



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

Account reporting year 2024

for Orkla House Care AS



Ethical Trade Norway has assessed the report of Orkla House Care 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

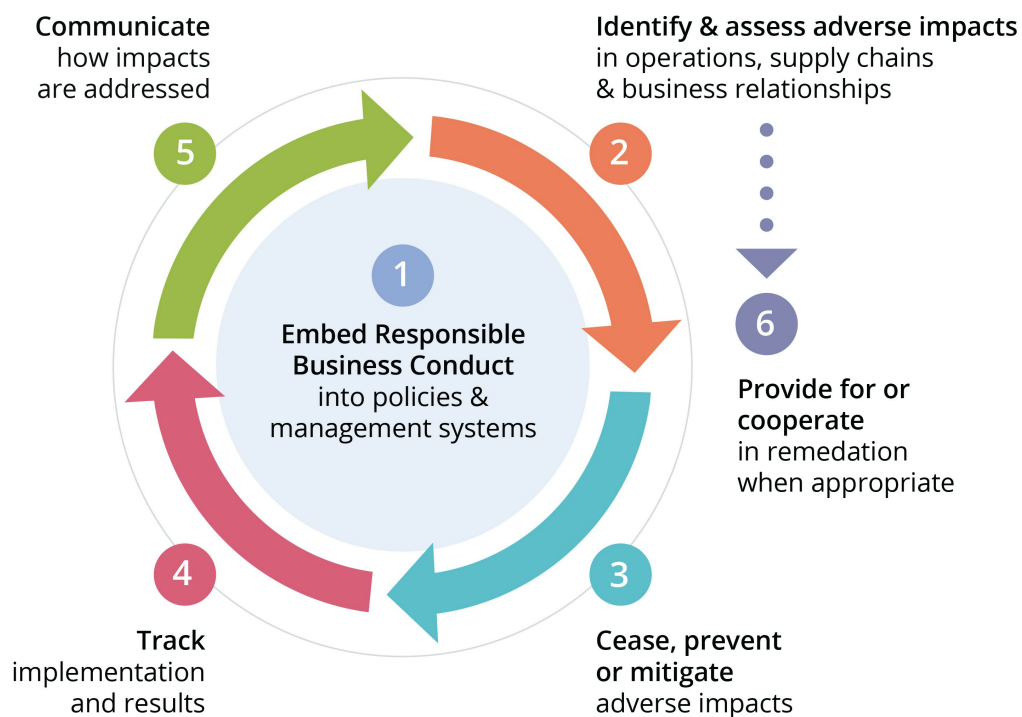
Executive Director

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 CEO

At the end of 2023 we launched our new strategy, which included establishing 'Sustainable Business' as a core pillar with four key focus areas – protecting our environment, supporting people and communities, enhancing governance and ethics, and ensuring financial strength. During 2024 Orkla House Care has made considerable progress in our journey to make the sustainability agenda an integral part of our work by operationalizing these principles through concrete plans and actions which will help us to pave the way forward to creating positive and measurable change.

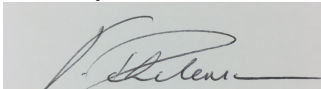
One of the most noteworthy milestones was the establishment of our CO2e baseline, a key step in understanding and managing our environmental impact. By improving the capturing and management of data, we have laid the groundwork for future reductions in emissions and strengthened our ability to prioritize actions that will have a positive impact. This initiative serves as a cornerstone of our environmental commitment, ensuring that Orkla House Care remains accountable in its pursuit of sustainable development.

Another significant achievement was the launch of our Double Materiality Assessment. This forward-looking exercise enabled us to evaluate financial and non-financial impacts across our value chain, ensuring that our decisions are informed by a robust understanding of risks and opportunities. By integrating this assessment into our broader business strategy, we have enhanced our capacity for responsible decision-making and continue to demonstrate our dedication to transparency and accountability.

Additionally, we conducted an extensive Due Diligence process, aligned with internationally recognized frameworks such as the UNGPs and OECD standards. Through a series of cross-functional workshops, we rigorously risk-assessed our activities and addressed potential or actual negative impacts. The results of this work are shared in this report and reflect our commitment to building and maintaining trust with our internal and external stakeholders.

These initiatives, among others, are not isolated efforts but integral components of a broader strategy to embed sustainable development into our ways of working. They are supported by a continuous intent to refine our governance, improve our data collection and management systems, and evolve our Key Performance Indicators (KPIs). We recognize that sustainability is an ongoing journey, and we remain committed to maturing our processes and enhancing collaboration across our value chain to be a business that contributes to positive change.

Sincerely,



Vicky Philemon
CEO

Board Signature

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

Maria Syse-Nybraaten

Chair of the board

Jostein Brekka

Board member

Marte Helene Sølvsberg

Board member

John Mitchell Cowley

Board member

Tom Martti Waltasaari

Board member



Enterprise information and enterprise context

Key enterprise information

Enterprise name

Orkla House Care AS

Head office address

Drammensveien 149, 0277 Oslo, Norway

Main brands, products and services offered by the enterprise

Orkla House Care comprises Jordan, Anza, Hamilton, Spekter, SAM and Harris - six leading brands, offering painting tools and accessories to both DIYers and professional painters alike.

Description of enterprise structure

Orkla House Care Norge AS is a Norwegian company with subsidiaries in Sweden, United Kingdom, Denmark, Belgium and China. All subsidiaries within the group are ultimately fully owned by Orkla House Care Norge AS. The companies vary in size and operations and conduct their part along our complete value chain, from idea to finished painting tool. Our core products, painting brushes and rollers, are mainly produced by our own production sites in Sweden, the United Kingdom and China. The Nordic region, Benelux and United Kingdom are the home markets, however the products can be found in a number of countries around the world.

Orkla House Care Norge AS is fully owned by Orkla ASA, a Norwegian investment company focusing on branded consumer goods listed at the Oslo Stock Exchange.

In this report, we will refer to Orkla House Care (OHC) as the whole group.

Revenue in reporting year (NOK)

1 646 000 000

Number of employees

640

Is the enterprise covered by the Transparency Act?

Yes

Major changes to the enterprise since last and current reporting period

No major changes during reporting period (2024).

Contact person for the report (name and title)

Øyvind Nesbø - Sustainability Manager

Email for contact person for the report

oyvind.nesbo@orkla.no



Supply chain information

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

OHC has a portfolio of suppliers globally with an emphasis in China and northern Europe. Supplier selection is based upon a combination of quality, ethical status, direct manufacturer classification and cost price. Many suppliers have supplied the group for in excess of ten years, long term relationships is a strong preference.

The Strategic Procurement team is responsible for the relationships with these suppliers and have support from other colleagues in the organisation for supplier quality assurance, auditing and compliance.

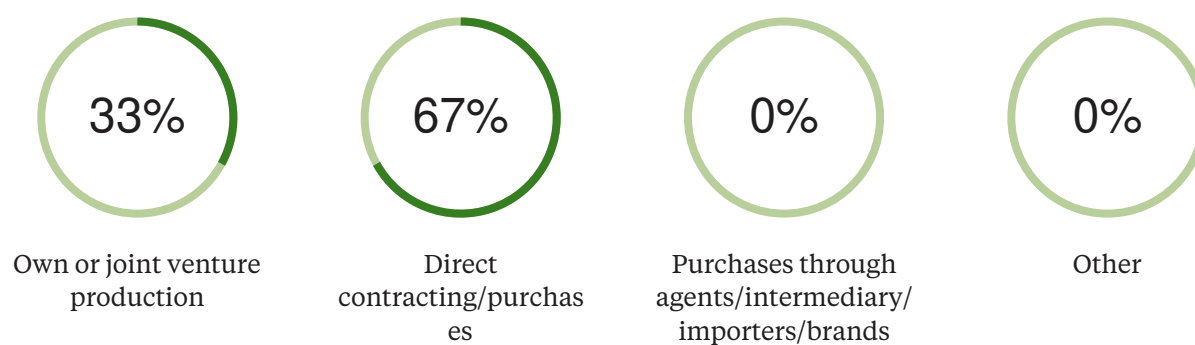
Number of suppliers with which the enterprise has had commercial relations in the reporting year

