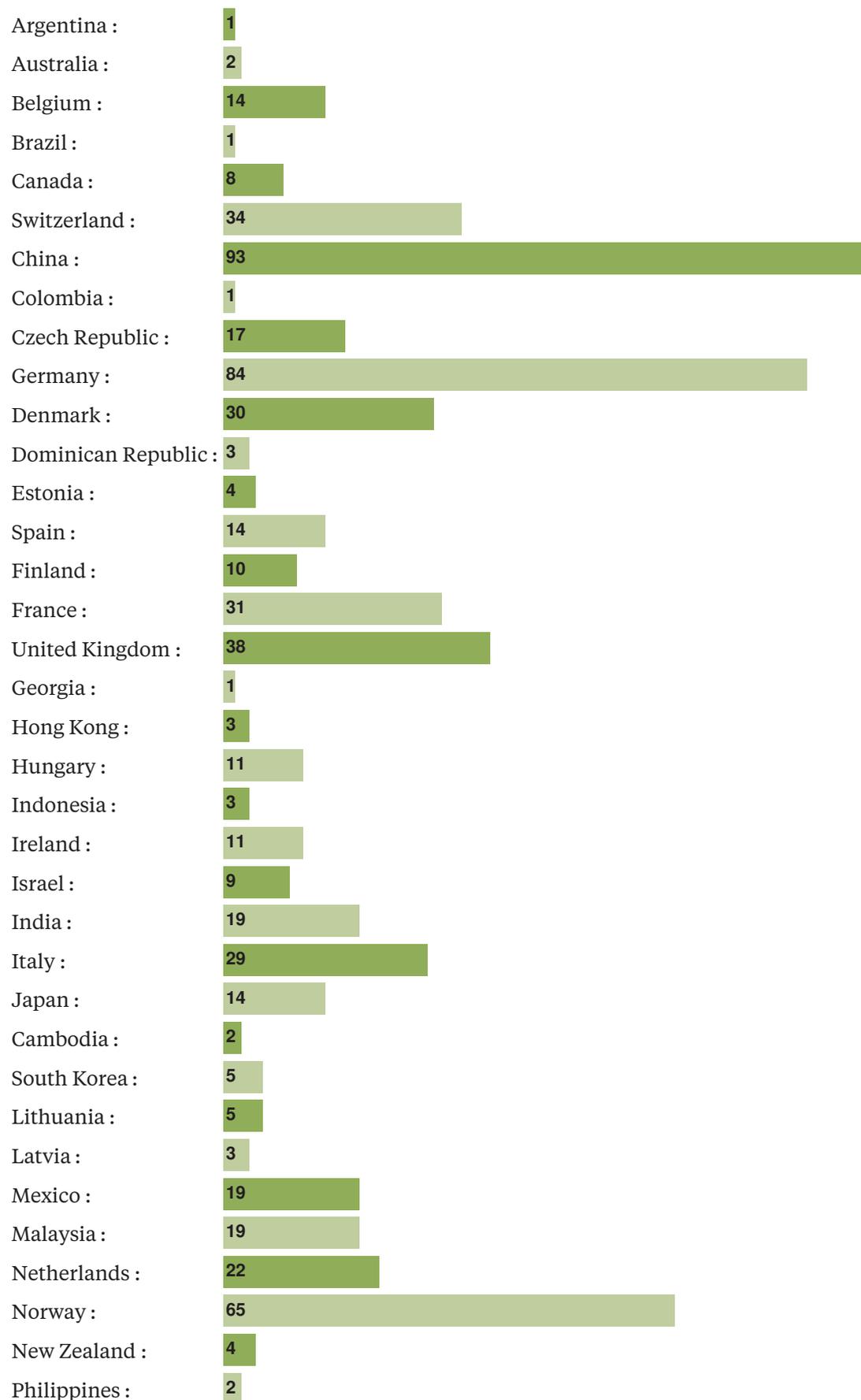


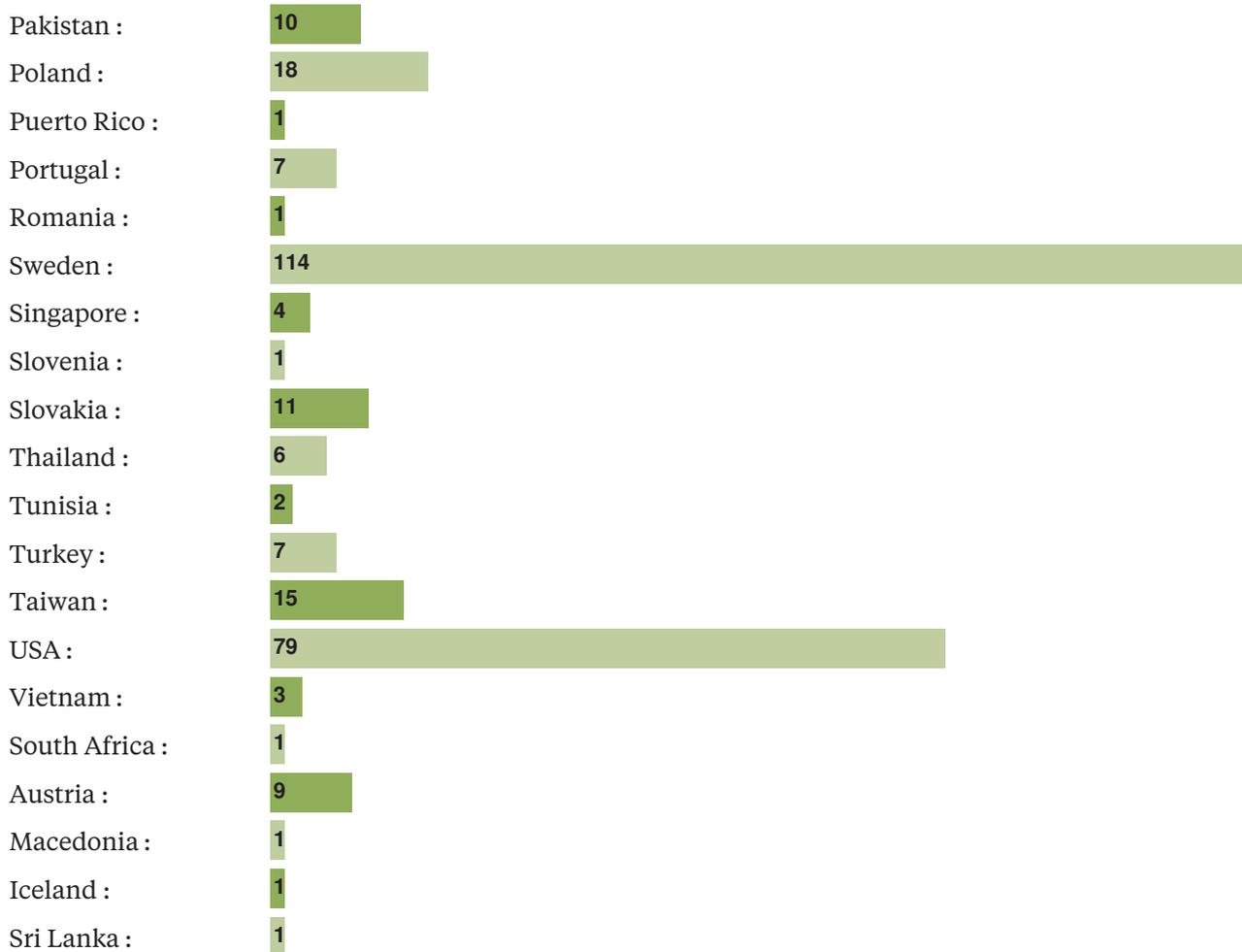
Mediq Norge is not a Manufacturer and do not own any manufacturing sites.

80% are purchased directly from the legal Manufacturer of the Medical Device. However, the legal Manufacturer may do their manufacturing at company owned factories, or at contracted factories. Often the legal Manufacturer provide articles manufactured from multiple factories and countries. And sometimes the legal Manufacturer manufacture the same product on different sites. This adds complexity to the supply chain.

20% are purchased from an Importer/Distributor.

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





Information of Country of Origin of product is collected from the supplier as part of the process when we create the different stock keeping units (SKU) in our ERP system.

In 2024 Mediq Norway had about 16.000 active SKUs.

The legal Manufacturer may do their manufacturing at both company owned factories or at contracted factories. Often the legal Manufacturer provide articles manufactured from multiple factories and countries. Hence, the list above of producers is larger than the number of suppliers.

---

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

**Number of workers**

17 181

---

**Comments to number of workers**

The numbers of workers are based on 35 suppliers.

