

# Norwegian Transparency Act Statement

The cornerstone of our commitment to protect human rights is constant vigilance to identify and address such risks across our value chain in good faith and to the best of our ability.



### Introduction

This Statement is made pursuant to Section 5 of the Norwegian Transparency Act (the "Act") by GE Healthcare Norge AS, GE Vingmed Ultrasound AS, and GE Healthcare AS (the "Reporting Entities")

GE HealthCare Technologies, Inc.'s human rights program applies to all of its global subsidiaries and affiliates, including the Reporting Entities (all together "GE HealthCare" or the "Company"). This Statement discusses actions that GE HealthCare took in its prior fiscal year (January 1, 2024 to December 31, 2024) to address risks of human rights and modern slavery in its own operations and value chain.

GE HealthCare is a trusted partner and leading global healthcare solutions provider, innovating medical technology, pharmaceutical diagnostics, and integrated, cloud-first AI-enabled solutions, services, and data. This report builds on previous statements GE HealthCare has submitted under the California Transparency in Supply Chains Act of 2010, the Norwegian Transparency Act, the UK Modern Slavery Act of 2015, and similar laws to demonstrate the Company's continued commitment to address modern slavery and other human rights risks throughout our global operations and value chain<sup>1</sup>. We are proud of our efforts on this issue but are mindful that we must continually review and evolve our program as we remain vigilant in our fight against global human rights violations.

The Company is committed to unvielding integrity and high standards of conduct in our dealings with suppliers. Since 2002, this commitment has been embedded in our business and procurement operations through the implementation of GE HealthCare's Ethical Supply Chain commitment, including our Know Your Supplier enterprise standard (KYS) and Supplier Responsibility Governance (SRG) Program. The purpose of KYS and SRG is to build and continually strengthen an ethical, sustainable, and transparent global supply chain and establish clear social and environmental responsibility requirements for suppliers. KYS and SRG enable GE HealthCare to make smart, risk-based business decisions to partner with suppliers who comply with laws and meet our ethical code of conduct. We believe that by working with suppliers to assess and manage their risks, the supplier, its workforce, and local communities can realize economic, social, and environmental benefits. We continually review, and revise as needed, our KYS and SRG programs to ensure they effectively address the evolving challenges and risks in our supply chain.

# Our Structure, Operations & Supply Chain

#### **Structure and Operations**

GE HealthCare operates through its consolidated affiliates in approximately 70 countries with approximately 53,000 colleagues as of year-end 2024. Approximately 1,400 of these colleagues are employed in Norway. We operate through four segments: Imaging, Advanced Visualization Solutions, Patient Care Solutions and Pharmaceutical Diagnostics. A more detailed description of GE HealthCare's business operations and ambitions can be found in our annual report found <u>here</u>.

We serve customers in more than 160 countries. Manufacturing and service operations are carried out at 43 manufacturing, assembly and pharmaceutical production sites located in 17 countries. 3 of these sites are located in Norway.

GE HealthCare Technologies, Inc. ultimately owns and controls the Australia, Canada and UK Reporting Entities (together, the "Reporting Entities"). It is incorporated in Delaware, with its corporate headquarters in Chicago, Illinois, USA.

#### **Supply Chain**

GE HealthCare's supply chain is expansive and global, spanning suppliers in most countries in the world. We source a wide variety of raw materials and components that are incorporated into the products and services that GE HealthCare sells. The largest categories of direct material purchases are mechanical and electronics. GE HealthCare also buys products and services to support our business operations, which are used to develop or create, but are not incorporated into, GE HealthCare's products or services.

# **Our Commitments & Programs**

Our commitment to human rights is grounded in the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the Ten Principles of the United Nations Global Compact. Driven by those standards, we strive to respect the fundamental dignity of everyone we might affect directly through our operations, products, and services and indirectly through our business relationships across the globe. Our ideals flow from the International Bill of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, and the Sustainable Development Goals.

Using those as our foundation, we address human rights and modern slavery risks through specific policies, training and awareness, due diligence and remediation.

#### **Policies & Standards**

The Company's **Human Rights Policy (the "Human Rights Policy")** (applicable across GE HealthCare, including the Reporting Entities) is the cornerstone of our global program, emphasizing the importance of "respect for fundamental human rights." The Human Rights Policy specifically prohibits reliance on any form of forced, prison or indentured labor and is embedded in expectations of all businesses and personnel and is part of our Code of Conduct, **The Spirit & The Letter ("S&L")**.

The S&L sets the Company's expectations regarding ethics & compliance and applies to all GE HealthCare directors, officers and colleagues, including those working for our subsidiaries and affiliates. All new hires are required to review and agree to abide by

<sup>&</sup>lt;sup>1</sup> GE HealthCare spun off from the General Electric Company on January 3, 2023. GE HealthCare was covered by General Electric's prior Modern Slavery Act statements and human rights policy and programs, which GE HealthCare has continued and modified, as appropriate.

the S&L during the onboarding process, and colleagues are further expected to annually acknowledge their commitment to comply. The S&L and its accompanying policies, including the Human Rights Policy, address the full spectrum of integrity and compliance issues across GE HealthCare's global value chain. GE HealthCare expressly prohibits the types of actions associated with the most common forms of modern slavery, including the charging of recruitment fees, the withholding of immigration documents, and the use of misleading recruitment tactics. Violations of this policy can result in disciplinary action, up to and including termination.

