

ANNEX C

Pharmaq Norway Transparency Act Statement 2024

June 2025

PHARMAQ
part of **zoetis**

This Statement describes the activities of Pharmaq AS ("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, 2024. 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 Year 2024** (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).

B. Guidelines and Procedures

Pharmaq Norway comes within Zoetis' global compliance program which is discussed throughout the Statement. Zoetis has a dedicated compliance function and an internal audit team.

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 2024.

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 attempt to identify areas where there might be a potentially elevated risk of adverse impacts in our supply chain. The areas identified were freight forwarding, outsourced clerical and IT services, warehousing and logistical services and the supply of raw and operating materials.

No serious findings or actual impacts were identified as a result of our assessment of these areas, although minor gaps were identified related to suppliers' formalization of human rights policies and immaturity in certain other program elements.

In addition, 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 earlier in this 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.

Although no serious findings or actual impacts were identified as a result of our assessments, minor gaps were identified related to suppliers' formalization of human rights policies and

immaturity in certain other program elements. We are continuing to develop and implement programs to follow up with suppliers and ensure agreed actions are implemented.

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

- Continue to enhance communications and training, raise employee and supplier awareness of the Transparency Act, Zoetis' commitment to ethical behavior, and the mechanisms available to report issues to continually increase understanding, among the Zoetis and supplier employees who are most likely to encounter potentially adverse impacts in their day-to-day work, of the seriousness of Zoetis' commitment to promoting fundamental human rights and decent working conditions. This should provide increasing confidence that, if these issues are manifested in our operations or supply chain, they will be identified and reported.
- Assess our Transparency Act compliance program to identify potential improvements, including any opportunities for deeper integration of the program with Zoetis' ERM program and third party risk management systems to evolve the effectiveness of the program that takes advantage of 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 all business activities.

Ben Backman, Chair of Board

Sissel Hansen, Board Member

Marit Rode, Board Member

Nils Arne Grønlie, Board Member

Bernt Martinsen, General Manager