---



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

<b>Cotton</b>	Global China India Pakistan
<b>Rubber</b>	Global Indonesia Thailand Vietnam
<b>Stainless Steel</b>	Global United Kingdom Indonesia South Korea Sweden
<b>Plastic</b>	Global Mexico USA
<b>Aluminium</b>	Global

Mediq Norge's assortment includes ~16.000 active articles. Mediq does not at this time routinely require our suppliers to confirm the country of origin of the Raw Materials for all of our products. This information is only collected for selected products.

The raw materials listed here are the main raw materials for our top categories, in no particular order. The countries and regions stated above are mainly stated due to them being large global exporters.

---

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

Yes

---



## Goals and progress

### Process goals and progress for the reporting year

1

**Goal:** 100% of our employee shall have completed our annual e-training of our Mediq Code of Conduct.

**Status:** 90% of our employees have completed our annual e-training module for our Mediq Code of Conduct.

2

**Goal:** 100% of our top 100 Nordic suppliers should sign Mediq's Supplier Code of Conduct.

**Status:** 94% of our top 100 Nordic suppliers have signed Mediq's Supplier Code of Conduct.

3

**Goal:** 100% of top 30 Nordic suppliers (by spend) from our Mediq High Risk list should be assessed by SAQ or 3rd party audit.

**Status:** Out of the list of top 30 Nordic suppliers 3 of them were internal suppliers in the Mediq group. 13 external suppliers have approved the Sedex membership. 10 of these external suppliers have completed the SAQ at Sedex.

We will continue encouraging our suppliers to approve the Sedex membership and complete the questionnaire through 2025.

4

**Goal:** 100% of our top 30 Nordic suppliers (by spend) sign "Confirmation on compliance with EU sanctions and regulations regarding trade with Russia" statement.

**Status:** 90% of our top 30 Nordic suppliers (by spend) have signed the statement "Confirmation on compliance with EU sanctions and regulations regarding trade with Russia".

## Process goals for coming year

1

Employee training:

100% of our employees shall have completed our annual e-training of our Mediq Code of Conduct.

2

Supplier Code of Conduct:

100% of our top 100 Nordic external suppliers should sign Mediq's Supplier Code of Conduct.

3

Supplier Assessment Questionnaire:

100% of Nordic external suppliers with Inherent Risk Score above 4,1 according to the Sedex screening methodology and with >0,1m EUR in annual spend, should be assessed by SAQ through Sedex (or equal assessment).

4

Russian sanctions:

100% of our top 100 Nordic suppliers (by spend) should sign "Confirmation on compliance with EU sanctions and regulations regarding trade with Russia" statement.

5

Sustainable assortment - Mediq Own Brand:

Increase share of our Mediq Own Brand products that are part of Mediq's "Care-to-Care" program.

6

Sustainable assortment - Mediq Own Brand:

Develop more LCAs.



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://mediqnorge.no/om-oss/csr>.

---

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

Mediq has established a set of Mediq Code of Conduct (<https://mediqnorge.no/om-oss/code-of-conduct>) which all companies in the Mediq Group need to comply to. This document highlights Mediq's core values and mission in addition to describing Mediq's expectations in regards to:

#### • **People and Environment**

- Safe Workplace
- Workplace violence
- Alcohol and drug-free workplace
- Human Rights (with listing of relevant conventions and guidelines)
- Anti-Discrimination
- Anti-Harassment
- Diversity, Equity & Inclusion
- Environment
- Animal Welfare

#### • **Business Integrity & Fairness**

- Conflicts of interest
- Anti-Kickback, Bribery and Corruption
- Dealing with government officials, Healthcare professionals, Healthcare insurers and other payors
- Quality
- Exports and anti-money laundering
- Antitrust and competition laws
- Gifts, entertainment, hospitality and donations

#### • **Safeguarding of company assets**

- User of company resources & property
- IT use guidelines
- Fraud
- Privacy & data protection

#### • **Instruction of reporting suspected breach of conduct on anonymous reporting hotline ([www.speakupfeedback.eu](http://www.speakupfeedback.eu))**

Based on our Mediq Code of Conduct, Mediq has developed a Supplier Code of Conduct (<https://mediqnorge.no/om-oss/csr>) that all companies in the Mediq Group use towards our suppliers. The Supplier Code of Conduct requires that our suppliers commits to the same principles throughout the whole value chain. The ethical guidelines are designed to ensure that products and services that we deliver complies with human- and labor rights.

Mediq Norge is ISO14001 certified. Our Environmental Management system support Mediq Norge to systematically work to minimize environmental impact and ensure operations in compliance with local laws and regulations. It allows Mediq Norge to continuously monitor and improve the way our business affects the environment. Our ISO certificates are published on our website (<https://mediqnorge.no/om-oss/isosertifisering>).

Mediq is committed to upholding ethical labor practices and procedures across all of its locations. Our responsibility in this area includes creating awareness and understanding of human rights, employment, and labor practices. By incorporating these principles into strategies, policies, and procedures, and living out our values, Mediq will uphold our responsibilities to people and environment, and set the stage for our customers trust.

Mediq supports and respects the protection of internationally proclaimed human rights, and we strive to ensure that we are not complicit in human rights abuses. We also uphold the freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced and compulsory labor, and

the effective abolition of child labor.

Our principles regarding the quality, environment and ethical labor practices are founded on UN and International Labor Organization conventions as amended or restated from time to time.

Mediq Norge uses our website to communicate how we commit to doing our due diligence in our supply chain, towards our external stakeholders. Our "Policy for Responsible Business Conduct" and a description of how Mediq work with Environmental Social Governance towards our suppliers are published on our website.

You can read more about Mediq ESG Strategy in pt 1.C.1 and on our website <https://mediqnorge.no/om-oss/csr>

---

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

The sender of our Mediq Code of Conduct is the CEO of Mediq Group.

The policy is on the agenda from board meetings down through sales meetings, purchasing meetings, and supplier contract.

Mediq Code of Conduct is developed by Top Management together with our Group ESG Committee. Local country ESG coordinators give their input to the Group ESG Committee.

Our Mediq Code of Conduct on group level are currently not describing policy for Regular Employment (ILO Convention No 95, 158, 175, 177 and 181). This is only stated in our Group Supplier Code of Conduct. Hence, Mediq Norge has a national policy document "Policy for responsible business conduct" to include this topic (<https://mediqnorge.no/om-oss/csr>).

This policy document is based on resources from Etisk Handel Norge, approved by the board of Mediq Norge and signed by Managing Director of Mediq Norge.

The Mediq Code of Conduct is part of our mandatory annual e-training module for all employees in Mediq Group.

The onboarding process of new employees at Mediq Norge also include face to face training on ESG topics with the local ESG coordinator.

Also, the company's intranet is used to communicate with all employees about the work on ESG topics and risks in the value chain. Including communication regarding our member reporting to the Ethical Trade Initiative in Norway, as well as the risks and issues we see in the markets we operate in.

Our Mediq Code of Conduct applies to all employees, officers, and directors of Mediq and governs all our decisions and actions, whether in our offices, warehouses, in the boardroom, at customer or supplier premises. This Code is at the center of everything we do. It reinforces our Core Values. We require that all our suppliers commit to our Supplier CoC, to ensure that the same principles are followed throughout the value chain.

Mediq Norge has established internal procedures related to ESG in our Management System.

Mediq Norge is certified according to ISO9001 and ISO14001.

## 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 ESG policy and strategy are decided by our CEO for Mediq Group. Our Managing Director for Norway is overall responsible for ESG within Norway.

Within Mediq the responsibility for Supplier Due Diligence is placed to our Sourcing department. The reporting lines within Sourcing are:

- CEO
- Chief Product Officer
- Sourcing Director Nordics & Baltics
- Sourcing Manager Nordic
- Sourcing & Ethical Trade Specialist Nordic

Chief Product Officer Sourcing is part of our Group ESG Committee (as previously described in pt “Description of Enterprise Structure”). Hence, the Chief Product Officer Sourcing have been part of developing our ESG Strategy. The role is responsible for implementing actions throughout the reporting lines for the different countries to ensure we will meet our ambitions set out in our ESG Strategy. A Road Map 2030 have been developed. Personal incentives are set to ensure adherence to the Road Map 2030.

The Nordic countries in Mediq have many shared functions, such as Sourcing. The Nordic countries share many of the same suppliers. Nordic Sourcing Specialist is responsible for the practical performance of the Supplier Due Diligence for the Nordic countries, by the use of the external company Sedex.

Procedures for Due Diligence and how we collaborate with Sedex is developed on Group level with input from the local organizations.

During 2024 the different Mediq countries have further worked on harmonizing our Ways of Working. All Mediq countries now use Sedex as partner for Due Diligence.

Sedex (Supplier Ethical Data Exchange) is a global non-profit organization headquartered in London, UK. It operates one of the world's largest collaborative platforms for sharing responsible sourcing data on supply chains. Sedex enables businesses to efficiently manage and report on ethical and responsible practices within their supply chains, addressing issues such as labor rights, health and safety, environmental impact, and business ethics. Through its platform, Sedex facilitates transparency and collaboration among companies, suppliers, and stakeholders to drive improvements in supply chain sustainability.