260

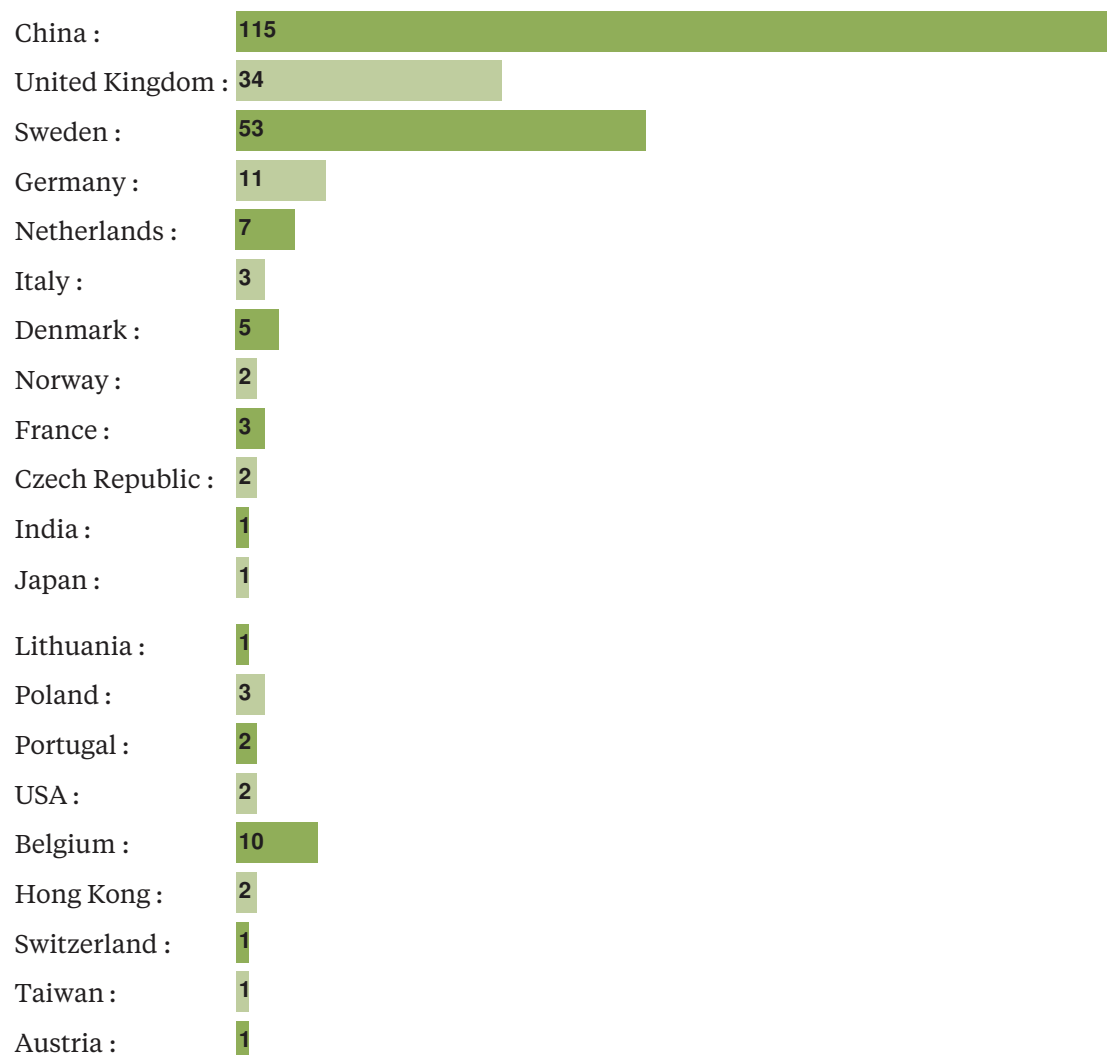
Comments

The number of suppliers is Tier 1 and includes suppliers of finished goods and raw materials.

Type of purchasing/ suppliers relationships



List of first tier suppliers (producers) by country



We have a stable and well-established supplier base with whom we maintain long-term and close collaborations. The list of suppliers is based on spend for the reporting year. Purchasing volume increased by 10% in 2024 compared to 2023 due to higher demand. This partly explains a higher number of reported suppliers this year.

During the last couple of years, OHC has worked on transferring the management of existing suppliers to Orkla Supplier Portal. We experience we have a more accurate and aligned list of suppliers where the 'counted' number of suppliers have increased somewhat since previous reporting, even if the suppliers are not new to OHC.

In 2024 we on-boarded one new supplier located in Sweden.

State the number of workers at first tier producers

Number of workers

9 300

Comments to number of workers

Estimated 8000-8500 workers

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

Polypropylene	China The European Union
CR Steel	China Germany
HDG Steel	China The European Union
PET Monofilament	China The European Union
Aluminum	China The European Union
ABS	China

Orkla House Care purchase both raw materials and finished goods from our supply base. The materials stated are a general list and is not exhaustive and excludes packaging.

Is the enterprise a supplier to the public sector?

No

Goals and progress

Process goals and progress for the reporting year

1

Establish CO2e emission baseline, including Scope 3.

Goal :

We will establish a cross functional group to scope the project, decide on calculation model and data management, and aim to have a full baseline including Scope 1, 2 and 3 by end of year 2024. Results and findings will support our updated targets, goals and action plans related to emission reduction and the environment.

During 2024, OHC established a full CO2e baseline, aligned with the GHG Protocol, emission hotspots identified.

Development of reduction plan on-going, with target setting for 2030 and 2045 to be concluded.

Status :

Scope 1: 163 tCO2e

Scope 2: 223 tCO2e (market based) / 2065 tCO2e (location based)

Scope 3: 47,255 tCO2e

2

Due Diligence & Double Materiality

Goal :

The foundation for responsible business conduct, including existing and coming legal requirements on ESG, requires proper due diligence. Aligned with the UNGPs/OECD framework, and Orkla ASA owner requirements, we are establishing systems and tools to support management of, and conducting of human rights (including labor rights, environmental and economic (including anti-corruption) due diligence. Double Materiality is a specific assessment of risk, which we will conduct for the first time during 2024. We expect to improve our communication and reporting of our work with responsible business conduct in the years ahead, and the findings from our due diligence will be subject to prioritization and reporting, aligned with the OECD 6-step process. Concrete action plans will also follow from our due diligence and Double Materiality processes.

Status :

Double Materiality Assessment (DMA) conducted August 2024, providing insight into most material topics for OHC from both an impact and financial perspective. DMA also provided input to OHC reporting to Orkla ASA annual sustainability report.

OHC Sustainability Policy Commitment, Due Diligence methodology and grievance mechanism finalized and implemented in 2024, publicly available on <https://www.orklahousecare.com/sustainability/sustainability-commitment/>

3

Data Collection & Management

Goal :

OHC recognizes the need for detailed, improved and verifiable data on the different areas of sustainability. It stems from e.g., legal requirements, customer demands and internal needs. During 2024 our goal is to identify and determine the broader scope of ESG data requirements, including data capture, management, analysis and reporting. We expect to focus on data capture this year, and depending on progress we will implement systems and tools to support proper ESG data management.

Status :

During 2024, OHC has further identified and determined the scope of ESG data requirements, and conducted several major data collection projects. As ESG and sustainability data requirements continues to evolve in both detail and complexity, we expect data collection and management in this area to continue being an important focus area for OHC in the years ahead. OHC climate account, CO2 reduction plan, product and innovation are example areas where continuous improvement in data quality and availability plays an important role moving forward.

Process goals for coming year

1

ESG Improvement Measures & Reporting

OHC continues our efforts to better structure the organisation and approach towards sustainability and responsible business conduct. During 2024 OHC established and updated its management systems for sustainability, implemented a Due Diligence processe, established a CO2e baseline, and reported against the CSRD/ESRS to Orkla ASA. In 2025, OHC plans to follow up on the results and outcomes from these initiatives. E.g., we identified hotspots in our emission baseline, gaps in our data collection and improvement areas related to how we measure and track our progress, and ultimately report. Based on this, OHC will continue building processes to capture both qualitative and quantitative aspects, such as ensuring more clear group targets on E, S and G, structured approach to data collection and analysis, and building on our CO2e emission reduction plan.

2

Due Diligence and Double Materiality

During 2025, OHC will keep 'Due Diligence and Double Materiality' as a separate workstream with aim to enable our work in this area to move to Business As Usual from 2026. This involves completing the impact reassessments for OHC Norway, OHC Sweden and OHC UK, and conduct our first impact assessment of OHC China during 2025. Also, defining the roles and responsibilities for all topics in the line organisation is an ongoing initiative, and will support implementation of sustainability Due Diligence into regular business operations. OHC plans to conduct our next Double Materiality Assessment in 2026.

3

Policy Development

Considering the significant volume of new and updated regulations and requirements in the field of sustainability, OHC sees a need for continuous development and evolution of related policies and operating procedures. To ensure compliance and drive towards responsible business conduct, OHC aligns with legal requirements, Orkla ASA owner requirements, and other applicable internal or external demands. We do not believe a separate policy for every single sustainability related topic is the best approach, as it might create better awareness and effect when combining related topics under one policy. We develop bespoke policies for separate topics where relevant and material, such as for anti-corruption, competition law, deforestation, environment, etc.

During 2025, 'Policy Development & Implementation' is a separate strategic workstream with aim to map applicable legislation and requirements and define required new or updated policies and operating procedures to be developed and implemented in the OHC organization.

4

Sustainable Sourcing

OHC is following Orkla's three step risk model for our suppliers. To improve our risk assessments, OHC will through 2025 further on-board all the existing supplier base (raw materials and traded goods) to the Orkla Supplier Portal and SMART. This allows for a more accurate management of the suppliers, including using functionality in the portal for efficient risk assessment based on SEDEX data. To be able to use the risk assessment tools, OHC also needs to improve internal supplier data like e.g. categorization, to have supplier's risk scores from the portal, this will be conducted during 2025.





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://www.orkla.com/code-of-conduct/>

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

Orkla House Care, as part of Orkla, commit to policies and requirements as listed on public webpage:
<https://www.orkla.com/guidelines/>

The policies and requirements encompasses Orkla's Corporate responsibility, Code of Conduct, Orkla Human and Labour Rights Policy, Animal Welfare, Anti-Corruption, Nature and Climate, and more.

Orkla annual sustainability report can be found here: <https://www.orkla.com/annualreport/>

Orkla House Care further shares information about our sustainability commitments here:
<https://www.orklahousecare.com/sustainability/sustainability-commitment/>

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

The Orkla Code of Conduct is annually approved by Orkla ASA Board of Directors. It is the Board and CEO of the individual Orkla legal entity's responsibility that the Orkla Code of Conduct and other Policies are implemented. Managers on all levels have responsibility for ensuring employees and other stakeholders are informed about Orkla Code of Conduct and internal policies and instructions. The roles and responsibilities for embedding the CoC is described in the CoC itself. E.g., all employees, including new hires, are required to read and sign the CoC.

The OHC Sustainability Policy Commitment is approved and signed by the Chairperson of the board and the CEO of OHC.

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?

