



Rapport for

# Bærekraftig forretningspraksis 2021

for Mediq Norge AS





## FNs BÆREKRAFTSMÅL



## Til lesere av rapporten

Næringslivet har stor påvirkning på mennesker, samfunn og miljø og kan både bidra positivt til utvikling, men også medvirke negativt og forårsake skade. Virksomheter har derfor også en nøkkelrolle i å oppnå FNs bærekraftsmål. Alle selskaper, uavhengig av størrelse, er av norske myndigheter forventet å kartlegge, forebygge, begrense og gjøre rede for hvordan de håndterer risiko for negativ påvirkning samt rette opp skade for mennesker, samfunn og miljø – såkalte aktsomhetsvurderinger (due diligence). Dette gjelder både næringsliv, offentlig sektor og organisasjoner. Større virksomheter er fra og med 1.juli 2022, gjennom åpenhetsloven, lovpålagt å utføre dette arbeidet og vise åpenhet om det ved å rapportere offentlig om arbeidet.

Medlemmer i Etisk handel Norge har forpliktet seg til å jobbe med aktsomhetsvurderinger for bærekraftig forretningspraksis. Til grunn for dette arbeidet ligger Etisk handel Norges prinsipper (vår code of conduct), som dekker områdene anstendig arbeid, menneskerettigheter, miljø/klima, antikorrupsjon og dyrevelferd.

Malen for medlemsrapporten er utformet for at virksomheten skal vise åpenhet om sitt arbeid med ansvarlig næringsliv og bærekraftig forretningspraksis, som beskrevet i FNs veiledende prinsipper for næringsliv og menneskerettigheter og OECDs retningslinjer for flernasjonale selskaper. I rapporteringen skal det inngå hvordan virksomheten arbeider med aktsomhetsvurderinger og beskrive hvilke utfordringer virksomheten står overfor, hvilke tiltak som gjennomføres for å håndtere utfordringene samt fremdrift og resultater. Alle medlemsrapportene gjøres offentlig tilgjengelig på Etisk handel Norges hjemmesider.

**Heidi Furustøl**

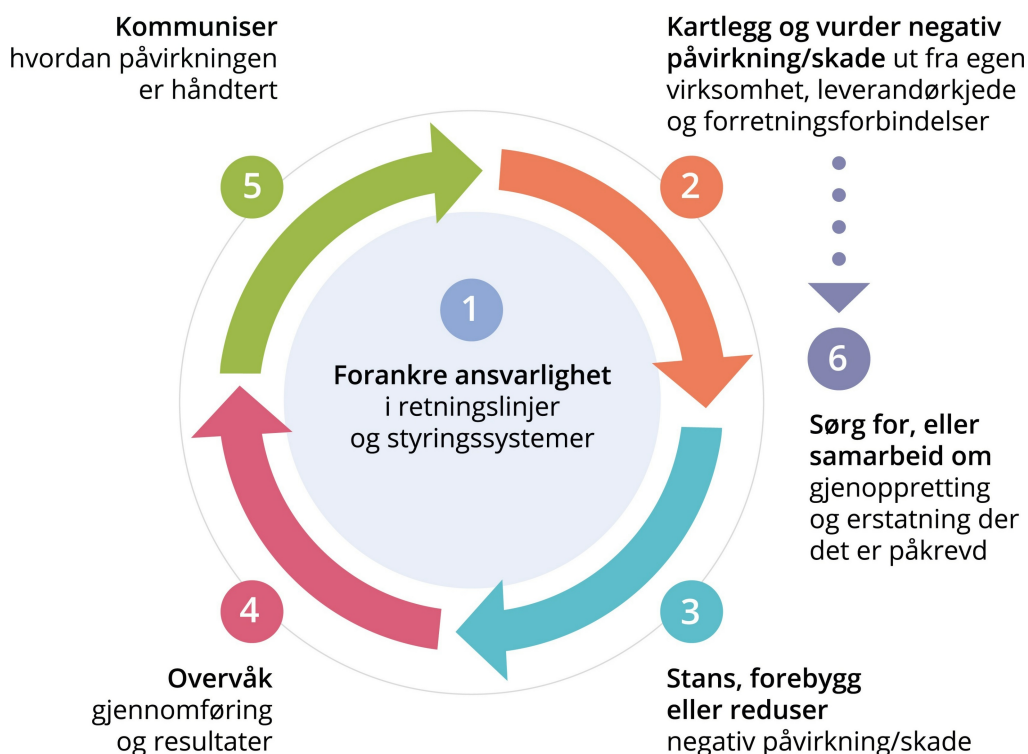
Daglig leder

Etisk handel Norge

# Aktsomhetsvurderinger

Denne rapporten er bygget rundt FNs veiledende prinsipper for næringsliv og menneskerettigheter og OECDs modell for aktsomhetsvurderinger for ansvarlig næringsliv.

Modellen har seks trinn som beskriver hvordan virksomheter kan jobbe for mer ansvarlig og bærekraftig forretningspraksis. Å være god på aktsomhetsvurderinger betyr ikke at en virksomhet ikke har negativ påvirkning på mennesker, samfunn og miljø, men heller at virksomheten er åpen og ærlig om utfordringer og håndterer dette på best mulig måte i samråd med sine interessenter. Denne rapporten er delt inn i kapitler basert på denne modellen.



# Forord av daglig leder

As a leading supplier of medical devices, Mediq Norge is naturally engaged in health and wellbeing. We do not limit this engagement to our customers buying our products, but include everyone affected by Mediq Norge's activity, both locally in Norway and globally in the supply chain.

We see an increased awareness of issues related to ethical trade both from our customers and suppliers, which we consider to be something very positive. We will continue our work with our internal suppliers and make sure that we will do what we can to improve both transparency and dialogue within our value chain.

Through our membership in Etisk Handel Norge, we have committed ourselves to continually strive to improve conditions in our value chain. Mediq Norge have in 2021 continued to enforce and anchor the processes and activities related to our work with ethical trade both on the board and our management team.

While our Sourcing and Category functions are the ones closest to our suppliers, other functions within the company such as sales and supply chain are also crucial for making this a collaborative effort and on top of the agenda.

While we operate in Norway, we are also a part of an international company. Increased dialogue and focus on these issues are on the agenda across our different business units. However, Mediq Norge has through the use of Factlines SAQ with our suppliers as well as being a member of Etisk Handel Norge for several years, a knowledge-sharing position that we intend to use positively and constructively across our business units.

Mediq Norge AS consider ethical trade work to be of great importance, and it is surely aligned with our core values;

- Caring heart
- Customer drive
- Champion spirit

Trond Dahl Hansen  
*Administrerende Direktør, Mediq Norge AS*

# Nøkkelinformasjon om bedriften og leverandørkjeden

## Nøkkelinformasjon om bedriften

### Navn på bedriften

Mediq Norge AS

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### Adresse hovedkontor

Brynsveien 14, 0667 Oslo

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### Viktigste merker, produkter og tjenester

Mediq Norge sell and service articles within 14 different categories within Medical devices and IVD offerings. We represent the main A-brand suppliers like Coloplast, Dansac Hollister, Essity, Nutricia, Fresenius, Nestle.

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### Beskrivelse av bedriftens struktur

Mediq Norge AS is part of the Mediq Group with activities in 13 countries with 3000 employees. The Mediq Group is owned by the private equity company Advent.