The annual report of Due Diligence for Responsible Business Conduct are shared with and signed by the board of Directors.

Group ESG Manager assist Top Management in anchoring policies, developing processes and tools related to ESG, and to support all business units (Mediq Countries) in ESG matters.

The local country ESG Coordinators assist local Management, ensure local routines, coordinate reporting and internal communication, as well as promoting local requirements up to Group level.

### **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?**

Mediq has set up an e-training module "Mediq's Ethical Guideline" in our digital tool "Mediq Academy". The e-training includes a video presentation from our CEO, an explanation of why we need a Code of Conduct and the actual Mediq Code of Conduct. The theoretical training is followed by a test. The e-training module is mandatory for all employees on all levels and must be performed annually.

On local level, the onboarding process at Mediq Norge include a section of ESG training conducted by the local ESG coordinator in Mediq Norge. This training is face-to-face training that includes more details about local Norwegian requirements and stakeholder expectations.

Personnel with specific tasks related to Due Diligence have Job Descriptions that describes these responsibilities and tasks. This applies for i.e Nordic Sourcing Specialist and local ESG Coordinator.

Individual training programs are set up for new employees within these roles. The training program includes process descriptions and procedures in our Management System, as well as materials and webinars available at Etisk Handel Norge.

Personal incentives related to ESG are implemented for dedicated personnel in 2024.

---

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

Mediq ensure suitable competence for performance of Due Diligence for responsible business conduct by setting up individual training programs for dedicated employees. The training program includes:

- Relevant processes and procedures in Mediq Management System
- Etisk Handel Norge resources, courses and webinars
- Training and guidance from Sedex
- Sharing of best practices in Supplier & Customer meetings
- Sharing of best practice internally
- Negotiation courses
- Leadership programs
- Higher educations

## 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?

Mediq Norge AS strives towards responsible business conduct that respects people, society and the environment. Mediq considers responsible business conduct to be a prerequisite for sustainable development, meaning that today's generation get their needs covered without compromising the ability of future generations to meet their own needs.

This is in line with our Core Values: Caring Hearth, Customer Drive and Champion Spirit.

Mediq have transitioned from a CSR-focused approach to a more encompassing ESG model. For those unfamiliar, while Corporate Social Responsibility (CSR) has traditionally emphasized ethical operations and sustainability initiatives, the Environmental, Social, and Governance (ESG) framework takes a broader view. ESG not only addresses the negative impacts, but focuses on minimizing those impacts and redirecting them toward creating positive outcomes.

This enhanced strategy encapsulates our entire value chain — from the production phase of our products to their eventual disposal by end-users.

Our strategy is structured around four key pillars:

- **Our products**

We deliver products with minimal environmental impact – keeping circularity as our guiding principle – that are ethically produced.

- **Our services**

We provide services and solutions to enrich the quality of life of patients and people working in healthcare and support the sustainability transition in healthcare.

- **Our operations**

We operate minimizing waste, use of packaging material, emission in transport and energy use in buildings. Keeping circularity as our guiding principle.

- **Our people**

We develop and empower engaged, healthy and diverse people.

You can read the full description of Mediq's ESG Strategy, with description of the four key pillars, focus areas, ambitions and corresponding UN sustainable development Goal, on our webpage.

<https://mediqnorge.no/om-oss/csr>

<https://mediq.com/about-us/environmental-social-governance>

Our ESG Committee have developed a Road Map against 2030, in order to reach our Ambitions that are outlined in the ESG strategy.

For Mediq Norge the definition of our ESG strategy and setting a Road Map against 2030 is essential for being a player in the public tender biddings and to comply to the Norwegian Transparency Act.

See further description of resources and organizational set up in "Description of enterprise structure" and 1.B.1.

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

Mediq Group have anchored the responsibility of the ESG strategy in the functional reporting lines up to Top Management representatives, for the key areas PRODUCTS, SERVICES, OPERATIONS and OUR PEOPLE. In 2024 personal goals related to these key areas in our ESG strategy have been developed and followed up through this functional reporting line, to promote achievements within our ESG ambitions.

See "Description of enterprise structure".

The local management team is responsible for following up on the work on local level, with the different support functions in the Nordic countries, with regards to responsible business conduct and sustainability, with the Managing Director as overall responsible.

A local ESG Champion team have been appointed with representatives from different areas, covering Sourcing, Product Management, Operations, Governance etc. The focus of the local ESG Champion team is to initiate local actions according to our ESG ambitions from Mediq Group.

The team reports to local Management Team.

The board is informed of status via this annual reporting.

---

## 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?

As part of the process that our Nordic Sourcing department follows when a contract with a new supplier are to be entered, Mediq require that our Supplier Code of Conduct is read, understood and signed. The Supplier Code of Conduct is a mandatory attachment to the commercial agreement. The Supplier CoC require that our suppliers commit and adhere to the requirements, that they have the training and tools to do so, and that they shall be able to document their efforts to secure compliance with the local laws and our Supplier Code of Conduct at our request. This also applies to any sub-supplier. Mediq may terminate the relationship with any supplier, third party representative or other business partners that fails to meet the standards in this Code after a reasonable period of time for remedying a breach.

Other attachments to our commercial agreement include "Guidelines for environmentally adapted choice of products".

Our minimum requirements to our suppliers include that they shall sign our Mediq Supplier Code of Conduct, or provide us with an equal statement. This commits the Supplier to actively communicate the content of the Supplier Code of Conduct to their workers as well as to their suppliers. The Suppliers must at minimum require that its suppliers (our second tier supplier) acknowledge and implement a corresponding Code of Conduct requirements. The Supplier Code of Conduct also requires the Supplier to provide Mediq with information by responding to supplementary questionnaire, as well as allowing Mediq or 3rd party to perform audits. (As listed in pt 6 in Supplier Code of Conduct).

All new manufacturing partners for Mediq Own Brand products are subject to a supplier visit and evaluation with a multifunctional team.

As described in EHN report for 2023, Mediq changed our partner from Factlines to Sedex in 2023. During 2024 we have developed our collaboration with Sedex and defined routines and responsibility regarding screening of suppliers within the Sedex system. Sedex provides us with digital solutions and services, to monitor how closely our suppliers comply to the Mediq Supplier Code of Conduct and to identify areas for follow-up. Prioritized concerns are followed up with the supplier.

To communicate Mediq policies, Mediq Norge has uploaded "Policy for responsible business conduct" and "Responsible Sourcing Program" to our website: <https://mediqnorge.no/om-oss/csr>.

Mediq acknowledge that our purchase practices influence the suppliers ability to comply to our CoC. It is important for our suppliers to have predictability and Mediq strive to give good and accurate information of forecasts to our suppliers. To ensure this our Demand Management team analyze demand data to optimize order predictability and regularity. During 2024 our Demand team was expanded to enable even more precise predictability. Supply Planning is responsible for executing regular orders based on well-founded demand data.

---

## Indicator

**% of our top 100 Nordic suppliers that has signed our Mediq Supplier Code of Conduct, or provided equal statement.**



Our top 100 suppliers are relative stabile. However, new suppliers come from time to time. Sometimes there are mergers or splitting of companies at our suppliers, so there are naturally some changes in the list.

---



## 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?

According to our strategy described in EHN report for 2023, Mediq have set up collaboration with Sedex to ease the strain of social auditing/questionnaires for the suppliers. By using Sedex we now have access to a pool of audit reports to supplement the SAQ data.

During 2024 we have focused on getting our prioritized suppliers connected to the Sedex platform, collecting and analyzing SAQ results and audit reports. For the suppliers that have accepted Sedex membership, Mediq now have increased transparency, enabling more targeted dialogue with our suppliers. This process will continue in 2025.

However, we also experience challenges related to resistance from some suppliers to accept Sedex membership, as cost of Sedex membership and SMETA audits falls on the supplier. Other suppliers see the value of connecting to Sedex to reduce the amount of different questionnaires and social audits from their customers.

Mediq also see that environmental requirements from our public customers have increased.

Stricter requirements for emphasizing climate and environmental considerations in public procurement came into effect on 1 January 2024. The main rule is now that climate and environmental considerations must be weighted by a minimum of 30 percent, with exceptions if specific conditions are met.

Examples of requirements we meet in public tenders:

- Manufacturer have committed to Science Based Target Initiatives
- Ecolabelled products
- Zero emission transport

As Norway is the first country requiring this substantial weighting of environmental consideration in public tenders, this sets a new pressure on our suppliers. We have experienced that for some of our suppliers, the tender requirements speeds up the internal processes related to sustainability. However, there is also a risk that some Manufacturers will not prioritize putting their Medical Device on the Norwegian market.