Sustainability Due Diligence and Responsible Business Conduct (RBC) is embedded in OHC overall company strategy, policies and management systems, approved and anchored by the Board and OHC leadership team. The Chief Financial & Sustainability Officer (CFSO) is part of the OHC leadership team.

The work and responsibilities related to RBC and due diligence are distributed in the organization based on departmental responsibilities. The Sustainability Manager leads the OHC Sustainability strategy and follow-up and reports on results and progress. However, the work with sustainability and due diligence is not limited to the responsibility of one function, but is part of our way of working and integrated in processes, priorities, action plans, etc.

OHC Methodology for sustainability Due Diligence can be found here:

<https://www.orklahousecare.com/wp-content/uploads/sites/78/2025/04/OHC-Methodology-for-Sustainability-Due-Diligence.pdf>

For detailed overview of roles and responsibilities related to Due Diligence, see our operational level impact assessments made public here:

<https://www.orklahousecare.com/sustainability/sustainability-commitment/#duediligence>

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?

All employees have job descriptions describing tasks and responsibilities for their role. For roles that have specific responsibilities related to sustainability and responsible business conduct, this is included in their job description. In addition, sustainability and responsible conduct topics (e.g., tasks, projects, competence development) are being addressed in Personal Development Plans (PDP) with goals and action plans. The PDP is being followed up in frequent meetings with line manager. Line managers are encouraged to ensure job descriptions are reviewed in the PDP-meetings in order to ensure updates are efficiently implemented and that the job descriptions are up to date.

During our work with due diligence reassessments, roles and responsibilities in the line organization have been further formalized. The responsible employees are involved and made aware of their responsibilities through direct involvement in the impact assessments, any actions set and follow-up thereof, and the final reporting text of the assessments.

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

For roles that require specific competence, the job description describes requirements to competence and experience.

Development goals for the employees are mapped, discussed and agreed in annual Performance Development Plan meetings and followed up during the year.

As part of our onboarding to the UNGPs/OECD framework, we have focused on competence building and been able to share experiences internally and supported by external experts to ensure adequate experience is built in the organization. OHC Sustainability Due Diligence work, and conducting the Double Materiality Assessment, has been a cross functional initiative in OHC group, making sure the wider organization is involved and included in the progress and the building of competence that comes with such efforts.

In addition, Orkla has established mandatory e-learning modules for all employees with topics such as Code of Conduct, Anti-corruption, Whistleblowing, and more.

Orkla House Care is part of Orkla's sustainability network and relevant roles participate in network meetings, courses, and seminars. External networks, seminars and webinars are also important contributors to gaining new knowledge and ensuring adequate competence in the many areas of sustainability, e.g., ESG, CSR, Responsible Business Conduct and sustainability Due Diligence.

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?

In Orkla House Care, our commitment to sustainability and Responsible Business Conduct is embedded in our overall company strategy and plans.

One of the four strategic growth pillars in the company strategy is Sustainable Business, where the strategic agenda is working collectively to be a positive contributor for all of our stakeholders.

(See page 12 in the strategy presentation)

https://s29.q4cdn.com/711870714/files/doc_downloads/2023/CapitalMarkets/orkla-house-care.pdf

Our mission in OHC is *"To help everyone succeed in achieving the best finish for their painting projects and to act responsibly by being a frontrunner in the transition to a more sustainable painting tools industry"*. The four main areas where we implement actions are: Protecting the Environment, People & Community, Governance & Ethics, and Financial Strength. Goals and KPIs within the four areas have been defined and action plans for relevant departments are being updated.

We recognize the need for continuous improvement in the area of ESG data capture, analysis and management, to enable sufficient reporting and verifiable communication on an ever increasing level of detail. The updated strategy therefore includes several initiatives, actions and workstreams to ensure we can deliver on coming legal requirements, customer demand, and internal needs for continuous improvement.

All employees are encouraged to have defined Personal Development Goals related to sustainability and contributing to achievement of the overall goals.

In addition to Orkla House Care own strategy, we are adhering to Orkla ASA groups's sustainability strategy and reporting to Orkla ASA groups' annual Sustainability report, which for 2024 was aligned with CSRD/ESRS.

Read more about the detailed action plans and the dedicated resources/budget in our due diligence reports:

<https://www.orklahousecare.com/sustainability/sustainability-commitment/#duediligence>

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

The OHC leadership team follows up on strategies and action plans mainly through close involvement and evaluation of progress. The leadership team is directly involved in prioritization of planned actions, assigning resources including budgets, defining roles and responsibilities for actions and more. The full leadership team is updated regularly during the year, and adhoc if specific attention is needed.

OHC Board of Directors follows the work towards responsible business conduct mainly through the board meetings, following the annual wheel. They are further responsible for approving and signing the annual Ethical Trade report, and authoritative policies. E.g., Sustainability Policy Commitment.

The board is also informed during the reporting to Orkla ASA, through progress reviews and other measures during the processes.

In 2024, OHC conducted our first Double Materiality Assessment, assessing against the ESRS' s as part of the CSRD reporting to Orkla ASA.

The 5 topics most material to OHC were: Climate Change, Resource Use & Circular Economy, Occupational Health & Safety, Human Rights in the Supply Chain, Training & Skills Development.

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?

OHC communicates the importance of responsible business conduct in several ways.

From June 2022 Orkla implemented Orkla Supplier Portal (OSP) enabling an automated and more efficient supplier approval process. It is mandatory for all new suppliers of Orkla to be registered and approved in the portal. To be approved, the supplier needs to pass risk assessment covering e.g. financial, ethical and sanction risks. The Supplier CoC emphasises the importance of responsible business conduct, and all suppliers of Orkla are required to upload signed Orkla Supplier Code of Conduct to OSP: <https://www.orkla.com/supplier-code-of-conduct/>

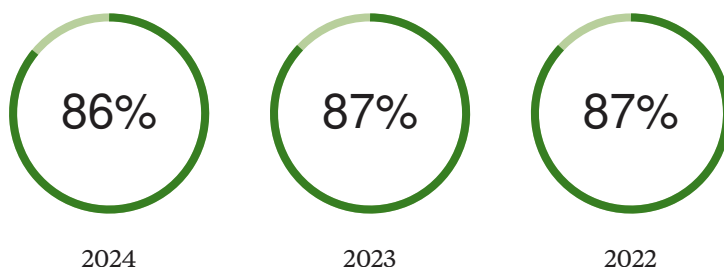
As part of the supplier approval process and to follow-up the Supplier CoC, OHC conducts supplier quality and / or social audits on site for suppliers based on risk assessment. Orkla and OHC are members of SEDEX (Supplier Ethical Data Exchange), an online system allowing sharing of information and data on ethical and responsible practices between OHC, customer and supplier. For existing suppliers, they are subject to continuous follow up and audits (quality and social) based on assessed risk.

On our website, we make publicly available our own impact assessments of OHC with all stakeholders, including our business relationships. This practice is aligned with the UNGPs/OECD framework, and aims to not only place requirements on our business relationships (e.g., communicating Supplier or Business Partner CoC) but share how we work, as inspiration for their own work on due diligence and responsible business conduct. In addition, we aim to strengthen focus on these topics in regular communication with our business relationships, we have during 2024 communicated a 'Letter to Business Relationships' to our downstream partners. Moving forward, we aim to strengthen our dialogue with stakeholders also in the upstream value chain to further emphasize the importance of responsible and sustainable business conduct.

In 2024 we continued the ongoing work of improving our supplier risk assessment tools and methods, this supporting the automatic risk assessments done in the OSP. This includes us doing desktop risk assessments, considering e.g. country, industry, raw material, level of spend, certificates, Sedex SAQ, etc. We will use same tools and methods across the OHC sites and the Quality and Procurement departments are collaborating on defining the new way of working, including on defining how to follow up suppliers based on risk.

Indicator

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



In 2024 86% of suppliers have signed Orkla Supplier Code of Conduct, which account for 98% of our spend.

We expect this number to remain relatively stable as we don't implement high number of new suppliers.

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?

Key takeaways from the reporting period (2024) was the finalization of our first full sustainability due diligence (SDD), the first time conducting a Double Materiality Assessment (DMA) aligned with the CSRD/ESRS, and the first time reporting to Orkla ASA according to the European Sustainability Reporting Standards (ESRS).

The initiatives above are all connected, where the SDD gives valuable input to the DMA, which in turn sets the guidance for what to report on for the ESRSs.

The CSRD report is published by Orkla ASA here:

<https://www.orkla.com/wp-content/uploads/sites/3/2025/03/Orkla-Annual-Report-2024.pdf>

Summary page of OHC can be found on page 23 in the report.

The most significant change from these initiatives in 2024 was the increased collective understanding and awareness of how responsible business conduct applies to so many levels of what we do and how we conduct business. In practice we have already, or are in the process of updating and strengthening our policies, procedures, responsibilities and targets related to responsible business conduct. Both to comply with existing and coming regulation and requirements, but also to meet our own ambitions to be a frontrunner in the transition to a more sustainable painting tools industry.



