

# Nordic Infucare Human rights statement

## 1. Introduction

As a Nordic organization we have applied The Norwegian Transparency Act (the “Act”) to the whole Nordic organization. The Norwegian Transparency Act (the “Act”) is a legal framework in Norway designed to ensure that businesses uphold fundamental human rights and maintain fair working conditions in connection with the delivery of goods and services. This legislation aims to safeguard human rights and decent working conditions across Nordic Infucare entire value chain, with a particular emphasis on our suppliers. Nordic Infucare’s work with due diligence in our own operations and in our supply chain is based on the UN guiding principles for businesses and human rights, and the OECD guidelines for multinational enterprises. Our aim is to promote, respect and protect human rights both in conducting our business, and in our supply chain. We always strive to improve our operations to monitor and handling risks related to human rights and the environment.

## 2. General information on the structure of our organization

Nordic Infucare is a distributor of drugs and medical devices specialized in treatment at home for patients suffering from chronic diseases and have developed a structured support to patients and medical staff. Our main areas are: Diabetes, Neurology, Cardiology, Pulmonology and Immunology. Our operations covers the five Nordic countries and consists of over 130 employees with more than 40 000 patients on treatment in the Nordics. We are part of healthcare section of the French multinational company Air Liquide. Air Liquide operates in 73 different countries with over 67 000 employees in the areas of gases, technologies and services for industry and healthcare.

Nordic Infucare upholds the highest standards in how we run our activities, notably by respecting human rights, labour law and the environment. Respecting Human Rights and ensuring decent working conditions is an integrated part of our business. Our management team is ultimately responsible for all the policies and procedures. Furthermore, they are also responsible for assigning responsibility, time and competence needed to minimize negative impact related to our own business or in our supply chain. The policies and routines are revised on a regular basis and updated when needed.

### Routines related to human rights in our own operations.

The foundation of our integrated work is our sustainability policy which describes our ambitions for sustainable and ethical business practices and sustainability expectations of our organization.

We also have a Code of Conduct for employees which is applicable for all Nordic Infucare staff in Denmark, Finland, Norway and Sweden. The content of the Code of Conduct is part of onboarding process and is signed by all new employees.

We have a systematic work on health and safety including policies on anti-discrimination, inclusion and safety and other relevant policies, processes, and systems in place. An annual risk assessment related to work environment is conducted as well as continuous surveys to all employees on their health and wellbeing. Assessments on sick leave and work hazards are continuously being made.

Nordic Infucare is determined to offer personnel equal opportunities for recognition and career advancement, whatever their origins, gender, beliefs or physical condition and will not tolerate any form of discrimination, or harassment.

Our documents are easily accessible for employees in our document management system and intranet.

#### Relevant policies and commitments in our own operations:

- Sustainability Policy
- Code of Conduct for employees
- HMS håndbok Norway
- Inclusion Policy
- Safety Policy
- Victimization Policy

#### Routines related to human rights in our supply chain

Nordic Infucare supports the principles outlined in the Universal Declaration of Human Rights and the ten International Labor Organization (ILO) core conventions which is stated in our Code of Conduct for suppliers. We also expect our suppliers to uphold these principles and ensure that their own supply chains adhere to the same responsibilities.

Our Code of Conduct for suppliers is known and accepted by our suppliers and is integrated in our contract terms. Each business unit is responsible for regularly monitoring suppliers.

Our Code of Conduct for suppliers is available on our website.

#### Relevant policies and commitments in our supply chain:

- Nordic Infucare Code of Conduct for suppliers
- Due Diligence process for new suppliers
- Contract Management
- Supplier Evaluation Questionnaire
- Risk process

#### Complaint mechanisms and Whistleblower system

We promote a culture of transparency and honesty within our company, urging all employees and stakeholders to use our Whistleblower system if they suspect, perceive a risk of, or witness any violations of human rights or workers' rights—such as issues related to working conditions, harassment, discrimination, or corruption. We both have an internal and external channel to address complaints as well as through Ethicall, the Air Liquide ethics alert system

([www.safecall.co.uk/airliquide](http://www.safecall.co.uk/airliquide)). Our head of HR is responsible for securing that necessary measures are taken, and no whistleblower shall face punishment or retribution for speaking up against violations. Reports via Ethicall are presented to the Cluster Management in case of whistleblowing. Our Whistleblower system is available on infucare.com.

### **3. The supply chain in brief and our Due Diligence process**

As a distributor of medical devices and drugs (complex products that contain many different components and materials) our supply chain is somewhat complex. Electronics, plastic, and pharmaceuticals all have long and complex supply chains with many steps. We import our products from different countries in Europe and they are stored in outsourced warehouses or wholesalers in the different Nordic Countries. The warehouses and wholesalers are specialized in storing and transporting medical devices and pharmaceuticals.

We work with well-known suppliers and manufacturers in US, Sweden, Netherlands, Portugal, Germany and Spain.

During 2023 we reviewed our process for supply chain management in relation to responsible business conduct to align our due diligence process with OECD Guidelines for multinational enterprises and the Norwegian Transparency Act.

As a result, a new process for supplier qualification and supplier development has been implemented. This includes a more robust process for Due Diligence of new suppliers, Risk analysis, Supplier requirements, Supplier evaluation, follow-up and addressing deviations.

All new suppliers are revised through our Due Diligence-process where they need to provide information on how they address risks in their own operations and their supply chains.

In order to increase transparency on potential risks we have started to systematically map our supply chain. Risk analysis is conducted regarding human rights and environmental impacts for all active suppliers where we prioritize the highest risks. The supply chain mapping and related risk analysis is based on both sector and country. The information is collected from credible sources and from close dialogue with our first-tier suppliers. We also have a close dialogue together with the self-assessment questionnaire as part of our monitoring strategy for suppliers.

### **4. Identified negative consequences related to human rights**

As a distributor of medical goods without our own manufacturing we acknowledge the high risks and adverse impacts on human rights related to our products.

Our own operations are all mainly office and warehouse environments located in the Nordic countries. Our identified human rights impacts are mainly related to health and safety, discrimination, and psychosocial risk factors

Regarding our supply chain, the highest risks of negative impact are related to raw-materials, extraction, transportation and manufacturing of our products.

Therefore, we prioritize to focus on close collaboration and development with strategic suppliers that share our high ethical standards and has an active risk-based approach on their supply chain. This will be ensured by having a supplier qualification process including a robust due diligence for all new suppliers.

### **5. Actions and priorities for 2024**

Our priorities over the next year include formalizing routines related to mapping of supply chains, and work with our process for analyzing risks for human rights impacts and leveraging data from our supplier's self-assessment questionnaires.

Our aim is to have a robust risk analysis in place based on severity and probability for adverse impacts on fundamental human rights. The risks should be assessed from a perspective of scope, scale and irremediability.

## **6. Contact**

Requests for information can be sent to [anna.rahmberg@infucare.com](mailto:anna.rahmberg@infucare.com)

This statement is approved and signed by Nordic Infucare's Management Team.