NORWEGIAN TRANSPARENCY ACT

STATEMENT 2024

INTRODUCTION

This statement is made pursuant to the Norwegian Transparency Act of 2022 (referred to as "the Act"), which requires certain in-scope companies to conduct due diligence and publish an account of that due diligence as specified in Section 5 of the Act.

This statement is submitted by the reporting entity Organon Norway A/S. It describes Organon procedures for addressing actual and potential negative impacts on fundamental human rights and decent working conditions.

All data and information reported in this statement refers to the financial year ending on December 31, 2024.

STRUCTURE, OPERATIONS AND SUPPLY CHAINS

ABOUT ORGANON

Organon is a global healthcare company with a focus on improving the health of women throughout their lives. Organon has a portfolio of more than 60 medicines and products across a range of therapeutic areas. Led by the women's health portfolio coupled with an expanding biosimilars business and stable franchise of established medicines, Organon's products produce strong cash flows that will support investments in innovation and future growth opportunities in women's health.

In addition, Organon is pursuing opportunities to collaborate with biopharmaceutical innovators looking to commercialize their products by leveraging its scale and presence in fast growing international markets.

Organon has a global footprint with significant scale and geographic reach, world-class commercial capabilities, and approximately 10,000 employees. Organon's headquarters are located in Jersey City, New Jersey, USA and a list of our worldwide locations is available at Organon Global Locations (https://www.organon.com/menat-en/contact-us/global-locations/).

For more information, visit https://www.organon.com.

ORGANON NORWAY A/S

Organon Norway A/S is a pharmaceutical company and the Norwegian subsidiary of Organon. We specialize in the distribution and sale of prescription medications across various therapeutic areas, including Women's Health, Cardiovascular and Central Nervous System. As a subsidiary of Organon, Organon Norway A/S has implemented, abides by, and carries out due diligence in accordance with, all Organon policies and procedures for addressing actual and potential negative impacts on fundamental human rights and decent working conditions described in the following.

Our customer base includes drug wholesalers, retailers, hospitals, government agencies and healthcare professionals.

Organon Norway A/S is part of the Central & Northern Europe Cluster and within that Cluster we have a Leadership Team headed by the Managing Director who is also a member of the Organon Norway A/S Board of Directors. Our office is located in Oslo, and as of the end of 2024, we had 14 employees.

For more information, visit https://www.organon.com/norway/.

SUPPLY CHAINS

Organon manufactures, packages and distributes products to more than 157 countries and territories around the world. Organon has established business relationships with over 16,000 suppliers and partners. Our network is comprised of approximately 485 direct suppliers (including external manufacturing partners), 540 capital expenditure suppliers, 15,000 indirect partners, and 450 research providers. We have established a footprint in 69 countries.

Our direct suppliers provide us with goods and services such as packaging, components, and ingredients. Capital expenditure suppliers provide goods and services such as engineering and construction. Our indirect suppliers include those that provide services such as logistics, travel and meetings, facility management and marketing. Our research providers include those that provide laboratory supplies and other services.

RESPECT FOR HUMAN RIGHTS

IN OUR OPERATIONS

Organon is committed to meeting its responsibility to respect internationally recognized human rights standards, as they relate to our operations. We believe that dignity and respect for people is essential in business. Respect for Human Rights is core to our Company`s purpose to save and improve lives around the world.

We expect all our employees to conduct their activities in a manner that respects human rights.

Our approach to human rights is guided by internationally recognized standards. Our commitment to human rights embraces established global standards such as the Universal Declaration of Human Rights, the ILO`s Declaration on the Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights.

We believe that the risk of Organon violating Labour and Human Rights (LHR) within our own operations or causing, contributing to or being linked to instances of modern slavery is minimal. We do not engage in business activities that involve low-skilled, labour-intensive production or foreign migrant workers. We have robust labour, employment and recruitment practices in place.

The pharmaceutical industry is highly regulated and is not generally recognised as an industry that poses a significant risk of modern slavery or other violation of LHR, compared to other industries (e.g. agriculture, construction, electronics, extractives & mining, hospitality, textiles, apparel, forestry, fishing, food processing and transportation).

IN OUR SUPPLY CHAINS

We expect all our suppliers and other business partners to conduct their business in a manner that respects human rights.

We have assessed that the risk of modern slavery practices or other violations of LHR occurring within our supply chains is predominantly associated with our use of third-party suppliers and service providers that operate in countries that are known to present a significant risk of modern slavery, such as those listed on the Walk Free Foundation's Global Slavery Index, as well as other recognised external data sources on modern slavery and human trafficking.

