



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.

Document attributes

Status	Approved
Distribution	Public

Table of Contents

1	Opening Statement from the Board of Directors.....	3
2	Omda Health Group's Operations and Global Structure	3
3	Policies and Routines	3
4	Due Diligence of Supply Chain, Suppliers and Business Partners	4
5	Risk of Actual or Potential Adverse Impact on Human Rights	4
6	Results from the Due Diligence Process.....	5
7	Measures to Prevent and Mitigate Risk.....	5
8	Going Forward	6

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 identify risk of adverse impact. 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 public safety in the Nordics. From solid foundations in Norway, we have grown to serve more than 500 customers in 27 countries. Today we are structured in seven Business Areas with operations spanning the Nordics, Europe, North America, Oceania and Asia. We have more than 300 employees and a global organisation consisting of 20 legal entities.

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: 87 % from the Nordics (Sweden (46 %), Norway (21%), Denmark (11%), Finland (9%)), and 13 % 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. Here are the key policies which define this commitment in practice:

- Omda Statement of General Business Principles

- Omda 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.
- Omda Supplier Code of Conduct
- Omda 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 Corporate Social Responsibility (CSR) Policy or suspected violations of law or regulations that govern Omda's operations.

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 by assessing the risk of adverse impact for the operations of the Group's Norwegian Parent, Omda AS, and will enlarge its scope to ensure we comply with legal regulations and are well prepared for the requirements under the EU's Corporate Sustainability Reporting Directive (CSRD), expected to enter into force for Omda with effect from the Financial Year of 2025.

5 Risk of Actual or Potential Adverse Impact on Human Rights

In 2022 Omda AS (the Parent) had 62 employees and a total revenue of 192 million NOK. In addition to providing software solutions to customers 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. In addition, 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 160 suppliers and business partners in 2022. Some of the largest suppliers to the Parent are other Omda entities.

We are committed to identifying potential risks of adverse impact on human rights and decent working conditions across our operations and supply chain. Applying a risk-based approach, we have considered four risk aspects in our assessments, in addition to the scale of our business relationship with each supplier or business partner:

- Sector and Industry Risk
- Service and Product Risk
- Geographic 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 of hospitals, health regions and other public sector customers in the Nordics and Europe, Omda's operations is not identified as conducted in a sector or industry at high-risk for adverse impact on human rights and decent working conditions.

Omda's services are delivered by well educated, trained and skilled employees, and are not seen 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 others, carry a higher risk of such violations. This risk also applies to most of our suppliers, all well-known professional and renowned providers of IT services and technology support, with the same array of electronics as working tools.

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

The majority of the suppliers and business partners of Omda AS are professional technology companies and providers of IT services and other services, mainly domiciled in Norway, the Nordics and Europe. We are not aware of potential adverse impact from our suppliers or business partners, or of non-compliance with human rights and decent working conditions at entity level.

7 Measures to Prevent and Mitigate Risk

The due diligence process of Omda is continued on a day-to-day basis, and regularly developed as our knowledge and experience of potential risk in our operations and supply chains expands through monitoring local and regional developments across all our geographies.

Omda has implemented several measures to prevent and mitigate the risk of adverse impact on human rights and decent working conditions.

A key measure was to promote 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, and how to report suspected breaches.

Measures taken:

- The revision of policies and routines
- Establishing a risk-based due diligence process for suppliers and business partners.
- Promoting a Supplier Code of Conduct
- Publishing key policies on Omda's website
- Establishing a whistleblower channel on Omda's website available for employees and others

8 Going Forward

Omda will widen policy application from covering the Parent (in 2022) to covering all legal entities in time for FY2025 when the EU Corporate Sustainability Reporting Directive (CSRD) comes into effect. Omda operations and supply chains will benefit as it systematically identifies and carries out measures to prevent and mitigate, human rights related risks.

As the scope of Omda's due diligence process widens we will implement 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 2022 and will be reviewed and updated on an annual basis.

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

Date: 2023-04-17