



# The Transparency Act Report 2025

Culligan Norway AS  
Organisation number 984522738

Published in accordance with the Transparency Act  
June 29, 2026

The report has been prepared by Culligan Norway AS. The report has been completed as part of the certified management system of the Nordic group and affects all other Nordic entities under the Culligan brand. The report has been prepared in accordance with Section 5 of the Transparency Act, based on the OECD's model for due diligence for corporate social responsibility. This work has been carried out jointly by the Nordic management team, the Board of Directors, the responsible departments

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## Overview

Culligan Norway AS is a leading player in the delivery of equipment and services for coffee and drinking water solutions. We have a strong focus on sustainability and responsibility in our business, and we are committed to complying with the Transparency Act. This means that we actively work to identify, assess and address any negative impacts on fundamental human rights and decent working conditions in our supply chain. Our commitment to transparency is reflected in our due diligence work, which we carry out in line with the OECD Guidelines for Multinational Enterprises.

The Transparency Act requires us to carry out thorough due diligence assessments to identify actual and potential negative consequences in our operations and supply chain. This work is important because it helps to ensure that our business practices are consistent with international human rights standards and codes of conduct. By being proactive in our approach to risk management, we can reduce the possibility of human rights violations and work towards decent working conditions for all parties involved.

In 2025, we conducted a comprehensive due diligence assessment that included 257 suppliers across 16 countries. We identified one high-risk supplier and performed one risk assessment, which resulted in a thorough mapping of risk areas related to performance issues and ethical pay conditions. In particular, challenges were identified with specific suppliers related to delivery and payment practices, which has led us to take action to address these risks.

To address the identified risks, we have implemented several important measures. We have decided to outsource the supplier who handles logistics to ensure a more transparent and reliable supply chain. Furthermore, we have updated our assessment of priority products and suppliers. We have also changed system support to improve our control and follow-up of suppliers, where AI and continuous market and news monitoring help us detect things that would otherwise be at risk of being overlooked.

Our ambition going forward is to strengthen our efforts for human rights and decent working conditions, as well as to further improve traceability in our supply chain. We want to continue to develop our work on sustainability and responsibility, and we will continue to monitor and evaluate our actions to ensure that they have the desired effect.



## About the company

Culligan Norway AS is part of the Culligan Nordic operations within Culligan International, where units in Norway, Denmark, Finland and Sweden work together under a unified management.

Culligan offers water and coffee solutions with associated consumables for the B2B market, both in the public and private sectors. Our customers trust us to deliver high-quality products, and they expect these to be produced under orderly conditions. For Culligan, sustainable business practices are a prerequisite for meeting customer expectations, building trust, and maintaining that trust.

At a time when sustainability and accountability are in focus, it is important for the company to carry out due diligence to ensure that its activities do not lead to negative consequences for human rights and working conditions.

As a company operating in a globalized world, Culligan Norway AS is covered by the Transparency Act. This is especially true due to our extensive supply chain, which includes both local and international suppliers of raw materials and products. In our value chain, it is particularly important to pay attention to conditions related to working conditions in the production of coffee and other related products, as well as in the distribution of these. Due diligence is therefore crucial to ensure that we contribute to positive working conditions and respect fundamental human rights at all levels of our business.

### 1. Area of activity

Culligan Norway AS specializes in drinking water solutions and coffee services for the Norwegian B2B market. We offer products such as water coolers, coffee machines and related services for installation and maintenance. Our focus on sustainability and quality means that we work continuously to improve our services and products to meet our customers' needs.

### 2. Employees and organization

Within Culligan's Nordic operations, of which Culligan Norway AS is a part, there are companies in Norway, Sweden, Denmark and Finland. In total, there are over 360 employees in the Nordic group, of which 130 employees are permanently employed by Culligan Norway AS.

The Nordic operations are currently led by a Nordic management team/board that is responsible for all the Nordic companies. Other joint Nordic functions across the business include finance, marketing, IT, purchasing and warehousing, M&A, HR and the quality and environment department.

### 3. Geographical presence

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Culligan Norway AS operates in Norway, but also has connections to international suppliers in several countries. We have a network of suppliers that enable us to offer high-quality products to our customers, regardless of their location.