Trond Dahl Hansen in the Managing director for Mediq Norge AS. Mediq is operated in 3 European clusters, where Mediq Norge is part of the Nordic, Baltics & UK Cluster headed by the Nordic, Baltics & UK EVP Christian Kanstrup.

Mediq Norge is based in Oslo. Warehouse is operated by Mediq Sverige based in Kungsbacka, Sweden.

Several functions are organized pan-nordic. Such as; Supply Chain, Sourcing, Category Management, IT, HR, Tender & Contract.

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### Omsetning i rapporteringsåret (NOK)

649 300 000

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### Antall ansatte

97

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## **Vesentlige organisatoriske endringer siden forrige rapportering**

Mediq Norge has in 2021 continued to strive to improve the overall business performance based on following initiatives:

- Establish a pan-nordic organisation to support the company.
- Establishing one common Nordic enterprise resource planning (ERP) system. A dedicated project team is working on this task which is planned to be completed Q2 2022.

Puls AS which was acquired by Mediq International BV in May 2019. Puls will be fully integrated in Mediq Norway when the new ERP-system is implemented in 2022.

However in 2021 a lot of effort has been made to incorporate Puls into Mediq, including our way of working with ethical trade.

This report therefor includes data from both Mediq Norge AS and Puls AS.

Mediq has in 2021 acquired UpViser Oy, a Finnish leading provider of surgical and endotherapy products that focuses on gastroenterology, gynecology, plastic surgery and urology. Its customers include the largest hospitals in the Nordic countries. Data from UpViser is not included in the reporting year for 2021.

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### **Navn, tittel for kontaktperson for rapporten**

Kari Solhus, Quality Manager / CSR coordinator

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### **E-post adresse for kontaktperson for rapporten**

kari.solhus@mediq.com

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## Informasjon om leverandørkjeden

### Generell beskrivelse av bedriftens innkjøpsmodell og leverandørkjede

Mediq Norge AS is 100% owned by Mediq BV, a European market leader which proudly serves more than one million customers.

Mediq Norge AS is a part of the Nordic cluster.

Each country has a local Sourcing Manager who has an overall responsibility for the sourcing activities for their respective countries. The sourcing manager in Mediq Norway reports directly to the Nordic Sourcing Head, and has close contact with the local Managing Director.

Suppliers are ranging from global companies with strong brands to local Norwegian companies. Furthermore, Mediq Norge AS is part of an international group where Own Brands is handled centrally by Mediq's sourcing center located in the Netherlands. The Sourcing center is responsible for choosing the product, the producers and the follow-up of the supply chain.

Mediq Norge's sourcing department, which is part of the Nordic cluster as mentioned above, has a clear RACI chart which makes clear of all the activities or decision-making authorities across the organization. RACI stands for Responsible, Accountable, Consulted, and Informed.

The sourcing department works as a link between the supplier and the organization, and is responsible for following up the suppliers on different levels. Mediq has well established Code of Conduct requirements which all incoming suppliers have to commit to.

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### Antall leverandører som bedriften har hatt kommersielle relasjoner med i rapporteringsåret

299

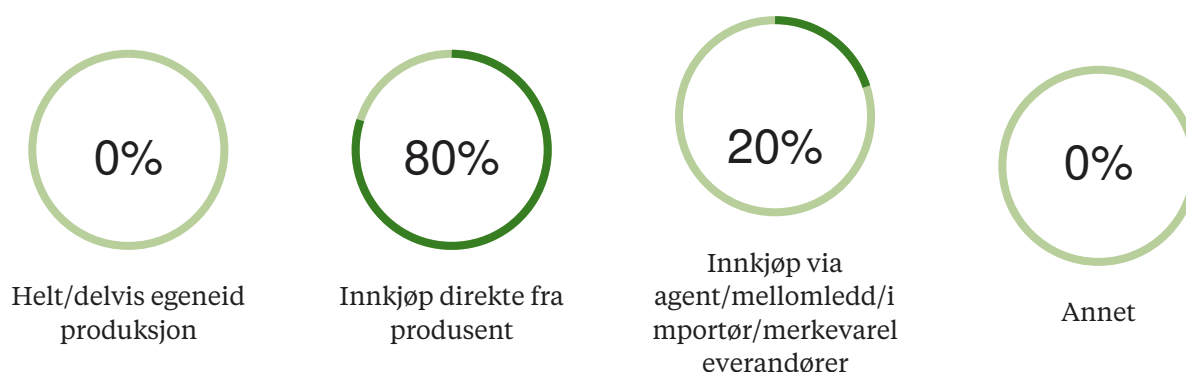
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### Kommentar til antall leverandører

Commercial suppliers for Mediq Norge during the reporting year consists of 250 suppliers, and 49 for Puls AS. 100 of these suppliers are considered tail end suppliers.

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### Type innkjøp/ leverandørforhold