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
<p><i>Climate Change</i> (environment)</p> <p>OHC has significant impacts on climate change mitigation due to the generation of GHG emissions in the upstream and manufacturing phases of the value chain, as well as transportation via sea, land and air (minimal) both up- and downstream. OHC in addition use materials and processes associated with use of (carbon intensive) fossil resources for a significant share of the company's products and packaging.</p>	Environment Emission Greenhouse gas emission Energy Use of materials	Global
<p><i>Resource Use & Circular Economy</i> (environment)</p> <p><u>Resource inflows, including resource use</u> OHC products requires significant volumes of raw materials, some of which are non-renewable virgin raw materials. This impact is also exacerbated by the short lifetime of the company's products, and the amount of disposable packaging materials associated with them.</p> <p><u>Resource outflows and waste</u> OHC has significant waste streams caused by either the short lifetime or the disposable nature of the products or its packaging. In some of the markets where OHC operates parts of the packaging material used can be recycled, but for most of the material used in the construction of the products this is not the case, either because the systems are not in place to do so, or the product does not facilitate it.</p>	Environment Energy Waste Use of materials	China United Kingdom The European Union

<p>Occupational Health & Safety in own operations (social/people)</p> <p>Occupational Health & Safety has been, and continues to be, a focus area in OHC for many years, due to potential severe impacts. Due to the nature of our business and human error, we cannot rule out negative impacts. Our operational level impact assessments (sustainability due diligence) for our production facilities/factories identified the human right <i>Right to safe & healthy working conditions</i> as the only severe potential negative impact, due to the irremedial nature in the case of a serious injury or in worst case fatality.</p>	Occupational Health and safety	China United Kingdom The European Union
<p>Human Rights in the supply-chain (social/people)</p> <p>OHC has a portfolio of approximately 260 Tier-1 suppliers globally with emphasis in China and northern Europe. (Suppliers of indirect materials are not included in these numbers).</p> <p>Tier-1 suppliers are primarily larger, professional companies with good systems. OHC has a high number of Chinese suppliers, which creates an inherent risk with several unknowns. We acknowledge we don't have adequate insight for all suppliers. Sedex audits have been done for some suppliers and show findings of various issues mainly linked to working hours, work hazards and management system. Actions to achieving better insight by risk assessments, supplier self-questionnaires and Sedex audits, are ongoing with a high priority.</p> <p>Certain sub-supply chains have high inherent risk of health hazards (chemicals). We assume there is low risk of forced labour/abuse of Uighurs given the geography of suppliers. Still, there are general risks in China, such as inability to organize and limitation of freedom of speech.</p> <p>OHC is also exposed to risk of irresponsible business practices in the value chain of partners (joint ventures), e.g., in India, and in supply chain beyond Tier-1 suppliers.</p> <p>However, as noted in the OHC Methodology for Sustainability Due Diligence: 'We realize that all companies, no matter where they operate or what they do, are at risk of sustainability impacts...' making assessment of potential negative impacts on behalf of all business relationships in the value chain a mission impossible.</p>	Freedom of association and collective bargaining Occupational Health and safety Working hours	China The European Union

Training & Skills Development in own operations (social/people)

The potential negative impact of lack of training and skills development is considered high, due to the impact potentially affecting most of our workforce. The likelihood of negative impact is higher now with the Orkla academies limited group activities. PortCos are fully responsible to secure own development. Negative impacts could include accident, mistakes, loss of business, quality issues, grievances, turnover, no opportunities for growth, lack of needed capability to fulfill strategy etc.

China
United Kingdom
The European Union

During the OHC Sustainability Due Diligence work, we found we have potential negative impacts on 18 out of 48 human rights, 8 out of 20 environmental, and 5 out of 16 economic areas. No actual negative impacts identified.

The topics above (*Climate Change, Resource Use & Circular Economy, Occupational Health & Safety, Human Rights in the supply-chain, Training & Skills Development*) were the five most material topics from the OHC DMA conducted in 2024, guiding our efforts to prioritize sustainability risks.

During 2023 we conducted our first full impact assessments aligned with UNGPs/OECD, where we considered risks on all essential sustainability areas (48 human rights / 20 environmental / 16 anti-corruption/economic). Where we found 'no risks' of adverse impacts, we described why we reached such conclusion. In the first assessments we noted all impacts as 'Potential' negative impacts, regardless of the fact that actual impacts may have occurred during the previous year. Actual adverse impacts was included in the 2025 annual reassessment, however, no actual negative impacts was identified.

Additionally, we use the UNGPs/OECD definition of what is an adverse impact, and when it is *severe*. We note in our FAQ that:

An adverse impact is an impact that your company has or potentially has on human rights, the environment or key elements of economic sustainability, i.e., anti-corruption, -competition or tax.

An adverse impact occurs when an action or omission removes or reduces the ability for a person or a group of persons to enjoy their human rights, strains the environment, or in case of engaging in corrupt practices.

The severity of an impact is defined from an evaluation against the following three parameters:

Scale: *Relates to the gravity of an impact. How grave is the impact for the affected party(ies) – e.g. employees or ground water.*

Scope: *Relates to the number of affected individuals or how widespread the impact is. How many are affected by the impact, or how big is the omission? There might, for example, be many customers exposed to adverse impacts on the right to health, when a big geographical area exposed to pollution.*

Irremediability: *Relates to the possibility to remediate the impact for all involved parties. Is it possible to make your impact good again for the affected parties? E.g. if a person loses their life, the impact is severe as it is irremediable.*

It is important that all risks of impacts are evaluated individually with regard to the three parameters. You should manage all adverse impacts, but in case it is necessary to prioritize company efforts, the three parameters can function as a guide to establish what impacts are severe and thus should be prioritized for immediate attention.

Typically, business relationships can and should deal with all risks of adverse impacts that they cause or contribute to, while prioritization will become necessary when acting in relation to risks of impacts that one is merely 'linked to' through business relationships. It is especially important to address an impact immediately, if delayed action may cause the impact to become severe.

In OHC we separate between due diligence in own operations, and in business relationships. We focus assessments on where OHC may 'cause' or 'contribute to' adverse impacts. When OHC is merely 'linked to' adverse impacts; the assessments identify known severe impacts in the value chains only. Our assessments are expected to improve over time taking information from the systematized approach requiring responsible business conduct by business relationships. We appreciate, that a minimum requirement for us, as part of our due diligence according to the UNGPs/OECD, is to require from our business relationships, that they also meet the minimum standard for responsible business conduct, and to engage any business in our value chain should they cause or contribute to severe impacts.

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.

a)

Sustainability Due Diligence

The *OHC Methodology for Sustainability Due Diligence* describes OHC routines for mapping, and is available here:

<https://www.orklahousecare.com/wp-content/uploads/sites/78/2025/04/OHC-Methodology-for-Sustainability-Due-Diligence.pdf>

We found we have potential negative impacts on 18 out of 48 human rights, 8 out of 20 environmental, and 5 out of 16 economic areas.

See the results and compliance reports here:

<https://www.orklahousecare.com/sustainability/sustainability-commitment/#duediligence>

Double Materiality Assessment

In 2024, OHC also conducted our first Double Materiality Assessment (DMA) supported by the results of the due diligence work, aiming to further identify impacts, risks and opportunities (IROs) and enable prioritization on most material sustainability topics.

OHC identified the following five topics as the most material: *Climate Change, Resource Use & Circular Economy, Occupational Health & Safety, Human Rights in Supply Chain, Training & Skills Development*.

The DMA was reported to Orkla ASA who is in scope of the CSRD and reports according to the ESRs for all Orkla PortCos, including OHC. The full Orkla ASA report can be found here:

<https://www.orkla.com/wp-content/uploads/sites/3/2025/03/Orkla-Annual-Report-2024.pdf>

b)

We have prioritized own operations and first tier suppliers as part of current risk assessments and sustainability due diligence. We aim to improve our assessment of risk and due diligence in certain areas of our supply chain, such as e.g., raw materials. In relation to ongoing work with new company strategy, a more thorough risk assessment will improve identification of relevant risks in our value chain and determine if more aspects should be covered.

OHC China is currently not covered in the sustainability due diligence reports, they will conduct impact assessments and be included in publicly disclosed reports during 2025.

c)

It is cross functional work to gather information and data for the risk and impact assessments, including the

sustainability due diligence work and the DMA. Resources from OHC supply chain, procurement, HR, quality, finance and other departments are involved.

Internal ERP systems are used for collection of data. Also results from internal and external audits are used as sources for information, including supplier audits.

Other sources for information include, but is not limited to, whistle blower system, stakeholder feedback, employee surveys, industry knowledge, networks, NGOs, etc.

Engagement with impacted stakeholders:

We appreciate that solid stakeholder engagement forms part of the due diligence process. To ensure informed stakeholder engagement, we conduct the first assessments with limited interactions with stakeholders. The engagements become real and informed once we share our assessments with impacted stakeholders, asking for input to improve and for grievances, should impacts occur.

The link between our established grievance mechanism (TELL-US) and our sustainability due diligence assessments are meant to improve and enable informed stakeholder engagement. During 2025 OHC plans to communicate the TELL-US mechanism in a better way to increase availability or engagement from both internal and external stakeholders. Updated assessments will take any stakeholder feedback into consideration, and OHC is prepared to reassess where new and updated information becomes available. E.g., if we identify or become aware of an actual negative impact.

The TELL-US function is publicly available here:

<https://www.orklahousecare.com/sustainability/sustainability-commitment/#grievance>

The Whistleblower system is available here:

<https://www.orklahousecare.com/sustainability/sustainability-commitment/#whistleblower>

d)

As we continuously improve on the area of responsible business conduct, OHC is basing our impact assessments on internationally agreed principles (UNGPs/OECD) to ensure our priorities are directed towards most significant risks in own operations and our value-chain, on human rights (including labour rights), environment and anti-corruption.

Of the most material topics from the DMA, we recognize the need for more information and data on *Climate Change, Resource Use & Circular Economy*, and *Human Rights in the Supply Chain*

We have ongoing initiatives to ensure improved data collection for these areas, e.g., updating our climate account and conducting supply chain risk assessments.

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.

(See comment section under section 2.A.1.)

The Double Materiality Assessment conducted in 2024 identified the 5 most material topics for OHC.

This, however, does not mean other sustainability topics are not important for OHC or disregarded in any way. In fact, our sustainability due diligence work describes how we identify and handle risk of negative impacts on all 48 human rights, 20 environmental and 16 economic areas, aligned with the UNGP/OECD framework.

