

# orthex GROUP



## **Norwegian Transparency Act Statement (Åpenhetsloven)**

*Reporting period: 1.1.2025 – 31.12.2025*

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## 1. Introduction

This statement is published in accordance with Section 5 of the Norwegian Transparency Act, which requires covered enterprises to conduct and publicly report annual due diligence on human rights and decent working conditions throughout their operations and supply chains. The law obligates companies to follow the OECD Due Diligence framework and respond to public information requests within three weeks.

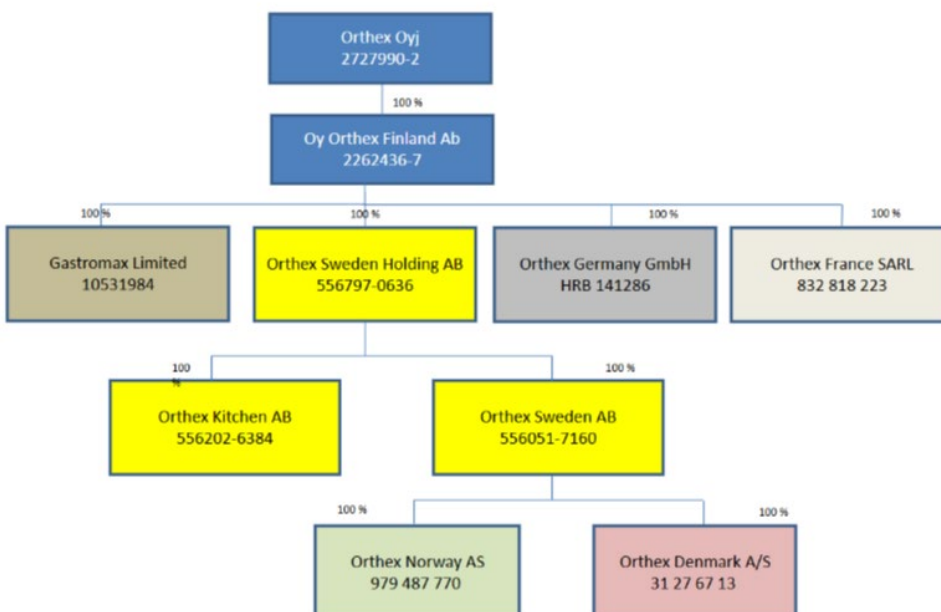
Orthex prepares this report as part of its broader ESG and sustainability management, which is central to its long-term strategy and operational decision-making.

## 2. Company Description

Orthex Group is a leading Nordic houseware company specializing in durable storage, kitchen, and household products, with an ambition to be the number one brand in storage solutions in Europe. Today, Orthex Group has customers in 40 countries and on four continents. It has three factories of its own employing around 300 people in total. Sustainability plays an integral role in Orthex’s growth strategy and is embedded in company-wide decision-making. Read more about Orthex and its approach to sustainability in the [Orthex Annual and Sustainability Report](#).

Orthex has operations in Norway, employing directly 2 people. Operating company in Norway is Orthex Norway AS. Orthex Norway AS is part of the Orthex Group and is therefore subject to the Group’s guidelines, strategies and policies—including, for example, the handling of human rights.

### Group legal structure



Orthex Group sources materials and components from a global supply chain. Orthex procures its raw materials mainly from European suppliers. Only slightly more than one percent of the raw materials used by the company come from other countries than the EU area or Great Britain.

### 3. Governance & Policy Framework

#### 3.1 Sustainability Governance

Orthex maintains an annually updated sustainability strategy, structured under the ESG framework, with targets and KPIs confirmed for rolling three-year periods.

This strategy includes measures aligned with expectations for responsible business conduct, including ethical sourcing, climate targets, stakeholder engagement, and worker wellbeing. Read more about Orthex’s approach to sustainability in the [Orthex Annual and Sustainability Report](#).