## 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
Breach of labor- and human rights for employees at suppliers on Mediq High Risk List. (Medical supplies in our categories Personal protection, Surgical & OR and Wound care & compressions / Medical supplies from selected countries. )	Occupational Health and safety Wages Working hours Regular employment	China Malaysia
Environmental impact from Transport Emissions, Energy use in buildings, Packaging Materials and Waste.	Environment Emission Greenhouse gas emission Energy Waste Use of materials	Global Norway Sweden
Conflict areas / War zones		Israel Russia Belarus

Mediq Norge AS is an importer/distributor of Medical Devices. We do not have our own production. Our suppliers are typically a legal Manufacturer that either does their own manufacturing, or have contracted the manufacturing to another partner. In this way Mediq Norge are directly linked to the manufacturing either through one or more entities.

Among the sources for risk assessment that are described in pt 2.A.2, we have found that the high risk product groups medical consumables/equipment and textiles, work clothes and footwear from DFØ's "The high-risk list" at Anskaffelser.no represent our portfolio very well.

From this we have reviewed our different product categories and chosen to prioritize suppliers of the following Mediq Product Categories:

- Surgical & OR, and sub-category Instruments
- Wound care & compression, and sub-category Compression
- Personal Protection, and sub-categories Examination Gloves & Personal Protection

Mediq has also prioritized to focus environmental impact from Transport Emissions, Energy use in buildings, Packaging Materials and Waste.

---

## 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.**

As mentioned earlier in this report, Mediq Own Brand products are manufactured by our sister company, Medeco, in the Mediq Group. The production is outsourced to strategic manufacturing partners. Medeco follows the same framework as the rest of Mediq Group, based on our common Code of Conduct. In order to have close control of the contracted manufacturing partners, Medeco has up until 2024 used Amfori BSCI as partner for Due Diligence. Since 2024 Medeco has worked with Sedex, which is now the chosen partner for responsible business for all Mediq companies. See further description in pt 1.B.1.

In addition to the Mediq Own Brand product provided by Medeco, Mediq Norge has about 300+ external suppliers. Some of them are the legal Manufacturer, others are Importers or Distributors. The legal Manufacturers may have multiple production sites. Some of the production sites might be their own, while others are contracted production sites. This results in a very large amount of production sites. For this reason we need to prioritize and focus our work.

Going into 2024 Mediq Nordics chose to do screening of our suppliers based on type of product. As mentioned in pt 2.A.1 Mediq has found that the high risk product groups medical consumables/equipment and textiles, work clothes and footwear from DFØ's "The high-risk list" at Anskaffelser.no represent our portfolio very well. Based on this, Mediq identified our corresponding product categories:

- Wound care & compression & sub-category Compression
- Personal Protection & sub-categories Examination Gloves & Personal Protection
- Surgical & OR & sub-category Instruments

With information about risk countries provided by Sedex and the high risk product groups identified above, we created our "Mediq High Risk List". All suppliers that deliver products within these high risk countries and high risk product categories were flagged in this list. Medeco being one of them. For our due diligence in 2024 the suppliers on the high risk list were prioritized according to the spend the previous year.

In 2024 this resulted in 30 selected high risk suppliers.

3 of these were internal suppliers within Mediq Group.

2 of these turned out to not have any spend in 2024.

The remaining 25 external High Risk Suppliers represented 11% of the Nordic spend in 2024.

Sedex invites Mediq suppliers to link with Mediq on the Sedex platform and once they are linked with Mediq, they are asked to fill in a self-assessment questionnaire (SAQ).

When the SAQ is completed, the supplier is analyzed by Sedex and get a combined risk score based on the SAQ answers & the overall inherent risk. Based on the combined risk scores and Mediq internal policy/requirements, Sedex recommends which sites to prioritize for audits.

When a high risk site is audited, the auditor upload a Corrective Action Plan Report (CAPR) to the Sedex platform, containing any non-compliances found during the audit and a recommended time frame for corrective action. Once audits are completed, Mediq's Ethical Trade Coordinator at Sedex reviews the CAP reports and follow up on the suppliers at highest risk to ensure that they take agreed actions on the non-conformities.

As mentioned in the 2023 report, Mediq Nordics changed from using Factlines to Sedex as responsible business partner for our Due Diligence. During 2024 the focus has been on encouraging suppliers from our defined High Risk list to approve Sedex membership, encourage them to complete the SAQs, to analyze and act on the results

as they come.

### **Status for our external suppliers:**

- 13 out of 25 Nordic High Risk suppliers (not including internal trade within Mediq Group) have approved the Sedex membership.
- 10 out of the 13 suppliers have completed the SAQ in full.
- 8 completed SAQs resulted in a combined Risk Score lower than 4,1 and was degraded to a Low Risk supplier.
- The remaining 2 of the 10 suppliers that have completed the SAQ, resulted in a combined risk score above 4,1 and had a spend above 0,1mEUR. Both entities supply Mediq via the same production site. Sedex are in process of booking full 4-pillar SMETA audit.

### **Status for our Mediq Own Brand manufacturing partners:**

Based on SAQ answers 23 manufacturing partners was identified to require audit.

- 5 manufacturing partners have performed audit with unsatisfactory results
- 8 manufacturing partners have performed audit with satisfactory results
- For 10 manufacturing partners Sedex are in process of booking full 4-pillar SMETA audit

In addition to questionnaires and audits, we act on information about risks that come to our attention in other ways. This could be from customers, business partners, news articles and reviewed journals.

The findings were communicated to and followed up with the Suppliers by Mediq, for further dialogue to solve issues.

Information on prioritized risks, results and assessment of collected information was shared with Category- and Product Management, so findings could be used to further work with the product selection. This information was also used towards our customers either when discussing in direct meetings where ESG was a topic, or in the surveys that we received from them.

### **Sedex risk assessment steps:**

#### Self-Assessment Questionnaire (SAQ) - Collecting data

Suppliers complete the SAQ about their business practices and upload this into Sedex platform. The SAQ covers the following topics:

- Workplace Impact
- Management Systems for Code Implementation
- Freely Chosen Employment
- Freedom of Association
- Health and Safety
- Living Accommodation
- Children and Young Workers
- Wages
- Working Hours
- Discrimination
- Regular Employment
- Discipline and Grievance
- Environment
- Business Ethics

#### Risk Assessment (Radar) - Assess data & risk

Sedex assesses the information provided by suppliers using Radar. Radar is their comprehensive risk assessment and analysis tool. Members use Radar to understand what the most likely issues in their supply chains are, even at the earliest stages of risk assessment.

Radar uses hundreds of data sources to produce scores, on a scale of 0 – 10.0. See list of indicators and sources at end of this text.\*

These scores act as an indication for the level of risk within different countries and industries. The higher the score, the higher the risk.

For example, in the “Working Hours” issue area, a score of 10 would indicate that workers are at the highest risk of working excessive hours.

Radar also incorporates data on the businesses suppliers, where this is available from audits and the self-assessment questionnaire, to produce unique risk scores for individual sites in a supply chain.

Sedex Members Ethical Trade Audit (SMETA) - Assess data & risk, analyze & report  
Higher risk suppliers are requested to undergo a SMETA audit by a third party.

Reporting tools (Analytics) - Analyze & report data  
Data is analyzed and reported using Sedex analytics.

E-Learning & Training - Learn how to implement improvements  
Sedex provides e-learning and guidance to resolve audit non-compliances and improve social, ethical and environmental business practices.

### **Areas not covered in this report:**

In regards to products we assess as low risk, we have not performed any follow up actions in 2024. Nor any actions towards our service providers, that are based in Norway, Sweden or Northern Europe, as we consider these countries to be low risk. The extent of activities for these suppliers are limited to getting our Supplier Code of Conduct signed.

### **Further development:**

By the end of 2024 Mediq developed a common way of working with the Sedex tools for screening of suppliers for all Mediq companies. Going forward Mediq will do screening using the Sedex "Inherent Risk Score", of all new suppliers as part of the onboarding process as a minimum criteria. Existing suppliers will be reassessed every 2 years. Meaning that for 2025 Mediq Nordics will discontinue using DFØs list of high risk products. Mediq aim to follow the following thresholds:

Scores between 0-3,9 are considered "Low Risk".

- From these suppliers we will require only signature of Supplier Code of Conduct.

Scores between 4,0-5,9 are considered "Medium Risk".

- For supplier with lower spend than 0,1 million EUR, we will require only signature of Supplier Code of Conduct.
- For suppliers with higher spend than 0,1 million EUR, we will require signature of Supplier Code of Conduct and performance of Supplier Assessment Questionnaire.

Scores between 6,0-10 are considered "High Risk".

- For these suppliers we will require signature of Supplier Code of Conduct and performance of Supplier Assessment Questionnaire.

Based on Inherent Risk Score and results from SAQ, a Combined Risk Score is calculated. For Suppliers with Combined Risk Score >4, a Social Audit is required.