We recognise that companies with supply chains that extend into high-risk countries potentially face greater risks of modern slavery or other violations of LHR. Our company can be indirectly exposed to modern slavery and LHR risks through our supply chains, as some of our third-party suppliers and service providers operate in countries that have a high prevalence of modern slavery.

ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS FOR LHR

IN OUR OPERATIONS

We strive to avoid causing or contributing to adverse human rights impacts through our own activities and seek to prevent or mitigate adverse human rights impacts that are linked to our operations and products.

All employees, service providers and Company-managed contractors must follow our safety standards. In addition, we have comprehensive programs focused on reducing risks, work-related injuries and illnesses, and other safety incidents.

Our oversight and monitoring of business-related human rights risks is supported by relevant internal functions and departments, including Human Resources, Global & Safety Environment, Global Supplier Management, Supply Chain Management, Ethics & Compliance. Global Security, Global Privacy Office, Information Risk Management and Enterprise Risk Management.

During 2024, Organon and its subsidiaries, including Organon Norways A/S, have worked and are continually working to detect and address the risks for LHR within our own operations through:

Organon Code of Conduct - Respecting and abiding by our company's core values and standards, as stated in our company Code of Conduct. We consider these to be the foundation of our company's success. They apply globally, wherever we are doing business.

Standards - Upholding and maintaining high company standards on LHR. We expect our employees to adhere to our Code of Conduct (https://www.organon.com/about-organon/mission-vision-and-values/code-of-conduct/) and our suppliers to adhere to our Business Partner Code of Conduct (https://www.organon.com/about-organon/mission-vision-and-values/business-partner-code-of-conduct/) ("**BPCC**") and Supplier Performance Expectations (www.organon.com/about-organon/mission-vision-and-values/supplier-performance-expectations/.

Speaking Up - Fostering an environment where employees feel safe to speak up and report concerns. We rely on employees to speak up about potential violations of our Code of Conduct, policies, procedures, the law or other misconduct, including any that are suggestive of modern slavery or other violations of LHR. Similarly, we also encourage our suppliers to speak up and report any concerns, as per our BPCC. We are committed to investigating any report of potential incidences of LHR violations occurring anywhere in our operations and confirm that we would take all appropriate steps to rectify any confirmed incidences of modern slavery in our operations.

Tone at The Top - Communications from senior leaders emphasising the importance of ethics and integrity and the importance of speaking up and reporting issues/concerns before they become a bigger problem.

Communication Channels - Maintaining multiple communication channels to make it easy for employees and others to ask questions or report concerns. Employees can report concerns to their managers, human resources, compliance or legal.

Speak Up Tool - Providing a speaking up tool. The Speak Up tool EthicsPoint - Organon (https://secure.ethicspoint.com/domain/media/en/gui/76765/report.html) is operated by an independent third-party and it is available 24 hours a day, 7 days a week. It allows employees to raise concerns or ask questions confidentially, and if preferred, anonymously, in their preferred language via telephone or the internet.

Investigations - All allegations of misconduct are investigated in accordance with our company's Compliance Issues Visibility Response process, which promotes confidentiality, dignity and respect, objectivity, promptness and non-retaliation.

Corrective Action - We take violations seriously. Corrective and disciplinary actions are taken against individual employees who are determined to have engaged in misconduct based on the findings of an investigation, which is independently overseen by our Office of Ethics & Compliance, Internal Audit and/or Legal investigations teams.

Training - New employees, as well as existing employees receive annual training on our company Code of Conduct, through a series of online compliance courses. Training completions are closely monitored and reported to senior management.

Accountability - Maintaining accountability. All employees are responsible for: 1) adhering to our company's Code of Conduct; 2) complying with all relevant polices; and 3) raising concerns. Substantiated violations may result in disciplinary action up to and including termination of employment.

IN OUR SUPPLY CHAINS

To help manage and address potential risks of LHR violations (as well as other risk areas associated with third-party business relationships), our Global Procurement Supplier Management ("**GPSM**") has an established third-party risk management program. Modern slavery and other risks for LHR are considered as part of our third-party risk management activities and is included in a risk assessment questionnaire provided to suppliers in scope.