The Company's Integrity Guide for Suppliers, Contractors and Consultants (the "Integrity Guide") also applicable across GE HealthCare, including the Reporting Entities, extends the reach of our Code of Conduct and its requirement of "unyielding integrity and high standards of business conduct" to our suppliers and their subcontractors, including labor providers. Beyond compliance with all applicable local laws and regulations, the Integrity Guide mandates third-party adherence to GE HealthCare standards in areas including human rights, respectful workplace (non-discrimination and non-retaliation), environment, and health and safety. The Integrity Guide expressly prohibits child labor and, in the area of forced labor, any form of compulsion, coercion or human trafficking; lists prohibited activities associated with trafficking, such as withholding passports, charging recruitment fees, and misleading recruitment; and imposes affirmative obligations on suppliers in certain circumstances such as reimbursement of return transportation costs and providing workers with written contracts in a language they understand. The Integrity Guide also encourages reports of violations of the policy through telephone, email and inperson channels by colleagues and third parties.

#### Governance

GE HealthCare has embedded respect for human rights throughout our global organization. Our Global Human Rights Leader is responsible for setting human rights strategy for the Company, including our modern slavery program. The Human Rights Leader works closely with a cross-functional Human Rights Council. The Council is comprised of senior personnel from across the Company who work with the Human Rights Leader to to implement the human rights program and evolve it over time.

The Nominating & Governance Committee of the Company's Board of Directors oversees the execution of GE HealthCare's human rights program and initiatives as an integrated part of the Board's oversight of GE HealthCare's overall strategy and risk management.

#### **Training & Awareness**

GE HealthCare's human rights program depends on the practical understanding of our people and business partners. We require all colleagues in our sourcing, legal and compliance functions to take periodic training on human rights and forced labor, which gives these colleagues an easy, efficient way to understand the core principles of human rights, the Company wide policies and programs and, most importantly, how they can serve a role in identifying and reporting possible signs of forced or child labor when they are at GE HealthCare and supplier facilities. We train colleagues who visit supplier sites as part of our SRG and Supplier Quality audit program with "Eyes Always Open" training so they, too, can recognize human rights risks and escalate internally as needed. We also do periodic communications about our Human Rights program to all colleagues, which includes a link to training so they, too, can learn more and be able to identify potential issues in their work, including at customer sites.

GE HealthCare provides its direct material suppliers an online compliance video that includes a module explaining GE HealthCare's position on human rights, with a more in-depth focus on forced labor— what it is, and what suppliers must do or avoid doing to comply with GE HealthCare's Human Rights Policy. Suppliers view this video as part of their commitment to abide by the Integrity Guide.

# Processes & Risks: Due Diligence, Pre-Qualification & On-Site Supplier Assessments

GE HealthCare strives to ensure compliance with these policies through a rigorous due diligence program reaching throughout our value chain.

One significant way GE HealthCare advances respect for human rights, in particular in the area of child and forced labor, is through our well- established, multifaceted ethical supply chain program. Under this program, GE HealthCare conducts due diligence on its suppliers pursuant to the KYS enterprise standard, where, based upon the location and type of engagement, GE HealthCare researches and reviews the third party for human rights risks. Additionally, based on a variety of risk factors, including whether they are located in high-risk countries, manufacture parts incorporated into GE HealthCare products, and negative news searches, suppliers may undergo an in-depth, on-site SRG audit of their manufacturing site, both before they are approved for onboarding and periodically thereafter, to ensure supplier compliance with, among other things, GE HealthCare's expectations regarding fundamental human rights.

In 2024, GE HealthCare assessed over 210 new or existing suppliers. Since 2012, GE HealthCare has conducted more than 3,100 assessments of more than 1,000 different suppliers. The human rights portion of the assessment focuses significantly on forced labor indicators, such as wage practices, recruitment efforts, and passport handling. The audit questionnaire and indicators provide GE HealthCare with a way to assess potential suppliers on their human rights programs, educate them as to the nature of forced labor and explain what is needed to prevent it. Virtually all findings from SRG audits in the human rights area related to the amount of overtime supplier colleagues work, especially during surge periods.

We track and monitor results. When issues are found in supplier assessments, our initial goal is to work with the suppliers to bring their practices into compliance. Suppliers are expected to address findings promptly and permanently within 60 days, although that



- 177 Existing suppliers approved
  - 32 New suppliers approved
    1 Acquisition suppliers approved
  - 1 New/existing/acquisition suppliers rejected

deadline may be extended based on discussions between the Company and supplier. GE HealthCare can suspend or terminate relationships with suppliers who do not meet our integrity expectations or remediate issues found during audits by the agreed upon timeline.

