FRESENIUS KABI
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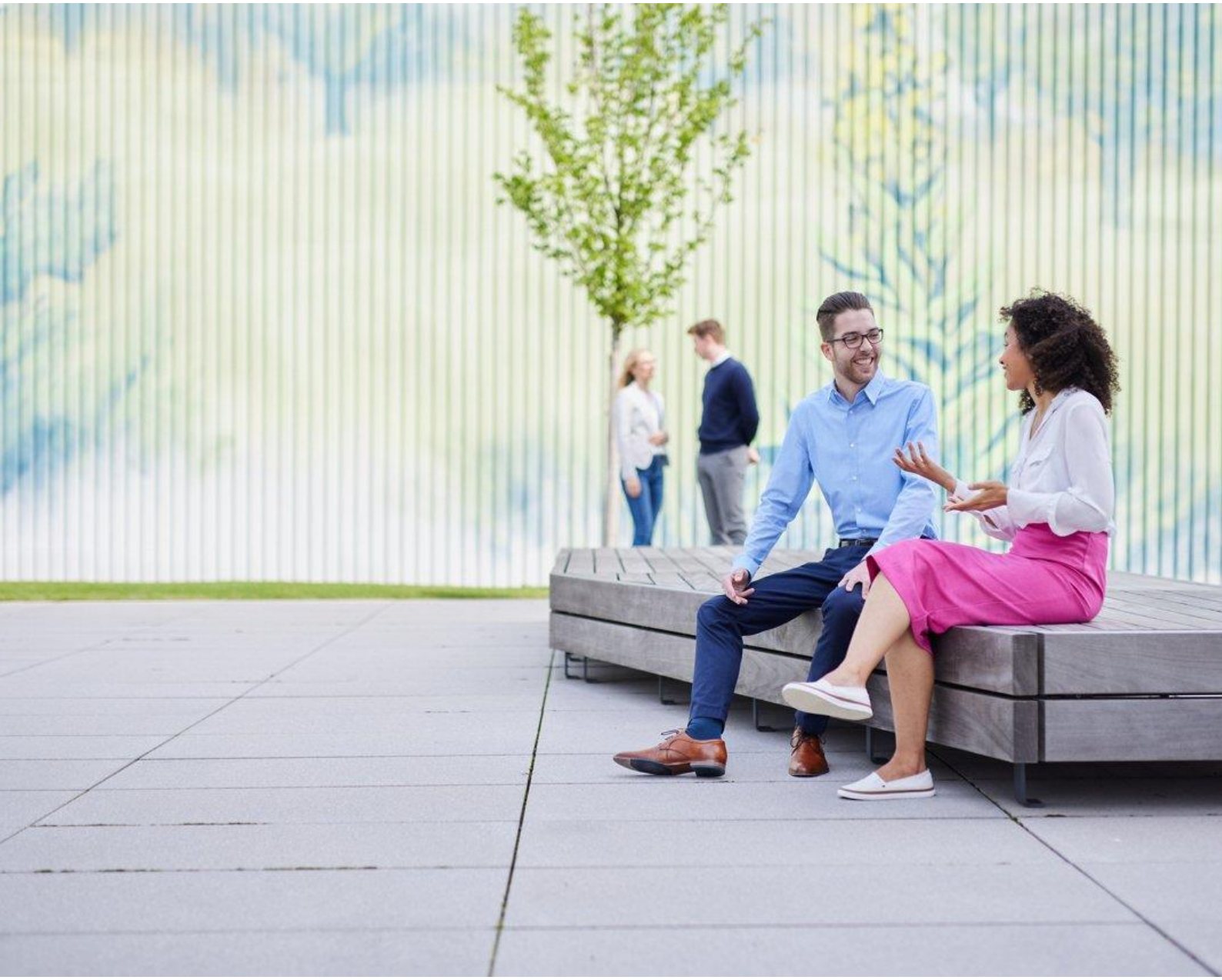
Fresenius Kabi Norge AS

The Norwegian Transparency Act
Report 2022-2024



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1. Introduction to the Norwegian Transparency Act

The Act shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services, and ensure the public has access to information about how businesses deal with negative consequences for basic human rights and decent working conditions.

