



Let's go further



# Norwegian Transparency Act Statement

June 2023

*EG Norge AS*

*EG Retail AS*

*Holte AS*

*PatientSky SaaS Norway AS including Infodoc AS and Hove Medical Systems AS*

*Ørn Software AS*



# NORWEGIAN TRANSPARENCY ACT STATEMENT

EG Norge AS - Business registration number 983 781 233

July 1, 2022, to December 31, 2022

Published June 2023 – English version.

## Background

As a larger enterprise resident in Norway the Transparency Act (Lov om virksomheters åpenhet og arbeid med grunnleggende menneskerettigheter og anstendige arbeidsforhold) is applicable to EG Norge AS.

EG Norge AS complies with the act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (Transparency Act), which shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

This document has been prepared to fulfill EG Norge AS's obligation to report the due diligence assessments for the period July 1, 2022, to December 31, 2022. The period corresponds to EG Norge AS's last financial year since the entry into force of the Transparency Act.

The document will be updated and published annually by June 30. It will also be updated in the event of significant changes in the EG Norge AS's risk assessments in accordance with the Transparency Act.

## General description of the company structure

EG Norge AS is fully owned by EG Danmark A/S.

CEO: Erik Tomren

Chairperson of the board: Mikkel Bardram

EG Norge AS has as of December 31, 2022, 57 employees.

## Area of operations

EG Norge AS's business area is related to the development and sale of standard software to selected industries in Norway. EG Norge AS's headquarter is located in Oslo with local offices in Gjøvik, Trondheim and Sandefjord.

## Guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions

EG Norge AS wants to be an honest, trusted, and accountable software company, aiming to make a positive contribution to the general development of modern society. All our products and operations shall comply with international human rights standards and standards for decent working conditions.

As part of the EG Group we commit ourselves to the UN Global Compact and our business complies with the UN Guiding Principles on Responsible Business and Human Rights and the OECD Guidelines for Responsible Business Conduct. Our overall approach to fulfilling our

commitment to respecting fundamental human rights and decent working conditions is guided by our policies, which includes both our own operations and our supply chain.

Read more about our policies [here](#).

EG Norge AS is compliant with the national legislation for health, safety, work environment and diversity. We expect our suppliers and business partners to support the Universal Declaration of Human Rights and Labor Rights and respect these rights within their sphere of influence and operate their business in a transparent and trustworthy way.

We expect the same of our suppliers and business partners as we expect from our selves. All employees and others affected by our business are treated with respect and dignity.

We expect our suppliers and business partners to act with seriousness and care to avoid injuries and negative consequences for people. The suppliers and business partners must ensure equal rights and opportunities for its employees and the suppliers and business partners must not discriminate e.g., based on race, ethnicity, gender, age, marital status, religion, political affiliation, union membership or sexual orientation.

We expect our suppliers and business partners to have an appropriate set of rules, practices, and processes in place to ensure accuracy, consistency, and responsiveness to key stakeholders including customers, shareholders, and regulators.

## ESG in EG and EG Norge AS

The EG ESG Committee sets the targets and prioritizes the ESG activities in EG and all subsidiaries, including EG Norge AS.

The EG ESG Committee is a cross-functional senior management committee, chaired by the CEO for EG A/S. In 2022 the Committee regularly evaluated the EG ESG activities, based on changes to relevant laws, regulatory guidance and best practice and it has been looking into new ESG activities and initiatives in EG and the subsidiaries for 2023.

The EG ESG Committee reports on initiatives, progress, and the material ESG topics to EG's Board of Directors.

## Information regarding actual adverse impacts and significant risks of adverse impacts that has been identified through the due diligence

In line with the Transparency Act, we conduct a due diligence of our own operations and supply chain, and we report annually publicly on our due diligence assessments. We respond to requests on how we work to ensure respect for human rights and decent working conditions in the production of our products.

