Account of due diligence
in accordance with the Norwegian Transparency Act

Table of contents

Introduction

This account has been published in accordance with the requirements of the Norwegian Transparency Act. The document covers the full operations of Tromp Medical AS for the work undertaken between 1st January 2023 and 30th June 2024.

Value proposition

Tromp Medical AS (referred to as "Tromp" onwards) is the Norwegian entity of the largest independent medical imaging sales and service organization in Western Europe: Tromp Medical Group ("Tromp Group") which is headquartered in the Netherlands. In addition to Norway, the group has subsidiaries in Belgium, Czech Republic, Denmark, Finland, France, Spain, and Sweden. Customers of Tromp Group include university hospitals, general hospitals, private clinics, research centers and screening programs in the European market.

In Norway, Tromp sells, installs and maintains various types of medical imaging equipment from leading manufacturers within the sector, including Canon Medical Systems, Carestream, Hologic, Ziehm Imaging and Stille. As distributors of renowned brands, the company is not engaged in the production of any equipment.

Our services include:
- Distribution of medical devices and equipment
- Provision of consultancy services such as training to medical professionals and healthcare organizations
- Provision of technical support, installations and maintenance services for the products sold.

Tromp sells various types of medical equipment as representatives of brands. The products range among others[1]:
- CT Scanners
- MR Scanners
- Vascular
- Ultrasound
- FPD Radiography and Fluoroscopy
- Mobile X-ray
- Mammography
- Biopsia systems
- Healthcare IT
- Digital radiology

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[1] Tromp medical overview of products: https://www.trompmedical.com/nn-no/produkt/

- C-arms
- Dental equipment[2]
- Selected external accessories for the equipment

The value added of Tromp is to ensure the equipment is tailored to the needs and specifications of their clients. Additionally, the medical systems are installed at the client's site and frequent maintenance is offered as part of the agreements.

The clients of Tromp are mainly actors at health entities in the Norwegian public hospital sector as well as private healthcare institutions. As such, their main distribution area is through public procurement processes.

Tromp is dedicated to conducting its business in an ethical and responsible manner, and this commitment extends to respecting human and labor rights throughout its value chain. The company recognizes that it has a responsibility to ensure that its suppliers and business partners also adhere to these principles.

This report is a testament to Tromp's commitment, and it is part of the company's ongoing efforts to ensure that its ethical and legal obligations are upheld. More information regarding Tromp's implementation of procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions can be found under the section "How we are implementing the Transparency Act".

Operations & Supply chain

Tromp has offices in Lierstranda, Norway. Tromp's own staff work with the daily operations; sales, installations and maintenance. During 2023 there were 21 employees and 1 contractor handling salary/accounting. Below is an overview of the team organization structure for the Norwegian operations.

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[2] As of March 2024, Tromp has ceased the distribution of dental equipment, but is still servicing existing equipment.

Image: Organization chart Tromp Medical AS

The General Manager or Managing Director is responsible for the overall running of the Norwegian entity and reports directly to the Group's CEO. The sales team has project managers that follow up the sales process from tendering to coordination of installations with the client and ensure the equipment is formally received.

Logistical support works with arranging secure transportation for the equipment from either the parent entity storage in the Netherlands or directly from the main suppliers. The technical team has several engineers responsible for all installations, maintenance and technical support. When there is lack of technical capacity or expertise in the local team, colleagues from sister entities or from headquarters provide support as an intercompany service.

Suppliers

Tromp has four main suppliers for products sold. They are Ziehm Imaging, Hologic Inc, Canon Medical Systems and Carestream. In addition, Tromp has some minor purchases, including products from Stille. These suppliers can also be categorized as partner entities as Tromp represents these companies in the Norwegian market. Consequently, Tromp adheres to each of the Supplier Code of Conduct or ethical clauses of these partners. The corporate responsibility addresses human rights and decent labor conditions stewardship.

Purchasing of products goes through a centralized system designed and maintained at the central level in the Netherlands. The parent entity is also responsible for negotiating the terms with main suppliers the company represents. At the national level in Norway, payments are handled according to the established processes and controls for approval and disbursement.

Suppliers of transportation are normally well-established entities with the capacity to handle large electronic equipment. Additionally, there are other suppliers of lower purchase value such as marketing materials.

The company also engages business partners that provide support for the daily running of operations, such as energy, internet & telecommunications or property management.