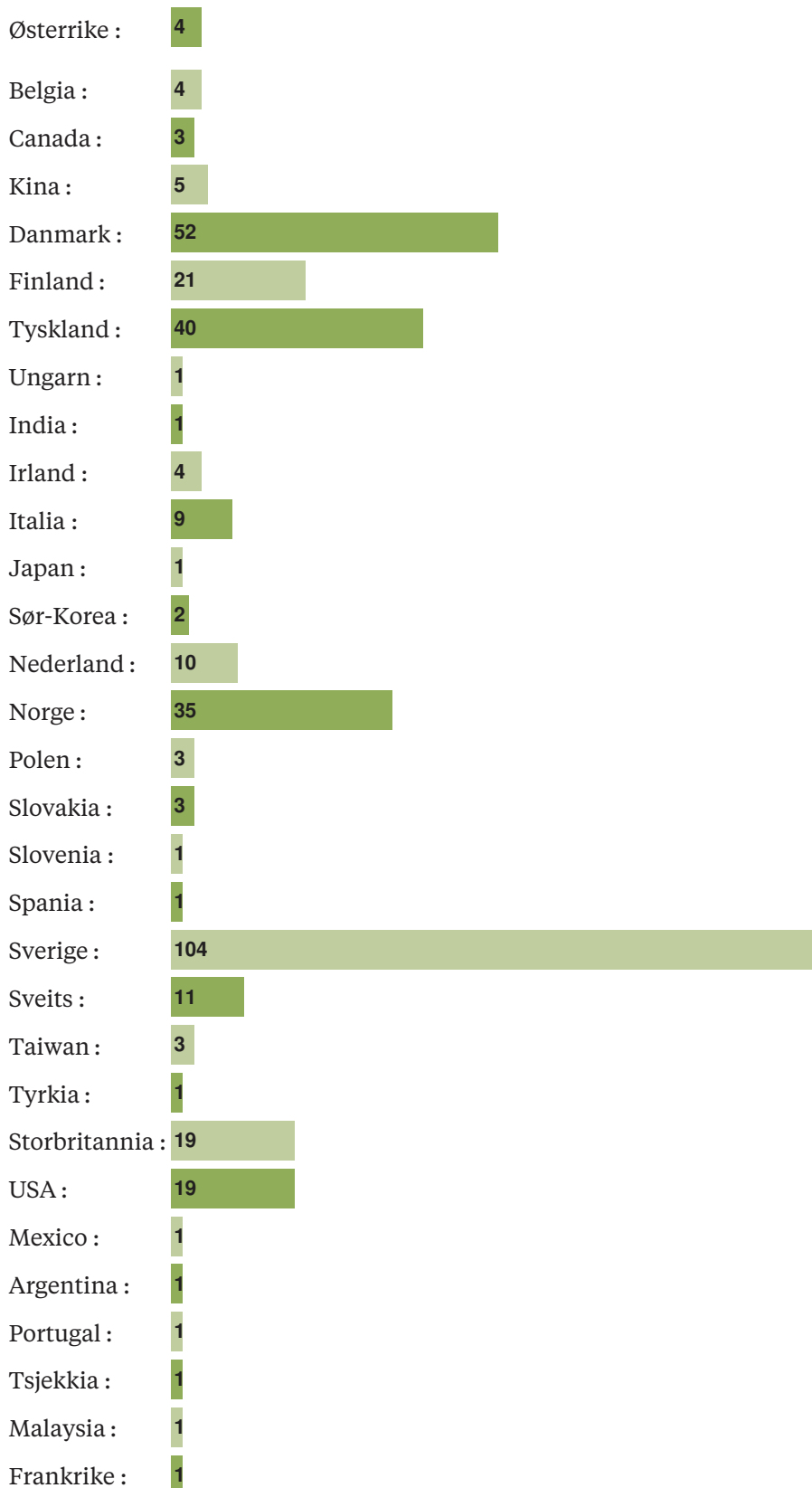


Mediq Norge and Puls do not own any manufacturing sites.

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### Liste over førsteleddsprodusenter per land

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The figures above illustrate 80% of spend for Mediq Norge during the 2021 calendar year according to the definition country of origin.

Some Manufacturers that we buy directly from have factories in different countries/locations.

Country of origin (COO) is an international term that indicates where a product is manufactured, produced, processed or grown. it is not to be confused with the invoice address of the country which we purchase, which is



mainly Europe

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**Oppgi antall arbeidere hos førsteleddsprodusenter som bedriften har oversikt over, og hvor mange produsenter dette er basert på.**

**Antall arbeidere**

1 608

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**Antall produsenter dette er basert på**

26

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**Antall arbeidere per produsent (kalkulert snitt)**

62

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**Kommentar til antall arbeidere**

The numbers of workers are based on 26 of our top 50 suppliers.

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**Viktigste innsatsfaktorer/råvarer og geografi**

<b>Cotton</b>	Globalt India Pakistan
<b>Rubber</b>	Globalt Indonesia Thailand Vietnam
<b>Stainless Steel</b>	Globalt Storbritannia Indonesia Sverige

The key raw inputs above are our main raw materials for our top categories in no particular order. The countries and regions stated above are mainly stated due to them being large global exporters. Mediq does not at this time require our suppliers to confirm the country of origin of the raw materials unless we request it. However, we do have great control over where our product originate from COO. This information is collected from the supplier as we create the different stock keeping units (SKU´ s) in our ERP system.

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**Er virksomheten leverandør til offentlig sektor?**

Ja

## Mål og fremdrift

### MÅL OG FREMDRIFT I RAPPORTERINGSÅRET

1

**Mål:** Supplier data gathered systematically by 75% of spend.

**Status:** Status pr 26/01/2021: 47%  
Status pr 31/12/2021: 69%

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### MÅL FOR KOMMENDE ÅR

1

Dedicate new resource in Nordic Sourcing department to have dedicated responsibility for sustainable supply chain within end of Q2 2022.

2

Prepare to ensure compliance with Åpenhetsloven by 1st July 2022.

3

Updated CSR data on hand by 90% of spend for the Nordic portfolio.

4

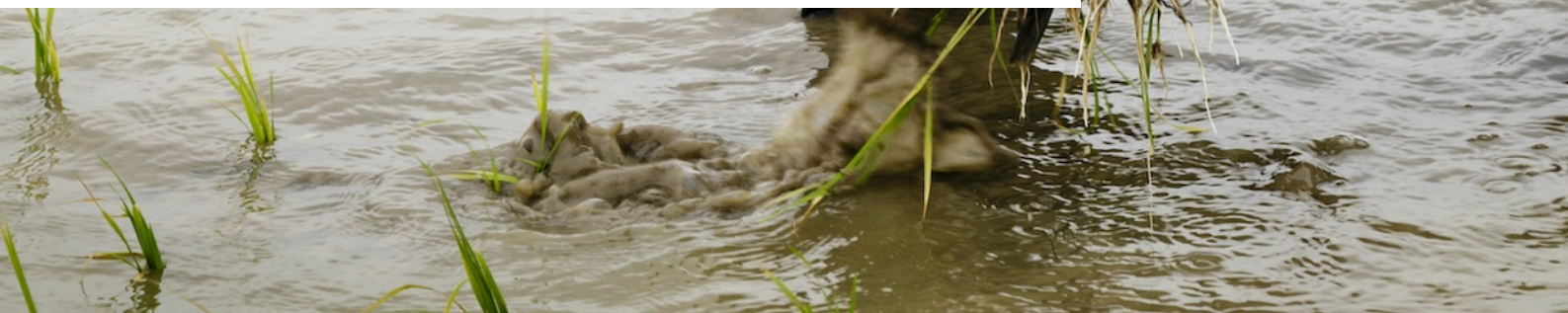
100% of our top 100 suppliers on Nordic level shall sign our updated Supplier Code of Conduct within end on 2022.



# 1

## Forankring av bærekraft i virksomheten

Forankring av ansvarlighet knyttet til bærekraftig forretningspraksis i virksomheten handler om å ha strategier, planer, relevante policyer\* og retningslinjer for aktsomhetsvurderinger som er vedtatt av ledelsen. Disse bør omfatte hele virksomheten, samt virksomhetens leverandørkjede og forretningsforbindelser. Effektive styringssystemer for implementering er en forutsetning for å lykkes, og arbeidet med aktsomhetsvurderinger bør være en integrert del av virksomhetens forretningsdrift. Tydelige forventninger fra toppledelsen, samt tydelig plassering av ansvar innad i virksomheten for implementering av de ulike delene av aktsomhetsvurderinger er viktig. Alle involverte må vite hva de skal gjøre. Åpenhet om forpliktelser virksomheten har til seg selv, utfordringer de står overfor og hvordan dette håndteres, er vesentlig.



## 1.A Policy\* for egen virksomhet

### 1.A.1 Lenke til offentlig tilgjengelig policy for egen virksomhet

<https://mediqnorge.no/om-oss/csr>

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### 1.A.2 Hva sier bedriften offentlig om sine forpliktelser til å respektere mennesker, samfunn og miljø?

As a leading company in our sector, there are high expectations towards Mediq. Our responsibility goes beyond the goal of ensuring high-quality sustainable care services. Our corporate social responsibility policy is about these main areas: the patients, the environment and the wider community.

Mediq has established a set of Code of Conduct which all companies in the Mediq Group need to comply according to. This document highlights Mediq`s core values in addition to describing required business practices, quality, environment and ethical labor practices, workplace issues as well as reporting irregularities. Mediq also has a Supplier Code of Conduct that all companies in the Mediq Group must adhere to. This requires that all our suppliers commits to the same principles throughout the whole value chain. The ethical guidelines are designed to ensure that the production of our goods complies with human rights, child labor, and labor rights.