## 4. Supply chain

Our supply chain includes 257 suppliers, of which **30** are prioritized. We have conducted risk assessments to identify high-risk suppliers and have established measures to monitor and improve working conditions in our value chain. This work is essential to ensure responsibility and sustainability in our operations.

## Methodology

Due diligence is a systematic approach to uncovering and dealing with negative consequences for human rights and working conditions that may arise in the company's value chain. These assessments are important because they help to ensure that Culligan Norway AS acts responsibly and in line with ethical standards, while protecting both employees and communities affected by the company's activities. We follow the OECD Guidelines for Multinational Enterprises, which gives us a solid framework for how we can integrate due diligence into our business model. The business has had a sustainability strategy since 2020,

The due diligence work in Culligan Norway AS is organized through interdisciplinary teams that work together to implement policies and procedures. We use modern tools and systems to collect data, analyze risk and report on our findings. This work is part of our overall strategy for sustainability and responsibility, which is anchored in our management system and our corporate policies.

The Nordic operations have a common certified management system for quality and environmental management (ISO 9001:2015, ISO 14001:2015). Well integrated with sustainability themes, ethical supply chains, local and group-wide ESG work towards the UN's global goals. The work on sustainability issues is led in accordance with the guidelines of the OECD, ISO 26000, ISO 14064, the Modern Slavery Act, CSRD, CSDDD, EU taxonomy and is also part of the joint work of Culligan International Group.

### Reference

[Culligan Nordic Operational policy](#)

[Culligan Nordic Corporate social responsibility \(CSR\) policy](#)

[Culligan Group Supplier Code of Conduct](#)

[About Culligan Nordic Group](#)

## 1. Anchoring

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We have integrated the Responsible Business Conduct Policy into our internal policies and management systems. This includes our Code of Conduct, which clearly defines our commitments to human rights and decent work. Our leaders regularly review these guidelines to ensure that they are known and followed throughout the organization.

## 2. Mapping

We conduct regular risk assessments to identify and assess negative impacts on human rights and working conditions. Prioritization of suppliers is based on factors such as geographical location, industry and previous experience. For example, we have identified 30 priority suppliers that we monitor more closely to assess any risks.

## 3. Handling

When we identify risks, we implement measures to stop ongoing damage and prevent future problems. For example, we have established a procedure for dealing with deviations detected at our high-risk suppliers, where we immediately take action to mitigate negative impacts.

## 4. Follow-up

We continuously monitor the impact of our measures through KPIs that assess suppliers' compliance with our policies. Regular reporting and audits are carried out to ensure that we achieve the desired effect of our due diligence measures, and we adapt our strategies as needed.

## 5. Communication

We communicate openly about our due diligence work both internally and externally. This transparency statement is part of our responsibility to inform stakeholders about how we manage impacts. In addition, we publish regular reports describing our findings and actions. And we are working to clarify more information about the suppliers in our upcoming transparency portal.

## 6. Recovery

In cases where we discover that the business has caused or contributed to damage, we work actively to ensure recovery. This can include working with affected parties to address issues and implementing solutions that ensure similar situations do not occur again.

## Findings

The mapping of potential and actual negative impacts on fundamental human rights and decent working conditions was carried out using a systematic approach that involved analyses of supplier relationships, risk assessments and dialogue with relevant stakeholders. We used tools for risk assessment and information gathering from both internal and external sources. In addition, audits and follow-ups of suppliers were carried out to uncover any deviations from ethical standards.

In the assessment, priority was given to focusing on high-risk areas, including working conditions, ethical wages and supplier performance. This was done to ensure that we



meet our obligations to both employees, customers and society. Overall, the survey has revealed one area with actual and potential consequences, especially related to pay conditions and ethical payment methods. We distinguish between actual negative consequences that have occurred and potential risks that may materialize in the future, and this gives us a clear picture of where we need to focus our efforts to improve the situation.

