

## **Transparency Act Statement – Smith & Nephew AS (Norway)**

This statement is published in accordance with the Norwegian Transparency Act (Åpenhetsloven) and describes how Smith & Nephew AS addresses actual and potential adverse impacts on fundamental human rights and decent working conditions in its own operations and supply chains.

### **1. About Smith & Nephew AS**

Smith & Nephew AS is a wholly owned subsidiary of Smith & Nephew USD Limited, part of the Smith & Nephew plc global group. The parent company is listed on the London Stock Exchange and the New York Stock Exchange. Smith & Nephew AS was established in Norway in 1979 and is headquartered in Asker. The company markets, sells, and distributes medical technology products within Advanced Wound Management, Orthopaedics, and Endoscopy. Most products are manufactured by other companies within the Smith & Nephew group.

### **2. Commitment to Human Rights and Decent Working Conditions**

Smith & Nephew is committed to:

- Respecting internationally recognised human rights, including the UN Universal Declaration of Human Rights and ILO core conventions
- Preventing all forms of forced labour, child labour, and human trafficking
- Conducting business ethically and with integrity
- Ensuring freedom of association, the right to collective bargaining, and a harassment-free workplace.

These commitments are embedded in the Smith & Nephew Code of Conduct and Business Principles, which apply to all employees and third parties.

### **3. Due Diligence Process**

Smith & Nephew conducts ongoing, risk-based due diligence in line with the OECD Guidelines for Multinational Enterprises. Due diligence activities include:

- Mapping and assessing risks in own operations and across the supply chain
- Risk-based screening and onboarding of suppliers
- Annual reassessment of Tier 1 suppliers
- Use of labour standards questionnaires and on-site social audits for higher-risk suppliers
- Requirements for Tier 1 suppliers to manage and assess their sub-tier suppliers.

## 4. Identified Risks

The risk of adverse impacts in Smith & Nephew AS's own operations is considered low due to the use of directly employed, skilled labour. Elevated risks may exist within parts of the global supply chain, particularly where:

- Manufacturing or raw materials originate from higher-risk countries
- Raw materials are sourced from high-risk industries such as mining
- Low-skilled labour is used within certain manufacturing processes.

## 5. Measures to Prevent and Mitigate Risks

Measures implemented include:

- Contractual requirements aligned with the Code of Conduct
- Denied party and sanctions screening
- Supplier corrective and preventive action plans (CAPAs)
- Enhanced monitoring or disengagement where issues cannot be remediated
- Whistleblowing mechanisms available to employees and external parties.

## 6. Results and Continuous Improvement

During 2025, Smith & Nephew completed due diligence assessments of 100% of Tier 1 suppliers globally. Supplier social audit programmes were expanded, and combined quality and social audits were further embedded. Internal tools and training were strengthened to improve consistency and effectiveness.

## 7. Remediation

Where adverse impacts are identified, Smith & Nephew works with suppliers to remediate issues through corrective action plans. If remediation is not achievable, responsible disengagement is pursued.

## 8. Transparency and Requests for Information

This statement is reviewed annually. In accordance with the Transparency Act, any person has the right to request information on how Smith & Nephew AS addresses actual and potential adverse impacts. Requests may be submitted via the company's official contact channels.



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13.04.2025

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Sources

[Modern Slavery Act Historical Archive](#)

[Sustainability](#)