Mediq Norway are ISO14001 certified which is a set of standards established to support Mediq Norway to minimize environmental impact by following local laws and regulations. This allows Mediq Norway to continuously measure and improve the way our business affects the environment. Our certificates are published on our website.

Mediq is committed to upholding ethical labor practices and procedures across all of its locations. Our responsibility in this area includes creating awareness and understanding of human rights, employment, and labor practices. By incorporating these principles into strategies, policies, and procedures, and living out our values, Mediq will uphold our basic responsibilities to our people, our environment, and set the stage for our long-term success. Mediq supports and respects the protection of internationally proclaimed human rights, and we strive to ensure that we are not complicit in human rights abuses. We also uphold the freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced and compulsory labor, and the effective abolition of child labor. Our principles regarding the quality, environment and ethical labor practices are founded on the following key UN and International Labor Organization conventions as amended or restated from time to time.

Mediq Norge uses our website to communicate towards our external stakeholders how we commit to our work doing our due diligence in our supply chain.

The website describes our CSR strategy; Strengthening the healthcare system, Patient empowerment and well-being, Sustainable supply chain, Environmental performance and Employee engagement & well-being. In addition our "Policy for Responsible Business Conduct" and a description of how Mediq work with Corporate Social Responsibility towards our suppliers are published on our website.

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### 1.A.3 Hvordan er policy for egen virksomhet blitt utviklet og forankret?

The sender of our Code of Conduct is Christian Wojczewski, CEO of the overall Mediq Group. All Mediq employees, ie management and employees in all business units have to adhere to our Code of Conduct upon hiring, including Mediq Norway. Ethical trade is on the agenda from board meetings down through sales meetings, purchasing meetings, and supplier contract.

In addition Mediq Norge has developed our local "Policy for responsible business conduct". This policy document is based on resources from Etisk Handel Norge, approved by the board of Mediq Norge and signed by Managing Director of Mediq Norge.

Mediq Norway ensures that the ethical guidelines and commitment regarding ethical trade is communicated during the onboarding process of new colleagues by use of our electronic training module. Also, the company's intranet Workplace is used to communicate with all employees about the work on ethical trade and risk in the value chain. Communication regarding our member reporting to the Ethical Trade Initiative in Norway, as well as the risks and issues we see in markets we operate in get also shared.

As mentioned above, this Code applies to all employees, officers, and directors of Mediq and governs all our decisions and actions, whether in our offices, warehouses, in the boardroom, at customer or supplier premises or when providing care to our patients. This Code is at the center of everything we do. It reinforces our Core Values. We also require that all our suppliers commit to following so that the same principles are followed throughout the value chain.

Lastly, Mediq Norway has established internal procedures in our management system for follow-up on activities related to ethical trade which we take great pride in.

Mediq Norge is certified according to ISO9001 and ISO14001.

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## 1.B Organisering og internkommunikasjon

### 1.B.1 Hvordan er arbeidet med aktsomhetsvurderinger organisert i bedriften, og hvorfor?

Mediq's ethical guidelines are defined by the Mediq HQ which all companies in the Mediq Group must fully and wholeheartedly comply with. The management team in Norway are responsible for that the work with responsible business is carried out according to our values, with the the managing director being the overall responsible for Mediq Norge.

The Nordic Mediq cluster has several joint functions. Many of the suppliers are the same across the Nordic Mediq clusters.

The Nordic Sourcing department is responsible for the day-to-day follow up of CSR topics for the suppliers and ethical trade within the organization.

I.e. performing the due dilligence assement. In this may we can draw synergies across the nordic cluster.

The role of CSR coordinator in Mediq Norge is related to both Sustainable supply chain, Environment performance as well as Mediq employee engagement and wellbeing.

The role of CSR coordinator is to assist in anchoring policies, developing internal processes and routines, coordinating required reporting and coordinating communication.

A corporate CSR coordinator has been hired with dedicated responsibility to support all business units (Mediq Countries).

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### 1.B.2 Hvordan blir betydningen av virksomhetens aktsomhetsvurderinger konkretisert og tydeliggjort for de ansatte gjennom stillingsbeskrivelse, arbeidsoppgaver og incentivordninger?

The work with responsible business conduct is mainly aligned and described in Mediq's ethical guidelines. Each and any new employee receives this information during the onboarding process. The values are rooted in the three following pillars: Caring Heart, Customer Drive, and Champion Spirit.

We have transferred these pillars to business principles, work routines within quality, environment, and ethics and behavioral patterns in the workplace. The ethical guidelines support these principles. The guidelines apply to all our employees, directors and directors, as well as our suppliers, third-party representatives, and other business partners.

CSR tasks are part of the Job Descriptions of Sourcing Specialists.

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### **1.B.3 Hvordan sikres det at relevante ansatte har tilstrekkelig kompetanse til å gjennomføre arbeidet med aktsomhetsvurderinger?**

Mediq support this in multiple ways, by offering our employees courses and programs which directly or indirectly improves the way the employees conduct business such as:

- Negotiation courses
- Leadership programs
- Higher educations
- Etisk Handel Norge
- Sharing of best practices in Supplier & Customer meetings

In 2020 a dedicated CSR Analyst has been employed in the Mediq cooperation supporting all Mediq entities, including Norway. The main task of this role is to conducting case studies to sustain the social value Mediq brings, particularly in strengthening the healthcare systems & patient empowerment and well-being. Secondly this role will be assigned is to help communicate and share our CSR stories within the cooperation. Mediq currently has smaller and bigger CSR initiatives and accomplishments across our business, we can do a better job at communicating those internally as well as externally.

On a corporate level in 2020 a sustainability workshop was held over a period of several weeks were representatives from each business entity were represented. The sourcing manager in Norway represented Mediq Norway in these workshops. CSR coordinator has participated in several courses supplied by Etisk Handel Norge.

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## 1.C. Planer og ressurser

### 1.C.1 Hvordan er virksomhetens forpliktelser til å respektere mennesker, samfunn og miljø forankret i virksomhetens strategier og handlingsplaner?

Mediq is an international company specializing in healthcare products. The various markets in which we operate are not regular markets. Governments set requirements on affordability, accessibility, and quality of care. This makes healthcare markets highly complex and challenging.

Our commitment to respect people, society and the environment is directly linked to our code of conduct, which is the root of our overall strategy as an organization. Our code of conduct which is included in this report outlines this in more detail. Our code of conduct is always evolving and improving based on the input from our market, suppliers, customer and other organizations such as Etisk Handel Norge.

Furthermore, Mediq Norge AS are also ISO 9001 which is an internationally known standard. This certification allows Mediq to demonstrate the ability to consistently provide our customers with products and services that meet regulatory requirements.

In addition to the ISO 9001 certification, Mediq Norge are also ISO 14001 certified which is a set of standards established to support Mediq Norge to minimize environmental impact by following local laws and regulations. This allows Mediq Norge to continuously measure and improve the way our business affects the environment.

Mediq creates and shares two CSR reports with relevant stakeholders annually. One report related to CSR aspects on a corporate level and one supplier CSR report relevant for the Nordic Mediq countries.

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### 1.C.2 Hvordan følges virksomhetens strategier og planer for å være ansvarlig og bærekraftig opp av ledelse og styre?

