

The Transparency Act - Risk assessment for EDRMedeso AS July 2024

Updated as of 01.07.2024

Disclaimer

The risk assessment is performed by EDRMedeso's own employees, none of whom has previous experience or education in the subject. The assessment is subjective and based on the knowledge available at the time.

Introduction

EDRMedeso AS is a Norwegian legal entity, fully owned by BluArc Holding AB, and we are obliged to report in accordance with the Norwegian Transparency Act. EDRMedeso AS is a reseller of software licenses and provides support and consultancy services. The office is located in Lysaker, Norway, with 36 employees.

The purpose of the Transparency Act is to promote companies' respect for basic human rights and decent working conditions as well as securing the general public's access to information. The act imposes on EDRMedeso an information obligation and a duty to carry out due care assessments. For that reason, EDRMedeso will complete a risk assessment every year, and publish the report on the website, [Privacy Policy | EDRMedeso](#).

We in EDRMedeso strongly believe that it is important for all businesses to respect human rights and take responsibility for decent working conditions at all levels of the business cycle.

Risk assessment

The risk assessment focuses only on suppliers and partners to EDRMedeso AS. The assessment is a subjective evaluation of our suppliers where the aim is to identify if some of our suppliers are in risk of breaching rules and codes of conduct, or not deemed to follow the high standard EDRMedeso set related to **Human rights, Employment obligations, Environment and climate and Anti-corruptions policies**. If suppliers and partners to EDRMedeso is considered not to comply with EDRMedeso standards, we aim to avoid starting, or terminate the business relationship.

EDRMedeso AS has more than [REDACTED] suppliers. They supply anything from office internet and electricity to licenses used for resale. A substantial part of the vendors supply IT licenses and related support/consultancy connected to IT, and some are used for the entire EDRMedeso Group. Most of the suppliers in this category are large international corporations.

We issued surveys to all our suppliers in the winter/spring of 2023. In the survey they had to answer questions related to the focus areas of the Transparency Act. The results are recorded in our contract management software (from [REDACTED]).

We had a new assessment in the spring 2024, where we considered the need for a new survey. The conclusion was that there was no need for new survey due to the following reasons:

1. Most of the suppliers were the same as in 2023.
2. All new suppliers are deemed as professional large corporations (i.e. [REDACTED]) and we perceive the risk to be none or low.
3. We do not have any reason to believe that the answers in the survey would be different or would uncover risk or breach compared to the survey in 2023.

EDRMedeso AS plan to complete a new and thorough assessment again in the spring of 2025.

EDRMedesio AS categorized all suppliers in 3 groups related to perceived risk:

- Zero – is the category for suppliers that are perceived to be zero to very low risk.
- Low – is the category for suppliers that are perceived to be low to some risk.
- Risk – is the category for suppliers that are perceived to be at risk.

The main factors we look at when putting companies in a risk category is the following:

- Size and notoriety. We believe that larger corporations usually have more focus on the risk factors and are aware of their impact and focused on their reputation.
- What service/goods are delivered. Compared to companies supplying licenses and services, we believe it is more likely that a company producing physical goods has more risk related to employment/HMS and Environment and climate impact. The risk for Human rights can also be higher. When assessing this, we also look at country of origin and where production facilities are located.
- The labor intensity and the education level of the employees. We presume that labor intensive suppliers with a high degree of blue-collar employees is in higher risk for breaching Human rights and employment obligations.
- Transparency/familiarity. The risk lowers the more transparent the supplier is perceived, or the higher knowledge we have about the company/employees.

Results – as of 09.05.2023

Most suppliers fall under the zero risk category. We have identified 6 companies we believe to be in the Low or Risk category. They are listed below. For all companies in this category we will go through their answers in the Transparency Act survey, and check that their answers are satisfactory. If they have not replied, we will physically call them and ask them to answer the survey. For all suppliers we have sent out 2 standardized reminders if they have not answered, and then also a personal email from [REDACTED] directly to their representative, asking them to reply to the survey.

Low:

- [REDACTED] Delivering service and refill of coffee and water tower. In a total consideration of the factors above, this supplier is perceived as Low risk. They had not answered the survey. We called them and they were able to answer reasonably to our questions. We will follow them up again next time we do a thorough survey (2025).
- [REDACTED] delivering coffee machines/service and refill of coffee. In a total consideration of the factors above, this supplier is perceived as Low risk. They had not answered the survey.
- [REDACTED] managing our payroll. In a total consideration of the factors above, this supplier is perceived as Low risk. In addition, they had answered the study, but had answered inadequately on the question if they take precautions where there is a risk of serious damage to health and environment. We called them and they were able to answer reasonably to our questions, and correct the misunderstanding they had in our survey.
- [REDACTED] Delivering IT equipment. In a total consideration of the factors above, this supplier is perceived as Low risk. They answered adequately to the survey.

Risk:

- [REDACTED] They are the owner of our leased office furniture. They are perceived as Risk because of small size, services/goods delivered, education level of their employees, low transparency. They had not answered the survey. We called them instead

and they gave satisfactory answers (update as of spring 2024: this vendor will be removed from our supplier list in autumn 2024 as the contract expires.)