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## Ethical pay conditions

**Type:** Actual

**Description:** A supplier in Norway has been flagged for unethical business practices, including non-payment of employees. It was revealed that the supplier operates with a flexible employment model that can affect salary payments. We have decided to change supplier to ensure that we have a more transparent and ethical supply chain.

**Value chain link:** Direct supplier - services

**Status:** Resolved

## Ethical pay and human rights

**Type:** Potential

**Description:** Products and raw materials that are grown/manufactured in geographical areas with a high risk of poor working conditions and a low level of labour rights. For example, commodities such as coffee, tea and cocoa always carry a potential risk of people further down the supply chain being negatively affected. Both in terms of wages and human rights. This has led to us only working with delivery partners who are open and transparent with their sustainability work and third-party certifications.

Therefore, we annually update a priority product and list of origin (*see next page*) for the products we offer our customers.

**Value Chain Link:** Direct Supplier - Procurement

**Status:** Continuous



Table of products and overview assessments							
Product category	Country of last supplier	Production process / main component input	Country of identified production or raw material	Country risk ITUC	Production risk	Total risk	Ref.
Water dispensers	Italy	Production	Italy	1	1	Low	1, 2,
	Sweden	Production	Czech Republic	2	1	Low	1, 2,
	Netherlands	Production	China	5	3	With	1, 2,
	Poland	Production	Poland	3	3	With	1, 2
Coffee machines	Norway	Production	Switzerland	3	1	Low	1, 3,
	South Africa	Production	Italy	1	1	Low	1, 3
	Netherlands	Production	Netherlands	2	1	Low	1, 3
Filters	Netherlands	Production	Germany	1	1	Low	1, 3
			China	5	3	With	1, 2,
			Mexico	4	3	With	1, 2,
Springwater	Sweden	Production/Origin	Italy	1	3	With	1, 2,
Coffee Certified	Sweden	Sweden	Sweden	2	1	Low	2
	Norway	Production	Sweden	1	1	Low	3,
	Sweden	Origin / raw materials	Laos	5	3	Med/High	4
	Sweden	Origin / raw materials	Peru	4	3	Med/High	4
	Sweden	Origin / raw materials	Honduras	5	3	Med/High	4
	Sweden	Origin / raw materials	Nicaragua	(not rated)	3	Med/High	4
	Sweden	Origin / raw materials	Colombia	5	3	Med/High	4
	Sweden	Origin / raw materials	Ethiopia	4	3	Med/High	4
	Sweden	Origin / raw materials	Kenya	4	3	Med/High	4
	Sweden	Origin / raw materials	Burundi	5+	3	Med/High	4
	Sweden	Origin / raw materials	Tanzania	4	3	Med/High	4
	Sweden	Origin / raw materials	Uganda	4	3	Med/High	4
	Sweden	Origin / raw materials	Brazil	4	3	Med/High	4
	Sweden	Origin / raw materials	India	5	3	Med/High	4
	Sweden	Origin / raw materials	Vietnam	4	3	Med/High	4
	Sweden	Origin / raw materials	China	5	3	Med/High	4
	Sweden	Origin / raw materials	Indonesia	4	3	Med/High	4
	Sweden	Origin / raw materials	Papua New Guinea	(not related)	3	Med/High	4
Milk Powder	Sweden	Origin / raw materials	Rwanda	3	3	Med/High	4
	Sweden	Origin / raw materials	Malawi	2	3	Med/High	4
Cocoa	Sweden	Origin / raw materials	Congo	3	3	Med/High	4
	Sweden	Origin / raw materials	Bolivia	3	3	Med/High	4
	Germany	Production	Germany	1	1	Low	3,
Cocoa	Germany	Origin / raw materials	TBD			Med/High	5
	Germany	Production	Germany	1	1	Low	3,
	Germany	Origin / raw materials	TBD	4	4	Med/High	5
Explanation of references							
Ref 1	Both Intercompany and external activity are ongoing for review of origin of parts and components.						
Ref 2	Intergroup manufactures outside and inside of EU/ESS area, ISO45001 certified or similar certifications in accordance with other legal acts such as Modern Slavery Act.						
Ref 3	External manufacture with full production within EU/ESS area, under Modern Slavery Act, Plan of Vigilance. Etc.						
Ref 4	Raw Materials combined in products with certifications. Either rainforest alliance, fairtrade or both <a href="#">Risk assessment of human rights and decent working conditions</a>						
Ref 5	Raw Materials combined in products with certifications. Either rainforest alliance, fairtrade or both (not Coffee)						



