

Due Diligence Assessment 2024

B. Braun Medical AS, 2025

Foreword by the Managing Director

In our work with the Transparency Act's due diligence assessment, we, as a subsidiary of a global company, have truly recognized the importance of our shared core values: trust, accountability, and diversity. These values, along with our Code of Conduct, which binds all individuals and entities within B. Braun, are foundational to our operations. The German Supply Chain Due Diligence Act (Gesetz über die unternehmerischen Sorgfaltspflichten in Lieferkette), effective from January 1, 2023, further reinforces the commitments already embedded in our Code of Conduct and the B. Braun Declaration of Human Rights.

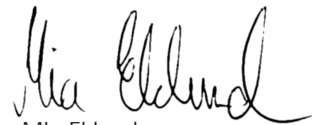
This due diligence assessment builds upon our initial evaluation and represents a continuation of our legally mandated and ethically driven methodology. Guided by our vision to "protect and improve the health of people around the world," we bear a particular responsibility to ensure that every link in our supply and production chain upholds human rights and environmental standards.

In 2024, we continued to invest in technology and training to enhance working conditions and uphold high standards for human rights. Sustainability, in this context, reflects our ongoing efforts to prevent, improve, detect, and correct any deviations from established procedures. In 2024, the sustainability department was integrated into the corporate strategy division, reporting directly to the CEO. This integration enables a stronger alignment between sustainability goals and corporate strategy. We also initiated an update of our materiality matrix through a double materiality assessment in preparation for compliance with the Corporate Sustainability Reporting Directive (CSRD).

We welcome inquiries and are open to sharing more about our business practices.



Roman Kübler,
B. Braun Medical AS
Chairman of the Board



Mia Eklund,
Managing Director
B. Braun Medical AS
Member of the Board

Foreword

As a family-owned company, B. Braun is deeply committed to our responsibility to protect and promote human rights and to safeguard the environment. We consider the protection of human rights a fundamental element of our corporate social responsibility.

Our commitment to respecting human rights is grounded in the United Nations Universal Declaration of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. We are dedicated to upholding internationally recognized human rights in all our business activities and throughout our value chains. This includes, the prohibition of child and forced labor, all forms of slavery and discrimination, and the promotion of freedom of association.

We are committed to ensuring occupational health and safety, providing fair wages, preventing environmental pollution, avoiding forced evictions, and refraining from deploying security forces where such deployment may pose a risk to human rights. We also adhere to the UN Guiding Principles on Business and Human Rights. These expectations are extended to our suppliers and are further detailed in our ESG documentation.

Our fundamental dedication to human rights is reflected in our internal policies, including the B. Braun Code of Conduct and the B. Braun SE Statement of Human Rights Declaration.

We always comply with applicable national laws. In cases where international rights are restricted by local legislation, we strive to promote the principles of international standards without violating local laws. Where local laws exceed international standards, we fully comply with them.

This due diligence assessment covers the period from January 1 to December 31, 2024.

Learn More

[B. Braun Code of Conduct](#)

[B. Braun Statement of Human Rights Declaration](#)

Contact Information

Point of Contact

Point of contact for questions regarding due diligence related to B. Braun Medical AS, Norway:

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B. Braun Medical AS, Norway.
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Applicability

To report all human rights or environmental risks and violations/breaches of our principles of protecting human and environmental rights please contact us through the listed channels.

Phone: +47 333 51 800
Email: kundeservice.no@bbraun.com

Local Compliance Coordinator

Daniella Lundin
Email: daniella.lundin@bbraun.com

B. Braun Whistleblower System

See also information related to complaint options regarding the B. Braun Group, including whistleblower system.
Learn more by [clicking here](#).

2.0 Organization and Business Areas

B. Braun Medical AS employs 38 people and is headquartered in Nøtterøy, Færder Municipality. The company is a wholly owned subsidiary of B. Braun Melsungen AG (B. Braun Group), a major global healthcare provider with over 66,000 employees across production and sales organizations worldwide. As a fully owned subsidiary, B. Braun Medical AS adheres to the rules, guidelines, and regulations established by the B. Braun Group, in addition to Norwegian legislation.

