



Whistleblower Policy

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1 Introduction

Omda AS (Omda) is committed to doing business in accordance with the highest ethical standards and requires its directors, officers, and employees to execute their duties and responsibilities in accordance with legal requirements, regulations and Omda's governing principles. Omda employees and representatives are required to practice honesty and integrity in fulfilling their responsibilities, and to comply with all applicable laws and regulations.

2 Reporting Responsibility

The Whistleblower Policy should encourage and enable employees and others to raise concerns that may arise so that Omda management can address any inappropriate conduct and actions. This policy makes it the responsibility of all board members, officers, employees, and volunteers to report concerns about violations of Omda's Statement of General Business Principles (SoGBP), Corporate Social Responsibility (CSR) Policy, Supplier Code of Conduct or any suspected violations of law or regulations that govern Omda's operations and business relationships.

3 No Retaliation

Omda does not tolerate retaliation of any kind against those who report in good faith a suspected violation of law, regulations and Omda's governing principles. An employee who retaliates against a whistleblower who has reported a violation in good faith is subject to discipline up to and including termination of employment.

4 Reporting Procedure

Omda embraces an open-door policy and recommends that employees share their concerns with their immediate supervisor. If an employee is not comfortable speaking with their direct supervisor, or not satisfied with their supervisor's response, the employee is encouraged to speak with the CEO or a board member. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Legal Director, who holds the responsibility of investigating all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor, the CEO or the whistleblower email at WB@omda.com.

For anonymous reporting, employees can submit a form on <https://csamhealth.sharepoint.com/sites/Whistleblower>. It is important to note that the reporter will not receive any feedback on the reported case if this option is chosen.

Non-employees with similar concerns are also encouraged to report to the whistleblower email at WB@omda.com.

5 Omda Legal Director

The Legal Director is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Legal Director will advise the CEO or the board of all complaints and their resolution. The Legal Director will report on any whistleblowing cases at every board meeting in Omda AS.

6 Accounting and Auditing Matters

The Legal Director shall immediately notify the CFO of all concerns or complaints regarding corporate accounting practices, internal controls or auditing, and work with the board until the matter is resolved.

7 Acting in Good Faith

Any person filing a written complaint concerning a violation or suspected violation must be acting in good faith and hold reasonable grounds for believing that the disclosed information indicates a violation. Any allegations that prove to be unsubstantiated and to have been made maliciously or knowingly false will be viewed as a serious disciplinary offence.

8 Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to every extent possible, consistent with the need to conduct a fully and satisfactory investigation.

9 Handling of Reported Violations

The Legal Director will notify individuals submitting a complaint and acknowledge receipt of the reported violation or suspected violation. However, it is important to note that in the case of anonymous reporting the reporter will not receive any feedback on the reported case. All reports will be promptly investigated, and appropriate corrective action will be taken if so warranted by the investigation.

10 Revision History

Date	Revision #	Change(s)	Author
27.09.23	2.0	Implemented change to Omda AS	H. Døcker