Pharmaq Norway Transparency Act Statement 2025

This Statement describes the activities of Pharmaq AS and Pharmaq Analytiq AS (collectively "Pharmaq Norway," "we," "us" and "our") to address fundamental human rights and decent working conditions in our business and supply chain during the year ended December 31, 2025. This Statement is published pursuant to the Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (the "Transparency Act").

Section 1: a general description of the enterprise's structure, area of operations, guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions.

A. Structure and Area of Operations

Pharmaq Norway is an indirect wholly owned subsidiary of Zoetis Inc. ("Zoetis"), a global leader in the animal health industry, as described in Zoetis' Human Rights Statement and Regulatory Disclosures for the Year 2025 (the "**Statement**").

Pharmaq Norway develops, manufactures, sells, and distributes vaccines and other fish health products to the global aquaculture industry. The main markets for Pharmaq Norway are the salmon and trout farming industries in Norway and the Nordics, Chile, Scotland, and Canada. Pharmaq Norway also has an important role as a supplier of fish health products to the sea bass industry in the Mediterranean region, the tilapia industry in Latin America, and the pangasius industry in Asia.

Although the majority of Pharmaq Norway's international suppliers are located in the European Union and the United States, we also rely on a small number of suppliers that are domiciled in other areas (including some based in Brazil, India, Türkiye and Vietnam).

Our supplier base primarily supports manufacturing, laboratory operations and global distribution and generally includes: (i) suppliers of raw materials and operating materials, (ii) packaging and labeling suppliers, (iii) freight forwarders and transportation providers, (iv) warehousing and logistics providers, and (v) outsourced service providers (including clerical and IT services).

B. Guidelines and Procedures

Pharmaq Norway comes within Zoetis' global compliance program. Zoetis has a dedicated Corporate Compliance function and an internal audit team. Zoetis has implemented measures to manage supply chain relationships responsibly and to mitigate modern slavery risks, including:

- **Governance:** Zoetis' **Code of Conduct** and **Global Human Rights Policy** are the key policies that govern our business practices with respect to human rights. Corporate Compliance is responsible for providing enterprise level oversight of human rights (including compliance with the Global Human Rights Policy), the Sustainability Reporting and Disclosure Steering Council is responsible for providing strategic insight for human rights and the Global Human Rights Policy, the Corporate Governance Committee of Zoetis' Board of Directors provides Board-level oversight for human rights, and the Human Rights Council is responsible for the implementation and enhancement of Zoetis' human rights program.
- **Verification / Diligence:** Zoetis evaluates its suppliers through an internal due diligence process. This process is designed to identify potentially higher risk suppliers and, where appropriate, apply additional diligence, increased monitoring, and/or additional controls.
- **Contracts:** Our standard contracts with direct suppliers require them to comply with all applicable laws, including laws regarding modern slavery of the country or countries in which they do business. Zoetis has a zero-tolerance policy with respect to modern slavery. We reserve the right to cease doing business with any supplier if they do not agree to or fail to comply with our policies.
- **Audits:** We periodically conduct routine assessments of our suppliers in our supply chain to confirm their compliance with our standards and policies and applicable laws, and regulations. We use a risk-based approach to determine which suppliers to assess and the frequency of such assessments. Starting in 2024, Zoetis has utilized the Pharmaceutical Supply Chain Initiative ("PSCI") standard process for EHS (which includes human rights and other Corporate Social Responsibility categories) to conduct supplier audits. Suppliers are expected to satisfactorily address any identified findings. Failure to comply or correct any findings or gaps are grounds for termination of the business relationship. We also regularly monitor and review our manufacturing sites' performance to help ensure our standards of conduct meet the high expectations we set.
- **Reporting:** We have robust policies in place that require reporting of concerns of modern slavery to Zoetis Corporate Compliance, multiple channels to report such concerns, and policies and procedures to ensure thorough investigation and the protection of whistleblowers.
- **Compliance Training:** Zoetis provides annual Code of Conduct and other mandatory compliance training for all employees and contractors that include the principles of each of the Acts. Training on Zoetis' Code of Conduct, including its requirements related to human rights, is assigned to all new employees during employment onboarding and to all employees, contractors, and directors on an annual basis.

C. Pharmaq Norway Transparency Act Due Diligence

Pursuant to the Transparency Act, Pharmaq Norway has adopted a supplier due diligence process model that is in accordance with the Organisation for Economic Co-operation and Development ("OECD") Due Diligence Guidance for Responsible Business Conduct (the "Guidance"). The Guidance's risk-based approach recommends conducting a scoping exercise to identify the most-likely areas of human rights risk to enable the company to prioritize its supplier assessments. Consistent with these recommendations, Pharmaq Norway undertook a scoping exercise that examined, among other factors, relevant geographic and sectoral / product risk factors, and which was managed by a cross-functional team of subject matter experts. The scoping exercise identified Pharmaq Norway suppliers and partners that were the focus of our due diligence assessments in 2025.

Consistent with the Transparency Act and the Guidance, Pharmaq Norway's due diligence assessment was directed at, among other potential issues, our suppliers' activities and controls related to relevant internationally recognized human rights that are enshrined, among other places, in the International Covenant on Economic, Social and Cultural Rights of 1966, the International Covenant on Civil and Political Rights of 1966, and the International Labor Organization's core conventions on fundamental principles and rights at work.

Section 2: information regarding actual adverse impacts and significant risks of adverse impacts that the enterprise has identified through its due diligence.

Pharmaq Norway's Transparency Act due diligence risk assessment used geographic and sectoral / product risk factors to identify areas where there might be a potentially elevated risk of adverse impacts in our supply chain. Based on this scoping, Pharmaq Norway considers the highest inherent risk areas for our supply chain to be regulatory services, lab services, and research and development.

To support our ongoing diligence, we issued supplier questionnaires to suppliers identified through our risk assessment as potentially higher risk and have taken reasonable steps and used best efforts to obtain the relevant information.

We believe that the risk of adverse impacts on fundamental human rights and decent working conditions, such as modern slavery, in our operations and supply chain is low for the reasons discussed in the Statement. The policies and steps described in the Statement that Zoetis has taken, which are designed to assess, mitigate, and manage the risk of forced labor and child labor, are applicable to Pharmaq Norway.

Section 3: information regarding measures the enterprise has implemented or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts, and the results or expected results of these measures.

We continue to develop and implement programs to follow up with suppliers, and, as appropriate, to ensure any agreed mitigation actions are implemented.

In the next reporting period, Pharmaq Norway intends to continue the following initiatives:

- Enhance communications and training to raise employee and supplier awareness of the Transparency Act, Zoetis' commitment to ethical behavior, and the available mechanisms for reporting issues. Pharmaq Norway will focus these efforts on Zoetis and supplier employees most likely to encounter potentially adverse impacts in their day-to-day work. This will deepen understanding of Zoetis' commitment to fundamental human rights and decent working conditions and increase confidence that issues arising in our operations or supply chain will be identified and reported.
- Assess our Transparency Act compliance program to identify potential improvements, including any opportunities for deeper integration of the program within the support systems and automation offered by Zoetis' enterprise-wide risk management programs.

The central goal of all these initiatives is to continuously improve our program and provide assurance that we are thoroughly assessing and addressing the potential risk of adverse impacts on fundamental human rights and decent working conditions in our operations and supply chain. Ultimately, these efforts are designed to ensure compliance with the Transparency Act and further support Zoetis' commitment to ethical conduct and integrity in our business activities.

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