Learn more by accessing our [corporate homepage here](#)

Product Range and Therapy Areas

B. Braun offers a comprehensive portfolio of over 5,000 products and 120,000 articles.

Approximately 95% of these are manufactured in B. Braun's own facilities by its own employees. This in-house production model ensures flexibility and robust control over planning and resource allocation, especially during periods of increased or shifting demands. From a human rights perspective, this also enables a unified policy and direct oversight from management.

Structure and Responsibilities

The Board of B. Braun SE holds overall responsibility for compliance with human rights and environmental obligations across the B. Braun Group. The Managing Director of B. Braun Medical AS is responsible for ensuring compliance within the Norwegian market, in alignment with the B. Braun Compliance Management System. Compliance is ensured through effective measures embedded in relevant business processes to monitor the fulfillment of due diligence obligations.

[Learn more here](#)

Compliance System

Aligned with our corporate strategy, B. Braun is committed to lawful and socially responsible corporate governance. This commitment is supported by the Group Compliance Office, the Group Compliance Committee, and designated Compliance Officers. The compliance framework includes ethical guidelines, training, audits, and communication initiatives.

[Learn more here](#)

Local Compliance

The local compliance coordinator provides training and guidance to the Norwegian organization and participates in local leadership meetings. This coordinator receives ongoing support and training from the Nordic Compliance Officer and the central compliance organization.

In September 2023, a global validated Learning Management System (LMS) was implemented. This system enables the planning and delivery of both mandatory and voluntary training for all employees on topics such as compliance, industry-specific regulations, and risk assessment. The LMS is integrated with the HR system to facilitate performance dialogues, feedback, and evaluations between employees and their managers.

In 2024, the training system was further enhanced with interactive modules and updated content to ensure relevance and engagement. Specific training programs were introduced for new compliance regulations and best practices in risk assessment. Onboarding procedures now include a compliance review within 14 days of employment, which is documented accordingly.

[B. Braun's Code of Conduct](#)

Additional Laws and Regulations

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2.1 Internal Guidelines

B. Braun Medical AS, like all companies within the B. Braun Group, is committed to establishing binding minimum standards for sustainable operations that safeguard both people and the environment. The Group's comprehensive risk management framework supports the identification, documentation, assessment, monitoring, and mitigation of human rights and environmental risks within its own operations and across global supply chains.

B. Braun's approach to sustainability is holistic. Respecting and ensuring compliance with human rights is a central tenet in a globalized world with complex supply and value chains. Through our Code of Conduct (CoC), B. Braun is committed to upholding human rights throughout the entire value chain.

All employees undergo annual training on the Code of Conduct, delivered by the local Compliance Officer. Additional training is provided when updates to the CoC occur. All training is documented. New employees receive CoC training as part of their onboarding process within 14 days of employment. Local management and the Compliance Officer are available daily to address any questions.

In 2022, the B. Braun Group revised its Code of Conduct, reaffirming its commitment to lawful and socially responsible corporate governance. To reinforce this, the Group launched a Human Rights Declaration effective October 1, 2022, covering all business units and global supply chains. This declaration addresses key human rights risks for workers in global supply chains.

In 2023, B. Braun clarified its expectations for suppliers through the ESG Standards for Suppliers. This initiative increased accountability among employees responsible for managing local and global supplier relationships. The program was expanded in 2024 to include:

- New measures include the use of integrated software platforms such as EcoVadis and IntegrityNext to evaluate suppliers on sustainability performance. These platforms assess ESG risks based on country and industry, and monitor supplier compliance using advanced tools.
- Expanded ESG Topics: Including conflict minerals to ensure compliance with sustainability requirements.
- Stricter Obligations: Reinforced supplier commitments to ESG standards.
- Continuous Monitoring: Ongoing evaluation of suppliers using advanced digital tools.