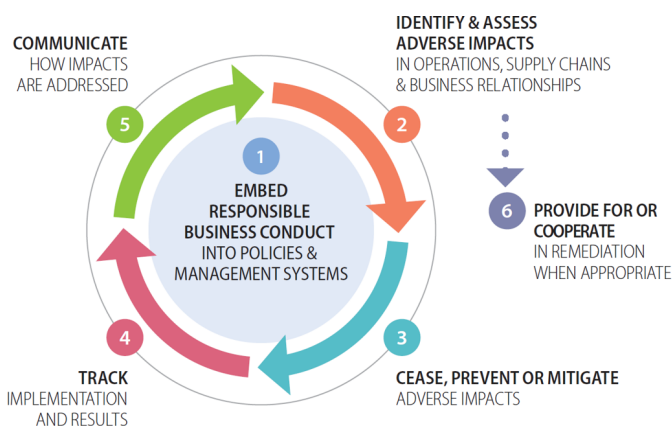
#### 3.2 Policy Structures Supporting Human Rights and Labor Conditions

Orthex integrates human-rights-related expectations through documents and policies:

- [Code of Conduct](#)
- Supplier Code of Conduct
- Supplier requirements and contractual clauses
- Whistleblowing channels and incident reporting processes

### 4. Due Diligence Conducted in Accordance with Section 4

The Transparency Act requires companies to conduct due diligence following the OECD six-step framework.



Below is Orthex’s approach aligned to these steps.

#### 4.1 Embedding Responsible Business Conduct

Orthex integrates sustainability considerations into strategic planning, product development, sourcing decisions, and supplier engagement. ESG strategy guides responsible business conduct throughout the value chain.

Orthex has been a member of the amfori Business Social Compliance Initiative (BSCI) since 2018 and uses the BSCI audit program, focusing on 11 principles for conducting business in an ethical and socially responsible way. An impartial third-party audit is mandatory for all factories in high-risk countries. To determine whether a country is a high risk, the latest analysis published by the World Bank is used. The audit is required before any cooperation and must always be renewed before expiry.

#### 4.2 Identifying and Assessing Risks

Orthex uses:

- Supplier assessments
- ESG criteria for procurement
- Materiality assessments covering environment, social and governance risks
- Risk indicators related to geographic origin of raw materials

Key risk categories typically include:

- Labor rights risks in raw material extraction/manufacturing
- Health and safety at production sites
- Environmental handling of polymers

#### 4.3 Preventing and Mitigating Risks

Orthex:

- Applies ESG-aligned sourcing requirements
- Works closely with suppliers to improve transparency
- Prioritizes suppliers adhering to strong social and environmental standards

#### 4.4 Tracking Effectiveness

Monitoring activities include:

- Regular review of supplier documentation
- Evaluation of ESG KPIs
- Follow-up on materiality topics and stakeholder expectations (updated annually)

#### 4.5 Communicating Findings

Orthex communicates progress through its [Annual & Sustainability Report](#), following ESG structure and publicly disclosing key indicators and developments.

#### 4.6 Remediation and Grievance

Processes exist to evaluate concerns raised internally or externally, including supplier noncompliance or worker-related issues. Necessary corrective actions are implemented according to the severity of identified risks.

### 5. Key Findings From the Reporting Year

Based on Orthex's sustainability analysis framework and supply-chain transparency practices, the following risk patterns are typically observed:

#### 5.1 Identified Risks

- Potential social risks related to subcontractors operating in high-risk regions
- Occupational health & safety considerations at the factories
- Limited transparency beyond Tier 1 suppliers, a common challenge in plastics-heavy industries

#### 5.2 Areas of Lower Concern

- Manufacturing within Europe with stricter regulatory oversight
- Strong internal commitment to ESG targets and production, reducing operational risks

### 6. Measures Implemented in the Reporting Period

Key actions aligned with Orthex's ESG program include:

- Strengthening supply-chain mapping and improving data availability on supplier tiers
- Updating KPIs and sustainability targets through the annual ESG strategy review, ensuring alignment with stakeholder expectations
- Enhancing cooperation with suppliers to support better transparency and compliance programs

### 7. Planned Improvements

Orthex intends to:

- Expand the visibility of high-risk raw material supply chains
- Strengthen due diligence documentation requirements for suppliers

- Further integrate human rights considerations into procurement KPIs
- Advance circularity goals which reduce reliance on potentially high-risk material sources

## 8. Information Requests (Section 6)

In accordance with the Transparency Act, Orthex will respond to written requests from the public regarding how it addresses actual or potential impacts on fundamental human rights and decent working conditions. Responses will be provided within three weeks, as required.

Requests for information should be sent via [contact form](#) on company website.

## 9. Approval and Publication

This statement has been reviewed and approved by Orthex Norway AS Board of Directors and will be made publicly available on Orthex's website, as required by the Transparency Act.

*Alexander Rosenlew*

*Saara Mäkelä*

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4.6.2026

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Alexander Rosenlew

Saara Mäkelä

(Board member)

(Board member)