For Mediq Norge, it is the local leadership team that are responsible for following up on the work with the different support functions in the Nordic cluster with regards to sustainability, with the managing director being the overall responsible for setting the agenda for Mediq Norway by making sure that:

- The achievement of the company's aims for the given year
- The company's strategy and the risks inherent in its business activities
- The compliance with legislation and regulations

Furthermore, as mentioned previously in this report, Mediq Norge are reliant on our core values to support activities which the management team are overall responsible for, but also make sure to align with the support functions in Mediq Norge to make sure that we deliver on different areas such as:

- Ensuring that our code of conduct are signed and aligned with our business partners and upheld
- Make sure that we are and remain ISO 9001 and 14001 certified by continuously working with improvements.
- Other initiatives set by other stakeholders

Nordic Sourcing Head reports monthly to Managing Director and the norwegian management team on status and progress, including CSR.



## 1.D Partnerskap og samarbeid med forretningsforbindelser, spesielt leverandører

### 1.D.1 Hvordan tydeliggjør virksomheten viktigheten av ansvarlighet og bærekraft i møte med forretningspartnere, spesielt i leverandørkjeden?

We select suppliers, third party representatives and other business partners based on their qualifications, reliability and adherence to applicable laws and our values. We take reasonable care in selecting them and do appropriate reviews from time to time. We require that they commit and adhere to the law and also that they have the training and tools to do so and that they shall be able to document their efforts to secure compliance with the local laws and our CoC at our request. This also applies to any sub-supplier. Mediq may terminate the relationship with any supplier, third party representative or other business partners that fails to meet the standards in this Code after a reasonable period of time for remedying a breach.

Our Code of conduct describes the key principles to ensure that we do the right thing in the right way. Always helped, of course, by a healthy dose of common sense. Together with our vision and values, the Code will guide our decisions and actions. This Code is applicable to all employees, officers and directors (together, "Employees") of Mediq and governs all our decisions and actions, whether in our offices, warehouses, in the boardroom, at customer or supplier premises or when providing care to our patients. This Code is at the center of everything we do. It reinforces our Core Values.

The Nordic identified some areas to improve and we have kicked off to great projects which will help the Nordic cluster including Norway to improve the follow-up process of our supplier in regards to business conduct by implementing the following:

To communicate Mediq policies, Mediq Norge has uploaded "Policy for responsible business conduct" and "Supplier CSR in Mediq" to our website: <https://mediqnorge.no/om-oss/csr>.

In our cooperation with Factlines, we receive reports for each supplier. In our regular evaluation meetings with suppliers, CSR is always a topic. The report from Factlines is used in these discussions with each supplier.

Regarding minimum criteria for suppliers, we have different parameters that we assess.

Firstly we demand that the supplier signs our Supplier Code of Conduct, or provide us with an equal statement. We also use the Onepager supplied by the Factlines system to assess the supplier before approving the supplier. The goal is that each category/area in the Factlines questionnaire have a score higher than 70% and it is a red flag if the supplier scores less than 50%.

Another goal is to have the answer "Yes" to the following questions:

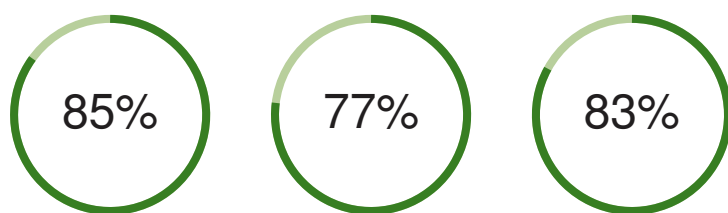
-If an on-site audit is required, can you provide access to your own production facilities relevant for the products and or services that you deliver to us"

-If an on-site audit is required, can you provide access to suppliers' and sub-suppliers' production facilities relevant for the products and or services that you deliver to us?

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## Indikator

### Andel av bedriftens leverandører som har akseptert retningslinjer for leverandører



2021

2020

2019

The percentage is lower in 2020 compared to 2019 due to introduction of several new suppliers in regards to warehouse movement from Norway to Sweden.

The percentage has increased from 2020 to 2021. It is expected to increase even further as process for approving new suppliers have been improved in our management system and is now well implemented.

All our main suppliers have signed the Code of Conduct. Approximately 1/3 of our suppliers are considered tail end.

## 1.E Erfaringer og endringer

### 1.E.1 Hvilke erfaringer har virksomheten gjort seg om arbeidet med bærekraftig forretningspraksis i rapporteringsåret, og hva har endret seg som et resultat av dette?

The key lesson during the reporting year concerning sustainability is that we can always improve our efforts regarding this highly important topic. Not only Mediq, but the whole supply chain going from the manufacturer to the end customer of the products we provide.

We do our best to listen to our stakeholders, and one example of this is from our customers from the public sector regarding the code of conduct and having this as a standard topic in meetings with our suppliers. This has been brought up internally, and will likely be implemented as a Nordic standard in our meetings with our suppliers where we take some time to review this topic with the suppliers on a yearly basis. The final form is to be decided.

Another experience is that it is sometimes challenging to assure the quality of the supplier responses to our questionnaire. A supplier may get a false low score if the questionnaire is completed by incorrect personnel. I.e. our commercial contact. Or if they misunderstand our questions.



2

Fastsette fokus for rapporten

## Kartlegging av virksomhetens påvirkning på mennesker, samfunn og miljø

Kartlegging handler om å identifisere virksomhetens risiko for, og faktiske negative påvirkning eller skade på mennesker, samfunn og miljø, inkludert i leverandørkjeden og gjennom forretningsforbindelser. Det handler om å først danne seg et overordnet risikobilde, for så å prioritere mest vesentlige risikoområder for grundigere kartlegging og håndtering av funn. Hvordan virksomheten er involvert i eventuell negativ påvirkning på mennesker, samfunn og miljø, er sentralt for å avgjøre riktig respons og tiltak. Involvering av interessenter, spesielt påvirkede parter, er sentralt i kartleggingsarbeidet, så vel som i tiltak for å håndtere utfordringene på en god måte.

## 2.A Kartlegging og prioritering

### PRIORITERT NEGATIV PÅVIRKNING/SKADE FOR MENNESKER, SAMFUNN OG MILJØ

*Å prioritere en eller flere risikoområder på bakgrunn av alvorlighetsgrad, betyr ikke at noen risiko er viktigere enn andre, eller at virksomheter ikke gjør noen med annen risiko, men at det som har størst negativ påvirkning prioriteres først. Kartlegging og prioritering er en kontinuerlig prosess.*

#### 2.A.1 List opp virksomhetens prioriterte risiko for negativ påvirkning/skade på mennesker, samfunn og miljø.

Prioritert negativ påvirkning / skade	Relatert tema	Geografi
Use of recruitment fees giving bonded labor	Tvangsarbeid Lønn Regulære ansettelses	Malaysia

We are an active members of Amfori BSCI trough Medeco BV, an external organization designed to evaluate factories and share information.

Multiple audits have been preformed during the reporting year and Mediq Norge have been briefed regarding the progress.

Our main focus has been related to production of gloves.

