
Transparency Act Due Diligence Report

Annual statement on due diligence assessments

LINK Medical AS
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For the Financial Year Ending: 2024

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1 Introduction and Company Overview

LINK Medical is a Norwegian company with an annual turnover of approximately NOK 213 million and a balance sheet of NOK 94 million. LINK Medical is a leading CRO and Regulatory service provider offering an exceptionally wide range of expertise, flexible services, and innovative technologies for the pharmaceutical and medical device industries across Northern Europe and beyond.

LINK Medical employees are located in Norway, Sweden, Denmark, Finland, Germany and the United Kingdom. LINK Medical Vendors are typically located in the Nordic countries or EU/EEA with few located in other locations.

As we are covered by the Norwegian Transparency Act ("Åpenhetsloven"), we are committed to ensuring openness, accountability, and respect for fundamental human rights and decent working conditions throughout our operations and supply chain.

This report presents our due diligence assessments and the measures taken in 2024.

2 Governance and Policies

LINK Medical operates in an industry where ethical behavior, social responsibility and anti-corruption is a common part of the evaluation process and has processes covering the same topics.

Our company is governed by a Code of Conduct that applies to all employees.

All our Vendors are approved and qualified as appropriate prior to use. Onboarding of new Vendors includes among other things evaluation of their Code of Conduct or similar and we require compliance with human rights, labor rights, anti-corruption principles, and that they seek same confirmation from their sub-vendors.

We verify periodically that our Vendors' Code of Conduct is still aligned with ours.

The company executive management is regularly informed about our work with the Transparency Act and CEO approves the annual report.

Responsibility for daily follow-up of Vendors lies with Chief Commercial Officer and delegates.

3 Due Diligence Process

We routinely carry out due diligence assessments and have not found actual and potential adverse impacts on fundamental human rights and decent working conditions. Our process consists of:

- Documented process for risk-based qualification and approval of vendors including routine periodic re-qualification of qualified Vendors.
- Written contracts with all Vendors.
- Mapping all vendors including their business partners.
- Vendor oversight process.
- Vendor follow-up including contractual obligations and dialogue.
- Formal process for handling vendor issues and complaints, including remediation measures.
- Annual reporting to ensure transparency.

4 Routine Measures Implemented in 2024

Introduced updated ethical trade clauses in new contracts and updated Code of Conduct with expanded text related to ethical behavior.

5 Transparency and Dialogue

In line with the Transparency Act, we recognize the public's right to information. Requests can be directed to: transparency@linkmedical.eu.

We will respond within a reasonable time, and no later than three weeks.

6 Looking Ahead – 2025 Focus

Publishing the Transparency Due Diligence Report on LINK Medical website

Continue strengthening awareness internally and externally.

7 Approval

This report has been discussed and approved by the Board of Directors of LINK Medical AS on September 30th, 2025.

8 Appendix: Extract from the LINK Medical Code of Conduct

LINK Medical is committed to fostering an inclusive environment in all aspects of our organization, ensuring equal opportunity and access for all individuals, regardless of background or identity and to promote diversity, equity, and inclusion (DEI) within our workforce and engagement with stakeholders.

Employees, colleagues, customers, vendors, and other business partners should be treated fairly and with respect. Interactions should be responsible and transparent.

Professional interaction with government officials and health care professionals takes place on behalf of LINK Medical's customers, and any interaction should be in accordance with the written contracts and comply with applicable regulations.

Corruption and bribery activities are prohibited by LINK Medical employees, or LINK Medical vendors and LINK Medical maintains a zero-tolerance approach to modern slavery and human trafficking.

LINK Medical's use of vendors should be transparent for the customer, and our goal is to source vendors whose values align with our own.

LINK Medical is committed to conduct all business with a focus on environmental sustainability, and social responsibility. LINK Medical employees strive to make the most environmentally sound choice wherever and whenever possible, in all of our actions, to minimize the impact on the environment as much as possible.

VERSION HISTORY

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ELECTRONIC SIGNATURES

Approvals

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