Process for due diligence

The Transparency Act and OECD Guidelines for Multinational Enterprises

Tromp supports the United Nations Guiding Principles (UNGP) and OECD Guidelines for Multinational Enterprises approach to due diligence and recognizes the need to have processes in place to identify, prevent, mitigate, and account for how the impact on human rights is addressed. It is understood that this is an ongoing activity, as risks may change over time in line with operational changes or external influences.
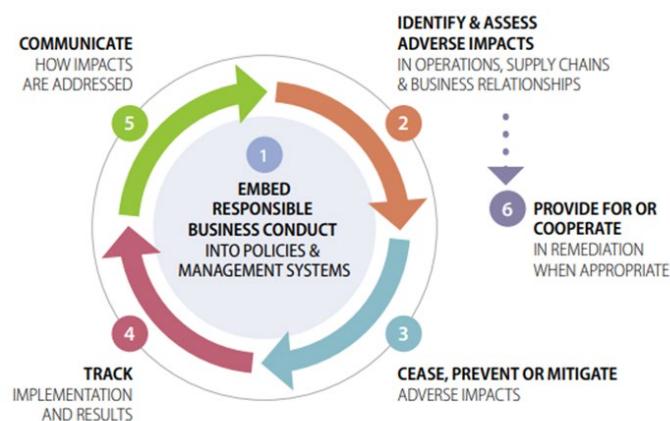

Image: OECD Due Diligence process

The process for mapping our own operations, supplier and business partners

How do we assess risk?

The risk assessment of our suppliers and business partners builds on the list of high-risk products from the Norwegian Government Agency for Financial Management (DFØ) and industries in Norway that have their own set of minimum legal requirements regarding wage and labour rights. The assumption is that such industries are most likely high risk in other countries too. In our risk matrix, the above products and services are considered as high risk. Services and similar risk profiles have been classified as medium or high depending on our knowledge of the industry. Other products and services have been considered as low risk.

DFØ defines products as high risk "[…] when there are systematic documented high risk of human rights abuse occurring in the supply chain, meaning the value chain from raw material extraction to component production until finishing assembling." The documentation is based on reports and

studies by ILO and other relevant sources (for example research reports and reports from acknowledged civil society- and union organisations). To make the list relevant in the daily practise of public procurers, specific product categories have been selected based on Norwegian public procurement activities. The High Risk List is a guidance tool, and not exhaustive. Products not on the list could therefore also be high risk purchase.

The high risk industries are defined by law as the construction industry, the maritime construction industry, cleaning workers, fish processing enterprises, electricians, freight transport by road, passenger transport by road, hotel, restaurants and catering.

For some categories of product/services, the risk depends on the country risk for human rights and decent working conditions. When assessing country risk, we use Global Rights Index, Labour Rights Index and Transparency International's Corruption Perception Index.

Adverse impacts

To date, Tromp has not identified any actual or potential negative risk for human rights and decent labor conditions associated with its own operations in Norway or supply chains.

How we are implementing the Transparency Act

In 2024, Tromp was focused on updating its senior management staff. With a new General Manager in place to oversee the company's operations, the company has started working systematically towards the implementation of the Norwegian Transparency Act and is liaising with headquarters in the Netherlands to systematize relevant documents and routines.

The General Manager has been appointed as responsible for overseeing the implementation of the Transparency Act with the support of a local working group. Tromp has started undertaking a gap assessment of the steering systems to identify potential for aligning policies, systems, operations, awareness raising, and building the capacities of the Norwegian entity in accordance with corporate standards and policies, and national laws.

This assessment lays the foundation identifying improvement opportunities for internal governing procedures and establishing, as needed, an overview of suppliers and business partners, an assessment of those posing the greatest risk and monitoring activities.

Tromp has engaged with an independent third party to assist in conducting a full assessment of the corporate structures, policies and due diligence of third parties. The project will run during the second semester of 2024, following the methodology described to further address the requirements of the Transparency Act.

Third parties will be assessed as per risk-based impacts and actions will be defined according to the identified, if any, risks of potential negative impact to human rights and decent labor conditions as described above. This work will provide an initial baseline for relevant follow-up actions for Tromp's own organization and towards any identified third party.

Signatures

   Lierstranda, 30 June 2024

konrad eichberger

Konrad Eichberger
Chairman of the Board, Tromp Medical AS

And

Jørgen Nilsen

Jørgen Nilsen
General manager, Tromp Medical AS

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