In this year's disclosure, we have conducted a risk analysis based on the largest suppliers and business partners we did business with during the period July 1, 2022 to December 31, 2022. We have also explored how our suppliers and business partners identify and mitigate risks in their own supply chains to that extend that it was possible.

No human rights violations or bad working conditions were revealed through the supplier and business partner survey and due diligence.

As all our largest suppliers and business partners are based in the Nordics, we asses that the risk for adverse impacts in terms of child labor most likely to be low.

We are aware of the risks that are inherent in our area of operations such as non-equality and discrimination, but no violations were detected.

Additionally, we are aware of risks of human rights breaches connected to the supply chains of IT-products, regarding raw material, components, and assembly.

In the reporting period, no actual negative consequences were identified.

## EG Norge AS operations

Our risk assessment in our own operations has revealed that the most critical potential consequences could be:

- stress,
- bullying,
- sexual harassment,
- fire, the indoor environment such as air quality, light, temperature, and noise,
- strain ailments like back, shoulder, and neck pains,
- eye fatigue and headache due to screen work.

Information regarding measures that has been implemented or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts, and the results or expected results of these measures

## EG NORGE AS operations

We work systematically in cooperation with employees to prevent injuries from occurring, through our HSE routines. All deviations are followed up.

## Suppliers and business partners

We aim by performing due diligence of our suppliers and business partners to influence our suppliers and business partners to provide their workers and workers in their supply chain decent employment conditions according to the expectations set in the Transparency Act.

If violations of human rights and or other fundamental standards at a supplier, business partners or subcontractor are discovered, or significant risk of such violations, we follow up through dialogue with the relevant supplier, business partner or/and relevant stakeholders.

## Whistleblower scheme

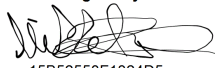
EG Norge AS has effective routines for ensuring compliance and knowledge of human rights and sustainability among our employees. We have a whistleblower scheme where employees and others can report breaches of our Code of Conduct, report violations of fundamental human rights, decent working conditions or other censurable conditions. At the same time, continuous learning, and improvement in the organization is facilitated through training materials and awareness training.

## Next step

EG Norge AS will continue its efforts in 2023 by working actively with the Transparency Act. We will continuously review our suppliers and business partners with focus on fundamental human rights

and decent working conditions and perform risk assessments. We will also continue to evaluate how our suppliers and business partners are working with identifying and mitigating risks in their own supply chains.

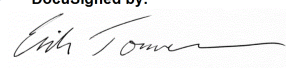
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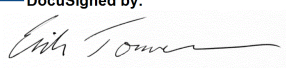
Mikkel Bardram  
Chairperson of the Board

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*Henrik Hansen*  
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Henrik Hansen  
Director

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Erik Tomren  
Director

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Erik Tomren  
Chief Executive Officer

# NORWEGIAN TRANSPARENCY ACT STATEMENT

EG Retail AS – Business registration number 968 992 600

July 1, 2022, to December 31, 2022

Published June 2023 – English version.

## Background

As a larger enterprise, resident in Norway the Transparency Act (Lov om virksomheters åpenhet og arbeid med grunnleggende menneskerettigheter og anstendige arbeidsforhold) is applicable to EG Retail AS.

EG Retail AS complies with the act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (Transparency Act), which shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

This document has been prepared to fulfill EG Retail AS's obligation to report the due diligence assessments for the period July 1, 2022, to December 31, 2022. The period corresponds to EG Retail AS's last financial year since the entry into force of the Transparency Act

The document will be updated and published annually by June 30. It will also be updated in the event of significant changes in the EG Retail AS's risk assessments in accordance with the Transparency Act.

## General description of the company structure

EG Retail AS is fully owned by EG Norge AS

CEO: Erik Tomren

Chairperson of the board: Mikkel Bardram

EG Retail AS has as of December 31, 2022, 86 employees.

## Area of operations

EG Retail AS offers a comprehensive solution portfolio developed together with the market's largest and managed retail sector in the Nordics within the industry, trade, sports, grocery, and service trade. EG Retail AS has offices in Trondheim, Oslo, and Bergen.

## Guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions

EG Retail AS wants to be an honest, trusted, and accountable software company, aiming to make a positive contribution to the general development of modern society. All our products and operations shall comply with international human rights standards and standards for decent working conditions.

As part of the EG Group we commit ourselves to the UN Global Compact and our business complies with the UN Guiding Principles on Responsible Business and Human Rights and the OECD Guidelines for Responsible Business Conduct. Our overall approach to fulfilling our

commitment to respecting fundamental human rights and decent working conditions is guided by our policies, which includes both our own operations and our supply chain. Read more about our policies [here](#).

EG Retail AS is compliant with the national legislation for health, safety, work environment and diversity. We expect our suppliers and business partners to support the Universal Declaration of Human Rights and Labor Rights.

We expect the same of our suppliers and business partners as we expect from our selves. All employees and others affected by our business are treated with respect and dignity.

We expect our suppliers and business partners to act with seriousness and care to avoid injuries and negative consequences for people. The suppliers and business partners must ensure equal rights and opportunities for its employees and the suppliers and business partners must not discriminate based on e.g., race, ethnicity, gender, age, marital status, religion, political affiliation, union membership or sexual orientation.

We also expect our suppliers and business partners to have an appropriate set of rules, practices, and processes in place to ensure accuracy, consistency, and responsiveness to key stakeholders including customers, shareholders, and regulators.

## ESG in EG and EG Retail AS

The EG ESG Committee sets the targets and prioritizes the ESG activities in EG and in the subsidiaries including EG Retail AS. The EG ESG Committee is a cross-functional senior management committee of EG, chaired by the CEO of EG A/S.

In 2022 the Committee regularly evaluated the EG ESG activities, based on changes to relevant laws, regulatory guidance and best practice and it has been looking into new ESG activities and initiatives in EG and the subsidiaries for 2023.

The EG ESG Committee reports on initiatives, progress, and the material ESG topics to EG's Board of Directors

## Information regarding actual adverse impacts and significant risks of adverse impacts that has been identified through the due diligence

In line with the Transparency Act, we conduct a due diligence of our own operations and supply chain, and we report annually publicly on our due diligence assessments. We respond to requests on how we work to ensure respect for human rights and decent working conditions in the production of our products.

In this year's disclosure, we have conducted a risk analysis based on the largest suppliers and business partners we did business with during the period July 1, 2022 to December 31, 2022. We have also explored how our suppliers and business partners identify and mitigate risks in their own supply chains to that extent that it was possible.

No human rights violations or bad working conditions were revealed through the supplier and business partners survey and due diligence.

As all our largest suppliers and business partners are based in the Nordics, we assess that the risk for adverse impacts in terms of child labor most likely to be low.

We are aware of the risks that are inherent in our area of operations such as non-equality and discrimination, but no violations were detected.

Additionally, we are aware of risks of human rights breaches connected to the supply chains of IT-products, regarding raw material, components, and assembly.

In the reporting period, no actual negative consequences were revealed.

## EG Retail AS operations

Our risk assessment has revealed that the most critical potential consequences could be:

- stress,
- bullying,
- sexual harassment,
- fire,
- the indoor environment such as air quality, light, temperature, and noise,
- strain ailments such as back, shoulder, and neck pains,
- eye fatigue and headache due to screen work.

Information regarding measures that has been implemented or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts, and the results or expected results of these measures

## EG Retail AS operations

We work systematically in cooperation with employees to prevent injuries from occurring, through our HSE routines. All deviations are followed up.

## Suppliers and business partners

We aim by performing due diligence of our suppliers and business partners to influence our suppliers and business partners to provide their workers and workers in their supply chain decent employment conditions according to the expectations set in the Transparency Act.

If violations of human rights and or other fundamental standards at a supplier, business partners or subcontractor are discovered, or significant risk of such violations, we follow up through dialogue with the relevant supplier, business partner and relevant stakeholders.