## Measures

Culligan Norway AS has a proactive approach to measures to manage identified risks and negative consequences in our value chain. We prioritize measures based on severity and impact, ensuring that the most critical issues are addressed first. This includes evaluating supplier performance, as well as assessing products and business practices. We employ a variety of measures such as dialogue with suppliers, contractual clauses, employee training, supplier audits and, if necessary, termination of business relationships to ensure that our ethical standards and decent working conditions are maintained.

Follow-up of the measures is carried out systematically; We have established procedures for evaluating the effect of implemented measures and adapting them as needed. It is important for us to ensure that our actions lead to real improvements, both for our business and for the communities in which we operate.

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### Implementation of improved quality controls and follow-up of suppliers who have shown performance problems, particularly related to deliveries and product quality, as seen with Supplier A and Supplier B.

**Objective:** To reduce the risk of delivery problems and damage to products during transport, as well as to ensure that suppliers comply with agreed quality standards.

**Timeline:** The measure was implemented in June 2026 after identifying problems in the deliveries from the aforementioned suppliers, with a planned follow-up monthly.

**Status:** Ongoing

**Effect:** Expected improvement in delivery precision and reduction in damage to products have been observed, which has led to increased satisfaction among our customers.

### Followed up the suppliers' management systems in quality, environment and working environment.

**Objective:** To ensure that suppliers comply with agreed quality standards.

**Timeline:** The measure was implemented in 2023 after identifying varying quality and uncertainty in the response from suppliers once we have carried out our due diligence assessments.

**Status:** Completed

**Impact:** Suppliers rate their own routines and systems lower if they are not verified by a third party. In our investigation, we have seen clear evidence that suppliers, even without certified/diplomatic systems, can have practically effective management of their businesses.



### Develop cooperation with suppliers on social and ethical working conditions

**Objective:** To ensure that suppliers themselves do not experience uncertainty about how these issues affect their own operations.

**Timeline:** The measure was implemented in October 2023 after the identification of the first completed due diligence assessments.

**Status:** Completed

**Effect:** Suppliers who feel confident that they meet our requirements and have an understanding of the requirements and the need for insight into their own supply chains. This gives us a more complete insight also into supply chains with lower risk classifications.

### Establish an information channel for the Transparency Act and other topics.

**Goal:** Launch of a new information channel for better dissemination and sharing of the company's ESG work.

**Timeline:** The measure was implemented in April 2023 and published on the website.

**Status:** Completed

**Effect:** All Culligan Nordic pages have a page "About Culligan Nordic Group", where this The statement, policies, certifications, etc., are published to all external stakeholders. This gives all customers and external stakeholders the opportunity to take part in the work, while at the same time Provides a consistent place for the business to refer customer inquiries to.

### Anchor the local and national work with Culligan's international initiatives.

**Goal:** Anchor our local and national CSR and ESG work in relation to Culligan Group's international initiatives. (Culligan International is a member of the UN Global Compact, CEO Water Mandate and Water Resilience Coalition)

**Timeline:** The measure was implemented in November 2024 and is part of the Group's ESG work.

**Status:** Completed

**Effect:** The work has given us a greater overview and relationship to the internal production of machines. Where we continuously impact the international business with demands from stakeholders that lead to international improvements.

### Focus on technical suppliers' component documentation and supply chain

**Objective:** Improve the overview of supply chains in the production of dispensers, water coolers, coffee machines and similar products. Both internal and external production.

**Timeline:** The measure was implemented in August 2024 after identifying the need for a thorough investigation.



**Status:** Completed

**Effect:** A better overview of where the components of a technical product are produced and create an understanding among the supplier of the importance of documentation and ethics related to these. Most suppliers actively cooperate with their component manufacturers, but do not disclose in-depth information about trade secrets.