B. Braun reserves the right to reassess business relationships in the event of significant breaches of ESG standards.

B. Braun is a member of Melanor, the industry association for suppliers to the Norwegian healthcare sector. As such, the company adheres to cooperation agreements with Sykehusinnkjøp (Hospital Procurement), regional health authorities, and LMI/Melanor. These agreements govern collaboration between healthcare personnel and industry representatives.

B. Braun Medical AS is Eco-Lighthouse (Miljøfyrtårn) certified and complies with requirements for mapping social sustainability in the supply chain. The 2024 Eco-Lighthouse report was submitted by the April 1, 2025 deadline. Recertification for 2026 will begin in autumn 2025.

In 2024, we further strengthened our internal guidelines by implementing new digital tools for improved compliance monitoring and reporting. This includes updated training programs and enhanced documentation to ensure all employees are well-informed and compliant with our internal policies.

Learn more about B. Braun's work with corporate sustainability [here](#)
[Click here to find B. Braun Statement Human Rights](#)
[Learn more about the Eco-Lighthouse certification here](#)

Organizational Structure

Sustainability is only effective when it is fully embedded within organizational and management systems. For this reason, the B. Braun Group has spent recent years enhancing the structures that support sustainable operations—from strategy development to implementation—by strengthening its sustainability leadership with additional personnel across various operational areas worldwide.

The Group Sustainability Department, which has been responsible for sustainability at the corporate level since 2022, lays the foundation for sustainability efforts across B. Braun. This department initiates necessary activities, ensures their execution, monitors sustainability-related requirements, coordinates the global sustainability network, and supports other departments in sharing best practices. The department reports directly to the CEO.

In 2024, the Sustainability Team was integrated into the Corporate Strategy Department, further aligning sustainability goals with the company's strategic objectives.

Corporate Governance

Good corporate governance is a core part of our business culture and shapes our daily operations. The legal and ethical conduct of our employees is an integral part of our value system. For the B. Braun Group, compliance means more than adhering to standards—it encompasses ethical values such as integrity, fairness, and sustainability, which we uphold both internally and externally.

Our Global Compliance Management System ensures that employees act in accordance with unified ethical standards.

We also require our suppliers to respect and uphold human rights in their business activities. To support this commitment, B. Braun launched a Human Rights Declaration in 2022, covering all business units and global supply chains. The updated Code of Conduct and Human Rights Declaration were developed by a cross-functional team and are based on international human rights standards and principles.

In 2024, we continued to strengthen our compliance culture by implementing comprehensive training programs and conducting regular audits to ensure that all employees and suppliers adhere to our ethical guidelines. We also emphasized open dialogue on ethical issues and sustainability, fostering a sense of shared responsibility throughout the organization.

Risk Management

B. Braun's objective is to utilize a comprehensive risk management system to proactively identify, document, assess, and mitigate actual and potential risks that may arise within our own operations and across global supply chains.

Due diligence is a fundamental component in our commitment to respecting employee human rights, as outlined in our Human Rights Declaration and Code of Conduct. The B. Braun Group's approach to due diligence also includes the implementation of preventive measures among our suppliers.

We have developed a compliance framework for our supply chains, which defines minimum standards that suppliers are expected to meet, as well as the consequences of non-compliance. This framework also takes into account the German Supply Chain Due Diligence Act, which came into force in 2023 and mandates transparency in supply chains with respect to human rights and environmental protection.

[Read the B. Braun Annual Report here](#)

3.0 Due Diligence

As a company operating in the healthcare sector, B. Braun has a unique opportunity to strengthen the protection of human rights in various ways. Our overarching goal is to protect and improve the health of people around the world. However, we are also acutely aware of the potential human rights and environmental risks associated with our business activities.

To address these risks, we have implemented procedures within our business processes to minimize, prevent, or eliminate such risks and breaches of our obligations—both to people and the environment.