## Whistleblower scheme

EG Retail AS has effective routines for ensuring compliance and knowledge of human rights and sustainability among our employees. We have a whistleblower scheme where employees and others can report breaches of our Code of Conduct, report violations of fundamental human rights, decent working conditions or other censurable conditions. At the same time, continuous learning, and improvement in the organization is facilitated through training materials and awareness training.


## Next step



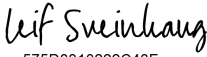
EG Retail AS will continue its efforts in 2023 by working actively with the Transparency Act. We will continuously review our suppliers and business partners with focus on fundamental human rights and decent working conditions and perform risk assessments.

We will also continue to evaluate how our suppliers and business partners are working with identifying and mitigating risks in their own supply chains.


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Mikkel Bardram  
Chairperson of the Board

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Leif Atle Holden Sveinhang  
Director

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Henrik Hansen  
Director

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Erik Tomren  
Chief Executive Officer

# NORWEGIAN TRANSPARENCY ACT STATEMENT

Holte AS – Business registration number 982 506 395

July 1, 2022, to December 31, 2022

Published June 2023 – English version.

## Background

As a larger enterprise, resident in Norway the Transparency Act (Lov om virksomheters åpenhet og arbeid med grunnleggende menneskerettigheter og anstendige arbeidsforhold) is applicable to Holte AS.

Holte AS complies with the act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (Transparency Act), which shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

This document has been prepared to fulfill Holte AS's obligation to report the due diligence assessments for the period July 1, 2022, to December 31, 2022. The period corresponds to Holte AS's last financial year since the entry into force of the Transparency Act

The document will be updated and published annually by June 30 It will also be updated in the event of significant changes in the Holte AS's risk assessments in accordance with the Transparency Act.

## General description of the company structure

Holte AS is fully owned by EG Danmark A/S.

CEO: Aleksander Bjaaland

Chairperson of the board: Mikkel Bardram

Holte AS has as of December 31, 2022, 106 employees.

## Area of operations

Holte AS's business area is related to the development and sale of standard software for project management and services to the primary building, construction, and real estate industry in Norway. The company's headquarter is located in Oslo with local offices in Tønsberg, Trondheim and Gdansk.

## Guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions

Holte AS wants to be an honest, trusted, and accountable software company, aiming to make a positive contribution to the general development of modern society. All our products and operations shall comply with international human rights standards and standards for decent working conditions.

As part of the EG Group we commit ourselves to the UN Global Compact and our business complies with the UN Guiding Principles on Responsible Business and Human Rights and the

OECD Guidelines for Responsible Business Conduct. Our overall approach to fulfilling our commitment to respecting fundamental human rights and decent working conditions is guided by our policies, which includes both our own operations and our supply chain. Read more about our policies [here](#).

Holte AS is compliant with the national legislation for health, safety, work environment and diversity. We expect our suppliers and business partners to support the Universal Declaration of Human Rights and Labor Rights and respect these rights within their sphere of influence and operate their business in a transparent and trustworthy way.

We expect the same of our suppliers and business partners as we expect from our selves. All employees and others affected by our business are treated with respect and dignity.

We expect our suppliers and business partners to act with seriousness and care to avoid injuries and negative consequences for people. The suppliers and business partners must ensure equal rights and opportunities for its employees and the suppliers and business partners must not discriminate based on e.g., race, ethnicity, gender, age, marital status, religion, political affiliation, union membership or sexual orientation.

We also expect our suppliers and business partners to have an appropriate set of rules, practices, and processes in place to ensure accuracy, consistency, and responsiveness to key stakeholders including customers, shareholders, and regulators.

## ESG in EG and Holte AS

The EG ESG Committee sets the targets and prioritizes the ESG activities in EG and in the subsidiaries including Holte AS. The EG ESG Committee is a cross-functional senior management committee of EG, chaired by the CEO of EG A/S.