### **Sources\*:**

- High risk products - The Norwegian Agency for Public and Financial Management (DFØ)  
<https://www.anskaffelser.no/public-procurement/socially-responsible-publicprocurement/information-about-high-risk-products>

Topic - Indicator - Source (as used by Sedex):

- Gender - Gender inequality - Index United Nations Development Programme (2024)
- Gender - Global Gender Gap - World Economic Forum (2023)
- Gender - Women, Business and the Law Custom subset - World Bank (2024)
- Forced Labour - Forced Labour Index - Ergon Associates (2022)
- Freedom of Association and Collective Bargaining - ITUC Global Rights Index - The International Trade Union Confederation (ITUC) (2024)
- Health, safety & hygiene - Environmental Performance Index (EPI): Sanitation & Drinking Water - Yale University (2022)
- Health, safety & hygiene - Global Health Security (GHS) Index: Social resilience - Nuclear Threat Initiative (NTI), the Johns Hopkins Center for Health Security (JHU), The Economist Intelligence Unit (EIU) (2022)
- Health, safety & hygiene - The Notre Dame-Global Adaptation Index (ND-GAIN) Country Index - University of Notre Dame (2023)
- Children & Young Workers - Children's Rights in the Workplace - Global Child Forum and UNICEF (2023)
- Wages - 2023 Country Reports on Human Rights Practices - US Bureau of Democracy, Human Rights and Labor (2024)
- Wages - Poverty headcount ratio at \$6.85 a day (% of population) - World Bank (2024)
- Working Hours - Mean weekly working hours actually worked per employee - ILO (2017-2024)
- Discrimination - Group Grievance - Fund for Peace (2023)

- Discrimination - Global Slavery Index vulnerability Model: Disenfranchised groups - Walk Free Foundation (2023)
- Discrimination - Freedom in the World - Freedom House (2024)
- Regular employment - Wage and salaried workers, total (% of total employment) - World Development Indicators World Bank / ILO (2023)
- Business Ethics - Corruption Perception Index - Transparency International (2024)
- Biodiversity - Environmental Performance Index (EPI): Biodiversity & Habitat - Yale University (2024)
- Biodiversity - Environmental Performance Index (EPI): Forests (previously "Ecosystems services") - Yale University (2024)
- Energy & Emissions - Environmental Performance Index (EPI): Climate Change Mitigation - Yale University (2024)
- Water - Water Stress Index - World Resources Institute (2023)
- Waste and pollution - Environmental Performance Index (EPI): APE – pollution emissions - Yale University (2024)
- Waste and pollution - Environmental Performance Index (EPI): WMG – Controlled solid waste - Yale University (2024)

---

## 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.**

Mediq have during 2024 continued to follow up our suppliers in regards to the Russian sanctions. We have requested that our suppliers sign a "Confirmation on compliance with EU sanctions and regulations regarding trade with Russia".

Concerning the Israel/Palestine conflict Mediq assessed suppliers and manufacturing sites in Israel to see if they are based within the conflict areas of Golan heights, West Bank or Gaza. None of our suppliers are related to these areas. We will continue to follow the situation closely.



### 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

	<p><b>Breach of labor- and human rights for employees at suppliers on Mediq High Risk List.</b>  <b>(Medical supplies in our categories Personal protection, Surgical &amp; OR and Wound care &amp; compressions / Medical supplies from selected countries. )</b></p>
<p><b>Goal :</b></p>	<p>Reduce negative impact on labor- and human rights.</p>
<p><b>Status :</b></p>	<p>Due Dilligence for our supply chain performed in collaboration with Sedex.</p> <p>Status for Mediq Nordic external suppliers:</p> <ul style="list-style-type: none"> <li>• 13 out of 25 Nordic High Risk suppliers (not including internal trade within Mediq Group) have approved the Sedex membership.</li> <li>• 10 out of the 13 suppliers have completed the SAQ in full.</li> <li>• 8 completed SAQs resulted in a combined Risk Score lower than 4,1 and was degraded to a Low Risk supplier.</li> <li>• The remaining 2 of the 10 suppliers that have completed the SAQ, resulted in a combined risk score above 4,1 and had a spend above 0,1mEUR. Both entities supply Mediq via the same production site. Sedex are in process of booking full 4-pillar SMETA audit.</li> </ul> <p>Status for our Mediq Own Brand manufacturing partners:  Based on SAQ answers 23 manufacturing partners was identified to require audit.</p> <ul style="list-style-type: none"> <li>• 5 manufacturing partners have performed audit with unsatisfactory results</li> <li>• 8 manufacturing partners have performed audit with satisfactory results</li> <li>• For 10 manufacturing partners Sedex are in process of booking full 4-pillar SMETA audit</li> <li>• Open Non-conformances are monitored and followed up directly with the supplier</li> </ul>
<p><b>Goals in reporting year :</b></p>	<p>100% of our top 100 Nordic external suppliers should sign Mediq' Supplier Code of Conduct.</p> <p>100% of top 30 Nordic suppliers (by spend) from our Mediq High Risk list should be assessed by SAQ or 3rd party audit.</p>

**Describe already implemented or planned measures :**

During 2024 our collaboration with Sedex have developed and we have been able to improve transparency in our supply chain further.  
Critical/Major non-conformities have been identified.

Examples of Non-Conformances, where new follow-up audits have been scheduled to check effect of the planned corrective actions:

-At a manufacturing site of personal hygiene products the following was discovered:  
No recent fire drills have been organized covering all shifts, including unambiguous attendance records.  
No/inadequate eye wash/shower station in hazardous environments including chemical areas.  
Lack of adequate/appropriate signings in high risk areas on usage of PPE.

-At a manufacturing site of personal hygiene products the following was discovered:  
Workers hired by one of the external labor providers worked overtime, but was not being paid overtime allowance.  
Systems to verify that labor providers or on-site subcontractors are following ethical recruitment practices were inadequate or not consistently applied.

-At a manufacturing site of gloves the following was discovered:  
Fire license, inspection or certificate not in place as required by law.

Examples of Non-Conformances where new follow-up audits have been performed, and verified by the auditor to be no longer an issue:

-At a manufacturing site of gloves the following was discovered:  
Inaccurate or incomplete records, significantly impacting the progress of the audit  
Unable to verify working hours due to missing/incomplete/inconsistent records

Besides the direct follow-up via new audits, Mediq strive to impact the practice of our suppliers through open dialogue by our Sourcing department.

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

More detailed knowledge are already giving us a better platform to drive the dialogue for improvement with our suppliers.  
Mediq will continue the collaboration with Sedex to screen our supplier with Inherent Risk Score, request SAQs of prioritized suppliers based on Inherent Risk Score, request audits of prioritized suppliers based on Combined Risk Scores, and follow up on identified Non-conformances.

	<b>Environmental impact from Transport Emissions, Energy use in buildings, Packaging Materials and Waste.</b>
<b>Goal :</b>	To be climate gas neutral and circular company.
<b>Status :</b>	Group KPIs and reporting lines have been set for various KPIs related to environment.
<b>Goals in reporting year :</b>	<p>Continue reporting on our established KPIs. Evaluate trend and effect of various project to reach set targets.</p> <p>Examples of KPIs:</p> <ul style="list-style-type: none"> <li>- We aim to decrease residual waste with a year-by-year reduction of 5%.</li> <li>- We aim to decrease electricity consumption with a year-by-year reduction of 2%</li> <li>- We aim to decrease packaging carton consumption with a year-by-year reduction of 2%</li> <li>- We aim to decrease packaging plastic consumption with a year-by-year reduction of 2%</li> <li>- We aim to decrease CO2 emission per kg sent by pallet/parcel with a year-by-year reduction of 5%</li> </ul>

**Describe already implemented or planned measures :**

Mediq has implemented several actions to reduce transport emission and amount of packaging materials used in our warehouse. This includes working close with our transport partner to optimize for emission neutral transport. We use transport partner that is market leading in terms within sustainability.

Efforts to reduce transport of air include optimizing transport box size, by use of AI driven calculation of order volume and using automatic packaging process that cut the height of box sides according to content level.

Mediq use transport boxes of unbleached fibers with high degree of recycled materials, that are FSC certified and labelled with recycling information.

Efforts to reduce use of plastic include using carton instead of plastic as fill material and using cellulose material for delivery note pouch. Upgrade of machines for plastic wrapping that stretches the plastic more efficiently.

We only use transparent plastic for wrapping of pallets to ensure recyclability.

Mediq encourage customers to place orders in whole transport boxes, to avoid repacking into new packaging materials. We help customers in different ways to avoid rush orders outside of predefined delivery dates and reduce number of delivery dates as far as possible.

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

As Mediq Norge and Mediq Sverige share Warehouse in Kungsbacka. It is not possible to separate consumption of electricity, plastic and carton between the two companies.

