The Norwegian Transparency Act Report on Due Diligence

Date: 30th June 2026

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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 Holdings 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. Due Diligence Assessment – Introduction and Structure of the Process

General

The ADC Group is committed to ensuring our people do what is right. Our foundation is the PHC Group Code of Conduct (“**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.

ADC is also committed to respecting and promoting fundamental human rights and employees’ rights across all areas of its business activities and across the entire value chain. Our fundamental standards and expectations for business partners are outlined in the PHC Group Procurement Guidelines and the PHC Group Human Rights Policy, which has been lately updated in September 2025 to better reflect international guidelines and strengthen our alignment with recognized standards.

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

Own operations

At ADC Group, anyone who has a compliance incident or concern and wants to report it in good faith (anonymously) is welcome to do so, through ADC Compliance Incident Infoline, available on ADC Website.

Moreover, PHC formally launched its Human Rights Due Diligence (HRDD) project to implement human rights due diligence across all group companies, including ADC, in line with international guidelines and European regulations.

In Fiscal Year 2025, we revised the Human Rights Policy and conducted a preliminary risk assessment across the entire value chain. This included identifying key human rights risks relevant for PHC Group’s activities and developing a group-wide human rights risk map. We also held a study session for Board members and defined a roadmap for future actions in the short, medium, and long-term, including specific plans for Fiscal Year 2026.

These efforts mark the start of a long-term commitment to accountability, transparency, and continuous improvement.

Supply Chain & Business Partners

ADC holds a group-wide Third-Party Due Diligence process to comply with strict legal standards across the globe. This includes screening distributors, suppliers, and vendors with significant contract value, in line with the Third-Party Due Diligence Policy. Mandatory training for all employees is provided annually.

Furthermore, ADC conducts a due diligence assessment on key suppliers and business partners on a regular basis; this assessment is risk-based, proportionate and conducted in accordance with UN's Guiding Principles for Business and Human Rights and the OECD Procedure for Multinational Enterprises.

Regarding ADC suppliers, we actively monitor risks and potential adverse impacts across its value chain using EcoVadis platform. This process currently covers first-tier suppliers, with the expectation that they carry out appropriate due diligence on their own suppliers. This is monitored through EcoVadis and, where necessary, through a dedicated questionnaire assessing their due diligence practices. In Fiscal Year 2025, ADC:

- Conducted pre-assessments of key global suppliers above the defined threshold, based on country risk, industry risk, and web research, through EcoVadis platform.
- Requested global direct material suppliers to complete a third-party sustainability assessment through EcoVadis Ratings. This assessment covers four areas: labor and human rights, environment, ethics, and sustainable procurement. Submitted evidence is verified through expert analysis, resulting in scorecards that highlight risks and areas for improvement.
- Selected high-priority Corrective Action Plans (CAPs) for global direct material suppliers and indirect suppliers with scorecards below 50/100.

Regarding ADC Norway AS business partners, we monitor risks and potential adverse impacts for key partners above the defined threshold through the following steps:

- Conduct pre-assessments based on country risk, industry risk, and web research, using the EcoVadis platform.
- Review live news alerts provided by EcoVadis, focusing on labor and human rights topics published in the previous fiscal year, to identify any actual adverse impacts.
- When a business partner’s sustainability risk is rated Medium High, High, or Very High, issue a targeted questionnaire covering human and employee rights topics.
- Assess responses using a scoring approach to enable consistent comparison.
- Where necessary, following internal discussion, engage with the business partner to request additional documentation.

3. Outcomes of the Due Diligence Assessment

Own operations

During Fiscal Year 2025, no relevant compliance incidents or concerns were reported through the ADC Compliance Incident Infoline.