In 2022 the Committee has regularly evaluated the EG ESG activities, based on changes to relevant laws, regulatory guidance and best practice and they have been looking into new ESG activities and initiatives in EG and the subsidiaries for 2023.

The EG ESG Committee reports on initiatives, progress, and the material ESG topics to EG's Board of Directors

## Information regarding actual adverse impacts and significant risks of adverse impacts that has been identified through the due diligence

In line with the Transparency Act, we conduct a due diligence of our own operations and supply chain, and we report annually publicly on our due diligence assessments. We respond to requests on how we work to ensure respect for human rights and decent working conditions in the production of our products.

In this year's disclosure, we have conducted a risk analysis based on the largest suppliers and business partners we did business with during the period July 1, 2022 to December 31, 2022. We have also explored how our suppliers and business partners identify and mitigate risks in their own supply chains to that extend that it was possible.

No human rights violations or bad working conditions were revealed through the supplier and business partners survey and due diligence.

As all our largest suppliers and business partners are based in the Nordics, we asses that the risk for adverse impacts in terms of child labor most likely to be low.

We are aware of the risks that are inherent in our area of operations such as non-equality and discrimination, but no violations were detected.

Additionally, we are aware of risks of human rights breaches connected to the supply chains of IT-products, regarding raw material, components, and assembly.

In the reporting period, no actual negative consequences were revealed.

## HOLTE AS operations

Our risk assessment has revealed that the most critical potential consequences could be:

- stress,
- bullying,
- sexual harassment,
- fire,
- the indoor environment such as air quality, light, temperature, and noise,
- strain ailments such as back, shoulder, and neck pains,
- eye fatigue and headache due to screen work.

Information regarding measures that has been implemented or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts, and the results or expected results of these measures

## HOLTE AS operations

We work systematically in cooperation with employees to prevent injuries from occurring, through our HSE routines. All deviations are followed up.

## Suppliers and business partners

We aim by performing due diligence of our suppliers and business partners to influence our suppliers and business partners to provide their workers and workers in their supply chain decent employment conditions according to the expectations set in the Transparency Act.

If violations of human rights and or other fundamental standards at a supplier, business partner or subcontractor are discovered, or significant risk of such violations, we follow up through dialogue with the relevant supplier and/or relevant stakeholders.

## Whistleblower scheme

Holte AS has effective routines for ensuring compliance and knowledge of human rights and sustainability among our employees.

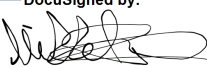
We have a whistleblower scheme where employees and others can report breaches of our Code of Conduct, report violations of fundamental human rights, decent working conditions or other censurable conditions.

At the same time, continuous learning, and improvement in the organization is facilitated through training materials and awareness training.

## Next step

Holte AS will continue its work in 2023 by working actively with the Transparency Act. We will continuously review our suppliers and business partners with focus on fundamental human rights and decent working conditions and perform risk assessments. We will also continue to evaluate how our suppliers and business partners are working with identifying and mitigating risks in their own supply chains.

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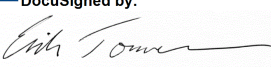
Mikkel Bardram

Chairperson of the Board

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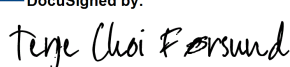
Kirsten Ruud Haugen

Director

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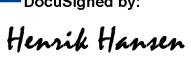
Erik Tomren

Director

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Terje Førsund

Director

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Henrik Hansen

Director

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Aleksander Bjaaland

Chief Executive Officer

# NORWEGIAN TRANSPARENCY ACT STATEMENT

PatientSky SaaS Norway AS - Business registration number 929 666 070

July 1, 2022, to December 31, 2022

Published June 2023 – English version.

## Background

As a larger enterprise, resident in Norway the Transparency Act (Lov om virksomheters åpenhet og arbeid med grunnleggende menneskerettigheter og anstendige arbeidsforhold) is applicable to PatientSky SaaS Norway AS and the subsidiaries Hove Medical Systems AS and Infodoc AS.