### **Reduce the number of suppliers and focus on active collaborative relationships.**

**Goal:** Develop collaborative relationships with a focus on sustainability.

**Timeline:** The measure was implemented in December 2025 as part of our improvement work in procurement and supplier management.

**Status:** Completed

**Impact:** A more sustainable supply chain with fewer (prioritized), well-informed, and focused suppliers.

### **Increase sustainability work in the smaller product groups.**

**Goal:** Increase sustainability work within the product group Ingredients outside coffee.

**Timeline:** The measure was implemented in September 2025 as part of our improvement work in procurement and supplier management.

**Status:** Completed

**Impact:** Established a replacement program for non-certified products.

### **Change of work tools to simplify and capture risks at suppliers**

**Goal:** Improve the methodology with more modern tools that also with AI support the search for suppliers and capture any risks that are not addressed in the FAQs.

**Timeline:** The measure was implemented in January 2026 as part of process improvement in our sustainability and supplier work.

**Status:** Completed

**Impact:** It is much easier to do thorough work and also to receive notifications about public activities, news events and public reports in our supply chains.

### **Evaluation and update of the supplier portfolio, where we have removed a supplier with unethical payment methods and chosen a more traditional supplier for transport in Oslo.**

**Objective:** To ensure ethical management of working conditions and reduce the risk of negative consequences related to economic injustice in the supply chain.

**Timeline:** The measure was implemented in March 2026 with immediate effect, when the agreement with the supplier in question was terminated.

**Status:** Completed

**Impact:** Improved supply chain transparency and increased trust from customers who demand ethically responsible practices.



## Information requirements

According to the Transparency Act (§ 6), any person or organization has the right to request information from Culligan Norway AS about how we handle actual and potential negative consequences for fundamental human rights and decent working conditions. This means that you can request information about our due diligence assessment, measures we have implemented to prevent negative consequences, and how we follow up and assess the effect of these measures.

Information requirements can be submitted by any person or organization, and there are no specific requirements for how the request should be worded. To submit an information request to Culligan Norway AS, we encourage you to use our dedicated [Reporting Portal](#). We also accept inquiries via our CustomerCare department, where you can specify what kind of information you want.

When Culligan Norway AS receives a request for information, it is immediately registered and we review the content to ensure that we can provide a clear and informative response. According to the law, we are obliged to respond within three weeks of receiving the claim. In special cases, where we need more time to collect or assess information, the response deadline may be extended to a maximum of two months.

It is worth mentioning that there may be certain limitations to our duty of disclosure, particularly when it comes to trade secrets or personal data. During the reporting period, we have received three information requests, all of which were processed in accordance with applicable laws and guidelines, and the responses were provided within the stipulated timeframes. We value transparency and feedback from the community, and are constantly working to improve our information flow.

## Group conditions

Culligan Norway AS is an independent company operating in water treatment and related services in Norway. We are part of the global Culligan Group, which has an extensive network of subsidiaries and partners across several countries. In the Group, Culligan Norway AS is responsible for local distribution and sales of products and services, including coffee and drinking water solutions, to both the private and corporate markets.

The due diligence work in Culligan Norway AS is organised locally, but we benefit from the Group's common guidelines and policies that ensure a holistic approach to human rights and working conditions. This includes guidelines for supplier selection and assessment of ethical standards, which have been implemented across the Group. We work closely with the Group's head office to ensure that our due diligence assessments are in line with global standards, while adapting them to our specific local conditions.

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Account of due diligence assessments  
cf. the Norwegian Transparency Act

Reporting and information sharing internally in the Group takes place through established channels that ensure that all relevant parties are informed of findings and measures related to the due diligence work. This statement applies only to Culligan Norway AS, but we are committed to sharing experiences and best practices with other companies in the Group to promote a common goal of responsibility and sustainability.

The collaboration at group level gives us opportunities for synergies, but can also present challenges, as local conditions and supply chains must be assessed individually. Nevertheless, our approach is rooted in a common ethical framework that strengthens our due diligence work and ensures that we take responsibility for both our own operations and our suppliers' practices.

## Publication

Signed and approved by the board  
Trollåsen 29. June 2026

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