

Transparency Act Due Diligence Report 2025 Vision Healthcare Nordic AS

Date: 24 June 2025

1. Introduction

Vision Healthcare Nordic AS is committed to promoting respect for fundamental human rights and decent working conditions throughout our operations and supply chains. This report is prepared in accordance with the Norwegian Transparency Act (Åpenhetsloven), which came into force on 1 July 2022.

Pursuant to Section 4 of the Transparency Act, we are obliged to conduct due diligence to identify actual and potential threats to fundamental human rights and decent working environment within its own organisation and supply chain. The findings from the due diligence shall be presented by way of an annual due diligence report, no later than 30 June each year, cf. Section 5 of the Act. The purpose of this due diligence report is to give the general public access to the key findings from the due diligence, as well as our implemented and ongoing efforts to address and combat any actual or potential risks.

2. Company Overview

- Business Area: Health and wellness products
- Headquarters: Strandveien 30, 1366 Lysaker, Oslo
- Employees: 22 FTE
- Supply Chain: Primarily European suppliers for product manufacturing, packaging, and logistics.

3. Due Diligence Framework

We are currently in the process of implementing the Transparency Act Module from House of Control, which will serve as the foundation for our due diligence processes. This includes:

- Mapping of suppliers and business partners.
- Risk assessment tools for identifying human rights and labor risks.
- Documentation and follow-up procedures.

4. Risk Assessment (Preliminary Phase)

As of this report, we have not yet completed a full risk mapping. However, based on industry knowledge and preliminary assessments, we have identified the following potential risk areas:

- Environmental and health standards in packaging suppliers.
- Third-party logistics partners' compliance with labor laws.

Our strategy for supplier selection includes all vendors with purchases exceeding 250,000 NOK and all intercompany partners. Based on this approach, we expect to cover over 90% of all purchases in 2024. After the summer, we will gain deeper insights into all vendors through a questionnaire distributed via the Transparency Act module.

5. Planned Measures

In 2025, we will:

- Finalize supplier mapping using the House of Control module.
- Conduct risk assessments and initiate supplier audits where necessary.
- Establish a grievance mechanism for stakeholders.
- Train internal staff on the Transparency Act and ethical sourcing.

6. Public Access and Information Requests

This report is publicly available on our website: <u>www.vhcnordic.com</u>

We welcome inquiries from the public regarding our due diligence practices. Requests can be sent to: finance.no@visionhealthcare.eu

7. Approval

This report has been reviewed and approved by our board:

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Director

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