By fundamental human rights it is meant the internationally recognized human rights that are enshrined, among other places, in the International Covenant on Economic, Social and Cultural Rights of 1966, the International Covenant on Civil and Political Rights of 1966 and the ILO's core conventions on fundamental principles and rights at work. Decent working conditions means work that safeguards basic human rights and health, environment and safety in the workplace, and that provides a living wage. By supply chain it is meant any party in the chain of suppliers and sub-contractors that supplies or produces goods, services or other input factors included in an enterprise's delivery of services or production of goods from the raw material stage to a finished product. By business partner it is meant any party that supplies goods or services directly to the enterprise, but that is not part of the supply chain.

The enterprises' must carry out Due Diligence assessments in line with the OECD's guidelines for multinational companies. The Due Diligence assessments must be carried out regularly and be in relation to the size of the business, the nature of the business, the context within which the business takes place, and the severity of and the likelihood of negative consequences for basic human rights and decent working conditions. The businesses must publish an account of the Due Diligence assessments. The statement must be made easily available on the company's website, or be easily accessible. In the annual report, the companies must state where the report is available. The report must be updated and published by 30 June each year and otherwise in the event of significant changes in the business's risk assessments. It must be signed in accordance with the rules in § 3-5 of the Accounting Act.

For more information, please visit: https://lovdata.no/dokument/NLE/lov/2021-06-18-99

2. Methodology for the Transparency Act work

The methodology used to answer the requirements in the Transparency Act follows the OECD's guidelines for due diligence for multinational enterprises in accordance with § 4 in the Norwegian Transparency Act. The method is based on a four-step model that contains the following components and activities:

1. Embedment of responsibility
    a. Embedment in the board and management
    b. Embedment into policies and management systems
2. Due Diligence
    a. Analysis of the enterprise' suppliers and value chain in accordance with the OECD guidelines
    b. Due Diligence assessment with representatives from the enterprise to identify areas of improvement
3. Prioritize and prevent
    a. Prioritize areas of improvement and selected suppliers to follow up
    b. Identify measures to prevent, reduce or avoid negative impact
4. Prepare KPI and report
    a. Prepare KPI for measurement and surveillance over time
    b. Finalize report on the Norwegian Transparency Act for the enterprise

The data used is the enterprise' supplier register, supplier transactions as well as global risk indicators[1] for violations of human rights, violations of decent working conditions, violations of economic and tax legislation and the maturity of national environmental policy. The analysis further looks at current guidelines, routines and procedures the company has in place to be able to map, carry out, measure, evaluate and follow up potential negative impacts for the company, suppliers and business relationships.

Fresenius Kabi Norge AS has collaborated with Azets for the supplier analyses and preparation of the report.

[1] Global Slavery Index, Global Rights Index, Global Waste Index, Human Rights Guidance Tool, Human Freedom Index, Corruption Perceptions Index, The World Strength of legal rights index & Worldwide Governance Indicators.

3. Fresenius Kabi Norge AS

3.1 About Fresenius Kabi Norge AS

Fresenius Kabi Norge AS ("Fresenius Kabi Norge" or "the Company") is a Norwegian subsidiary of the global healthcare company Fresenius Kabi AG, specializing in the supply of pharmaceutical products globally. Established on October 26, 1998, and officially registered on October 30 of the same year, the Company has steadily grown into a trusted supplier within the healthcare sector. With a workforce consisting of 26 permanent and 2 temporary employees, the Company operates from two locations in Norway – Helsfyr in Oslo and Halden – bringing together a diverse team with broad and complementary expertise.

The core activities of Fresenius Kabi Norge include marketing and wholesale (procurement, storage, supply and export) of pharmaceutical products, as well as managing public tenders. The Company handles customer inquiries and is actively involved in creating brochures and various support materials related to its product portfolio. A dedicated regulatory and quality department is responsible for overseeing product registrations, managing complaints, and processing reports of adverse events, ensuring compliance with both national and international standards.

