

# Summary of Re-audit Follow-Up Results

Below is a summary of a follow-up on sustainability requirements for a supplier to Sweden's regions. The summary reflects the results of the audit as well as activities carried out as a result. It has been updated continuously as new activities related to the follow-up have been conducted, until all potential non-conformities have been addressed and the follow-up is considered complete. For questions regarding the summary, please contact the Regional Office for Sustainable Procurement.

[www.husr.se](http://www.husr.se)

## Log

---

Last updated 2025-09-08

## General Information

---

Supplier	Orion Pharma AB
Regions with Agreement	Västra Götalandsregionen (VGR)
Risk Area	Pharmaceuticals
Product	TRUXIMA SIMDAX REMSIMA GABAPENTIN
Type of Follow-Up	Digital Office Audit
Requirement	Sustainable supply chains & environmental requirements
Re-audit Date	2025-09-05
For more information	Jenny Forsell Skoog, <a href="mailto:jenny.forsell.skoog@vgregion.se">jenny.forsell.skoog@vgregion.se</a> Anders Lindberg, <a href="mailto:anders.e.lindberg@vgregion.se">anders.e.lindberg@vgregion.se</a>

# Re-audit Results

**Summary of the Re-audit** One out of two deviations were closed during the re-audit. In accordance to the action plan the deviation regarding the risk analysis is supposed to be finished by the end of 2025. As the re-audit was conducted before the deadline and Orion Pharma does not fully comply to the term regarding risk analysis, the deviation is not yet closed. In the beginning of 2026, Västra Götalandsregionen (VGR) will do a follow-up to make sure that the supplier now fully complies to the term and assess their risk analysis.

Audit Results	Sustainable Supply Chains	Assessment*
	1. Policy Commitment	Compliant at 1st audit, 2024-09-02
	2. Forwarding of commitment	Compliant at 1st audit, 2024-09-02
	3. Allocation of Responsibilities	Compliant at 1st audit, 2024-09-02
	4. Risk Analysis	Non-Conformance at re-audit 2025-09-05
	5. Monitoring	Compliant at re-audit 2025-09-05
	6. Non-Conformance Management	Compliant at 1st audit, 2024-09-02
	Environmental Requirements	Assessment *
	1. Systematic environmental work	Compliant at 1st audit 2024-09-02
	2. Environmental policy	Compliant at 1st audit 2024-09-02
	3. Environmental investigation	Compliant at 1st audit, 2024-09-02
	4. Goals and action plans	Compliant at 1st audit, 2024-02-09
	Explanations	
	Non-Conformance	
	No identified non-conformities	

---

\*For a detailed description, see Appendix 1. Non-Conformities

**Next Actions**

In the beginning of 2026, Västra Götalandsregionen (VGR) will do a follow-up to make sure that the supplier now fully complies to the term and assess their risk analysis.

# Appendix 1 - Non-Conformities

---

## Sustainable Supply Chains

**Non-Conformity**

Risk analysis. Supply chain due diligence with sustainability focus is yet not implemented in the company.

Supplier's Action

Orion will further develop its risk based approach to sustainable procurement to consider impact risk to people and planet across the supply chain. The risk tree underpinning supplier sustainability assessment and supplier selection will be further developed, so that supplier related, and product related supply chain risk, are set, and consequent actions are prioritised, based on severity of impact.

Orion's existing (annually reviewed) impact materiality assessment acts as the basis for the impact-risk-based-approach -related sustainable procurement processes.

Orion's consequent actions related to identified impact risks, will be aligned to the further developed risk based approach. As an example, when the impact risk is located in sub-tiers, actions are implemented to engage with tier1 and ensure building of traceability into the supply chain to allow for impact identification and taking action.

The current pilot project on [REDACTED] as well as the regularly conducted forced labor screenings will feed into the further development of the process.

Timeline

End of Q4, 2025