To fulfill these obligations, B. Braun has established the following procedures across its business areas and, where necessary, with suppliers and subcontractors:

1. Risk Management

B. Braun Group's risk management system supports the identification, documentation, assessment, monitoring, and mitigation of risks related to human rights and the environment, both within our own operations and across global supply chains.

In 2024, we expanded the scope of our risk management efforts to include more suppliers and subcontractors. This included:

- An increase in third-party audits
- Enhanced training programs for employees and suppliers
- Implementation of advanced technologies for improved traceability and monitoring

We also introduced blockchain technology to ensure transparency and integrity throughout the supply chain.

2 Risk Analysis

As part of our risk management framework, B. Braun conducts both annual and event-driven risk analyses to identify human rights and environmental risks in the supply chain, with a focus on risks specific to the healthcare sector.

To ensure a comprehensive and in-depth analysis, relevant departments collaborate with the supplier evaluation platform Integrity-Next. This platform enables holistic assessments of B. Braun's business units and suppliers based on ESG (Environmental, Social, and Governance) criteria, country and industry-specific risks, critical news monitoring, and sustainability performance through structured questionnaires.

This work was further intensified in 2024, with full implementation scheduled for 2025.

Environmental focus

There has been an increased emphasis on reducing the environmental impact of our operations. Measures include:

- Reducing our carbon footprint
- Enhancing sustainability in production processes

Quality management and core labour standards

B. Braun operates a comprehensive and integrated quality management system certified by accredited bodies. This system consists of a multi-step process that complies with international requirements, regulations, and legislation, and incorporates applicable standards for products, processes, and risk management. Environmental protection and occupational safety requirements are also integrated into this unified management system.

Our global quality management system applies across all areas of the production network, and we operate according to consistent processes, requirements, and principles to meet the quality standards for our products and services. Legal standards include, for example, the European Medical Device Regulation (MDR), which was adopted in May 2017 and came into force in May 2021. In 2019, B. Braun in Germany successfully passed the audit under the new regulation and received MDR certification for its internal quality management system, as well as for the first products reviewed under the regulation. As part of our local preparations for MDR implementation, we mapped our obligations as a distributor in Norway and conducted a gap analysis to identify necessary updates to our SOPs to ensure compliance. This work began in 2024 and will continue into 2025.

B. Braun's Code of Conduct underpins our commitment to promoting human rights and acting responsibly toward society. We respect applicable labor standards set by the International Labour Organization (ILO), ensure working conditions that exceed legal requirements, and strictly reject all forms of child labor, forced labor, and exploitation. To implement this transparently and with long-term impact, we follow the German government's National Action Plan for Business and Human Rights (NAP). The NAP clearly outlines the goal of examining working conditions in global supply chains and collectively improving the human rights situation worldwide. B. Braun's quality management includes internal monitoring of labor standards and conditions and ensures that employees are informed of relevant organizational changes in a timely and appropriate manner. In 2024, new requirements were introduced for companies with more than 30 employees to establish a working environment committee. At B. Braun Norway, this was established in spring 2024, and all participants received training in occupational health and safety (AMU).

We take a proactive approach to minimizing work-related accidents and illnesses. Across all departments, occupational safety is achieved through leading by example and through employees' willingness to take responsibility. Protecting the health of our employees is a top priority. Therefore, B. Braun focuses not only on physical health but also on mental well-being. We emphasize a broad range of preventive measures with a holistic approach, including medical care, physical health, mental health, and nutrition. In countries with less developed healthcare systems, we offer nutritional counseling, dental check-ups, and cancer screenings. These efforts enable us to meet the DIN EN ISO 540001 criteria in all reporting countries where we manufacture medical devices.

As part of our local recertification as an Eco-Lighthouse company, a materiality assessment was conducted, and risk factors related to our operations were identified, mapped, and used as a basis for management activities to safeguard the physical and psychosocial working environment.