Beyond office-based functions, the Company maintains close contact with its customer base through on-site training and educational courses. This hands-on approach underlines Fresenius Kabi Norge's commitment to quality, safety, and customer support. The Company's operations are certified under the NS-EN ISO 9001:2015 quality standard, reflecting its systematic approach to quality management and continuous improvement across all business areas.

In the spring of 2024, Fresenius Kabi completed the sale of its production plant to the Prange Group, establishing HP Halden Pharma AS. As a result of the sale, the Company no longer maintains any operational or contractual relationships with the former suppliers associated with the Halden site and no longer has insight into their activities.

3.2 Organisation and business management

Fresenius Kabi Norge belongs to the German healthcare group Fresenius Kabi AG, a company dedicated to improving the lives and health of patients across the globe. As part of this internationally renowned organization, Fresenius Kabi Norge benefits from the extensive

expertise, innovation, and resources of a global network while remaining deeply rooted in the Norwegian healthcare landscape.

Fresenius Kabi AG specializes in life-saving medicines and technologies for infusion, transfusion, and clinical nutrition, primarily serving patients with critical and chronic illnesses. The Norwegian division operates within this framework, contributing locally to the broader mission of the company while aligning with its high standards for quality, safety, and care.

Globally, Fresenius Kabi employs more than 41,000 people and recorded a revenue exceeding €8.4 billion in 2024. It is one of the four main business segments of the larger Fresenius Group, which employs over 190,000 individuals worldwide and has a total annual turnover of €22.3 billion. The group continues to show a strong positive financial trend, supported by its long-standing commitment to innovation and excellence in healthcare.

In Norway, the leadership of Fresenius Kabi Norge reflects the Company's international standards and strategic direction. The general manager is Anna Birgitta Ekwall, supported by a board led by chairman Mikko Henrik Tiitinen. The board also includes Hege Børringbo and Mats Christer Hermansson, whose combined experience ensures strong governance and alignment with the group’s global vision.

Through its connection to Fresenius Kabi AG and the wider Fresenius Group, Fresenius Kabi Norge is well-positioned to continue supplying vital healthcare solutions globally, always with a focus on quality, patient safety, and the continuous improvement of life-sustaining treatments.

3.3 Business activities

Fresenius Kabi Norge operates across several core business areas, offering a comprehensive portfolio of products and solutions that support the treatment and care of patients in various healthcare settings. The Company's offerings include a wide range of medical nutrition products, infusion solutions, intravenous generic drugs, and the medical devices required for administering these therapies.

Within the field of medical nutrition, the Company provides an extensive selection of oral nutritional supplements such as nutrient-rich drinks, creams, enrichment powders, and enteral feeding solutions. These products are formulated to meet the nutritional needs of patients with

a variety of medical conditions where regular food intake is insufficient or impossible. This includes individuals recovering from illness or surgery, those undergoing medical treatments, or patients living with chronic conditions.

The Company is also a leading provider of intravenous generic medications, covering key therapeutic areas such as oncology, infectious diseases, anesthesia, pain management, and critical care. To support the safe and effective administration of these medications, a broad array of medical equipment and consumables is being supplied.

In fluid therapy, the Company offers a diverse selection of infusion and blood volume replacement products. The portfolio also includes technical medical equipment and disposable materials for the intravenous administration of fluids, contributing to comprehensive solutions for hydration and hemodynamic support in clinical environments.

A key area of strength is clinical nutrition. Fresenius Kabi is among the few global healthcare companies capable of delivering both parenteral nutrition, administered intravenously, and enteral nutrition, delivered via the gastrointestinal tract as drinks or tube feedings. These methods are essential for patients who are unable to eat or absorb adequate nutrition through conventional means – often those in intensive care, severely ill, or suffering from malnutrition. The necessary pumps and accessories for both forms of nutritional therapy are also being provided.

