

Responsible Sourcing Report

This report demonstrates how we at Omda comply with the legal requirements set out in the Norwegian Transparency Act, that entered into force on 1 July 2022.

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1 Opening Statement from the Board of Directors

At Omda, we are committed to ensuring that our business operations and supply chains reflect our values, including respect for human rights and decent working conditions.

This report demonstrates how we at Omda comply with the legal requirements set out in the Norwegian Transparency Act, that entered into force on 1 July 2022.

It contains an overview of Omda operations and global structure, and the policies and practices to ensure responsible sourcing and the identification of risk of adverse impacts. It also outlines the results of our assessments, measures, and mechanisms to mitigate and prevent risk of actual or potential infringement of human rights and ensure decent working conditions in conducting our business.

2 Omda's Operations and Global Structure

Omda is the leading provider of specialised software for healthcare and emergency response in the Nordics, with a growing presence in Europe, North America, and the Pacific region. We have more than 500 customers in 27 countries and employ almost 300 dedicated specialists. Omda's global organisation consist of 18 legal entities.

Our highly specialised healthcare solutions empower medical professionals and emergency responders, enabling them to know more and work smarter. With a focus on user-centric design, value-driven development, and close working relationships with customers, Omda delivers solutions that enhance patient safety and improve healthcare outcomes.

Through our focused mergers and acquisitions strategy, we have built a unique blend of best-in-class innovative technology and outstanding expertise. We build long-term relationships with our customers, helping them achieve their goals, and knowing that our growth is earned by consistently delivering secure, quality software services.

The Group's revenue breaks down as follows: 83 % from the Nordics (Sweden (44 %), Norway (19%), Denmark (10%), Finland (9%)), and 17 % from rest of the World (Europe, UK, US and Oceania).

Omda AS is the Parent of the Group, domiciled in Norway, and listed on the Oslo Stock Exchange, Euronext Growth (Ticker: OMDA).

3 Policies and Routines

Omda adheres to the Ten Principles of the United Nations Global Compact on human rights, labour rights, environment, and anti-corruption. Our commitment to human rights and decent working conditions is rooted in the Group's strategy and values and in formal policies initiated and overseen by the Board of Directors. We seek to be transparent in this work and publish all policies and reports on our website (omda.com/about-omda/sustainability/).

Here are the key policies which define this commitment in practice:

- Statement of General Business Principles
- Corporate Social Responsibility (CSR) Policy stating that Omda will follow OECDs Guidelines for Multinational Enterprises in conducting due diligence of the value chain, suppliers and business partners supporting Omda's business.
- Supplier Code of Conduct
- Whistleblower Policy, stating a no retaliation principle and that a whistleblower channel is available for employees, and others, to report concerns about violations of Omda's Statement of General Business Principles, or CSR Policy, or suspected violations of law or regulations that govern Omda's operations.
- Environmental Policy

4 Due Diligence of Supply Chain, Suppliers and Business Partners

Omda conducts its due diligence of its supply chain, suppliers and business partners using the principles and framework set out in the OECD Guidelines for Multinational Enterprises. We began this work in 2022 by assessing the risk of adverse impacts for the operations of the Group's Norwegian parent company, Omda AS. For the financial year 2023, we have expanded the scope to include suppliers of all Swedish entities, to ensure compliance with legal regulations and to prepare for the requirements under the EU's Corporate Sustainability Reporting Directive (CSRD), which will take effect for Omda from the financial year of 2025.

5 Risk of Actual or Potential Adverse Impact on Human Rights

In 2023 Omda AS (the Parent) had 50 employees and a total revenue of NOK161 million. The Omda Group (the Group) had a total of 291 employees and a total revenue of NOK 414 million. In addition to providing software solutions that are instrumental in the clinical care processes of healthcare providers and in enabling emergency responders to enhance public safety, Corporate Management and the Common Services functions provide services to the Group's Business Areas and subsidiaries.

Our key supply chain and material business partners are mostly professional technology companies and suppliers of IT services, located mainly in Norway, other Nordic countries, and the EU. Additionally, Omda procures services and goods for use in its offices and for employees, including office rent, furniture, computer equipment and accessories, mobile phones, cleaning services, insurance and food and beverage supplies.

Omda AS had transactions with approximately 165 suppliers and business partners in 2023. Some of the largest suppliers to the Parent are other Omda entities. Including the Swedish entities of the Omda Group, Omda had transactions with approximately 500 suppliers and business partners in 2023.

We are committed to identifying potential risks of adverse impact on human rights and ensuring decent working conditions across our operations and supply chain. We use a software-supported approach to classify all our suppliers based on the nature of their business and their geographical location. This results in an initial assessment of Social Risk per supplier. Applying a risk-based approach, we have considered the following risk aspects in our assessments, in addition to the scale of our business relationship with each supplier or business partner:

- Industry Risk
- Geographic Risk
- Social Risk
- Entity Risk

The aim is to gauge our partners' commitment to ensure human rights and decent working conditions across our value chain.