We recognise that potential risks for LHR may also exist in the pharmaceutical supply chain including the suppliers who supply our primary suppliers. The Pharmaceutical Supply Chain Initiative ("**PSCI**") Human Rights & Labour Sub-Committee has identified several materials[1] commonly used within our industry that warrant further examination. We plan to continue efforts (in collaboration with PSCI) to ensure that the suppliers we work with are appropriately assessed and audited and that the materials we use are sourced responsibly.

During 2024, we have continually worked to detect and address the risks for LHR in our supply chain through:

[1] Rubber, Corn, Palm oil, Aluminum, Shellac, Glass, Sugar, Talc; Fish oil; Castor seed/oil; Soy; Cellulose; Ethanol; Carnaùbawax.

Supplier Selection - Striving to select suppliers that are socially responsible and who share our company's commitments to ethics and legally compliant business practices. Our goal is to obtain services, goods, active ingredients, components, finished goods or other products in a way that is lawful, fair and aligns with the principles outlined in our BPCC.

Expectations - Setting and communicating our expectations of suppliers, including those related to international LHR, child labour, forced labour and human trafficking. We use our BPCC to communicate our expectations. It has been translated in most countries in which Organon operates. Recently, Organon has also conducted a further review of its BPCC to require that similar levels of due diligence would also be implemented by our business partners in their downstream supply chains.

Supply Chain Mapping - Identifying which of our suppliers operate in countries that are known to present significant risks for LHR. We use this information to help us decide upon the level of due diligence and auditing that may be necessary.

Due Diligence - Conducting appropriate supplier due diligence helps to determine the level of risk presented by suppliers, including both prospective and existing direct material suppliers and contract manufacturing partners.

Our due diligence process for LHR targets direct materials suppliers, including external manufacturing suppliers and contract manufacturing organisations, regardless of their geographic location.

A risk assessment questionnaire is used to gather information on LHR matters, including assessing freely chosen employment and that forced labour is never used including disclosures about slavery and trafficking, child labour and young workers, employment practices, employee disclosures, fair treatment, wages, benefits, working hours and freedom of association.

The information gathered as part of due diligence is used to determine the acceptability of suppliers' local practices. Any red flags identified during due diligence are reviewed and analysed and used to inform our supplier selection and risk management process.

Contracts - Seeking written commitments from suppliers to respect the principles set forth in our BPCC through our contracts/agreements. Our standard contract templates also contain clauses on compliance with laws, ethical business practice, right to audit/inspect, as well as contract termination. Where applicable, we would consider in future including additional modern slavery contractual wording into our agreements with certain Suppliers.

Auditing - Where a need is identified, LHR audits could be conducted using a risk-based approach at select supplier facilities to verify their conformance with our company's expectations (as stated in our BPCC) and by working with them to address identified non-conformities.

Remedial Actions - Tracking and reporting (to senior management) on the closure of remedial actions taken by suppliers to address identified non-conformities (gaps/concerns) revealed by supplier LHR auditing.

Governance - Third-party risk and compliance is embedded in and sponsored by GPSM. It collaborates with compliance offices and facilitates supplier due diligence and provides independent and objective oversight, monitoring and reporting in relation to the risks presented by third parties.

Engagement - Engaging and seeking input from relevant stakeholders including about modern slavery risks and issues, including GPSM, Office of Ethics & Compliance, Legal, Global Safety & Environment and the Office of Corporate Responsibility.

Training: Training GPSM professionals with responsibility for supplier selection, oversight and monitoring.

Collaboration: By working with PSCI Labour & Human Rights Sub-Committee to develop training materials on modern slavery and by sharing knowledge across our industry and with our suppliers.

POLICIES

Organon prides itself on acting ethically, fairly and with integrity, including by recognising and respecting human rights. We embody that attitude in our company Code of Conduct (www.organon.com/about-organon/mission-vision-and-values/code-of-conduct/) and other policies (www.organon.com/about-organon/policies-disclosures/). especially the Human Rights Position Statement (https://www.organon.com/wp-content/uploads/sites/2/2022/04/ASG_POSITION_Human_Rights_Position_Statement_v04052022_final.pdf).

We expect our suppliers to adhere to our BPCC (www.organon.com/about-organon/mission-vision-and-values/business-partner-code-of-conduct/), which is based on our Code of Conduct, as well as the PSCI's Principles for Responsible Supply Chain Management and the 10 Principles of the United Nations Global Compact.

Our BPCC requires our suppliers to treat their workforces with dignity and respect and specifically to not: (i) use any form of forced or involuntary labour, including bonded labour, prison labour or indentured labour; or (ii) engage in or support any form of modern slavery or human trafficking.