- [REDACTED] They deliver the cantina service and handle the office cleaning. They are perceived as Risk mainly because of the nature of their services. They answered adequately to the survey. (Update spring 2024: after using this supplier for several years now, we have not experienced any misconduct or have been given any reason to suspect breach to any of our standards within Human rights, Employment obligations, Environment and climate and Anti-corruptions policies.)

Conclusion

Based on our knowledge of today, we are not aware of significant risks or violations of human rights in our own operations or with our suppliers and business partners. We recognize our responsibility and will carry out ongoing risk assessments for negative consequences linked to the company's activities and suppliers.

Thomas Heiberg Løvik,

Director Procurement, IT and Legal EDRMedeso.

July 2024, Lysaker.

Signed by the board of directors in EDRMedeso AS:

John Nyheim

Marcus Oledal

Sabinah Svensson







Signaturcertifikat

Dokumentnamn:
EDRMedeso The Transparency Act- Risk Assesement July 2024

Unikt dokument-id:
dccddb80-e4a7-4888-9fad-dcf2205c0d04

Dokumentets fingeravtryck:
**16f7e4662fe4588dd52fcb8a61cc2f21099e3bebb600b31ffc0acb3168259dea8d9e855f0eedcf7d6a3
b847b215cae146d9278c460e7ac467ad09dae4f0cd19f**

Undertecknare

 <p>Sabinah Svensson CFO E-post: sabinah.svensson@edrmedeso.com Enhet: Edge 133.0.0.0 on Unknown Windows 10.0 (desktop) IP nummer: 62.63.193.102</p>	<p>Signerad med BankID: Sabinah Sofia Joseette Svensson (198308046906)</p> <p>Betrodd tidsstämpel: 2025-02-28 15:36:39 UTC</p> 
 <p>John Nyheim E-post: john.nyheim0506@gmail.com Enhet: Safari 18.3 on iPhone iOS 18.3.1 (smartphone) IP nummer: 104.28.105.25</p>	<p>Verifierad med BankID: John Nyheim (1952-06-05)</p> <p>Betrodd tidsstämpel: 2025-03-01 11:00:40 UTC</p> 
 <p>Marcus Oledal E-post: marcus.oledal@edrmedeso.com Enhet: Chrome 133.0.0.0 on Unknown Windows 10.0 (desktop) IP nummer: 83.191.174.5</p>	<p>Signerad med BankID: Marcus Eric Magnus Gudfast Oledal (196503098219)</p> <p>Betrodd tidsstämpel: 2025-03-03 06:31:02 UTC</p> 

Detta dokument slutfördes av alla parter:
2025-03-03 06:31:02 UTC



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Aktivitetslogg

Betrodd tidsstämpel

2025-03-03 06:31:02 UTC

Aktivitet med insamlade uppgifter

Dokumentet signerades av Marcus Oledal (marcus.oledal@edrmedeso.com)
Enhet: Chrome 133.0.0.0 on Unknown Windows 10.0 (dator)
IP nummer: 83.191.174.5 - IP Plats: Gothenburg, Sweden

2025 03 03 06:31:01 UTC

Dokumentet verifierades genom BankID av Marcus Oledal (marcus.oledal@edrmedeso.com)
Enhet: Chrome 133.0.0.0 on Unknown Windows 10.0 (dator)
IP nummer: 83.191.174.5 - IP Plats: Gothenburg, Sweden

2025-03-03 06:30:32 UTC

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2025 03 03 06:28:45 UTC

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IP nummer: 83.191.174.5 - IP Plats: Gothenburg, Sweden

2025-03-01 11:00:40 UTC

Dokumentet signerades av John Nyheim (john.nyheim0506@gmail.com)
Enhet: Safari 18.3 on iPhone iOS 18.3.1 (smartmobil)
IP nummer: 104.28.105.25 - IP Plats: Oslo, Norway

2025 03 01 11:00:35 UTC

Dokumentet verifierades genom BankID (eid:bankid-no) av John Nyheim (john.nyheim0506@gmail.com)
Enhet: Safari 18.3 on iPhone iOS 18.3.1 (smartmobil)
IP nummer: 104.28.105.25 - IP Plats: Oslo, Norway

2025-03-01 10:59:39 UTC

Dokumentet lästes igenom av John Nyheim (john.nyheim0506@gmail.com)
Enhet: Safari 18.3 on iPhone iOS 18.3.1 (smartmobil)
IP nummer: 104.28.105.25 - IP Plats: Oslo, Norway

2025-03-01 10:53:51 UTC

Dokumentet öppnades av John Nyheim (john.nyheim0506@gmail.com)
Enhet: Safari 18.3 on iPhone iOS 18.3.1 (smartmobil)
IP nummer: 104.28.105.25 - IP Plats: Oslo, Norway

2025-02-28 15:36:39 UTC

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2025-02-28 15:36:38 UTC

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2025-02-28 15:35:37 UTC

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2025-02-28 15:32:48 UTC Dokumentet skickades till Sabinah Svensson (sabinah.svensson@edrmedeso.com)
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2025 02 28 15:32:47 UTC Dokumentet skickades till Marcus Oledal (marcus.oledal@edrmedeso.com)
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2025 02 28 15:32:45 UTC Dokumentet förseglades av Sabinah Svensson (sabinah.svensson@edrmedeso.com)
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