### BEGRUNNELSE FOR HVORFOR DISSE UTFORDRINGENE ER PRIORITERT SOM MEST VESENTLIGE FOR MENNESKER, SAMFUNN OG MILJØ

**2.A.2 Beskriv kort virksomhetens rutiner for kartlegging og identifisering av risiko og vis til hvordan den negative påvirkningen/skaden ble identifisert og prioritert i denne perioden. Beskriv hvordan informasjon ble hentet inn, hvilke kilder som er benyttet og hvilke interessenter som er involvert/dere har snakket med. Beskriv videre også om det er identifisert områder eller tema hvor det er manglende informasjon for å danne seg et helhetlig bilde, og hvordan dere planlegger å gå frem for å få mer informasjon/håndtere dette.**

Risk process description

The supplier survey

The survey uses the Factlines standard CSR self-assessment questionnaire with additional questions within the topics labour and human rights, environment, health and safety and anti-corruption and bribery.

The survey is based on the ten principles in UN Global Compact, OECDs guidelines for responsible business and Mediq's supplier code of conduct.

Questions

The Mediq CSR survey covers the following topics:

- Part 1: CSR strategy and ethical guidelines
- Part 2: Supply chain; follow-up, insight and control
- Part 3: Risk assessment and management
- Part 4: Corporate management systems
- Part 5: Labour and human rights
- Part 6: Environment, health and safety



Part 7: Anti-corruption and bribery

Part 8: Commitment to Mediq's code of conduct

CSR score

Each question is pre-defined with a given score based on importance. Maximum score is 955 (100%).

Risk profile

Each supplier gets a risk profile based on their response to the survey. The risk profile supports the prioritization of follow-up activities. Risk profiles can be adjusted according to Mediq's policy and priorities.

Risk report

Factlines risk report covers information regarding Supplier risk profile, recommended follow-up actions, high risk countries in Mediqs Supply Chain and the suppliers awareness of the risks in those countries etc.

Add hoc

In addition to the annual survey, we act continuously in areas where risks are brought to our attention by other means. There can be multiple sources ranging from customers, business partners, news articles and also peer reviewed papers to name a few. We collaborate with Factlines to help assess the information.

Sources:

- High risk products - The Norwegian Agency for Public and Financial Management (DFØ)  
<https://www.anskaffelser.no/public-procurement/socially-responsible-publicprocurement/information-about-high-risk-products>
- Transparency International Corruption Index 2020 <https://www.transparency.org/en/cpi/2020/table/nzl>
- The US Department of Labour; List of Goods Produced by Child Labor or Forced Labor 2018  
<https://www.dol.gov/sites/dolgov/files/ILAB/ListofGoods.pdf>
- International Trade Union Confederation (ITUC) - Annual Survey of Violations of Workers Rights 2020  
[https://www.ituc-csi.org/IMG/pdf/ituc\\_globalrightsindex\\_2020\\_en.pdf](https://www.ituc-csi.org/IMG/pdf/ituc_globalrightsindex_2020_en.pdf)
- US State Department: Country Reports on Human Rights Practices 2019 <https://www.state.gov/reports/2019-country-reports-on-human-rightspractices/>
- UN Global Sustainability Goals [www.unglobalcompact.org](http://www.unglobalcompact.org)
- Maplecroft; webinars on Human Rights and statistics <https://maplecroft.com/about/webinars/watch/>
- Human Rights Watch <https://www.hrw.org/>
- Initiative for ethical trade (NO,DK,UK) [www.etiskhandel.no](http://www.etiskhandel.no) [www.dieh.dk](http://www.dieh.dk) [www.ethicaltrade.org](http://www.ethicaltrade.org)
- The CSR Risk Check (developed and owned by MVO Nederland, funded by the Dutch Ministry of Foreign Affairs) <https://www.mvorisicochecker.nl/en/world-map>

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## ANNEN NEGATIV PÅVIRKNING/SKADE

### **2.A.3 Beskriv annen negativ påvirkning/skade på mennesker, samfunn og miljø som ble identifisert i kartleggingen i egen virksomhet, leverandørkjeden eller hos forretningsforbindelser i rapporteringsåret og hvordan disse er håndtert.**

Inspection of a manufacturer in February 2021 verified that earlier findings related to Freedom of association, Safety and hygienic conditions, Working hours, Regular employment were corrected to a satisfactory level.

Regarding Facemasks: Mediq received information about treatment of the Uyghurs minority group in Xinjiang province of China. Mediq immediately contacted all facemask suppliers to map the supply chain and could confirm that the source of the facemask did not come from Xinjiang province.

A woman in a blue lab coat and cap is shown in profile, looking down at a piece of equipment in a laboratory setting. Other people in similar attire are visible in the background, working at their stations. The lighting is bright and clinical.

### 3

#### Håndtering av prioritert påvirkning

## Stanse, forebygge eller redusere negativ påvirkning

Stanse, forebygge eller redusere handler om å håndtere funn fra kartleggingen på en god måte. Virksomhetens mest vesentlige negative påvirkning på mennesker, samfunn og miljø prioriteres først. Dette betyr ikke at annen risiko er uvesentlig eller at det ikke håndteres. Hvordan virksomheten er involvert, er sentralt for å treffe riktige tiltak. Faktisk negativ påvirkning/skade som virksomheten forårsaker eller bidrar til må stanses, forebygges og reduseres. Virksomheter som er direkte forbundet med negativ påvirkning må bruke sin innflytelse til å få forretningsforbindelser (f.eks. leverandører) til å stanse, forebygge og redusere dette. Dette innebærer å utvikle og iverksettes planer og rutiner for å håndtere risiko, og kan kreve endringer i egne policyer og styringssystemer. Virksomheters vellykkede håndtering av negativ påvirkning på mennesker, samfunn og miljø er et avgjørende bidrag til FN's bærekraftsmål.

### 3.A Stanse, forebygge eller redusere

#### 3.A.1 Legg til mål, status på fremdrift, og beskriv tiltak dere har iverksatt for å håndtere virksomhetens prioriterte negative påvirkning/skade på mennesker, samfunn og miljø

<b>Prioritert negativ påvirkning/skade</b>	<b>Use of recruitment fees giving bonded labor</b>
<b>Overordnet mål :</b>	There shall be no forced, bonded or involuntary prison labour.
<b>Status :</b>	Manufacturer where recruitment fees has been identified has reimbursed recruitment fee for all relevant workers during 2021.
<b>Mål i rapporteringsåret :</b>	Manufacturer where recruitment fees has been identifies must reimburse recruitment fee for all relevant workers

#### Utforte tiltak og begrunnelse :

As a result of the ongoing pandemic (COVID-19) several new suppliers have been established in order to fulfill the significantly increased world demand for examination gloves. Based on the globally highlighted ethical challenges especially related to glove production, Mediq have conducted an full audit at a glove manufacturer in Malaysia in cooperation with Amfori BSCI. A corrective action plan were established with concrete corrective actions.

A follow up inspection was performed in February 2021 and it was concluded that salient issues were corrected to a satisfactory level. Including remediation of recruitment fees. 2 verifications circles were performed in order to verify that all relevant workers were correctly reimbursed.



Prioritert negativ påvirkning/skade	
Overordnet mål :	
Status :	
Mål i rapporteringsåret :	

Utforte tiltak og begrunnelse :

## Tverrgående tiltak for å håndtere negativ påvirkning/skade:

**Beskriv virksomhetens tverrgående tiltak for å stanse, forebygge eller redusere negativ påvirkning/ skade på mennesker, samfunn og miljø i leverandørkjeden**

### 3.B.1 Reduksjon av miljø- og klimafotavtrykk

Mediq Norge is certified according to ISO14001.

We take our responsibility for collection and circulation of waste. We are member of Grønt Punkt and NORSIRK.