In 2024, we also focused on improving our sustainability practices by reducing our carbon footprint. This includes measures such as increasing the use of renewable energy in our production facilities and implementing energy-efficient solutions in our logistics processes. We also strengthened our collaboration with suppliers to ensure they follow sustainable practices and comply with our high environmental standards. These initiatives are part of our long-term strategy to contribute to a more sustainable future and ensure we meet our environmental obligations.

Establishment of Sustainability Supplier Assessment

As part of its due diligence obligations, the B. Braun Group has implemented preventive measures for supplier qualification and monitoring. This includes the use of integrated software solutions such as EcoVadis and IntegrityNext.

Both external service providers support the evaluation of our A-suppliers in terms of sustainability. Collectively, our top 80% of global third-party spend covers more than 2,000 suppliers. To date, a significant number of these suppliers have been assessed via the EcoVadis platform. Evaluations via IntegrityNext began in May 2022, and assessments for 500 suppliers have been uploaded so far.

What are our challenges?

We have observed that supplier willingness to undergo sustainability assessments via these platforms is limited. The main challenge lies in convincing suppliers to participate in the evaluation process. As a result, we have decided to apply increased pressure to emphasize the importance of compliance with our obligations.

Based on these experiences, the ESG Standard for Suppliers has been clarified, and supplier obligations have been tightened. The content of the ESG Standard has also been expanded to include additional topics, such as conflict minerals. B. Braun also reserves the right to reassess or terminate business relationships in the event of significant breaches of ESG standards.

Local Supplier assessment

The primary supplier to B. Braun Medical AS is the B. Braun Group. As such, the number of local suppliers is limited. We maintain long-term relationships with suppliers in areas such as IT, office services, cleaning, maintenance, travel, groceries, and hospitality. B. Braun Medical AS follows the guidelines set by the B. Braun Group in the event of any breaches or deviations related to our local suppliers.

In 2022, we identified the need to update or more thoroughly integrate B. Braun's Code of Conduct into both existing and new agreements. Measures were implemented in 2023, and preparations began to further strengthen our quality and compliance functions in 2025.

Screening and self-assessment B. Braun Medical AS

As part of the preparations for the Supply Chain Due Diligence Act, B. Braun Medical AS was evaluated by the B. Braun Group Supply Chain team with regard to human rights risk factors. In addition, a self-assessment was conducted using the IntegrityNext platform.

[Learn more here](#)

Eco Lighthouse Certificate

B. Braun Medical AS holds a valid Eco-Lighthouse (Miljøfyrtårn) certification through 2026. The recertification process is scheduled to begin in autumn 2025.

[Learn more about the Eco-Lighthouse certification here](#)

Results of the Due Diligence Assessment

With a high degree of in-house production and wholly owned factories operating under established quality standards, B. Braun is in a favorable position. However, we recognize that maintaining this position requires continuous awareness, systematic processes, and ongoing follow-up to prevent, detect, and correct any breaches or deviations.

Our local efforts, combined with the extensive work of our parent company in relation to the Norwegian Transparency Act, and the increasing regulatory focus in both Norway and the EU, indicate that attention to this area will continue to grow. We expect increased scrutiny and follow-up both internally within B. Braun and externally from stakeholders.

Just as we advocate for open competition, we view due diligence assessments as a necessary tool for fostering a sustainable health-care market.

In 2024, we did not receive any inquiries from private individuals regarding our work related to the Transparency Act. However, we have observed growing interest from our customers and partners. Due diligence assessments are now a standard part of our contract follow-up discussions with both public and private purchasers.

Various tools for status reporting and standardized templates for due diligence work have been introduced by different stakeholders. In response, we have allocated additional and dedicated resources to Quality Management and Compliance in 2024.

The Transparency Act was introduced in 2022 during a period marked by delivery instability and logistical challenges following the COVID-19 pandemic. The ongoing war in Ukraine and rising geopolitical tensions have continued to create uncertainty in 2024, both within our industry and across others. Competition for resources and raw materials, as well as trade barriers, are expected to persist into 2025.