This is to ensure we handle risk in all areas of sustainability, before they become severe, and to mitigate any actual negative impacts before they occur.

OHC sustainability due diligence reports can be found here:

<https://www.orklahousecare.com/sustainability/sustainability-commitment/#duediligence>



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><i>Climate Change</i> (environment)</p> <p>OHC has significant impacts on climate change mitigation due to the generation of GHG emissions in the upstream and manufacturing phases of the value chain, as well as transportation via sea, land and air (minimal) both up- and downstream. OHC in addition use materials and processes associated with use of (carbon intensive) fossil resources for a significant share of the company's products and packaging.</p>
Goal :	Cease, prevent or mitigate negative impacts on <i>Climate change</i>

<p>Status :</p>	<p><u>Climate change mitigation</u></p> <p>OHC assesses that we may be at risk of significant impacts in this area in terms of Scope 1, 2 and 3 emissions.</p> <p>Risks mainly concern:</p> <ul style="list-style-type: none"> - Product design - Production and sourcing decisions - Transportation of goods (land, sea and occasionally air) - Business travels <p>We acknowledge that GHGe are directly linked to decisions made on corporate level. Further, we acknowledge that the majority of emissions originate from Scope 3.1 "Purchased goods and Services", the materials used in OHC products.</p> <p><u>Use of energy</u></p> <p>OHC assesses that we may be at risk of significant impacts in this area. We use significant amounts of energy for our daily operations in running our production sites and in the manufacturing of our products. We have additional energy consumption in our office environment. This mainly concerns use of electricity.</p> <p>Risks may concern:</p> <ul style="list-style-type: none"> - Powering of electric trucks and cars - Powering of machinery - Increased consumption during increased periods of production - Heating, through district heating - Lighting <p>OHC appreciates that our use of energy constitute scope 2 in relation to our Green House Gas emissions (GHGe) and that all companies should engage in cutting GHGe. OHC uses energy for our daily operations in our office environments. We assess that we do not cause or contribute to significant adverse impacts in relation to the use of energy for our HQ. Nonetheless, we continuously look into methods to minimise our use of energy. We recognise that choices made at corporate level also affect the energy use at our production sites.</p>
<p>Goals in reporting year :</p>	<p>In addition to the continuous work in OHC to reduce emissions from Scope 1 and 2 (OHC has reported to Orkla ASA on Scope 1 and 2 since 2016), the most significant goal for 2024 was to establish a CO2 baseline that included Scope 3. This project was finalised in the end of 2024, and will be subject to annual updates in the years to come.</p>

Describe already implemented or planned measures :

Climate change mitigation

OHC already implemented measures to cease, prevent or mitigate negative impacts on this:

During 2024 OHC successfully established a CO2 baseline aligned with the GHG Protocol, including Scope 1, 2 and 3 emissions.

OHC will during 2025:

- Determine a CO2e reduction plan
- Develop specific indicators to support implementation of CO2e reduction plan
- Update the OHC climate account on an annual basis

Use of energy

OHC already implemented measures to cease, prevent or mitigate negative impacts on this:

- Has multiple reduction initiatives ongoing, energy saving and efficiency, replacement of fossil energy sources
- Purchases green certificates to ensure renewable energy consumption across sites
- Continues to replace old lighting with LEDs across sites
- Tracks, and reports on energy use
- Has a management system in place, based on the ISO 14001 standard
- Continue investigating into smart energy solutions

Additional planned actions:

- Consider defining better 'targets' for setting indicators of effectiveness

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

We have identified Indicators of Effectiveness, to enable tracking and evaluation of effectiveness of our actions to address potential impacts.

OHC aim to set indicators that are adequate to evaluate whether OHC has responded effectively to the identified impact, and whether OHC is continuously improving our response to the impact.

The indicators are:

Climate change mitigation

1. Scope 1, 2 and 3 emissions

2024: Scope 1: 163 tCO₂e

2024 Scope 2: 61 tCO₂e

2024 Scope 3: 47,255 tCO₂e

Use of energy

1. Energy used (Scope 2 - total)

2024: MWh - 7,550.2

2. Effect of reduction activities (targets)

2024: Not defined yet

3. Results of investigations into smart solutions

2024: Introduced smart lighting systems (finalised 2024 OHC UK) / introduced more efficient ventilation systems (OHC SE)

Furthermore, we expect the CO₂ reduction plan to support our development of concrete emission reduction efforts, while the annually updated climate account will track our progress related to emission reduction in the years to come. Furthermore, we expect the majority of our emission reduction to come from *Scope 3.1 - Purchased goods and services*, and *Scope 3.4 - Upstream transportation and distribution*, as these are the two categories with the highest emissions for OHC. We aim to continuously track and improve energy use, but we don't expect significant emission reductions from energy use in own operations in the coming years, compared to other Scope 3 categories.

Indicator

Scope 1 emissions

2024: 163

2023: 595

Emissions noted in tonnes CO₂e. 2024 numbers not including fuel consumption for company cars.

Scope 2 emissions (market based)

2024: 61

2023: 49

Emissions noted in tonnes CO₂e

Scope 3 emissions

2024: 61013

2023: 63181

Emissions noted in tonnes CO₂e. 2024 numbers not yet verified.

	<p><i>Resource Use & Circular Economy (environment)</i></p> <p><u>Resource inflows, including resource use</u> OHC products requires significant volumes of raw materials, some of which are non-renewable virgin raw materials. This impact is also exacerbated by the short lifetime of the company's products, and the amount of disposable packaging materials associated with them.</p> <p><u>Resource outflows and waste</u> OHC has significant waste streams caused by either the short lifetime or the disposable nature of the products or its packaging. In some of the markets where OHC operates parts of the packaging material used can be recycled, but for most of the material used in the construction of the products this is not the case, either because the systems are not in place to do so, or the product does not facilitate it.</p>
Goal :	Cease, prevent or mitigate negative impacts on <i>Resource Use & Circular Economy</i>
Status :	<p><u>Use of raw materials</u> OHC assesses that we may be at risk of contributing to significant impacts in this area. We both trade products that include raw materials, and use raw materials in our production that we buy from our suppliers, including but not limited to wood, metal, metal alloys and plastic components. This concerns both products and packaging.</p> <p><u>Waste management of solid waste</u> OHC assesses that we have risks of significant impacts in this area. In our office environments, we do not generate significant waste. However, we appreciate that we need to nurture a culture of recycling also at our offices. We also acknowledge, that decisions concerning product design and packaging impacts the amount of waste generated at our production sites, and by end users of our products. Risks may also concern waste generated in production processes.</p>

Goals in reporting year :

We continuously aim to improve use of materials in products and packaging in accordance with strategy and KPIs, operationalized through our evolving product roadmap. This goal is interlinked with other initiatives such as the development of both our CO2 reduction plan and the tracking of progress through the updating of our climate account. As materials use is the most significant contributor to OHC Scope 3 emissions, we will continue to focus on this for the coming years.

A second goal for 2024 was to continue strengthen the tracking and data collection related to waste and scrap in production through new ERP system, and to use results to identify potentials for improvement. Good progress has been made in this area, including e.g., daily scrap reports for identifying improvements to reduce scrap in production. We will continue to focus on this for the coming years.

Describe already implemented or planned measures :

Use of raw materials

OHC already implemented measures to cease, prevent or mitigate negative impacts on this:

- Continuously works to optimise use of raw materials in product and packaging design, including reduction of scrap rates
- Strives to buy recycled materials like metals, plastic, paper and cardboard
- Recycles raw materials, see also area 16: Waste management of solid waste
- Is increasing use of FSC certified products, packaging and marketing materials
- Reports on sustainability impacts at each project gate, including production, packaging, products and people
- Ensures that all manufacturing sites are FSC certified
- 1st stage of project to collect data completed (packaging)

Additional planned actions:

- Further strengthen competence and include additional resources on how to manage risks proactively
- Continue assessing risks, determining which raw materials to prioritise, ensuring that scarce natural resources are included
- Look into amount of raw material used in product design, aiming to reduce, similarly to packaging
- Include data to guide and quantify reduction efforts vis á vis the product roadmap
- Look into and conclude on recycled materials certification schemes
- Review and update indicators of effectiveness for this area

Waste management of solid waste

OHC already implemented measures to cease, prevent or mitigate negative impacts on this:

- Works to reduce packaging used both in total and in relation to virgin plastic
- Uses recycled materials where possible
- Reduces waste to the extent possible
- Measures and reports amounts of generated solid waste at production sites
- Works to optimise use of materials in production, to reduce amount of waste generated. The bulk of waste concerns cardboard, plastic and scrap materials
- Office environment offers recycling stations for appropriate handling of generated waste

Additional planned actions:

- Ensure increased measurement of waste generated through ERP system and PowerBI dashboard to further target improvement initiatives
- Update group targets
- Redefine indicator of effectiveness

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

We have identified *Indicators of Effectiveness*, to enable tracking and evaluation of effectiveness of our actions to address potential impacts.

OHC aim to set indicators that are adequate to evaluate whether OHC has responded effectively to the identified impact, and whether OHC is continuously improving our response to the impact.