In addition, Fresenius Kabi is actively engaged in the development of biosimilar medicines, with a particular focus on oncology and autoimmune diseases. These biosimilars are highly similar in efficacy, safety, and quality to original biologic drugs but are developed by manufacturers other than the original patent holders, offering more accessible treatment options.

Furthermore, the company supplies a wide range of medical devices used in the administration of intravenous therapies and nutritional products. In the area of transfusion technology, Fresenius Kabi offers solutions for blood collection, processing of blood components, and therapeutic apheresis systems, supporting both blood donation services and patient treatments involving blood component separation.

Through this diversified product range and its commitment to innovation and quality, Fresenius Kabi Norge plays a vital role in supporting healthcare professionals and improving patient outcomes globally.

3.4 Introduction to guidelines and policies

Fresenius Kabi Norge is committed to maintaining a high standard of quality, safety, and ethical conduct in all areas of its operations. To ensure consistency, compliance, and transparency throughout the organization, a comprehensive set of internal guidelines and policies has been implemented. These form the framework within which all employees, processes, and partnerships operate.

All employees of Fresenius Kabi Norge have access to a robust collection of internal routines and procedures. These include the Employee Handbook (Personalhåndbok), which outlines rights, responsibilities, workplace conduct, and the procedures for reporting misconduct such as harassment, discrimination, legal breaches, or other unacceptable conditions. Specific procedures for whistleblowing are also clearly defined, ensuring that concerns can be raised confidentially and are handled appropriately.

Health, safety, and environmental (HSE) practices are governed by the HSE Handbook (HMS Håndbok) in Norwegian and the Quality Handbook in English. These documents guide daily operations and are integral to maintaining compliance with both local and international standards.

The Company also maintains strict procurement protocols to ensure that external suppliers meet Fresenius Kabi's requirements regarding quality, delivery reliability, environmental responsibility, and ethical conduct. This is outlined in the procedure for Purchasing from External Suppliers, which aims to minimize business risk, ensure patient safety, and comply with applicable legislation. The selection process is based on a combination of cost-efficiency and supplier qualifications, ensuring that relevant suppliers are given equal opportunity and fair treatment. Depending on the value and risk classification of the goods or services in question, supplier documentation may be required. Mandatory documentation is specified for certain supplier categories, including those providing GxP-relevant products or services.

To ensure compliance with regulatory and internal quality standards, Fresenius Kabi Norge also follows a documented process for the qualification of pharmaceutical suppliers and customers. This includes verifying the legitimacy of all new pharmaceutical suppliers within the EEA before procurement, confirming Certificate of Conformance (CoC) for imported drugs, and ensuring that foreign pharmaceutical packaging is approved by the Norwegian Directorate of Medical Products before sale in the domestic market. All complaints related to distribution services are logged and investigated, and all order handling is conducted to ensure accurate fulfillment and transaction recording.

Annual re-qualification procedures are carried out for all registered pharmaceutical suppliers and customers to ensure ongoing compliance. If any changes occur in the original qualification criteria, a new verification is triggered, and all such evaluations are documented as part of the company's quality assurance processes.

On a global level, Fresenius Kabi upholds its ethical standards through the Third-Party Code of Conduct (TP-CoC), which outlines expectations for supplier behavior in terms of sustainability, human rights, and environmental practices. These standards apply to all international suppliers and are reinforced through contractual agreements, purchase orders, and general procurement terms and conditions. As part of its commitment to responsible supply chain management, Fresenius Kabi complies with international regulations such as the German Supply Chain Due Diligence Act. Relevant human rights and environmental clauses are included in supplier agreements to ensure alignment with the company’s expectations and preventive practices throughout the supply chain.

Together, these guidelines and policies form an integrated and comprehensive system that supports Fresenius Kabi Norge’s mission to provide safe, effective, and ethically sourced healthcare solutions, while ensuring compliance with all relevant legal and regulatory requirements.

4. Due Diligence

4.1 Account of Due Diligence

Fresenius Kabi Norge has carried out a Due Diligence assessment in accordance with § 4 of the Norwegian Transparency Act and accounts for the Due Diligence in accordance with § 5.