Moreover, regarding PHC Group's Human Rights Due Diligence (HRDD) project, PHC published its first Human Rights Due Diligence Report 2025. This report is intended to share the progress of our first year. While we are still in the early stages of this journey, we are committed to addressing the issues we have identified and to expanding our response as needed over time. The preliminary risk assessment conducted in FY2025 revealed the following key trends:

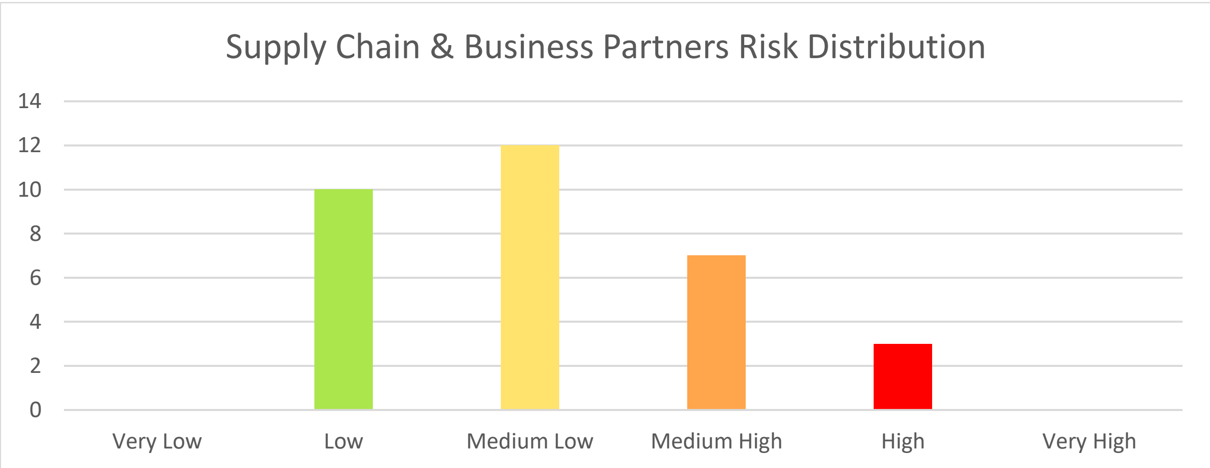
- Human rights risks are concentrated in our upstream value chain, specifically in procurement and manufacturing. While this pattern is common across many manufacturing industries, it was confirmed across multiple business domains within PHC Group.
- Healthcare-specific stakeholders—patients and clinical trial participants—were recognized as an important theme, given their vulnerability and the nature of PHC Group's products and services.

Based on the preliminary assessment, the following five areas have been identified as salient human rights themes for PHC Group to address on a prioritized basis: occupational health and safety at manufacturing sites and impact on local communities, rights of patients and clinical trial participants, procurement of high-risk raw materials, rights of migrant and foreign workers, working conditions of warehouse and logistics workers.

Supply Chain & Business Partners

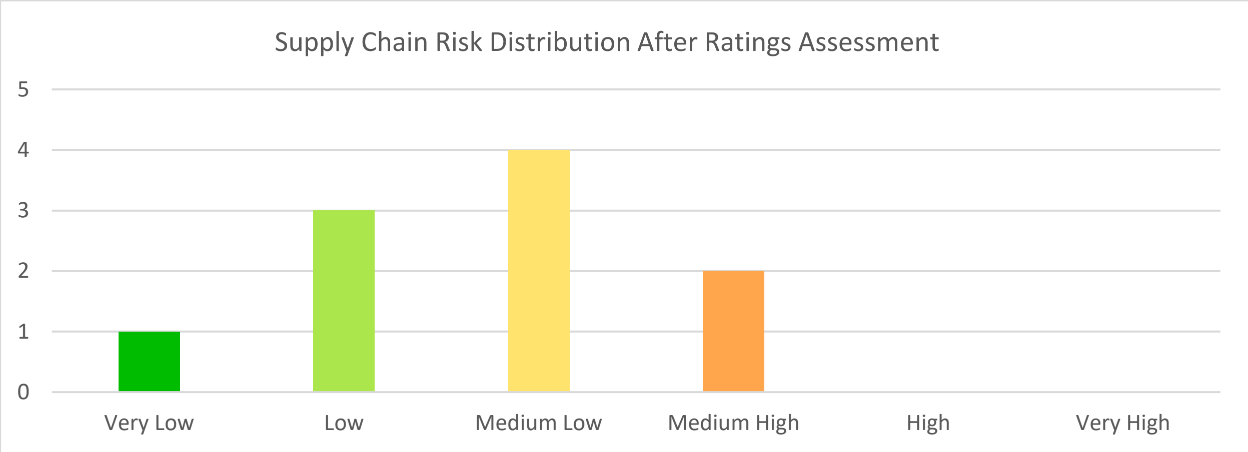
Among 32 analyzed companies, including 10 global suppliers, 5 have been assessed with entity-level EcoVadis Ratings and 9 with group-level EcoVadis Ratings.