Mediq focus on sourcing biodegradable products as an alternative to plastics. I.e band aids.

Mediq practice strict internal rules related to climate friendly transport by avoiding transport by air and choosing transport partners with zero emission vehicles as far as possible.

Mediq have several Key Performance Indicators related to environment. I.e CO2 emission due to transport of products, waste fractions, carton consumption and plastic consumption.

Actions we currently are working on to reduce carbon footprint, are transfer to automatic packing robots in our warehouse. The robot measure the height of products inside transport box and automatic cuts the sides of the box to minimum volume in order to avoid transport of dead volumes.

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### 3.B.2 Tilpasning av egen innkjøpspraksis (sourcing)

Mediq does it utmost in regards to its purchasing practices to be a trusted long-term partner to its suppliers and business partners.

One critical procedure Mediq Norge has in place is monthly a Sales- and Operations Planning meetings (S&OP) with key stakeholders in management.

The main purpose of these meetings is so that we can ensure that we have the right goods in stock at the right time, which cannot be done without working closely with our suppliers. The alignment internally within Mediq helps us to support our suppliers with quality information regarding what they can expect in terms of purchasing volumes and delivery dates. Hence avoiding rush orders and need for urgent transport by air.

It is an ongoing project within Mediq Norge to reduce the total number of suppliers and consolidate purchasing volumes. Having a long tail of suppliers and products makes the tracking and maintenance of the supplier base more complex both in terms of category management, but also with regards to ethical trade and control of the supply chain.

To add to the point above, the work which our category managers together with our product managers put in, is critical moving forward in regards to the assortment management and has a high priority within the Nordic cluster. This allows Mediq to improve and define the product range of the goods needed from a supplier, thus reducing the need to purchase goods outside of the agreed assortment, which can be challenging for the suppliers. This effort supports Mediq to be a stable buyer, as it hopefully reduces the need for non-planned purchases which can strain the supplier and the supplier relationship over time.

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### 3.B.3 Valg av produkter og sertifiseringer

We do our best to convert products lines from suppliers over to more eco-friendly versions. We stipulate in our supplier contracts that the supplier should have an active environmental policy and is certified according to ISO14001 or equivalent and that the supplier has a responsible approach and procedures. Reporting on certifications was included in the SAQ from 2019.

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### **3.B.4 Støtte aktivt opp om fri fagorganisering og kollektive forhandlinger, eller der lovverket ikke tillater dette, støtte aktivt opp om andre former for demokratisk valgt arbeiderrepresentasjon**

The Mediq group, including Mediq Norge AS has a strong Code of Conduct which is written based on our core values. In this area specifically, our principles are founded on the following key UN and International Labor Organization convention.

- Freedom of Association and the Right to Collective Bargaining (ILO Conventions Nos. 87, 98, 135 and 154)

Furthermore, we use the third party partner Factlines as support, which allows us to focus follow-up work on the part of the value chain where the risk of human rights violations is greatest.

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### **3.B.5 Bidrag til utvikling, kompetanseheving og opplæring internt og av leverandører og arbeidere i leverandørkjeden**

We do not contribute directly to development, capacity building and training of suppliers and workers in the supply chain in terms of funding different programs at this time, but we work closely with suppliers in which is a function which allows us to support each other in terms of information sharing, best practices, etc.

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### **3.B.6 Annen relevant informasjon for hvordan dere arbeider med å redusere, forhindre og håndtere negativ innvirkning på mennesker, samfunn og miljø.**

Scorecard of risk assessment from the Factlines system is used as a tool to discuss CSR topics with our suppliers on regular supplier meetings.



## 4

# Overvåking av gjennomføring og resultater

Overvåking av gjennomføring og resultater handler om å måle effekten av systematikken og eget arbeid i hvert trinn i aktsomhetsvurderingene, og viser hvorvidt virksomheten gjør gode aktsomhetsvurderinger. Virksomheten må ha systematikk og rutiner på plass for å kunne fange opp og kritisk vurdere egne konklusjoner, prioriteringer og tiltak som er gjort som en del av aktsomhetsvurderinger. Eksempelvis: Er kartlegging og prioritering av mest negativ påvirkning gjort på en faglig god og troverdig måte, og som reflekterer de faktiske forholdene? Virker tiltakene for å stanse, forebygge og/eller redusere virksomhetens negative påvirkning/skade etter hensikten? Er skade gjenopprettet der det er relevant? Dette kan gjelde tiltak virksomheten gjør selv og som utføres av eller i samarbeid med andre. Erfaringene virksomheten gjør seg med arbeidet med aktsomhetsvurderinger brukes for å forbedre prosesser og resultater i fremtiden.



## 4.A Overvåkning og evaluering

### 4.A.1 Beskriv hvem som har ansvar for å overvåke effekten av tiltak iverksatt for å håndtere virksomhetens vesentlige risiko for skade/negativ påvirkning på mennesker, samfunn og miljø, og hvordan overvåkingen gjennomføres i praksis

In regards to our relationship with third-party suppliers, we take several steps. We are an active member of Amfori BSCI, an external organization designed to evaluate factories and share information. Potential partners are subject to a rigorous selection and quality criteria as part of the overall Mediq Sourcing Policy.

Furthermore, our quality team in Holland performs independent audits on our suppliers on a annually risk-based assessment, where we get the opportunity to cooperate closely with the suppliers to uncover weaknesses and flaws. Based on the findings we create a corrective and preventive action plan which can cover topics going from health and safety to working hours. The Capa consist of four key elements which the supplier must submit back to Mediq's quality team:

- Completed Date
- Audit Category
- Preventive / Corrective Action
- Actions completed

The Nordic Mediq countries annually conducts a CSR survey with the supplier base. The survey covers following topics:

- Part 1: CSR strategy and ethical guidelines
- Part 2: Supply chain; follow-up, insight and control
- Part 3: Risk assessment and management
- Part 4: Corporate management systems
- Part 5: Labour and human rights
- Part 6: Environment, health and safety
- Part 7: Anti-corruption and bribery
- Part 8: Commitment to Mediq's code of conduct

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### 4.A.2 Beskriv hvordan dere sannsynliggjør at virksomhetens tiltak for å identifisere, forebygge og redusere negativ påvirkning faktisk fungerer

As mentioned above, our quality team in Holland performs independent audits on our suppliers on a annually risk-based assessment, where we get the opportunity to cooperate closely with the suppliers to uncover weaknesses and flaws. Based on the findings we create a corrective and preventive action plan which can cover topics going from health and safety to working hours. The Capa consist of four key elements which the supplier must submit back to Mediq's quality team:

- Completed Date
- Audit Category
- Preventive / Corrective Action
- Actions completed

The suppliers receive follow up requests from Mediq regarding salient issues and are urged to solve the complaints.

Mediq have preformed multiple audits in the reporting year which leads to wider experience and lessons learned over time.





## 5

# Kommunikasjon av hvordan negativ påvirkning/skade er håndtert

Forutsetningen for god ekstern kommunikasjon om arbeidet knyttet til virksomheters aktsomhetsvurderinger for bærekraftig forretningspraksis er at den bygger på konkrete aktiviteter og resultater. Virksomheter skal kommunisere offentlig om relevante styringsdokumentet knyttet til aktsomhetsvurderinger, eksempelvis policyer, retningslinjer, prosesser og aktiviteter knyttet til å identifisere og håndtere bedriftens faktiske og potensielle negative påvirkning på mennesker, samfunn og miljø. Kommunikasjonen bør inkludere hvordan risikoen er avdekket og håndtert, samt hvilke effekter man oppnådde av tiltakene/aktivitetene. Etter åpenhetslovens §4 skal virksomheter som er omfattet årlig offentliggjøre en redegjørelse for aktsomhetsvurderinger.