PatientSky SaaS Norway AS complies with the act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (Transparency Act), which shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

This document has been prepared to fulfill PatientSky SaaS Norway AS's obligation to report the due diligence assessments for the period July 1, 2022, to December 31, 2022. The period corresponds to PatientSky SaaS Norway AS's last financial year since the entry into force of the Transparency Act

The document will be updated and published annually by June 30 It will also be updated in the event of significant changes in the PatientSky SaaS Norway AS's risk assessments in accordance with the Transparency Act.

## General description of the company structure

PatientSky SaaS Norway AS is fully owned by EG Norge AS

CEO: Kjell-Magne Solli

Chairperson of the board: Mikkel Bardram

PatientSky SaaS Norway AS, Hove Medical Systems AS and Infodoc AS has as of December 31, 2022, 106 employees.

## Area of operations

PatientSky SaaS Norway AS is proving EHR-solutions in Norway within primary care. The company's office is located in Oslo.

## Guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions

PatientSky SaaS Norway AS wants to be an honest, trusted, and accountable software company, aiming to make a positive contribution to the general development of modern society. All our products and operations shall comply with international human rights standards and standards for decent working conditions.

As part of the EG Group we commit ourselves to the UN Global Compact and our business complies with the UN Guiding Principles on Responsible Business and Human Rights and the OECD Guidelines for Responsible Business Conduct. Our overall approach to fulfilling our commitment to respecting fundamental human rights and decent working conditions is guided by our parents' company's policies that we are working on having implemented, which includes both our own operations and our supply chain.

We follow national legislation for health, safety, work environment and diversity. We expect the same of our suppliers and business partners as we expect from our selves. All employees and others affected by our business are treated with respect and dignity. We expect our suppliers and business partners to act with seriousness and care to avoid injuries and negative consequences for people.

## ESG in Patientsky SaaS Norway AS

The Board of Directors of PatientSky SaaS Norway AS provided in 2022 oversight for sustainability and ESG in PatientSky SaaS Norway AS.

### Information regarding actual adverse impacts and significant risks of adverse impacts that has been identified through the due diligence

In line with the Transparency Act, we conducted a due diligence of our own operations and supply chain, and we report annually publicly on our due diligence assessments. We respond to requests on how we work to ensure respect for human rights and decent working conditions in the production of our products.

In this year's disclosure, we have conducted a risk analysis based on the largest suppliers and business partners we did business with during the period July 1, 2022 to December 31, 2022. We have also explored how our suppliers and business partners identify and mitigate risks in their own supply chains to that extend that it was possible.

No human rights violations or bad working conditions were revealed through the supplier and business partners survey and due diligence.

As the largest suppliers and business partners all are based in the Nordics, we asses that the risk for adverse impacts in terms of child labor most likely to be low.

We are aware of the risks that are inherent in our area of operations such as non-equality and discrimination, but no violations were detected.

Additionally, we are aware of risks of human rights breaches connected to the supply chains of IT-products, with regarding raw material, components, and assembly.

In the reporting period, no actual negative consequences were revealed.

## Patientsky SaaS Norway AS operations

Our risk assessment has revealed that the most critical potential consequences could be:

- stress,
- bullying,
- sexual harassment,
- fire,
- the indoor environment such as air quality, light, temperature, and noise,
- strain ailments such as back, shoulder, and neck pains,

- eye fatigue and headache due to screen work.

Information regarding measures that has been implemented or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts, and the results or expected results of these measures

## PatientSky SaaS Norway AS operations

We work systematically in cooperation with employees to prevent injuries from occurring, through our HSE routines. These are described in more detail in our HSE handbook.

All deviations are followed up.

## Suppliers and business partners

We aim by performing due diligence of our suppliers and business partners to influence our suppliers and business partners to provide their workers and workers in their supply chain decent employment conditions according to the expectations set in the Transparency Act.