GE HealthCare also posts at its own sites a human trafficking education and hotline notice to alert colleagues and contingent workers of GE HealthCare's prohibition on forced labor and how to report any suspicion of such actions. The notice makes clear that complaints of such behavior can be anonymously reported to the internal ombudsperson network, not only by colleagues but also by contingent workers, without fear of retaliation.

#### **Modern Slavery Risks**

Based on our due diligence and risk assessments, we have identified the following general types of modern slavery risks that may be present in our operations and supply chains:

- Operations In our operations, modern slavery risks may exist within the population of contingent workers that support GE HealthCare office sites. These workers provide janitorial, food/ beverage, and other facilities-type services. These contingent workers are primarily provided through an enterprise-wide vendor arrangement but may also be further sub-contracted. GE HealthCare maintains a strong partnership with the vendors who provide us with our contingent workers and conducts periodic reviews to ensure they are complying with their obligations and respecting human rights. To address this risk, GE HealthCare audits vendors who provide these services at our own sites in high-risk countries and required our primary facility management vendor to do so at sites it manages for us. To date, we have not identified any.
- 2. Supply Chain Due to the nature of GE HealthCare's products and services, potential sources of modern slavery risks include manufacturing sites in high-risk countries; and mineral sourcing deep in our supply chain. Our modern slavery risks are most acute in those parts of our supply chain where we have limited or no visibility, such as subcontractors using seasonal, low-skilled, and/or migrant labor and mineral sourcing. GE HealthCare is also committed to not sourcing conflict minerals from suppliers who directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or from conflict- affected and high-risk areas ("CAHRAs"), while at the same time minimizing unintended consequences for legitimate miners and their dependents. More information on our responsible mineral sourcing program can be found in our <u>Responsible Mineral</u> <u>Sourcing Statement of Principles</u>.









# **Ensuring Continuous Improvement**

GE HealthCare assesses the effectiveness of actions through review & analysis of its supply chain audit results, and learnings from the Open Reporting & Ombudsperson program.

#### **Ongoing Assessment & Effectiveness Review**

GE HealthCare strives for continuous improvement in all aspects of its operations. GE HealthCare runs an annual assessment that focuses on evaluating the inherent risks and the strength of our internal controls across our operations. The assessment process asks each Segment and Region to benchmark its own compliance programs against the Human Rights Policy (among others), and additional stakeholders, including the Human Rights Leader, and sourcing and compliance professionals, contribute to an overall assessment as to how GE HealthCare performs in this key policy area. Insights from this process are used in many aspects of the human rights program including by identifying additional training needs, control improvements, and other areas that may need remediation efforts. GE HealthCare also actively engages with external stakeholders to benchmark our program's practice and identify ways to improve effectiveness.

#### GE HealthCare Open Reporting & Ombudsperson Program

The GE HealthCare Open Reporting & Ombudsperson ("Ombuds") Program, comprised of a central Ombuds team and a group of trained part-time Ombuds, is the primary vehicle for the Company to hear from colleagues and contingent workers regarding any violations of our integrity standards. The Company has a website, phone hotline and mobile QR code where colleagues and contingent workers can raise concerns. The website is available in 10 languages and the phone hotline is available in over 40 languages. The program enables colleagues, contingent workers and third parties, such as supplier colleagues, to raise concerns, including those relating to respect for human rights, confidentially and without fear of retaliation. Consistent with our Human Rights Policy, and in the spirit of "Eyes Always Open," colleagues are expected to report unfair employment practices and human rights concerns they observe at GE HealthCare sites or working with direct business partners.

# Conclusion

The Norwegian Transparency Act serves a significant role in driving transparency in global efforts to address the problem of modern slavery. As discussed above, GE HealthCare continues to build on the Company's longstanding human rights program to better identify and prevent forced labor in its own operations and those of its suppliers and business partners. We have been and remain committed to upholding our fundamental role in this critical effort.

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This statement was approved by the Boards of the reporting Entities, but the principles apply to all of GE HealthCare's global operations.

This Report was approved by the Board of GE Healthcare Norge AS under the Norwegian Transparency Act.

Pal Arne Wølen Chairman

Rune Kristoffersen

Rune Kristoffersen **Board Member** 

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**Gunnar Arveschoug** Board Member & General Manager

This Report was approved by the Board of GE Vingmed Ultrasound AS under the Norwegian Transparency Act.

Dagfinn Saetre Chairman & General Manager

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Bård Moseng Board Member

Eirik Christoffersen Board Member

Hunne-Lise Kielson alsen

Thrine-Lise M Olsen Board Member

Sour Herde toes

Sølvi Heidi Aas Board Member

Anders Bo Bergman Board Member

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Line Rørstad Board Member

This Report was approved by the Board of GE Healthcare AS under the Norwegian Transparency Act.

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Niels Christian Aall Chairman of the Board

Pal Arne Wøien Board Member

Rolfsvag Dina

Dina Rolfsvag Board Member

Kisti Sapa

Kirsti Saga Board Member

Jon Gabriel Noddeland Board Member

Herman Wilhelm Strand Board Member

fare

Evy Stavik Board Member

thrine Thomasser

Cathrine Thomassen Board Member