



## **Statement on Due Diligence Assessments in 2024 pursuant to the Norwegian Transparency Act for Asker Contract Manufacturing AS**

### **1. Introduction**

The Norwegian Transparency Act, which came into force on July 1, 2022, requires companies to carry out and report on due diligence assessments related to fundamental human rights and decent working conditions, in accordance with the OECD Guidelines for Multinational Enterprises.

This statement has been prepared by Asker Contract Manufacturing AS (hereinafter referred to as “ACM”) pursuant to Section 5 of the Transparency Act. Its purpose is to provide insight into how ACM systematically conducts due diligence assessments of our key suppliers, and to fulfil the Act’s requirements on transparency and accountability.

### **2. Key Information about the Company**

ACM (org. no. 929107187) is a development and contract manufacturing company located at Drammensveien 852, 1383 Asker, Norway. The company’s purpose is the development, pharmaceutical manufacturing, and distribution of chewable calcium and vitamin D3 tablets used in the prevention of osteoporosis.

ACM commenced operations on April 1, 2023, and is owned by the NextPharma Group (NextPharma Germany Bidco GmbH). As of December 31, 2024, the company employed 165 people in Norway and had an annual turnover of NOK 505 million.

Production is carried out for a limited number of customers who hold marketing authorizations and sell the products under their own brand names. The manufacturing facility has previously been owned by, among others, Nycomed and Takeda.

### **3. Embedding of Responsibility**

The obligations under the Transparency Act were anchored in the company’s Board of Directors and the management group during autumn 2023.

Responsibility concerning human rights and working conditions is integrated into corporate governance through policies and guidelines from the NextPharma Group (see link in section 4 below). In addition, ACM has implemented internal guidelines covering harassment, slavery and human trafficking, equal treatment, anti-corruption, ethical conduct, and whistleblowing. These are published in the internal Employee Handbook.



#### 4. Mapping of the Supply Chain

ACM has formal commercial and quality agreements in place with all suppliers involved in production. Annual surveys are conducted to assess risk and verify that suppliers comply with the ethical standards outlined in NP's Supplier Code of Conduct and Human Rights Policy, see [NextPharma Standards | NextPharma](#)

The due diligence assessments cover suppliers of raw materials and packaging materials, as well as transport companies and key service providers linked to the production process. These suppliers operate under pharmaceutical manufacturing requirements and are regularly monitored through audits and follow-up meetings. Through this systematic dialogue and monitoring, ACM has gained solid insight into its suppliers' operations.

#### 5. Due Diligence Assessments Conducted in 2024

In 2024, ACM carried out a survey targeting relevant suppliers as outlined above. The survey focused on the following topics:

- Transparency regarding human rights, working conditions, and remuneration
- Measures to promote gender equality and diversity
- Procedures for handling complaints and employee suggestions for improvements
- Policies on discrimination and health, safety, and environment (HSE)
- Suppliers' own assessments of risk in their supply chains
- The extent of external audits related to corporate social responsibility

The responses were evaluated and scored to identify any potential risks.

#### 6. Results and Responses

The response rate for the survey was 91%. All respondents confirmed compliance with NP's Supplier Code of Conduct, see [NextPharma Standards | NextPharma](#). Furthermore, all suppliers stated that they actively work to reduce CO<sub>2</sub> emissions and other environmental impacts.

Suppliers who did not respond cited either capacity constraints or corporate policies against responding to such inquiries (typically large international corporations). However, we have no grounds to believe that these cases involve violations of rights.

The majority of our suppliers are based in Norway and the EU and are thus subject to comprehensive and harmonized regulations concerning labor and human rights.

#### 7. Conclusion and Measures

Based on the data collected and our knowledge, ACM assesses the risk that our operations directly cause or contribute to violations of human rights or decent working conditions as low.

No actual negative impacts or significant risks have been identified in the supply chain. Therefore, it has not been necessary to implement specific mitigating measures.



We will continue to conduct due diligence assessments in line with the requirements of the Transparency Act and as part of our regular supplier monitoring activities.

## 8. Signature and Approval

This statement has been prepared by the Procurement and Supply Chain departments and has been approved by the company's Site Director and Board of Directors. The document has been electronically signed.

June 2025, Asker Contract Manufacturing AS

DocuSigned by:

A handwritten signature in black ink that reads "Bjørn Lie".

Bjørn Lie (General Manager)

DocuSigned by:

A handwritten signature in black ink that reads "Eric Carsten Schmidhäuser".

Eric Carsten Schmidhäuser (Chairman of the board)

DocuSigned by:

A handwritten signature in black ink that reads "Mark Hawkins".

William Mark Hawkins (Member of the board)

Signed by:

A handwritten signature in black ink that reads "Veronica Horpestad Liane".

Veronica Horpestad Liane (Member of the board, employee representative)

Signed by:

A handwritten signature in black ink that reads "Sven Rune Andersen".

Sven Rune Andersen (Member of the board, employee representative)