The Company has carried out an internal analysis, as well as analysis of suppliers and business partners for 2022-2024 based on global risk indicators on human rights, working conditions, climate and environment, as well as corruption.

4.1.1 Internal evaluation

Fresenius Kabi Norge maintains a strong commitment to workplace health, safety, and overall employee well-being. As part of its internal evaluation processes, the Company continuously assesses occupational risks and implements preventative measures to safeguard its personnel. In recent evaluations, the overall risk level has been assessed as low. The likelihood and potential consequence of incidents were each rated at the lowest level, reflecting a well-managed and secure working environment. There have been no recorded work-related accidents, no known near-misses of significant concern, and no fatalities resulting from occupational injuries or illness.

Health and safety training is normally conducted annually for all employees, as documented in the training plan and carried out in both 2022 and 2023. However, Fresenius Kabi Norge did not conduct HSE training in 2024 due to office relocation.

These evaluations affirm that Fresenius Kabi Norge operates in a low-risk environment, with effective internal controls and a strong focus on employee safety. Continuous improvement remains a priority, and the Company remains dedicated to further strengthening its documentation practices and training frameworks in alignment with best practices and regulatory expectations.

4.1.2 Evaluation of suppliers and business partners

Between 2022 and 2024, Fresenius Kabi Norge maintained a network of 279 suppliers and business partners. Among these, 36 were identified as prioritized suppliers based on their volume of transactions - representing approximately 80 % of all procurement activity - and the

inclusion of all international suppliers located outside of Norway. This prioritization ensures a focused and risk-aware approach to supplier management.

Of the 36 prioritized suppliers, 18 were previously associated with HP Halden Pharma. As Fresenius Kabi Norge no longer collaborates with these entities and has no ongoing insight into their operations, they were excluded from the evaluation process. Among the remaining prioritized suppliers, none are based in medium- or high-risk countries.

Fresenius Kabi Norge applies a systematic approach to supplier evaluation, ensuring that suppliers meet defined standards in terms of quality, compliance, and ethical conduct. No supplier has been linked to any actual or potential incidents as defined by OECD guidelines. Risk assessments based on the likelihood and consequence of adverse events have consistently resulted in low-risk classifications across the board.

In addition to this broader evaluation, the Company has also performed a deeper supply chain analysis for five specific suppliers. Among these, one was assessed as carrying a medium level of risk due to warehouse-related activities, while the remaining four were classified as low risk. This demonstrates Fresenius Kabi Norge's commitment to proactive supply chain oversight and its ongoing efforts to ensure responsible and sustainable business practices throughout its network of suppliers and partners.

4.2 Actions to remedy, mitigate or prevent incidents

Fresenius Kabi Norge takes a proactive approach to ensuring ethical conduct, transparency, and compliance across its operations. As part of its commitment to preventing incidents and promoting responsible business practices, all employees are required to complete e-learning modules on the Company's Code of Conduct. These training modules are distributed from the corporate headquarters and are designed to reinforce a shared understanding of ethical expectations throughout the organization. The Code of Conduct is also an integral part of the onboarding program for all new employees, ensuring that these principles are embedded from the very beginning of each employee's journey with the company.

In addition, the Company is planning to strengthen internal policies by updating sections of its Employee Handbook to include key elements of the Norwegian Transparency Act. This initiative aims to provide clearer and more accessible guidance for employees regarding

responsible business conduct and due diligence obligations, thereby fostering a more transparent and ethically aware workplace.

At present, no further measures have been deemed necessary for 2025, as existing procedures and training initiatives are considered sufficient to support ongoing compliance and to mitigate the risk of ethical or legal incidents. The Company remains attentive to developments in regulatory expectations and industry standards, and will continue to adjust its practices as needed to uphold its commitments.

5. Contact information

For more information on the Norwegian Transparency Act for Fresenius Kabi Norge, please contact:

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5.1 Signature by Management and Board

The report is read and approved by the Company's management and board:

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