The indicators are:

Use of raw materials

1. Amount of recycled materials bought per year

2024: - Not available yet

2. % of suppliers who have signed our Supplier CoC (based on spend)

2024: 70,9 % (all materials)

(Indicators for this topic to be reviewed during next reassessment)

Waste management of solid waste

1. Amount of recycled materials used:

2024: To be redefined

2. Number of reports/grievances in this area:

2024: 0

3. Results of targets concerning scrap:

2024: To be redefined

	<p><i>Occupational Health & Safety in own operations (social/people)</i></p> <p>Occupational Health & Safety has been, and continues to be, a focus area in OHC for many years, due to potential severe impacts. Due to the nature of our business and human error, we cannot rule out negative impacts. Our operational level impact assessments (sustainability due diligence) for our production facilities/factories identified the human right <i>Right to safe & healthy working conditions</i> as the only severe potential negative impact, due to the irremedial nature in the case of a serious injury or in worst case fatality.</p>
Goal :	Cease, prevent or mitigate negative impacts on <i>Occupational Health & Safety</i>
Status :	<p><u>Right to safe and healthy working conditions</u></p> <p>OHC assesses that we may be at risk of adverse impacts on this right. We may have adverse impacts that are specific to the location, i.e. office environment, production site. In our office environments, risks occur primarily in relation to stress and desk work being performed in front of a computer. At our production sites, additional risks may occur in relation to job tasks performed and the workplace environment. At sales offices, we may also experience risks concerned with traveling extensively by car. Risks may concern:</p> <ul style="list-style-type: none"> - Stress - Ergonomics - Desk work in front of a computer - The psychosocial working environment <p>Specific risks at production sites may concern:</p> <ul style="list-style-type: none"> - Use of machines and trucks - Work at different heights and on slippery floors - Storage and handling of chemicals (potential exposure) - Exposure to dust and noise generated in production - Heavy lifting - Repetitive manual tasks - Risks of fire due to machinery malfunctions - Use of chemicals - Emissions of odour and noise in production

Goals in reporting year :

OHC continuously track and report on the following, related to the Right to safe and healthy working conditions:

- Lost working days rate
- Total recordable injuries
- Number of reported observations (near misses)
- Unsafe conditions
- Unsafe behavior
- Sick leave (long/short term)

Numbers are frequently reported to OHC Leadership Team as well as OHC Board of Directors.

Describe already implemented or planned measures :

OHC already implemented measures to cease, prevent or mitigate negative impacts on this:

OHC Group:

- Facilitates an annual EHS Week across the group to strengthen internal commitment and involve everyone in developing the culture to achieve our vision of zero injuries
- Has routines to prevent/minimise work related health challenges and established procedures for rehabilitation
- Conducts regular employee development talks and training on this topic
- Conducts regular staff satisfaction surveys incl. questions on health and stress
- Registers sick leave days and follows up in cases of high levels of sick leave
- Provides height adjustable desks for all employees enabling employees to stand/sit (Not including CN)
- Meets all reasonable requests for special ergonomic needs when providing equipment for the work
- Ensures that employees have the opportunity to take part in developing goals and plans, in risk analyses and in investigations after incidents or near misses
- Has regular fire evacuations training and first-aid training
- Offers flu vaccinations (Not including SE/CN)
- Ensures that field based sales staff have safe cars that are replaced every four years
- Ensures that all staff cars are equipped with hands-free telephone equipment
- Has auto insurance that ensures immediate roadside assistance
- Includes safety and driving in EHS talks, and instructs drivers to take regular breaks
- Ensures that the insurance applicable for the office during work, is extended to staff working from home
- Communicates signs of stress related conditions to all employees
- Has established local committees on which managers and employees cooperate on EHS work
- Has implemented overall OHC group EHS policy
- Indicators are used to direct actions for improvement

OHC NO:

- Offers health insurances that covers access to psychologists
- Has provided access to workout opportunities for employees.
- Provides guidance for how to use desks in an ergonomic way.

Additional planned actions:

- Implement new and improved incident registration, following up, and tracking system for factories
- Consider implementing same new system for NO, DK, BNL
- Establish a new committee for Health & Wellbeing at Group level
- Establish new training on accurate reporting of health and safety incidents

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

We have identified Indicators of Effectiveness, to enable tracking and evaluation of effectiveness of our actions to address this impact.

OHC aim to set indicators that are adequate to evaluate whether OHC has responded effectively to the identified impact, and whether OHC is continuously improving our response to the impact.

The indicators are:

1. Number of grievance/reports on safe and healthy working conditions (new indicators: number of incidents overall)(Group).

2024:

Lost working day injuries - 4

First aid injuries - 12

Near misses - 95

Unsafe condition - 93

Unsafe behaviour - 11

2. Number of sick leave days (Target: below 4%) (Group)

2024: 2.5%

3. Workplace Assessment performed (NO)

2024: Yes

4. Results on psycho-social (stress related) aspects in staff survey: "Have you been free of most of these early warning signs of stress during the last 4 weeks" & "Have you been free of severe signs of stress during the last 4 weeks"

2024:

Free of early warning signs of stress during the last 4 weeks - 43% (Yes), 23.5% (Neutral), 35.5% (No)

Free of severe signs of stress during the last 4 weeks - 59% (No), 23.3% (Neutral), 19.6% (Yes)

5. Number of work-related injuries reported

2024: See Indicator 1

Human Rights in the supply-chain (social/people)

OHC has a portfolio of approximately 260 Tier-1 suppliers globally with emphasis in China and northern Europe. (Suppliers of indirect materials are not included in these numbers).

Tier-1 suppliers are primarily larger, professional companies with good systems. OHC has a high number of Chinese suppliers, which creates an inherent risk with several unknowns. We acknowledge we don't have adequate insight for all suppliers. Sedex audits have been done for some suppliers and show findings of various issues mainly linked to working hours, work hazards and management system. Actions to achieving better insight by risk assessments, supplier self-questionnaires and Sedex audits, are ongoing with a high priority.

Certain sub-supply chains have high inherent risk of health hazards (chemicals). We assume there is low risk of forced labour/abuse of Uighurs given the geography of suppliers. Still, there are general risks in China, such as inability to organize and limitation of freedom of speech.

OHC is also exposed to risk of irresponsible business practices in the value chain of partners (joint ventures), e.g., in India, and in supply chain beyond Tier-1 suppliers.

However, as noted in the OHC Methodology for Sustainability Due Diligence:

***'We realize that all companies, no matter where they operate or what they do, are at risk of sustainability impacts...'* making assessment of potential negative impacts on behalf of all business relationships in the value chain a mission impossible.**

Goal :

Cease, prevent or mitigate negative impacts on *Human Rights in the supply-chain*

Status :

OHC conducted our first Double Materiality Assessment in 2024, and prioritized amongst the topics according to what is material for OHC. Human rights in the supply chain was identified as one of the five most material topics for OHC.

OHC assesses that we may be at risk of either 'contributing to' or being 'linked to' adverse impacts in our business relationships, on these 3 human rights. (Based on previous findings during supplier audits)

Right to safe and healthy working conditions

Many of our suppliers are production facilities, where risk of negative impacts in relation to health and safety is inherently higher, compared to office environments. Examples of non conformances in supplier audits are: machines without protective devices, PPE (personal protective equipment), fire safety procedures and equipment, and inadequate handling of hazardous chemicals.

(See 3.A.1 *Occupational Health & Safety* - for examples of specific risks in production facilities related to safe and healthy working conditions)

Right to social security, including social insurance

Non conformances in supplier audits on this right are related specifically to: social insurance coverage being insufficient, or not provided for all workers.

Right to rest, leisure and paid holidays

Non conformances in supplier audits on this right are related specifically to: working hours/overtime exceeding legal limits.

Goals in reporting year :

For new suppliers of OHC, registering of the supplier in the Orkla Supplier Portal is mandatory (from 2022). During the last couple of years, OHC has worked on on-boarding all existing suppliers to the Orkla Supplier Portal, ensuring automatic risk assessment and sanction screening for internal and external partners. Suppliers to our production facilities in China, UK and Sweden have been prioritized and we have successfully on-boarded the majority of the suppliers. In 2025 we are continuing the on-boarding of suppliers for the remaining sites (including suppliers of indirect materials).

By using the functions of the Supplier Portal to map progress and status of the supplier portfolio, we acknowledge we have had, and still have, some gaps in data for the suppliers. One example is incomplete categorization of suppliers, causing incomplete risk profiles of the suppliers in the Supplier Portal. Actions to improve the information and data for the suppliers is ongoing and will continue in 2025.

In parallel with improving the supplier data in the Supplier Portal, we have improved the OHC supplier risk assessment tool (excel-based) and included all the production sites in the scope of the tool. In 2024, a supplier risk evaluation was conducted two times. The results of the supplier risk evaluations are used to determine further follow-up of the supplier.

Supplier Self Assessment Questionnaires and Social audits of suppliers are conducted through Sedex / SMETA, and supplier audits (Quality and EHS) based on Orkla House Care Supplier Audit template have been conducted based on risks defined in the Supplier Risk evaluation.

Describe already implemented or planned measures :

OHC already implemented measures to cease, prevent or mitigate negative impacts on this:

- Long term relationships with suppliers and with transparent and close cooperation around improvement initiatives
- Sharing forecasts with suppliers and continuously working to improve the internal forecast processes
- Regular follow up with suppliers through strategic dialogue and on-site visits, assessing quality, delivery performance and working conditions
- Aligned risk evaluation tools
- Supplier Quality Audits conducted by OHC internal SQA auditor
- SMETA audits of selected high risk suppliers, conducted by external auditors

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

We have identified Indicators of Effectiveness, to enable tracking and evaluation of effectiveness of our actions to address potential impacts.

OHC aim to set indicators that are adequate to evaluate whether OHC has responded effectively to the identified impact, and whether OHC is continuously improving our response to the impact.

