



The Norwegian Transparency Act Report on due diligence

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1. General Information

Ascensia Diabetes Care Norway AS (“ADC Norway AS”) is a wholly owned subsidiary of Ascensia Diabetes Care Holdings AG, (“ADC”) headquartered in Basel, Switzerland. ADC is a global healthcare company dedicated to improving the health and lives of people with diabetes and is part of PHC Holdings Corporation (“PHC”). ADC specializes in the development, manufacturing, and marketing of products and solutions that make managing diabetes more effective and easier for patients.

ADC Norway AS; a subsidiary of Ascensia Diabetes Care Holding AG (together with all subsidiaries hereafter the “ADC Group”), is located in Lysaker, Bærum and is engaged in the marketing and distribution of healthcare medical devices by serving the Norwegian market with a range of blood glucose monitoring (BGM) systems.

2. Account on Due Diligence - Introduction and Structure of the Process

The ADC Group is committed to ensuring that its entire value chain upholds Human Rights and employee rights. Our fundamental standards and expectations for suppliers are outlined in the PHC Group Procurement Guidelines

https://www.phchd.com/global/~//Media/phchd_g/sustainability/pdf/PHC_CSR_Procurement_Guideline.pdf and the PHC Group Human Rights Policy <https://www.phchd.com/global/sustainability/social/humanrights>

Our commitment to health and safety is well described by the PHC Group Environment, Health and Safety Policy

<https://www.phchd.com/global/sustainability/environment/policy>

Additionally, ADC holds a group-wide Third-Party Due Diligence process to comply with strict legal standards across the globe; by conducting a screening process of all its distributors, suppliers and vendors with a significant contract value as outlined in ADC's Third-Party Due Diligence Policy. ADC is committed to ensuring our people do what is right. Our foundation is the PHC Code of Conduct (“Code of Conduct”)

<https://www.phchd.com/global/sustainability/governance/code-of-conduct>,

which encourages employees to act with integrity, transparency, and high standards, in adherence to ethical business practices, laws, and regulations. The Code of Conduct contains principles and expectations for ethical business conduct that guide our employees in making the right decisions. The Code of Conduct is a fundamental part of our terms of employment; all employees must adhere to it and are held accountable to its content. As part of our compliance program, the Code of Conduct training is provided once a year and all new employees receive training as soon as they join the company.

Anyone who has a compliance incident or concern and wants to report it in good faith (anonymously) is welcome to do so using the following link:

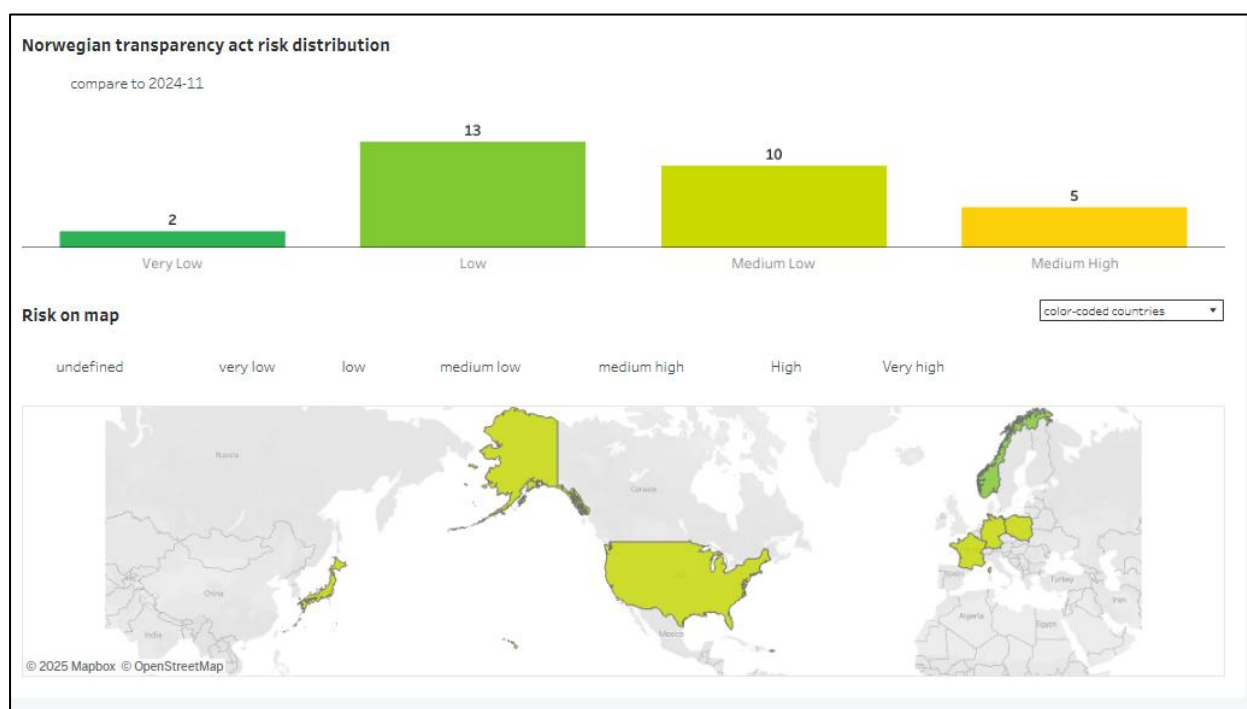
<https://www.ascensia.com/contact-us/report-a-compliance-incident/>



3. Outcomes of the due diligence assessment

In Fiscal Year 2024, ADC successfully implemented the Ecovadis Supplier Assessment Platform. The company actively monitors risks and potential adverse impacts within its value chain.

In Fiscal Year 2025, ADC will expect all global direct material suppliers to undergo a third-party sustainability assessment using Ecovadis Ratings. The assessment is based on structured supplier risk monitoring and assessment across four key areas: labor and human rights, environment, ethics, and sustainable procurement. The platform verifies submitted evidence through expert analysis, generating scorecards that identify risks and improvement opportunities. This creates documented proof of due diligence efforts, fulfilling Apenhetsloven's requirements for identifying and addressing human rights risks. ADC Norway AS actively tracks the performance of selected 30 business partners, including 9 direct material suppliers.



Source: Ascensia Diabetes Care's Ecovadis IQ Platform, retrieved on 11.06.2025.

Based on the risk profile and available evidence, we consider that the vast majority (83%) of ADC Norway AS supply chain is flagged with a very low, low or medium low risk profile. Among the remaining 5 suppliers with medium-high risk, 3 of them are direct material suppliers that are currently being validated through Ecovadis Rating assessments. Among 30 analyzed suppliers, 14 of them have already been assessed with Ecovadis Rating.

4. Account on measures to eliminate, reduce and prevent any actual or potential adverse impacts on workers and human rights

Based on the outcome of our Supplier Assessment, in 2025 Ascensia Diabetes Care Holdings AG will manage and track the effectiveness of Corrective Action Plans for our suppliers in regard to workers and human rights.

ADC is a subsidiary of PHC (together with all subsidiaries hereafter the “PHC Group”); as part of the PHC Group, ADC will implement improvements to the human rights due diligence processes, including new Human Rights Policy, implementation of human rights risk management plan and establishing an improved grievance mechanism.