VERIFICATION

Since June 2021, Organon has required all new direct suppliers (as well as selected indirect and research suppliers in certain geographies based on scoping criteria in place) to complete and return a Supplier Self-Assessment Questionnaire for Ethics & Compliance prior to entering into a contract or arrangement with us.

INTERNAL ACCOUNTABILITY

At our company, all employees are responsible for: 1) adhering to the values and standards set forth in our own Code of Conduct; 2) complying with all relevant company polices; and 3) for raising compliance concerns. Employees can raise concerns to their supervisor, Human Resources, Legal or the Office of Ethics & Compliance. They are also encouraged to Speak Up at https://secure.ethicspoint.com/domain/media/en/gui/76765/report.html to report concerns. We investigate all reported allegations of misconduct. Violations of our company's Code of Conduct or policies may result in a variety of corrective actions and in some cases may result in disciplinary action up to and including termination of employment.

ABOUT OUR COMPLIANCE PROGRAM

Being an ethical company is about much more than simply adhering to the letter of the law. But it's an important step.

As part of our commitment to ethics and good corporate citizenship, our first step is always to comply with the laws and regulations that govern the way we market and sell our medicines and other healthcare products.

We have a Compliance Program that:

seeks to prevent, detect and resolve potential violations of law or company policy; and undergoes regular assessment and adjustment to make sure we are being responsive to our evolving business and associated compliance risks.

Our Board of Directors and Senior Management as well as Organon`s Chief Ethics and Compliance Officer, oversees the company's Global Compliance Program, including compliance-related policies, procedures, education and training.

In addition, we:

require employees to report potential violations of law or company policy;

hold ourselves accountable for responding promptly when potential violations arise;

take disciplinary action as appropriate; and

examine whether identified violations are in part due to gaps in our policies, practices or

internal controls and if so, take appropriate action to prevent future violations.

ASSESSING THE EFFECTIVENESS AND IMPACT OF OUR ACTIONS

In 2024, we have not identified any actual adverse impacts or significant risks of adverse impacts in our activities and supply chains. Consequently, no measures have been taken to to cease actual adverse impacts or mitigate significant risks of adverse impacts in our activities and supply chains.

We are developing Key Performance Indicators ("KPIs") to help us assess the effectiveness of our efforts in addressing the risks for LHR in our operations and supply chains and identify opportunities to help improve our programs.

NEXT STEPS

We will continue working on our efforts to identify, assess, and address risks for LHR within our operations and supply chains. These efforts will include:

investigating any reported concerns promptly;

conducting further supplier LHR due diligence exercises to identify and address risks;

where appropriate, auditing selected suppliers to verify conformance with our standards

for LHR;

holding suppliers accountable for addressing non-conformities revealed by LHR audits; and

participating in the activities/initiatives of PSCI's Labour & Human Rights Sub-Committee.

CONSULTATION

The preparation of this Statement was performed in consultation with relevant internal stakeholders directly involved with the management of risks related to LHR, including senior management representatives from our GPSM, Legal, Office of Ethics & Compliance and ESG & Corporate Responsibility.

Company directors representing the Boards of Organon, and the reporting entity reviewed this statement and consulted with each other about matters contained in this statement prior to publication. Approvals are indicated in the section below.

APPROVALS

This statement has been approved by the Board of Directors of Organon Norway A/S.

isabel vandenberk

Electronically signed by: isabel vandenberk
Reason: Approved
Date: Jun 30, 2025 16:13 GMT+2

Name: Isabel Vandenberk
Title: Chair of the Board
Organon Norway A/S
Date: 30 June 2025

Pontus Ek

Electronically signed by: Pontus Ek
Reason: Approved
Date: Jun 30, 2025 15:44 GMT+2

Name: Pontus Ek
Title: Board Member
Organon Norway A/S
Date: 30 June 2025

Veronica Svanes

Electronically signed by: Veronica Svanes
Reason: Approved
Date: Jun 30, 2025 14:21 GMT+2

Name: Veronica Svanes
Title: Board Member
Organon Norway A/S
Date: 30 June 2025

In accordance with the requirements of the Norwegian Transparency Act, and in particular section 5 thereof, we attest that we have reviewed the information contained in the report for Organon Norway A/S. Based on our knowledge, and having exercised reasonable diligence, we attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Organon_Norwegian Transparency Act - Statement 2024

Final Audit Report 2025-06-30

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