1. % of OHC suppliers on-boarded to Orkla Supplier Portal (direct material and traded goods)

2024: 86 %

2. % suppliers signed Orkla Supplier Code of Conduct

2024: 86 %

3. Number of Supplier Quality Audits conducted

2024:

4. Number of supplier's Self-Assessment Questionnaires (SMETA) conducted

2024:

5. Number of SMETA 4-pillar audits conducted (or other similar social audits)

2024:

In 2025, we aim to on-board all suppliers to the Orkla Supplier Portal, SMART (Orkla system) and to improve the quality of supplier data. We will use relevant functionality in the Supplier Portal to make risk assessments more efficient. The outputs of the risk assessments shall be used to identify high risk suppliers and to implement appropriate actions according to the Orkla three-step model for sustainable sourcing.

	<p><i>Training & Skills Development</i> in own operations (social/people)</p> <p>The potential negative impact of lack of training and skills development is considered high, due to the impact potentially affecting most of our workforce. The likelihood of negative impact is higher now with the Orkla academies limited group activities. PortCos are fully responsible to secure own development. Negative impacts could include accident, mistakes, loss of business, quality issues, grievances, turnover, no opportunities for growth, lack of needed capability to fulfill strategy etc.</p>
Goal :	Cease, prevent or mitigate negative impacts on <i>Training & Skills Development</i>
Status :	<p><u>Right to work (training)</u></p> <p>OHC assesses that we may be at risk of adverse impacts on this right. We recognise that good training and risk management are crucial for preventing injuries and occupational illness, as well as a key aspect for competence development.</p> <p>Risks may concern:</p> <ul style="list-style-type: none"> - When staff starts working in the company - Throughout staff's working life with the company - When staff transitions from one position to another - Employees not having the necessary time for competence development/training

Goals in reporting year :

In 2024, Orkla House Care Group developed and implemented a comprehensive Diversity, Equity, and Inclusion (DEI) strategy and policy. This action is part of our broader commitment to improving working conditions and fostering a workplace that is inclusive, equitable, and supportive for all employees.

Specific initiatives in connection with our DEI strategy include Bias Training, where we have implemented training sessions for all employees, especially managers, to identify and mitigate unconscious biases in hiring, performance evaluations, and day-to-day interactions. This focus will continue forward with new initiatives to continuously improve in this area.

We have also completed several mandatory trainings during 2024 including targeted competition law training and anti-corruption/fraud training, but also specific mandatory training (sexual harassment prevention training) which came into law in 2024 in the UK for all people leaders that have employees in UK and also for all employees in the UK.

In addition to DEI, our Double Materiality Assessment highlighted a potential future risk of not offering sufficient skills development initiatives to employees, which could affect employee engagement and the company's ability to deliver on its strategic goals. To address this, we launched targeted skills development programs, including The 7 Habits of Highly Effective People training for our leaders and specialized courses such as Net Revenue Management, tailored to specific business areas. These programs aim to equip employees with the skills needed to support their personal growth and contribute to the company's success. In addition we have during 2024 established a leadership development strategy to ensure our people leaders on all levels are offered sufficient training to ensure their leadership role is managed according to our OHC expectations.

Describe already implemented or planned measures :

OHC already implemented measures to cease, prevent or mitigate negative impacts on this:

- Partakes in Orkla ASA global competency-building programmes including specialised academies and compliance training and a variety of other courses, available to certain roles
- Provides for management training programmes
- Conducts personal development plan (PDP) conversations at least annually. Within this scope, encourages a culture of asking questions and letting us know when they deem it necessary to develop training for new employees
- Ensures that staff fulfills trainings related to their specific roles
- Offers induction trainings for all employees upon employment
- Offers e-learning courses for all staff
- Facilitates and allows employees to participate in networks and seminars
- Requires employees to fulfil certain (e-)learning modules
- Ensures that employees that have roles that require specific certifications, receive training to obtain them
- Has defined a development plan for training of managers

Additional planned actions:

- Develop training materials to support the training of managers
- Develop trainings in corporate culture

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

1. Number of complaints/grievances on lacking training

2024: 0

2. Score in staff survey: "I have the opportunity to learn and develop" (whole group)

2024: 67% (positive), 22.8% (neutral), 10.2% (negative)

3. % of staff who has completed mandatory trainings to their respective roles

2024: total - 60,33% completed of all courses named "mandatory"

Code of Conduct - 80% completed

Anti Corruption - 76%

Data Privacy - 79%

4. New strategy implemented

YES

5. Results of needs analysis, functional training not available in the Orkla Academies

CONCLUDED

3.B Other actions related to management of negative impact

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

When conducting our impact assessments aligned with the UNGPs/OECD, we assess environment against 20 environmental areas.

The overview of the different areas can be found here: <https://globalcsr.net/overview-of-the-20-environmental-areas/>

In our latest reassessment of the 20 areas, we identified significant risk of potential negative impacts in 8 out of 20 areas. For 12 out of 20 areas we identified 'No impact' and explained why we reached such conclusions.

We publicly disclose our impact assessments on our website:

<https://www.orklahousecare.com/sustainability/sustainability-commitment/#duediligence>

Additionally, as part of the CSRD/ESRS reporting to Orkla ASA we report on these topics: *Climate change, Biodiversity and ecosystems, Water and marine resources, Pollution, Resource use & and circular economy*. OHC identified *Climate change and Resource use & circular economy as the two most material environmental topics*.

<https://www.orkla.com/sustainability/protecting-the-environment/>

See Orkla policies and guidelines: <https://www.orkla.com/guidelines/>

See Orkla annual report for more: <https://www.orkla.com/annualreport/>

3.B.2 Reduction of greenhouse gas emissions

(See 3.A.1 'Climate Change' for how we manage GHG emissions)

3.B.3 Improvements in own purchasing practices

We acknowledge the potential negative impacts we can contribute to, on our business relationships (e.g., suppliers) through our purchasing practices, and work to cease, prevent or mitigate the risk of such impacts.

In 2024, we continued to develop our purchasing practices with the aim of minimizing negative impact on our suppliers.

We have further improved our processes for sharing forecasts with suppliers, which has contributed to a more stable demand pattern. Suppliers now receive timely access to the volumes we plan to order, which supports their production planning and reduces the need for urgent changes or rush orders.

Following the implementation of an updated ERP system in 2023, we have been able to work more efficiently and systematically with forecast management during 2024. This has enabled us to communicate future needs with greater clarity and accuracy.

We maintain close cooperation with our suppliers, many of whom we have worked with for a long time. These long-standing relationships provide a solid foundation for mutual understanding, long-term planning, and continuous improvement initiatives.

We regularly follow up with our suppliers through both strategic dialogue and on-site visits, where we assess aspects such as quality, delivery performance, and working conditions. These follow-ups are conducted by both our Category Managers and our Supplier Quality Assurance Manager, ensuring broad and ongoing dialogue on improvements and responsible practices throughout the supply chain.

See Orkla policies and guidelines: <https://www.orkla.com/guidelines/>

See Orkla annual report for more: <https://www.orkla.com/annualreport/>

3.B.4 Choice of products and certifications

OHC hold FSC® certificates for a large number of our wooden handle products, but also our cardboard packaging and transport cartons. We have been FSC® certified as a company since 1999. Due to our pass-rate we are now preparing for self-certification. FSC® supports our overall ambitions for traceability of sustainable sourcing.

We have mapped all existing wood products bought through OHC, and their FSC® status. This makes it possible to now methodically work through this list to ensure all wood products are FSC® certified over time and is work in progress.

We re-use and recycle pallets, cartons and electrical equipment at our own facilities.

OHC continuously considers other relevant certification schemes and we are specifically considering certification of recycled content in relevant products.

See Orkla policies and guidelines: <https://www.orkla.com/guidelines/>
See Orkla annual report for more: <https://www.orkla.com/annualreport/>

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

Orkla policies and Code of Conduct support and require free trade unions and collective bargaining, both internally and for our business relationships.

China is often associated with higher risk of potential negative impacts related to free trade unions and collective bargaining, compared to other countries. To address this risk and mitigate potential negative impacts, a worker committee is in place at our Chinese facility. The committee consists of democratically elected worker representatives, elected by and from all employees. One of the main contributions of the worker committee is the communication with facility management, including (but not limited to): labor law compliance, overtime, employment contract signing and monitoring, cost reductions, policy implementation and more. The committee meets on a regular basis, typically every 3-6 months. Facility management appreciates the collaboration with the committee, and actively seek to collect employee concern and feedback, in addition to suggestions for improvements.

The right to free trade unions and collective bargaining is also addressed in our Sedex supplier audits.

See Orkla policies and guidelines: <https://www.orkla.com/guidelines/>
See Orkla annual report for more: <https://www.orkla.com/annualreport/>

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

OHC became member of Ethical Trade Norway in 2022 and will encourage relevant key personnel to participate in network seminars, training etc. Relevant personnel could be e.g., operational purchasing, strategic procurement, planning, supplier quality, and more. Through annual personal development plans each employee discuss and agree on development goals with their closest manager. The development goals should be related to strategic goals and action plans, including sustainability and responsible business conduct.

Orkla has an internal sustainability network where training and capacity building is one of the key focus areas.

Capacity building of suppliers and workers in the supply chain is a focus during supplier audits. OHC supplier audit template includes topics for EHS and selected areas from Supplier Code of Conduct. We discuss and encourage for improvements with suppliers during onsite visits.

We plan to share our own impact assessments and due diligence methodology with our business relationships, including suppliers. By sharing our assessments alongside our requirements for responsible business conduct (e.g., Supplier Code of Conduct) we expect to contribute to development and capacity building with our business relationships.

See Orkla policies and guidelines: <https://www.orkla.com/guidelines/>
See Orkla annual report for more: <https://www.orkla.com/annualreport/>

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

When conducting our impact assessments aligned with the UNGPs/OECD, we assess against 16 economical areas. The overview of the different areas can be found here: <https://globalcsr.net/overview-of-the-16-economic-areas/>

In our latest reassessment of the 16 areas, we identified significant risk of potential negative impacts in 5 out of 16 areas. For 11 out of 16 areas we identified 'No impact' and explained why we reached such conclusions.

