

## **Report under the Transparency Act**

### **CompuGroup Medical Norway AS and Profdoc AS**

#### **1. Introduction**

This report on human rights due diligence is made by CompuGroup Medical Norway AS and Profdoc AS in accordance with Section 5 of the Norwegian Transparency Act (Nw: "Åpenhetsloven").

#### **2. Structure and operations**

CompuGroup Medical Norway AS is a wholly owned subsidiary of Profdoc AS, the former being the operating company and the latter a holding company (both collectively referred to as "CGM Norway" or "the company" hereinafter).

CGM Norway manufactures, markets and sells software and information technology services for the healthcare sector. CGM's software products and related services are designed to support medical and organizational activities in doctor's offices, medical laboratories, pharmacies, hospitals and other provider organizations. We have a limited number of suppliers. The company's office is located at Lysaker in Bærum. In 2022, the company employed a total of 63 employees, consisting of 23 women and 40 men.

CGM Norway is part of the international CompuGroup Medical SE & Co. KGaA group ("CGM Group"), headquartered in Germany, with offices in 20 countries worldwide.

#### **3. Guidelines in relation to human rights**

CGM Norway, as well as the international CGM Group, are committed to social corporate responsibility, including promoting and respecting human rights and decent working conditions in our operations. We expect and require the same of our suppliers and business partners, and we conduct due diligence in this respect.

CGM's Code of Ethics forms the basis of our responsible business conduct. Requirements on human rights, HSE, equality and anti-discrimination, form an explicit part of the Code of Ethics, which applies to all employees, as well as to all business partners, and any third parties acting on our behalf. The Code of Ethics, which was recently revised, can be found on CGM's website. There you can also find CGM Group's separate non-financial group report for 2022, which provide more information on the ESG commitments and measures within CGM internationally.

The work on human rights and due diligence, takes place in interaction between CGM internationally and locally in Norway. As an international group, the CGM Group is covered by similar statutory requirements on human rights due diligence in other countries, such as Germany, and has to some extent coordinated routines, for example through our intra-group legal affairs and compliance unit. We are also in the process of establishing a central purchasing department within the group.

In Norway, the Board has the overarching responsibility for CGM Norway's compliance with the Transparency Act, whilst the day-to-day follow-up and responsibility is managed by the CEO together with relevant internal resources, such as within HR and purchasing.

We have a whistleblower system in place that provides employees, business partners, customers and other third parties with the opportunity to report suspicious incidents relating to unethical, illegal, fraudulent or undesirable conduct in activities, including in relation to suspected or actual violations of human rights or decent working conditions.

#### **4. Assessment and situation among own employees**

The working conditions, safety and health of our employees are extremely important to us, and CGM Norway has routines and measures in terms of working environment and HSE, and comply with Norwegian and other applicable legal requirements in this regard. The working environment within the company is generally considered to be good, and there have be no injuries or accidents in 2022.

We are committed to diversity, inclusion, and equal opportunity, and we stand for a working environment characterized by respect and tolerance. The average salary for women in the company is equal to the

average salary for men. Further, we are firmly opposed to any form of harassment or discrimination, and we work actively to prevent discrimination due to e.g. gender, sexual orientation, disability, ethnicity, national origin, colour, religion or belief, e.g. in relation to recruitment, payroll, working conditions, promotion and development opportunities.

**5. Assessment and situation in supply chain**

We require our business partners, service providers and suppliers to commit to the standards applicable at CGM, as set out in our Code of Ethics, and we expect them to have established or to establish processes that ensure compliance with the standards in practice. We achieve this through e.g. diligently reviewing agreements entered into prior to the signing of contracts and through careful selection of suppliers and business partners. CGM Group is currently in the process of further strengthening its supply chain due diligence routines. The work, which began in 2022, will carry on through the course of 2023, with the establishment of a global group-wide purchasing department being one measure.

In addition to the requirements and assessments made prior to a supplier relationship, CGM Norway annually conducts a more general mapping and assessment of the risk of actual or potential adverse impacts on fundamental human rights and decent working conditions in the supply chain and among business partners. The annual assessment, which has been introduced as a step in implementing the Transparency Act, is based on an own guideline, which again is based on a broad set of sources and criteria, for example OECD standards. Central assessment factors include geographical risk, industry risk, the probability/seriousness of the risk, as well as our connection to the risk and leverage, and the size and significance of the agreement.

Being a software and service provider, the company has relatively few suppliers and business partners, and our supply chain is limited. Last year, CGM Norway had approximately 50 suppliers (retail and smaller ad hoc purchases, excluded). Roughly speaking, our supply chain supports software development on one hand, and our business processes on the other, such as in relation to sales, support, consulting services, marketing, accounting and other administrative functions, as well as office rent. Our property owner/manager is Storebrand, and among our other main suppliers are DIPS ASA, ITVerket AS, Nets Branch Norway, Link Mobility AS and DNV Inmatis AS.

In general, we have a good overview and dialogue with our suppliers, which almost solely consist of Norwegian companies, of which the clear majority are subject to the Transparency Act themselves and with own routines in terms of due diligence and human rights. According to our latest assessments, the risk of adverse impacts on human rights and working conditions is considered as low in our supply chain, and our assessments have not revealed any actual negative consequences or considerable risks that require concrete measures further to our general measures.

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This report is for the period 1 July 2022 to 30 May 2023. However, we emphasise that due diligence is a continuous effort, and that we have processes ongoing in this area.

Lysaker, 12.06.2023

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