



Corporate Social Responsibility Policy

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Table of Contents

1	Introduction.....	3
2	Values and Business Principles.....	3
3	Employees.....	3
4	Market, Customers and Suppliers.....	4
5	Environment.....	5
6	Community Involvement	5
7	Scope and Responsibilities.....	6
8	Determination and Compliance	6
9	Revision History	6

1 Introduction

Corporate social responsibility (CSR) means conducting Omda's business in a socially responsible and ethical manner. It includes protecting the environment and the safety of people, supporting human rights, and respecting and supporting the communities and cultures with which we work.

In alignment with our Statement of General Business Principles, Omda will ensure that all matters of corporate social responsibility are considered and supported in our operations and administrative matters.

2 Values and Business Principles

Omda's activities must be conducted in accordance with the company's vision and values and aim to consistently keep long-term sustainability in focus. The business shall be conducted with a high level of standards, integrity, and ethics, in addition to fulfilling financial business requirements, goals and guidelines.

Omda and its employees shall follow the following guidelines:

- Omda will follow this CSR policy as well as laws and regulations in the countries where the company operates.
- Omda will respect the UN Declaration of Human Rights (www.un.org), the ILO core conventions (International Labour Organization) and accept its responsibility to consider the rights of employees and society to the extent that they are affected by the company's operations.
- Omda maintains an open attitude in its dialogue with those affected by the company's operations. Omda responds to enquiries from external parties and communicates with stakeholders in a timely and efficient manner.

In the areas where Omda has an influence, the company will aim to ensure that contractors and subcontractors comply with the relevant principles of this CSR policy.

3 Employees

Omda strives to be a respected employer by both current and potential future employees. The company will ensure a good working environment both physically and psychosocially. Omda will also seek to be an attractive employer with respect to the professional and personal development of the employees. This policy is not aimed at business issues related to each company's HR function, but instead aims to introduce fundamental requirements. The relationship with and between employees shall be based on mutual respect and dignity, and a reasonable level of influence within the areas that affect the individual's working situation.

- The terms of employment, including compensation and working hours, offered to its employees and subcontractors shall at least meet the minimum requirements of the national law or industry standards.

- Omda does not accept forced labour, slavery, or other forms of involuntary labour at the company's sites. The company does not allow practices that restrict the free movement of employees.
- Omda does not employ any person under the age of 15, and where local law stipulates a higher age limit, no persons are employed under this limit.
- Omda offers all employees equal opportunities regardless of the colour of skin, gender, age, nationality, religion, ethnicity, disability, or other distinguishing characteristics. The company does not allow any form of discrimination or harassment.
- Omda recognises the right of employees to form or join trade unions in accordance with each country's laws and principles.
- The work environment Omda offers employees will be safe and sound. Each company is responsible for ensuring that work is carried out in such a way that injuries and ill health is prevented. Written health and safety instructions are to be applied in the company's workplaces.

4 Market, Customers and Suppliers

Omda's business is based on close and long-term relationships with customers and other business partners. Omda aims to be perceived as a credible, long-term, and reliable partner and will act professionally, honestly, and ethically. Omda does not accept corruption, bribery, or unfair competitive practices. All sales and marketing of Omda's products and services will be conducted in accordance with relevant laws and regulations in each country.

- Omda will act in accordance with applicable competition laws in each country. Omda is not involved in cartels or in collusion with competitors, customers or suppliers that restrict or distort competition. If any company or subsidiary is approached with proposals for such cooperation or has reason to believe that there is any suspicious activity among its partners, it should be reported to senior management and the Competition Authority in that country.
- Omda shall not offer or give any undue compensation to any person or entity for the purpose of inducing the person or organisation to act contrary to prescribed duties to hire Omda or maintain an assignment for the company or its subsidiaries.
- Omda shall not - directly or indirectly - request or accept any undue payment or other compensation that is given to persuade the company to act in contrast to Omda's prescribed duties. To avoid conflicts of interest, employees of Omda only give or receive gifts or services that are in line with common business practices, do not violate applicable law, do not correspond to any major economic value, and cannot reasonably be regarded as bribery.
- Omda respects other companies' assets and protects the company's tangible and intangible assets from loss, theft, intrusion, or misuse.
- Omda will conduct due diligence of our value chain following OECDs Guidelines for Multinational Enterprises.

Suppliers and Partners

Within Omda's areas of influence, the company will ensure that suppliers and sub-contractors comply with the relevant principles of this CSR policy and, for example, offer its

employees a safe and healthy work environment. Omda will not buy products from suppliers that do not, on request, provide written assurances that child labour is not allowed in their production.

Omda shall, in its choice of suppliers and subcontractors, consider the ability to achieve the requirements of this CSR policy. Omda shall maintain appropriate processes for evaluating and selecting preferred suppliers and partners. Such processes shall also consider the ability to meet the requirements of this CSR policy. A follow-up of major suppliers' ethical, social, and environmental commitments shall be made annually, and immediate action shall be taken if the guidelines within this CSR policy have been breached. In accordance with Omda's quest for transparency and trust, the company reserves the right under agreements with suppliers to conduct independent audits of suppliers' operations and physical facilities using its own employees and/or external partners. The results from completed follow-up evaluations are to be discussed with the respective supplier to assist with any improvements and reported annually to the Management Team.

5 Environment

As a responsible member of society, Omda is committed to environmental protection and stewardship. As a company, we aim to limit our environmental impact and act in accordance with the general principles of sustainability.

All employees are responsible for operating in an environmentally responsible manner. In particular, we encourage employees to:

- Use video conferencing and limit physical travel to the extent possible, to minimise our carbon footprint. When travelling is required, consideration is always given as to whether trains are a feasible alternative to air travel
- Reduce energy consumption and ensure that the energy used is eco-labelled. We use green energy sources wherever possible
- Recycle and reduce waste
- Limit printing; use a digital format when possible
- Reduce the use of plastic forks, knives and drinking cups
- Consider the environmental impact when ordering advertising material and giveaways.

6 Community Involvement

Each individual company within Omda should aim to establish good relations with the local communities in which they operate. Business decisions that are likely to affect the community at large must as far as possible, be preceded by, or quickly followed by, discussions with community representatives to identify any need for joint action.

Omda must be politically neutral and does not contribute financially to political parties or candidates.

7 Scope and Responsibilities

The Omda Corporate Social Responsibility (CSR) policy applies to all employees and activities taken by or on behalf of Omda AS and its subsidiaries anywhere in the world.

All employees within the company and its subsidiaries are responsible for ensuring that they, as well as the business they operate within, act in accordance with this CSR policy. It is each employee's own responsibility to ensure that they have sufficient information about the relevant laws, regulations, and policies, in conjunction with all business, personnel and investment decisions.

The Compliance team is responsible for the implementation and the compliance of this CSR policy within Omda. It is every senior executive's responsibility to report any cases of fraud or other criminal behaviour to a member of the Management Team. Confirmed violations of Omda's CSR policy will immediately lead to disciplinary action, including dismissal in serious cases of violation of the guidelines.

8 Determination and Compliance

Omda's CSR policy is reviewed and updated as needed by the Board of Directors. The latest version of the policy can always be found under corporate policies folder in Webforum. All employees are responsible for keeping up to date with the latest version of the policy.

9 Revision History

Date	Revision #	Change(s)	Author
27.09.23	2.0	Implemented change to Omda AS.	H. Døcker
27.02.24	3.0	Updates to Section 5: Environment, to reflect Omda's Environmental Policy	Ø. Gravdal