If violations of human rights and or other fundamental standards at a supplier, business partners or subcontractor are discovered, or significant risk of such violations, we follow up through dialogue with the relevant supplier, business partner and/or relevant stakeholders.

## Whistleblower scheme

PatientSky SaaS Norway AS has effective routines for ensuring compliance and knowledge of human rights and sustainability among our employees. Our parent company has a whistleblower scheme that can be used to report negative consequences in accordance with the Transparency law.

## Next step

PatientSky SaaS Norway AS will continue its work in 2023 by working actively with the Transparency Act. We will continuously review our suppliers and business partners with focus on fundamental human rights and decent working conditions and perform risk assessments.

We will continue to evaluate how our suppliers and business partners are working with identifying and mitigating risks in their own supply chains.

We will also implement the policies of our new parent company which for instance includes Code of Conduct – workers and Code of Conduct - business partners.

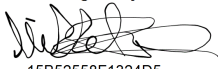
Afterwards the implementation of the Code of Conduct – business partners, we will have the opportunity subject to prior notice to conduct an audit to verify that the suppliers and business partners comply with our Code of Conduct – business partners.

By implementing the Code of Conduct - business partners we can influence suppliers and business partners to provide their workers decent employment conditions according to the expectations set in our Code of Conduct - business partners.


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(Signature page for the Norwegian Transparency Act Statement by PatientSky SaaS Norway AS)

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Mikkel Bardram  
Chairperson of the Board

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Åshild Osland  
Director

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Henrik Hansen  
Director

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Michelle Hjortland  
Director

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Michael Moyell Juul  
Director

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Kjell-Magne Solli  
Chief Executive Officer

# NORWEGIAN TRANSPARENCY ACT STATEMENT

Ørn Software AS - Business registration number 979 443 471

July 1, 2022, to December 31, 2022

Published June 2023 – English version.

## Background

As Ørn Software AS is a larger enterprise, resident in Norway the Transparency Act (Lov om virksomheters åpenhet og arbeid med grunnleggende menneskerettigheter og anstendige arbeidsforhold) is applicable to Ørn Software AS.

Ørn Software AS complies with the act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (Transparency Act), which shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

This document has been prepared to fulfill Ørn Software AS's obligation to report the due diligence assessments for the period July 1, 2022, to December 31, 2022. The period corresponds to Ørn Software AS's last financial year since the entry into force of the Transparency Act

The document will be updated and published annually by June 30. It will also be updated in the event of significant changes in the Ørn Software AS's risk assessments in accordance with the Transparency Act.

## A general description of the company structure

Ørn Software AS is fully owned by EG Norge AS.

CEO: Sten-Roger Karlsen

Chairperson of the board: Mikkel Bardram

Ørn Software AS has as of December 31, 2022, 50 employees.

## Area of operations

Ørn Software AS's business area is related to providing a digital platform that simplifies day-to-day operations for demanding businesses in the Nordics and Iceland. The Software as a Service-solutions ensure efficient operations and maintenance throughout a wide variety of industries. The company's headquarter is located in Oslo with local offices in Trondheim, Moss and Bergen.

## Guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions

Ørn Software AS wants to be an honest, trusted, and accountable software company, aiming to make a positive contribution to the general development of modern society. Our focus is on sustainable solutions for the market in which employees and the world around us can identify positively with. All our products and operations shall comply with international human rights standards and standards for decent working conditions.

Ørn Software AS implemented a Sustainability Policy in March 2021. The development of the Sustainability Policy was a part of the process of systematizing the work that is done on sustainability at Ørn Software AS.

As Ørn Software AS was acquired by EG, Ørn Software AS is in the moment working on implementing the policies of the parent company's policies. The policies include for instance Code of Conduct – workers and Code of Conduct – business partners.

As part of the EG Group we commit ourselves to the UN Global Compact and our business complies with the UN Guiding Principles on Responsible Business and Human Rights and the OECD Guidelines for Responsible Business Conduct. Our overall approach to fulfilling our commitment to respecting fundamental human rights and decent working conditions is guided by our parents' company's policies that we are working on having implemented, which includes both our own operations and our supply chain.