We do see a slight increase of electricity consumption at Warehouse. This is due to taking larger areas into use as preparation of consolidating warehouse for Mediq Danmark AS into the same warehouse facilities in Kungsbacka. The consolidation is planned to take place in Q2 2025. Hence, we expect further increase in electricity consumption in 2025.

However, electricity in our warehouse is guaranteed 100% fossil free. Heating is by district heating.

We also see an increase in waste that is linked to clearing space as preparation for the consolidation of the warehouse for Mediq Danmark.

We also see a slight increase of carton consumption/order line. We have identified the cause to be increase of smaller orders from our customers. We will continue to work with our customers to avoid small and frequent deliveries when this can be avoided.

Electricity consumption in Norway offices are reduced by 7,4% from 2022 to 2023, and by 9,8% from 2023 to 2024.

Average CO2 emission pr shipped pallet was reduced by 18% from 2023 to 2024.

Average CO2 emission of chargeable weight (kg) shipped by parcel has increased by 1,6%, but at the same time we see that the parcels have traveled on average 2,14% longer.

	<b>Conflict areas / War zones</b>
<b>Goal :</b>	Ensure that Mediq Norge comply to sanctions in Norwegian laws, and stakeholder expectations in matters concerning conflict areas/War zones.
<b>Status :</b>	Action have been taken to ensure that Mediq Norge have no commercial connection to Russia and Israeli companies based in illegally occupied areas.
<b>Goals in reporting year :</b>	Ensure that Mediq Norge comply to sanctions in Norwegian laws, and stakeholder expectations in matters concerning conflict areas/War zones.

**Describe already implemented or planned measures :**

Mediq have during 2024 continued to follow up our suppliers in regards to the Russian sanctions. We have requested that our suppliers sign a "Confirmation on compliance with EU sanctions and regulations regarding trade with Russia".

Concerning the Israel/Palestine conflict Mediq assessed suppliers and manufacturing sites in Israel to see if they are based within the conflict areas of Golan heights, West Bank or Gaza.

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

90% of our top 30 Nordic suppliers (by spend) have signed the statement "Confirmation on compliance with EU sanctions and regulations regarding trade with Russia".

None of the products offered by Mediq Norge have Country of Origin in Russia or Belarus.

None of our suppliers are related to the conflict areas of Golan heights, West Bank or Gaza.

Mediq will continue to monitor closely on development in conflict areas / war zones.

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

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

A Road Map against 2030 are developed to to steer all Mediq countries to reach our ambitions. We have set an ambitious overall environmental goal of working towards GHG emission neutral and circular business. To achieve this we focus on our Products, Services, Operations and Our People.

#### **Products:**

We have intensified our collaboration with our suppliers with focus on developing our Care-to-Care selection, with circularity as a guiding principle, rooted on the concept of the 9R's of sustainability; rethink, refuse, reduce, reuse, rehome, repair, restore, recycle, and rot.

This includes developing both the product and packaging. More LCAs are being developed for Mediq Own Brand products. Information is collected from our external suppliers on external products and updated in our ERP system.

We take our responsibility for collection and recycling of waste as member of Grønt Punkt for Packaging Material and NORSIRK for EE-products and batteries.

#### **Services:**

We focus on supporting the sustainability transition for Healthcare providers, by offering advisory services focusing on assortment transition towards more sustainable disposables and reusables. Services may also include efficient assortment and inventory management that helps healthcare professionals streamline the process of ordering medical supplies and managing hospital stock levels. Hence, avoiding rush orders or returns. This solution not only simplifies the ordering process but also aids in organizing shelving and inventory planning.

For complex Medical Technical Equipment we provide technical preventative maintenance, not only to ensure safe use, but also to ensure equipment meet the expected lifespan.

Some type of equipment can be returned to Mediq, for refurbishing and to re-enter device to market. However, this can only be done in line with governing regulations for Medical Devices to ensure the safety of the patients.

#### **Operations:**

We focus on minimizing waste generation, use of packaging material, emission in transport and energy use in buildings.

Office buildings is classified as BREEAM NOR- Very Good. Heat pump is used for both heating/cooling. Sensor regulated LED lighting.

Our warehouse facilities source 100% fossil free electricity and uses district heating.

Transport are done with partners preferably with zero emission vehicles, or minimum with Euronorm class 6 vehicles. Transport by air is strictly done when it can not be avoided, i.e for long distance transport of temperature sensitive medical devices.

#### **Our People:**

To reach our ambitions it is essential that our people are engaged. Engaged people will be achieved by focusing on aligning work to our strategy and by enabling, empowering and developing our employees. We focus on training and setting personal goals aligned with our strategy.

We focus on limiting employee travels. Digital meetings have become a standard practice in society. Company car fleet are transitioned to electric or hybrid cars. For travels within local area of headquarters of Oslo, public transport is preferred. Office is centrally located in Oslo close to train, subway and bus. Electric bikes are made available for our employees free of charge.

Mediq Norge are certified according to ISO14001.

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

As part of our preparations for CSRD reporting, Mediq have conducted Dual Materiality Assessment to determine which topics to report on. Our material topics include amongst others; E1 – Climate Change – Mitigation, Adaption and Energy.

Related to SDG 13 Climate Action, Mediqs ESG Strategy focuses on two of our four pillars; PRODUCTS and OPERATIONS.

- Mediq focuses on delivering PRODUCTS with minimal environmental impact. In addition to active collaboration with our suppliers to find more sustainable products and materials, to increase the amount of ecolabelled products in our assortment, we focus on making it easy for our customers to choose the more sustainable option. For example through clear labelling in our webshop and customer trainings.
- Mediq invests in sustainable OPERATIONS to minimize waste, use of packaging material, emission in transport and energy use in buildings. Our offices are BREEAM – Very Good certified. Our warehouse facilities source 100% fossil free electricity and uses district heating. Transport services is sourced from market leading transport providers with ambitious climate targets.

Mediq Group have in 2024 further developed our collaboration with ClimatePartner.

ClimatePartner is a sustainability-focused company that helps businesses calculate, reduce, and offset their carbon emissions. Through their software tools and expertise, ClimatePartner assists us in identifying areas where we can minimize our environmental impact and take meaningful steps towards carbon neutrality.

---

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

Mediq does it utmost in regards to its purchasing practices to be a trusted long-term partner to its suppliers and business partners.

We collaborate closely with our suppliers to create predictability, transparency and efficiency, as we believe this is the key to success for both parties.

Mediq focus on achieving qualified and reliable data of forecasts to be communicated to our suppliers, for the suppliers to plan by. Our Demand Management team analyze demand data to optimize order predictability and regularity. Supply Planning is responsible for executing regular orders based on well-founded demand data.

By having this close collaboration with our suppliers, we strive to have the right goods in stock at the right time and at the same time the suppliers have predictability for optimal production- and stock planning. Hence, avoiding to handle rush orders that put strain on suppliers, or trigger need for transport by air.

The Nordic countries in Mediq strive to have a common core of products. By acting as one party towards our suppliers, all the Nordic countries can utilize a wide range of assortment. This allows Mediq to reduce the need to purchase products outside of the agreed assortment, which can be challenging for the suppliers. This effort supports Mediq to be a stable buyer, as it hopefully reduces the need for non-planned purchases which can strain the supplier and the supplier relationship over time. Being a stable buyer is positive both for the production planning, as well as eliminating the need for transport by air.

---

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

Mediq have launched our own "Care-to-Care" selection. Our Care to Care selection is the result of careful evaluation and a commitment to transparency. Our team assesses each item in this selection to ensure it meets our sustainability standards based on the goal of becoming circular by 2050. While achieving full circularity in healthcare may still be a distant goal, we firmly believe in taking steps now – even if they are small - to achieve a more sustainable future. That's why our Care to Care selection criteria are rooted in the 9 R's of sustainability: rethink, refuse, reduce, reuse, rehome, repair, restore, recycle, and rot.

Products in the Care to Care selection are labelled with a special symbol in our webshop, to help our customers choose a more sustainable option.

You can read more about our ambitions related to products in our Care to Care selection in our ESG Strategy (<https://mediqnorge.no/om-oss/csr>).

### **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**

Our Code of Conduct includes the following point; Freedom of Association and the Right to Collective Bargaining (ILO Conventions Nos. 87, 98, 135 and 154).

Our suppliers are required to comply with this and also forward this requirements to its suppliers. Topic may also be discussed with the suppliers in meetings if we suspect any risks associated with this, and in this way raise awareness. This topic can typically be flagged as an issue in the Supplier Assessment Questionnaire responses.

---

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

Competence within our own organization in ethical trade and sustainability is considered critical in today's market. To ensure suitable competence, Mediq conducts both individual and collective training depending on the employees position. Collective E-training is provided via our platform "Flowsparks" and relevant topics are also part of the agenda on internal meetings.