6 Results from the Due Diligence Process

As a specialised software provider, with a customer base comprising primarily hospitals, health regions and other public sector customers in the Nordics and Europe, Omda's operations are not identified as being conducted in a sector or industry at high-risk for adverse impacts on human rights and decent working conditions.

Omda's services are delivered by well-educated, trained and skilled employees, and are not considered as high risk from a human rights violation perspective. We acknowledge nonetheless that the supply chains for the electronic devices our employees use at work, which include personal computers, laptops, mobile phones, and various other devices, carry a higher risk of such violations. This risk also applies to most of our suppliers, who are well-known professional and renowned providers of IT services and technology support, using the same array of electronics as working tools.

While Omda's operations across most of our geographies (Nordics, Europe, North America and Oceania) are of low risk, we recognise that our Philippines operation is of higher risk due to weaker labour laws and workers' rights. The developer team employed at the Aygo Cebu Office in the Philippines is covered by the Group's general policies, as are suppliers to our Group-wide operations.

Spend in % - external suppliers sorted by activity (NACE)

Omda AS

Financial Services including Insurance	55 %
Software, programming and IT services	17 %
Office lease	8 %
Legal advisory and Compliance services	4 %
Audit, accounting and payroll services	3 %
Suppliers of IT equipment	3 %
PR, Marketing and Visual Identity	3 %
Trade fairs, hotels, catering etc	2 %
Training	2 %
Property management and cleaning services	1 %
Other	2 %

Omda's Swedish Entities

Software, programming and IT services	42 %
Financial Services including Insurance	15 %
Office lease	11 %
Audit, accounting and payroll services	7 %
Suppliers of IT equipment	5 %
Pr, Marketing and Visual Identity	4 %
Property management and cleaning services	3 %
Communication services	3 %
Legal advisory and Compliance services	1 %
Trade fairs, hotels, catering etc	1 %
Other	6 %

The majority of the external suppliers and business partners of Omda AS are professional technology companies and providers of IT and other services, mainly domiciled in Norway, the Nordics and Europe. In 2023, Financial Services was a large category, due to the refinancing of Omda's Bond loan. The services were provided by top-tier Norwegian financial advisors and has not increased the risk of adverse impacts on human rights and decent working conditions in 2023. We are not aware of any potential adverse impacts from our suppliers or business partners, or of any non-compliance with human rights and decent working conditions at the entity level.

7 Measures to Prevent and Mitigate Risk

The findings of Omda's risk assessment process indicate that Omda generally operate in a low-risk environment with regard to adverse impacts on human rights and working conditions in the value chain of our Norwegian and Swedish entities.

Assesment summary - external suppliers of Omda

	Omda AS	Omda Swedish entities
High risk	2 %	4 %
Medium Risk	28 %	29 %
Low Risk	70 %	67 %

The due diligence process of Omda is conducted on a day-to-day basis, and regularly developed as our knowledge and experience of potential risks in our operations and supply chains expand through monitoring local and regional developments across all our geographies. Omda has implemented several measures to prevent and mitigate the risk of adverse impacts on human rights and decent working conditions.

A key measure is the promotion of a Supplier Code of Conduct, ensuring our suppliers and business partners are aware of Omda's policies and standards on human rights and working conditions in the value chain, as well as how to report suspected breaches.

Measures taken:

- Expanded the scope of Omda's due diligence process to include suppliers of both Norwegian and Swedish entities.
- Implemented Software support for Omda's risk-based due diligence process to increase efficiency, improve documentation and secure a consistent use of risk-based criteria.
- Promotion of a Supplier Code of Conduct
- Publication of key policies on Omda's website

8 Going Forward

Omda will expand policy application from covering the Parent and the Swedish entities (in 2023) to covering all legal entities in time for FY2025 when the EU Corporate Sustainability Reporting Directive (CSRD) comes into effect. Omda's operations and supply chains will benefit as it systematically identifies and implements measures to prevent and mitigate human-rights related risks.

As the scope of Omda's due diligence process widens we have implemented software support to make the risk-based assessments more continuous and timely across our global operations.

In addition to communicating our current Supplier Code of Conduct to new and existing suppliers and business partners, we will improve our sourcing policies and procedures. Omda will also continue to monitor and report identified and potential risks, and to assess the effectiveness of our mitigation measures.

This report was made for the year ending 31 December 2023 and will be reviewed and updated on an annual basis.

Reviewed and approved by Omda Board of Directors and CEO (sign)

Date: 2024-06-30