We publicly disclose our impact assessments on our website:
<https://www.orklahousecare.com/sustainability/sustainability-commitment/#duediligence>

Additionally, as part of the CSRD/ESRS reporting to Orkla ASA we report on these topics: *Governance* and *Business conduct*.

See Orkla policies and guidelines: <https://www.orkla.com/guidelines/>
See Orkla annual report for more: <https://www.orkla.com/annualreport/>

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

For other relevant information related to our work to reduce, prevent, and manage negative impact on people, animals, society and the environment, see the Orkla's governing principles, ownership requirements and expectations of portfolio companies and other directly owned companies.

https://www.orkla.com/wp-content/uploads/sites/3/2023/06/Sustainability_and_RBP_0623_DIGITAL_EKSTERN_V11_FINAL.pdf



4

Track implementation and results

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

4.A. Track and assess

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

a) In Orkla House Care the CEO, together with the leadership team, has the overall responsibility for tracking effect of measures implemented. The Sustainability Manager has the lead on this work, and reports status, progress and issues to top management. Status is also on the agenda in Orkla House Care Board of Directors meetings on a regular basis.

b) Orkla ASA reviews this as part of business area internal reporting, and includes the results in Orkla ASA annual sustainability reporting. Orkla ASA board of directors is briefed on progress on a regular basis, and on an annual basis concerning the sustainability report.

As part of the UNGPs/OECD impact assessments we conducted the in 2023 and re-assessments in 2024/2025, the assignment of responsibility is noted for each of the 48 human rights, 20 environmental areas and 16 economic areas. The combination of distributed responsible persons/roles in the organization and the indicators of effectiveness are supporting the tracking and implementation works in practice. The Sustainability manager is overall lead of follow-up and reports on results and progress.

For more information on reporting, responsibility and tracking, please see: <https://www.orkla.com/reporting-and-results/>

See Orkla annual report for more: <https://www.orkla.com/annualreport/>

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

We have identified *Indicators of Effectiveness* for each of the identified areas of potential negative impacts, to enable tracking and evaluation of effectiveness of our actions to address this impact. OHC aim to set indicators that are adequate to evaluate whether we responded effectively to the identified impact, and whether OHC is continuously improving our response to the impact.

(See description of results under each of the salient issues in point 3.A.1. for examples of such indicators.)

Results from the indicators are included in the annual update of our impact assessments, and demonstrate whether our measures taken to identify, prevent and reduce impact actually work. We expect to learn from this and use our findings to update and improve our indicators of effectiveness, and the impact assessments overall. During the 2024-reassessment, we acknowledged that some of the indicators need to be redefined, this will be conducted during 2025.

A close-up photograph of a woman with blonde hair looking through the eyepiece of a microscope. The microscope is black and silver, with the brand name 'EVIDENT' visible on the eyepiece. The woman's face is in profile, and she is focused on the instrument. The background is a soft, out-of-focus laboratory setting.

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 (Åbenhetsloven) §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

OHC communicates our impact assessments to employees and other potentially impacted stakeholders, asking for their input or ideas to better address impacts. When conducting the first impact assessments in 2023 we invited 30 employees from cross-functional roles within OHC to participate in the assessments. The reassessments in 2024 has been conducted by the responsible owners of the various risk areas. Apart from these participants, we did not engage with impacted stakeholders during our assessments. Sharing our assessments with such impacted stakeholders moving forward will ensure meaningful engagement and is planned to be strengthened during 2025.

OHC communicates our work in this area on our website:

<https://www.orklahousecare.com/sustainability/sustainability-commitment/>

Example from OHC impact assessment:

Means of engaging with affected stakeholders, related to the *Right to safe and healthy working conditions*

- Employee development talks
- Grievance mechanisms
- Workplace assessments
- Employee representatives
- Regular staff surveys
- Staff training
- On-boarding of new employees
- Employment contracts
- Exit interviews
- Staff training

For information on Orkla ASA communication and reporting on management of negative impacts, see his link:

<https://www.orkla.com/reporting-and-results/>

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

COMMUNICATION, HOW IMPACTS ARE ADDRESSED

Meeting the UNGPs/OECD Requirements to Communication

We are regularly communicating our impact assessments to employees and other potentially impacted stakeholders asking for their input or ideas to better address impacts.

Using First Impact Assessments as Models

We have used our first impact assessments as a basis and model for enrolling additional business units, i.e., subsidiaries, in our Sustainability Due Diligence programme, making their first operational-level impact assessments much more achievable and viable.

Meeting the UNGPs/OECD Requirements to Official Reporting

We communicate publicly on how we handle risks of severe impacts as required by the UNGPs/OECD. We will primarily use our annual report to Ethical Trade, the Orkla Sustainability Report, and our websites for this purpose.

Using Regular Operational-Level Impact Assessments in Business Relationships

We use our impact assessments actively in our communication with business relationships.

Firstly, we will disclose our Sustainability Policy Commitment, Orkla Supplier Code of Conduct or Orkla Business Partner Code of Conduct, and our latest Sustainability Impact Assessments, whenever our business relationships forward their requirements. We do encounter Codes of Conduct from customers that merely ask us to manage some labour rights. We hope they are satisfied to see that we manage risks in relation to such rights as well as other human rights from the International Bill of Human Rights, all environmental and all economic areas as required by the minimum standard.

Secondly, we will use our impact assessments to ensure that our business relationships can get inspired to conduct Sustainability Due Diligence in their operations. Hence, forwarding the latest impact assessments do not only demonstrate to our business relationships, that we meet our responsibility, but also serves that purpose of inspiring our business relationships, while demonstrating level of expectation that we find appropriate, when exchanging documentation of due diligence.

Public Disclosure of Regular Impact Assessments

Apart from the communication requirements mentioned above, companies are not required by the UNGPs/OECD to publicly share their operational level impact assessments. We have decided to share some of the information through our homepage and annual report to Ethical Trade.

For information on Orkla ASA communication and reporting on management of negative impacts, see his link: <https://www.orkla.com/reporting-and-results/>

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

We acknowledge the need to structure our routines to enable concrete responses relating to Transparency Act specifically. Customer service have training in how to respond to external inquiries in accordance with requirements in the Transparency Act. We have internal supporting documentation, e.g., FAQs to support efficient handling of external inquiries.

We expect the disclosure of our impact assessments to improve our documented due diligence, and thus support OHC to fulfill our obligations under the Transparency Act.

Our company strategy, commitments and goals for sustainability and responsible business conduct requires us to ensure routines and management systems are in place, regardless of the Transparency Act. The commitment to improve on this area is further supported and rooted in top management, and board of directors.



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

We have implemented Orkla House Care TELL-US as our grievance mechanism. Our TELL US mechanism is a way for potentially impacted stakeholders to engage with us concerning our sustainability work. This enables us to share our impact assessments with stakeholders, engage in stakeholders dialogue to improve due diligence, encourage good ideas, and enable reports or grievances. As required by the UNGPs/OECD, this mechanism is developed to provide access to remedy, for affected stakeholders through communication and dialogue with OHC. For more severe impacts, breaches of legal regulation or law, or the need for anonymous reporting, we enable such reporting through our whistleblower mechanism.

Providing access to remedy is linked to whether or not we are causing, contributing or linked to an adverse impact.

If we are causing or contributing to an adverse impact, we will implement relevant actions to provide remediation.

If we are merely linked to an adverse impact, we will use our leverage to actively influence the entity causing the adverse impact, to cease, prevent or mitigate the impact, and provide access to remedy.

Grievance mechanism (TELL-US):

<https://www.orklahousecare.com/sustainability/sustainability-commitment/#grievance>

Whistleblower mechanism:

<https://www.orklahousecare.com/sustainability/sustainability-commitment/#whistleblower>

Orkla ASA further describes this in the Human and Labour Rights Policy here:

<https://prod.orkla.webcore.no/wp-content/uploads/sites/2/2022/03/Orkla-Human-and-Labour-Rights-Policy-1.pdf>

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

Not relevant, no grievances reported during 2024.

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

Orkla provides a Whistleblower system that is publicly available to enable (if needed) anonymous reporting of grievances.

The Whistleblower system can be accessed here: <https://report.whistleb.com/en/orkla>

OHC implemented a new grievance mechanism, aligned with UNGPs/OECD during 2024. We want to encourage relevant stakeholders to access our impact assessments, to submit grievances or knowledge hereof, and to suggest improvements on our actions to prevent or mitigate adverse impacts, or of the grievance mechanism itself. All communication through this channel will be designed for dialogue and will be handled by OHC.

The TELL US & help us do better can be accessed here: <https://orklahousecare.tell-us.app/ui/about>

In essence, our grievance mechanism addresses personal or collective workplace disputes or concerns, while the whistleblower system is designed for reporting serious misconduct that could have legal or ethical implications for the organization.

We commit to having effective channels for complaints (grievance mechanisms) that are accessible to all employees.

However, to ensure workers and local communities have access to effective grievance mechanisms in our supply-chain, we require of our suppliers to do the same and have systems in place. Our Supplier Code of Conduct and other policies detail our expectations on business relationships.

When to use the Grievance mechanism and the Whistleblower system?

The grievance mechanism is a formalized process within Orkla House Care for receiving and resolving complaints from employees, customers, or other stakeholders, focusing on fair outcomes through dialogue or mediation.

The whistleblower system is a confidential channel for reporting unethical or illegal activities within Orkla House Care, providing protection for the whistleblower against retaliation.

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