## 5.A. Kommunisere eksternt

### 5.A.1 Beskriv hvordan virksomheten kommuniserer med berørte interessenter om håndteringen av negativ påvirkning/skade

Mediq Norge have published our Policy for responsible business conduct and our annual CSR report on our website; <https://mediqnorge.no/om-oss/csr>

In addition we have close direct dialogue with our suppliers and follow up directly to explore issues and initiate development.

Mediq Group has relied on use of external competence to perform audits and to follow up on mitigating actions. I.e audits by SMETA and action verification by ELEVATE.

In the particular care of reimbursement of recruitment fees, ELEVATE used the following approach:

- Manufacturer shared list of workers who were identified as part of the remediation program.
- ELEVATE used sampling approach of 90% confidence level and 5% margin of error to estimate pool of workers selected for random verification, ensuring good balance across gender and country of origin for the workers.
- ELEVATE asked manufacturer to provide transaction records (bank statements) and conducted remote interviews with current workers on the relevant local language. Before interview Manufacturer HR communicated with the selected workers that they would be interviewed by a 3rd party organization who would be verifying the transaction records on their bank accounts.
- To provide multi-lingual support, ELEVATE leveraged its partnership with North South Initiative (NSI). In total 5 NSI staff conducted the remote payment verifications, covering 7 languages.
- At each site, the selected workers were brought into a conference room in the factory for interviews, with a laptop for workers to dial-into conference call.
- During each interview, workers were asked whether they had received the reimbursement in full. Then they were asked to share details of transaction directly from their bank statements or pay slip. In addition to validating the fee amount, workers identity were verified by passport copies and employee card IDs.
- Only cases with physical evidence of transaction were considered verified.

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### 5.A.2 Beskriv hvordan virksomheten kommuniserer offentlig rundt eget arbeid med kartlegging og håndtering av negativ påvirkning/skade

Openness creates confidence, also regarding challenges in the supply chain. Mediq communicates it's work on this topic in several ways, such as:

- Directly to customers in customer meetings with this topic on the agenda.
- Through this report
- Our website

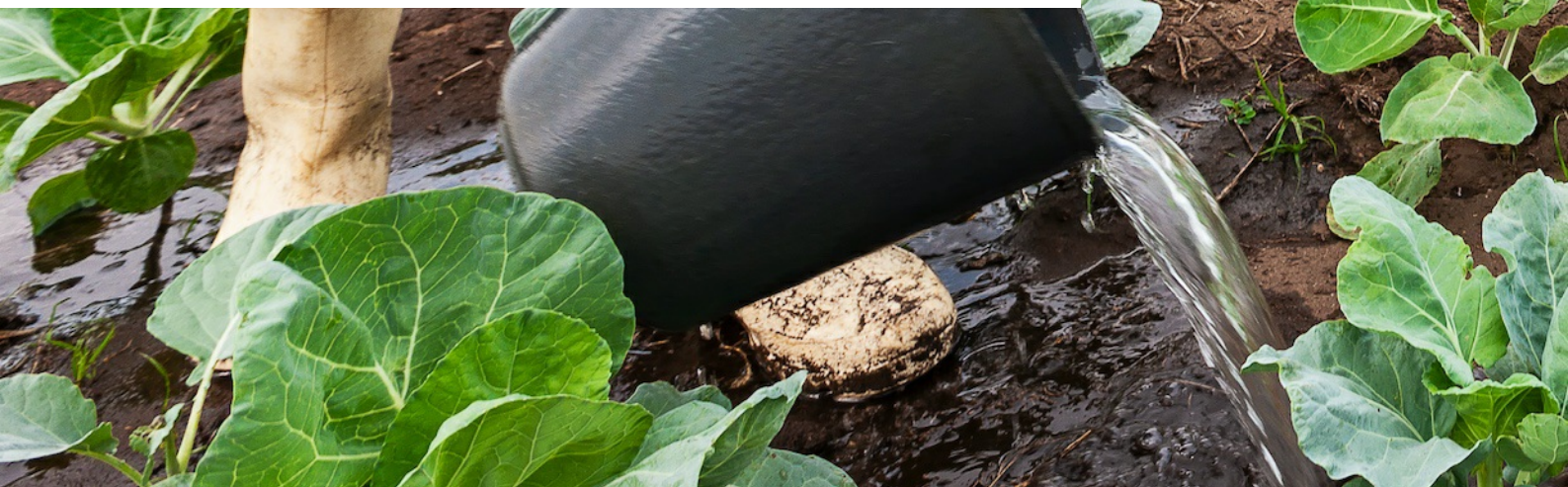




## 6

### Gjenoppretting der dette er påkrevd

Når en virksomhet har identifisert at den har forårsaket eller bidratt til skade på mennesker eller samfunn, håndteres skaden gjennom å sørge for gjenoppretting, eller samarbeide om gjenoppretting. Gjenoppretting kan innebære økonomisk erstatning eller kompensasjon, en offentlig beklagelse, eller at skaden på annet vis rettes opp. Det handler også om å sørge for tilgang til klageordninger for arbeidere og/eller lokalsamfunn slik at de kan få sin sak hørt og håndtert.





## 6.A Gjenoppretting

### 6.A.1 Beskriv virksomhetens policy for gjenoppretting ved negative konsekvenser for mennesker, samfunn og miljø

Our Policy for responsible business conduct is based on template from Etisk Handel Norge. The policy states: "If our activities are found to cause or contribute to negative impact on people, society or the environment, we will stop the activities and seek to provide remedy. If our supplier is responsible for the negative impact, the supplier is responsible for providing remedy."

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#### Beskriv eventuelle tilfeller av gjenoppretting i rapporteringsperioden

Reimbursement of recruitment fees were done for over 4000 foreign migrant workers at 8 sites of a Malaysian glove manufacturer.

With the help of ELEVATE, two payment verification cycles were performed to ensure that all workers in scope were rightfully compensated across the different sites. ELEVATE validated the transactions and receipt of payments.

In verification cycle 1, ELEVATE interviewed 284 workers across the 8 sites. Based on the findings ELEVATE verified that 99% of workers were reimbursed in full. The remaining 1% of workers indicated that they were also reimbursed, but ELEVATE was not able to verify physical evidence to validate information.

In verification cycle 2, ELEVATE interviewed 274 workers across 8 sites. Based on the findings ELEVATE verified that 100% of workers were reimbursed in full.

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## 6.B Tilgang til mekanismer for gjenoppretting

### **6.B.1 Beskriv hva selskapet gjør for å sikre at påvirkede arbeidere og lokalsamfunn har tilgang til effektive mekanismer for gjenoppretting, når det er aktuelt**

Mediq have a speakupfeedback hotline where all employees can report issues anonymously if desired.

Mediq are also in process to establish a whistleblower hotline for external use. We are planning to create a reporting opportunity on our website as part of our responsible sourcing information. This is expected to be in place latest Q1 2023.

Mediq will immediately and carefully investigate all violations brought to its attention.

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