Individual training for key personnel are described in pt 1B3.

Mediq do not contribute directly to development, capacity building and training of suppliers and workers in the supply chain in terms of funding different programs at this time, but we work closely with suppliers which allows us to support each other in terms of sharing information, best practices, etc. Via Sedex all members, both buyers and suppliers, have access to a range of training. Mediq encourage our prioritized suppliers to become Sedex members.

---

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

Corruption is a key topic in our internal Code of Conduct. Employees are encouraged to report breaches of our ethical guidelines through standard reporting lines. In addition Mediq has a hotline to facilitate anonymous reporting.

All employees are annually trained in our Code of Conduct through our e-training module.

Corruption is also a key topic in our Supplier Code of Conduct.

We also experience that customers and other business partners reach out to us for commitment on these topics. Which we welcome.

---

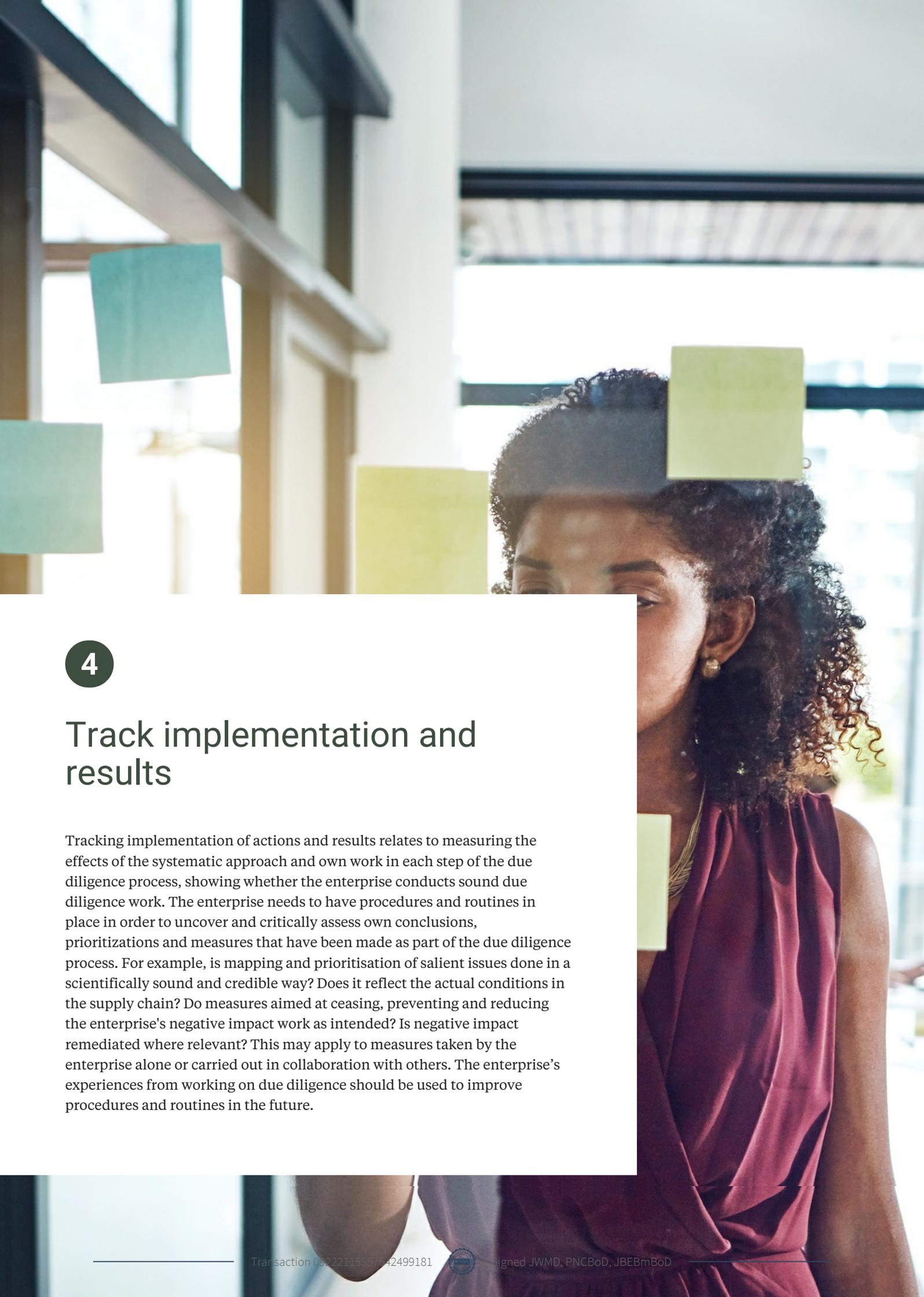
### **3.B.8 Other relevant information concerning the enterprise's work to reduce, prevent, and manage negative impact**

We hope you will follow Mediq Norge via LinkedIn to read news of small and large measures that Mediq does to reduce, prevent, and manage negative impact on people, animals, society and the environment.

According to our value "Caring Heart" we strive to help people in need. Mediq have historically been a contributor by donating medical equipment and personal protective equipment in crisis situations across the world.

Mediq Norge and Mediq Sverige share warehouse facilities in Kungsbacka. We collaborate with the Swedish non-profit organizations Human Bridge ([humanbridge.se](http://humanbridge.se)) and Våra Barn ([varabarn.nu](http://varabarn.nu)). In 2024 we donated a total of 60 pallets of medical- and personal protective equipment via Human Bridge and Våra Barn.

Mediq is at the heart of healthcare, and we leverage this unique position to collaborate closely with healthcare partners to accomplish sustainability transition in healthcare.

A woman with curly hair, wearing a maroon dress, is looking at several yellow sticky notes attached to a wall in a meeting room. The room has large windows and a wooden structure. The sticky notes are in various colors, including green and yellow.

## 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.

As described earlier in this report, Mediq collaborate with Sedex. All suppliers are first screened by assessing the inherent risk, which is based on country and business sector type.

Suppliers rated as Low Risk or as Medium Risk and with <0,1m EUR spend, are considered not to require further investigation for the next two years.

Suppliers rated as High Risk or as Medium Risk and with >0,1m EUR spend, are considered target for further investigation by Supplier Assessment Questionnaire.

Order of priority for Sedex membership and SAQs are suppliers with the highest inherent risk.

Our dedicated Ethical Trade Coordinator at Sedex follows up the suppliers to facilitate that the questionnaires are completed and unclarities sorted out. The SAQs answers are scored and combined with the Inherent Risk score. The Combined Risk Score is used to prioritize which Suppliers to follow up with a social audit. Audits are performed by accredited audit 3rd party companies. Auditor upload the SMETA audit report and the SMETA Corrective Action Plan Report (CAPR) to the Sedex platform. Critical non-conformances are expected to be closed within 3 months. Our dedicated Ethical Trade Coordinator at Sedex follows up on status of the CAPR. In case a supplier refuses to sign Supplier Code of Conduct, perform social audit or CAPR are overdue, this is escalated to respective Mediq Sourcing Director to establish an action plan and inform Chief Product Officer. Other certifications can replace a SMETA audit. Such as EcoVardis platinum or gold, Amfori BSCI A or B, SA8000 Valid, RBA platinum or gold.

### **Roles and responsibilities within our Responsible Sourcing Program**

#### **Global Sourcing Excellence**

- Designs, assess and review this Standard Operating Procedure (in line with ESG Manager)

#### **SEDEX Ethical Trade Coordinator**

- Run Supplier Inherent Risk Assessment
- Request supplier to Acquire Sedex Membership and Perform SAQ / Audit/ CAPR
- Escalate to Local Sourcing Team/MOB when supplier refuses to comply with steps above
- Provide reports on Group, Regional and MOB levels

#### **Local Sourcing (Nordic Sourcing Department)/Non-Trade Teams**

- Ensure compliance with this SOP in their respective regions/ MOB Business
- Provide updated suppliers status/contacts to Responsible Sourcing Analyst
- Escalation point to communicate directly with suppliers on issues raised by Responsible Sourcing Analyst
- Define plan for non-compliant suppliers and align with CPO
- Reporting lines are described in 1.B.1

#### **ESG Manager**

- Can be accessed to provide guidance about actions and decisions which are alleged to be in violation of the Mediq Supplier Code of Conduct.
- Monitor new regulations and relevant developments to safeguard that our approach and standards remain up to date.

#### **Chief Product Officer (CPO)**

- Informed and consulted beforehand about suppliers which are alleged to be in violation of the Supplier Code of Conduct and remedial actions (including any potential supplier relationship termination or suspension).

Global Sourcing Excellence, Sedex Ethical Trade Coordinator and local Sourcing& Ethical Trade Specialist conducts weekly meetings to monitor and follow up progress. Typically agenda has included:

- Status of invited suppliers to the Sedex platform
- New suppliers to be onboarded to the Sedex platform
- Evaluation of suppliers to be escalated for audit

---

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

The key for Mediq to ensure that measures taken actually work, is through 3rd party audits.

