

EDRMedeso AS – Risk assessment and Analysis (2025)

1. Introduction and Purpose

Company Background

EDRMedeso AS is a Norwegian entity, fully owned by BluArc Holding AB, and is obligated to report according to the Norwegian Transparency Act. EDRMedeso operates from Lysaker, Norway, employs 36 individuals, and offers software license reselling, support, and consultancy services.

Purpose of the 2025 Due Diligence Analysis

1. Comply with the Norwegian Transparency Act requirements to assess, prevent, and mitigate potential adverse impacts on human rights and decent working conditions.
2. Provide an updated and transparent overview of the risk landscape in EDRMedeso's operations and supply chain, building on the findings from the 2024 assessment.
3. Inform stakeholders, the general public, and relevant authorities of EDRMedeso's commitment to continuous improvement in responsible business practices.

2. Methodology

2.1 Annual Risk Assessment Cycle

In line with commitments made in the 2024 assessment, this document focuses on updating and refining EDRMedeso's due diligence processes. EDRMedeso completes these due diligence reviews annually and makes the results publicly available on its website (Privacy Policy | EDRMedeso).

2.2 Data Collection and Surveys

- **Existing Suppliers:** As of spring 2025, EDRMedeso revisited risk categorization for all suppliers identified in the 2024 review. This includes validating 2023 and 2024 survey responses stored in the company's contract management software (House of Control) and examining any major changes or red flags. Additionally, a new survey to all EDRMedeso AS's suppliers was conducted in the spring of 2025.
- **New Suppliers:** Newly added vendors in 2024 and early 2025 were assessed for risk upon onboarding. If they are large professional corporations (e.g., reputable financial institutions), they are generally categorized as zero or low risk.

2.3 Criteria for Risk Assessment

EDRMedeso continues to use the following factors:

1. **Size and Reputation:** Larger, established companies are often more transparent and typically comply with human rights and labor standards.
2. **Nature of Goods/Services Provided:** Physical goods production or labor-intensive services is perceived to potentially pose higher risk than purely digital or office-based services.
3. **Labor Intensity and Employee Qualifications:** Higher risk may be present in vendors that utilize extensive manual labor or lower-skilled workers.

4. **Transparency and Familiarity:** Information availability, willingness to answer surveys, and open communication all reduce overall risk.

3. Risk Categorization

EDRMedeso maintains three risk categories for suppliers:

1. **Zero** – Suppliers deemed to pose very low or no observable risk.
2. **Low** – Suppliers with some risk factors but not considered high-risk.
3. **Risk** – Suppliers or partners identified as having notable or potential risk factors.

This categorization is subjective (as underscored by the disclaimer below) and relies on the most recent information gathered in surveys and ongoing interactions.

4. 2025 Findings and Updates

4.1 Zero Risk

- **Large IT License Providers and Financial Services**

Many of the original 30+ suppliers remain in the Zero risk category, including larger international corporations offering cloud-based software licenses or established financial institutions such as [REDACTED] and [REDACTED]. Their transparency and internal compliance standards are considered robust.

During spring 2025 we issued an updated survey to our suppliers. The survey was developed by House of Control. The survey was conducted with 37 suppliers, but despite several reminders, only 8 replied. However, there have been only small changes to the supplier base since the past assessment, so the current assessment also relies on past findings/observations.

Our main suppliers for the software we resell, like [REDACTED], has also been deemed Zero risk. These are large international corporations, and they follow strict international standards. The suppliers only produce digital products or services, and low amount of manual labor. EDR Medeso has an active and open dialogue with all of them.

4.2 Low Risk

- **Low-Risk Suppliers**

The following suppliers has been deemed Low Risk, following our criteria for risk assessment.

1. [REDACTED] – Suppliers of coffee services, originally categorized as Low risk in 2023. Their improved communication and compliance with the 2024 guidelines keep them in the Low category.
2. [REDACTED] – Handles payroll. After clarifying a misunderstood question in the 2023 survey, they remain transparent and sufficiently compliant.
3. [REDACTED] – Provides IT equipment and responded adequately to previous surveys.

Follow-up Actions

- EDRMedeso confirms satisfactory answers and reserves the right to conduct telephone interviews if new information arises or surveys remain incomplete.

- The company plans a standard follow-up again in 2026 if the supplier's activities expand or a risk event is signaled.

4.3 Risk

• Risk Suppliers

Only one supplier was deemed as a Risk Supplier before the survey was conducted. The answers from the 2025 survey did not lead to any other suppliers being added.

1. [REDACTED] – Provides cafeteria services and cleaning at EDRMedeso's offices. While currently still deemed at higher risk due to labor-intensive operations, the company's prolonged track record of respectful practices has so far mitigated concerns. The answers to the survey in 2025 were satisfactory, and [REDACTED] can document compliance on all our measures.

Follow-up Actions

- EDRMedeso AS will continuously monitor all suppliers and conduct In-depth review if any reported breach or red flag arises.
- Potential contract termination if a supplier is found to violate EDRMedeso's standards on human rights, employment obligations, environmental stewardship, or anti-corruption.

5. Risk Mitigation Strategies and Responsible Business Conduct

1. **Annual Review:** EDRMedeso reaffirms the commitment to conduct a comprehensive supplier review each spring, with 2025 acting as a new baseline for forthcoming changes.
2. **Enhanced Onboarding:** New suppliers are assessed before contract signing, especially those providing physical goods or significant labor.
3. **Contractual Clauses:** EDRMedeso's standard terms include clauses obliging suppliers to adhere to local labor laws, uphold human rights, avoid corruption, and report potential breaches.
4. **Staff Training:** EDRMedeso continues to raise awareness internally about the requirements of the Norwegian Transparency Act, ensuring that employees understand their role in identifying and escalating potential human rights or labor issues.
5. **Public Reporting:** This 2025 due diligence report will appear on EDRMedeso's website to maintain transparency.

6. Conclusion (2025)

Based on current knowledge and thorough follow-up on suppliers, EDRMedeso has not identified any major violations of human rights, labor law, environmental standards, or anti-corruption policies among its suppliers. The 2025 analysis reaffirms that most suppliers remain at zero or low risk levels and that any vendors in the Risk category are closely monitored or phased out.

7. Disclaimer

This analysis is performed by EDRMedeso's own employees, who do not possess formal qualifications or extensive experience in human rights or responsible business audits. The findings and recommendations herein are subjective and reflect information available at the time of review.

Approval

This 2025 due diligence analysis has been compiled by EDRMedeso AS and approved by the Board of Directors. EDRMedeso will continue to update its assessments on an annual basis to ensure compliance with the Norwegian Transparency Act.

- Assessment year 2025
- Location: Lysaker, Norway

Thomas Heiberg Løvik

Director Procurement, IT and Legal, EDRMedeso

Board of Directors, EDRMedeso AS

Signaturcertifikat

Dokumentnamn:

Transparency Act, risk assessment 2025

Unikt dokument-id:

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Dokumentets fingeravtryck:

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Undertecknare



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John Nyheim

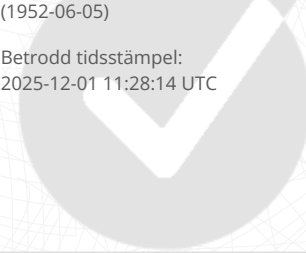
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Aktivitetslogg

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