Based on the pre-assessment results, the majority of ADC Norway AS's value chain (69%, or 22 out of 32 companies) is classified as Low or Medium Low Sustainability risk. Of the remaining 10 companies, 7 are rated Medium High risk and 3 High Risk. 9 of these higher-risk companies are global direct material suppliers.



Source: Ascensia Diabetes Care's EcoVadis IQ Platform, retrieved on 1.06.2026.

During fiscal year 2025, all key global direct material suppliers obtained either an entity- or group-level EcoVadis scorecard. This reflects their commitment to sustainability and continuous improvement. As a result, the actual risk profile improved, with only 2 suppliers remaining in the Medium High risk category. The average sustainability score is 59 out of 100.



Source: data based on Ascensia Diabetes Care's EcoVadis Ratings Platform, retrieved on 1.06.2026.

High-priority corrective action plans (CAPs) were identified and requested for all key suppliers. To date, one supplier has reported progress; however, the deadline for completion is December 2026.

Outside of the supply chain, only one additional business partner was rated Medium High risk, but the relationship was terminated in August 2025 due to unmet quality requirements. As no active business partners, were classified as Medium High, High, or Very High risk, no additional questionnaires or follow-up actions were necessary during this year.

A review of EcoVadis live news alerts related to labor and human rights in FY2025 did not identify any relevant actual adverse impacts.

4. Measures and Expected Results

ADC takes measures to prevent, mitigate, and remediate actual and potential adverse impacts on human rights and working conditions, based on the outcomes of its due diligence assessments.

From FY2026, PHC Group will further strengthen its HRDD approach by conducting more detailed assessments of identified salient risks and developing targeted response measures. In parallel, PHC will continue to enhance internal governance structures, deepen stakeholder engagement, and establish an improved group-wide grievance mechanism. These efforts are expected to enhance risk identification, increase transparency, and ensure effective and timely responses to adverse impacts.

In the supply chain, ADC will strengthen oversight and supplier performance by actively monitoring Corrective Action Plans (CAPs). During FY2026, all global direct material suppliers are expected to participate in CAPs where relevant, undergo EcoVadis reassessment, and achieve a minimum score of 50/100. Engagement with suppliers showing limited progress or expiring assessments is already underway. These measures are expected to reduce human rights risks and improve sustainability performance across the supply chain.

ADC applies a risk-based approach to business partner due diligence. Where elevated risks are identified, including low questionnaire scores, non-response, or specific concerns, cases are reviewed individually by ESG and local teams. Depending on the outcome, corrective actions may be required or the relationship may be terminated. While no active business partners required mitigation measures during the reporting period, one relationship identified as high risk in 2024 was terminated after the partner failed to demonstrate adequate human rights due diligence or alignment with the Norwegian Transparency Act.

ADC remains committed to continuous improvement. Supply chain and business partner assessments will be conducted annually and refined over time to reflect evolving risks, regulatory developments, and lessons learned, strengthening the overall effectiveness of its due diligence framework.

Statement on the Transparency Act – Ascensia Diabetes Care Norway AS

Report for the fiscal year 2025 (from April 2025 to March 2026), reviewed and signed by:

Andersen Torkild	Maria Schybergson
Country Cluster Head EU North	Country Manager Norway
Ascensia Diabetes Care Norway AS	Ascensia Diabetes Care Norway AS