When audit results are satisfactory or fair, Mediq consider the supplier to be compliant to our standards and we set the Supplier up for reevaluation in two years.

When audit results are not satisfactory or fair, Mediq consider supplier to be incompliant to our standards. A Corrective Action Plan Report needs to be performed by the Supplier. And a Follow-Up Audit is performed.

An example is a glove manufacturer in Malaysia that we mentioned in our 2023 report, that previously have been found to use recruitment fees for foreign workers. Both follow-up audits performed in 2023 and 2024 show no indication of use of recruitment fees for foreign workers.



## 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

Mediq Norge has published our Policy for responsible business conduct and our annual report for Due Diligence for Responsible Business Conduct (EHN) on our website; <https://mediqnorge.no/om-oss/csr>.

We have close direct dialogue with our suppliers and follow up directly to explore issue and initiate development.

Customers have access to our published information. Customers are also informed directly. Key customers perform annual supplier assessments which include our level of maturity related to ESG.

Mediq Group rely on use of external competence to perform audits and to follow up on mitigating actions. i.e. audits by SMETA.

---

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

Openness creates confidence, also regarding challenges in the supply chain. Mediq communicates it's work on this topic in several ways, such as:

- Directly to customers in customer meetings with this topic on the agenda
- Through this report/ESG reports published on our website (<https://mediqnorge.no/om-oss/csr>) and on social media

---

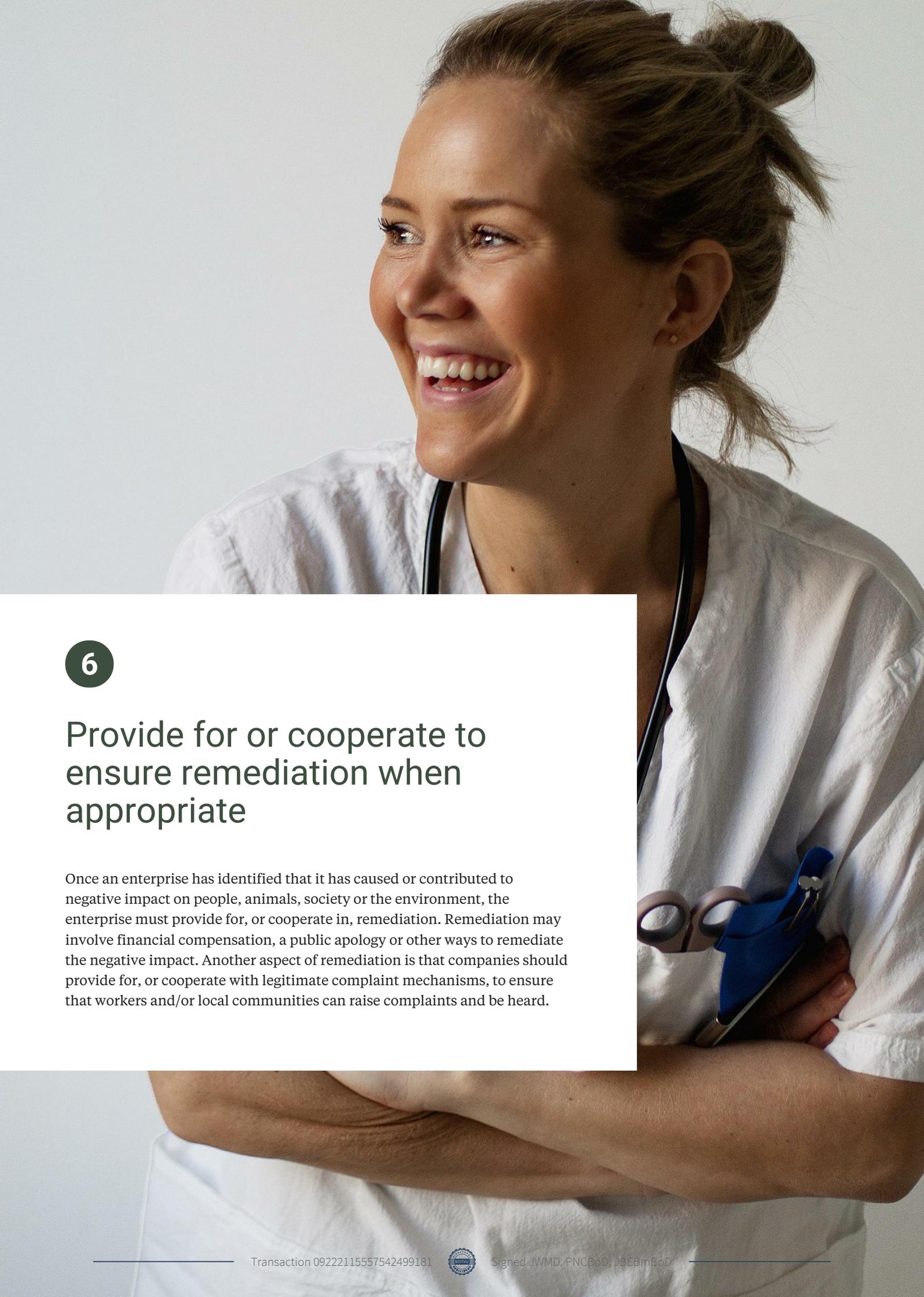
### 5.A.3 Describe the enterprise's routines for answering external inquiries related to the information requirement imposed by the Transparency Act

Any inquiries from external parts about ESG and compliance to the Transparency Act is routed to the local Norwegian ESG coordinator.

ESG coordinator involves Sourcing or other resources on Group level in case of need.

As our ESG follow up of our suppliers are risk based, we may not have all answers that are inquired.

If so, our answer then include description of how Mediq has prioritized and why.



## 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

Our Policy for responsible business conduct is based on template from Etisk Handel Norge.

The policy states: "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."

---

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

In 2024 we have no examples of cases where Mediq was responsible for the negative impact, resulting in remedy actions.

However, Mediq is directly linked to identified negative impact through purchase of goods from suppliers.

Regarding the example mentioned in pt 3.A.1, where workers hired by external labor providers did not receive overtime allowance, the supplier has started a due diligence process to ensure that human and labor rights for all workers are not violated. To ensure that workers hired by external companies receive same compensation as their own workforce. Follow-up audit to ensure remedy and proper systems are booked by Sedex.

---

## 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

Mediq have an internal speakup feedback hotline where all employees can report issues. This can be done anonymously, if desired. Contact information is easily accessible in our Mediq Code of Conduct, to which we run annual e-training for all employees.

Regarding grievance mechanisms in the supply chain, Mediq investigate the availability and quality of mechanism through our SAQs.

The SAQ include questions such as:

- Whether grievance mechanisms are a formal process, available in suitable language for workers and local community.
- What kind of reporting mechanisms are available (i.e through Unions, Worker Committees, Recruiter, Labor provider or Our Supplier).
- Whether the process protects the confidentiality of the person, protects against intimidation and retaliation.
- Whether the remediation are documented and shared with stakeholders within reasonable timeframe.
- Training and language of people handling cases.

Contact details:

Mediq Norge AS

Kari Solhus, Quality Manager / ESG coordinator

kari.solhus@mediq.com

etiskhandel.no



# Verification

Transaction 09222115557542499181

## Document

### Mediq Norge AS

Main document

48 pages

*Initiated on 2025-03-25 15:32:18 CET (+0100) by Etisk handel Norge (EhN)*

*Finalised on 2025-04-02 16:27:57 CEST (+0200)*

## Initiator

Etisk handel Norge (EhN)

*info@etiskhandel.no*

## Signatories

Joachim Warnberg Managing Director (JWMD)

*joachim.warnberg@mediq.com*

*Signed 2025-03-25 18:05:05 CET (+0100)*

Philip Nadelmann Chairman, Board of Directors

(PNCBoD)

*philipmorch.nadelmann@mediq.com*

*Signed 2025-03-31 14:26:09 CEST (+0200)*

Janke Berntsen Eriksen Board member, Board of Directors (JBEBmBoD)

*janke.eriksen@mediq.com*

*Signed 2025-04-02 16:27:57 CEST (+0200)*

This verification was issued by Scrive. Information in italics has been safely verified by Scrive. For more information/evidence about this document see the concealed attachments. Use a PDF-reader such as Adobe Reader that can show concealed attachments to view the attachments. Please observe that if the document is printed, the integrity of such printed copy cannot be verified as per the below and that a basic print-out lacks the contents of the concealed attachments. The digital signature (electronic seal) ensures that the integrity of this document, including the concealed attachments, can be proven mathematically and independently of Scrive. For your convenience Scrive also provides a service that enables you to automatically verify the document's integrity at: <https://scrive.com/verify>