We follow national legislation for health, safety, work environment and diversity. We expect the same of our suppliers and business partners as we expect from our selves. All employees and others affected by our business are treated with respect and dignity. We expect our suppliers and business partners to act with seriousness and care to avoid injuries and negative consequences for people.

## ESG in Ørn Software AS

The Board of Directors of Ørn Software AS provided in 2022 oversight for sustainability and ESG in Ørn Software AS.

## Information regarding actual adverse impacts and significant risks of adverse impacts that has been identified through the due diligence

In line with the Transparency Act, we conduct a due diligence regarding our own operations and supply chain and report annually publicly on our due diligence assessments and we respond to requests on how we work to ensure respect for human rights and decent working conditions in the production of our products.

In this year's disclosure, we have conducted a risk analysis based on the largest suppliers and business partners we did business with during the period July 1, 2022 to December 31, 2022. We have also explored how our suppliers and business partners identify and mitigate risks in their own supply chains to that extend that it was possible.

We are aware of risks of human rights breaches connected to the supply chains of IT-products, regarding raw material, components and assembly. No human rights violations or bad working conditions were revealed through the supplier and business partners survey and due diligence.

As the largest suppliers and business partners all are based in Europe except one, we asses that the risk for adverse impacts in terms of child labor most likely to be low. We are aware of the risks that are inherent in our area of operations such as non-equality and discrimination, but no violations were detected.

In the reporting period, no actual negative consequences were revealed.

We did an in-depth assessment of the supplier that has employees based in Norway but also outside of Europe and USA. To identify and assess specific actual and potential adverse responsible business conduct impacts, our approach was that we wanted to uncover potential risk of the supplier and we wanted to clarify if the risk was real and if necessary, we would work to reduce or remove possible damage.

The conclusion on the due diligence was that no actual consequences was revealed.

## Ørn Software AS operations

Our HSE risk assessment has revealed that the most critical potential consequences could be stress.

Information regarding measures that has been implemented or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts, and the results or expected results of these measures

## Ørn Software AS operations

We work systematically in cooperation with employees to prevent injuries from occurring, through our HSE routines. These are described in more detail in our HSE handbook. All deviations are followed up.

## Suppliers and business partners

We aim by performing due diligence of our suppliers and business partners to influence our suppliers and business partners to provide their workers and workers in their supply chain decent employment conditions according to the expectations set in the Transparency Act.

If violations of human rights and or other fundamental standards at a supplier, business partners or subcontractor are discovered, or significant risk of such violations, we follow up through dialogue with the relevant supplier, business partner and relevant stakeholders.

## Whistleblower scheme

Ørn Software AS has effective routines for ensuring compliance and knowledge of human rights and sustainability among our employees. Our parent company EG Norge AS's whistleblower scheme can be used to report negative consequences in accordance with the Transparency law. At the same time, we are implementing training materials and awareness training in the organization.

## Next step

Ørn Software AS will continue its work in 2023 by working actively with the Transparency Act. We will continuously review our suppliers and business partners with focus on fundamental human rights and decent working conditions and we will perform risk assessments. We will also continue to evaluate how our suppliers and business partners are working with identifying and mitigating risks in their own supply chains.

We will also implement the policies of our new parent company which for instance includes Code of Conduct – workers and Code of Conduct - business partners. Afterwards the implementation of the Code of Conduct – business partners, we have opportunity subject to prior notice to conduct an audit to verify that the supplier complies with our Code of Conduct – business partners.

By implementing the Code of Conduct - business partners we can influence suppliers and business partners to provide their workers decent employment conditions according to the expectations set in our Code of Conduct - business partners.

(Signature page for the Norwegian Transparency Act Statement by Ørn Software AS)

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Johnny Fabricius Iversen

Chairperson of the Board

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*Sten-Roger Karlson*

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Chief Executive Officer