

Supplier Code of Conduct

Compliance

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1 Introduction

1.1 About Omada

Omada is a market leading provider of IT security solutions for identity management and access governance.

Omada delivers services within identity and access governance, risk management, compliance, role-based access management, and process governance.

Established in 2000, Omada has operations in Europe and North America, delivering its solutions via a network of skilled partners and system integrators.

Our success is firmly based on our core values, which are:



Teamwork

We work collaboratively in teams with colleagues, partners, and customers because great teamwork creates extraordinary results. We always put the team first!



Ambition

We are ambitious in everything we do, and our innovative solutions exemplify this. We challenge status quo and believe that better never stops!



Constant Care

We are proactive and anticipate our customers' needs. We have a caring culture, not just for our customers, our products and each other, but for everything that matters.



Create Value

We are committed to continuously creating value to support our customers' business. Everything we do should be measured by the value it creates.

1.2 Applicability

All Omada's suppliers and sub-contractors must comply with this Supplier Code of Conduct. Supplier and sub-contractors applying this Code of Conduct are expected to comply with all relevant laws, regulations and standards in all of the countries in which they operate. This code is applied for the purpose of promoting safe and fair working conditions and the responsible management of environmental and social issues. Omada expects all its suppliers and sub-contractors to apply to the ten international principles as laid out in the United Nations Global Compact.

1.3 Contact

For more information you are welcome to contact Omada at legal@omada.net with any questions or comments.

2 Code of Ethical Purchasing

2.1 Discrimination

Discrimination, including discrimination based on race, color, sex, sexual orientation, religion, political opinion, nationality, social origin, social status, indigenous status, disability, age and union membership is strictly forbidden.

2.2 Forced Labor

Forced, bonded or compulsory labor is not used, and employees are free to leave their employment after reasonable notice. Employees are not required to lodge deposits of money or identity papers with their employer.

2.3 Child Labor

No person is employed who is below the minimum legal age for employment. Minimum age is the age of completion of compulsory schooling, or not less than 15 years.

Children (persons under 18 years as defined in Article 1 of the United Nations Convention on the Rights of the Child) are not employed for any hazardous work, or work that is inconsistent with the Child's personal development. Personal development includes a Child's health or physical, mental,

spiritual, moral or social development as described in the Article 32 of the United Nations Convention on the Rights of the Child.

Where a Child is employed, the best interests of the Child shall be the primary consideration. All measures taken in this regard, should aim at the improvement of the Child's wellbeing.

2.4 Freedom of Association

All employees are free to join or not to join trade unions or similar external representative organizations.

2.5 Disciplinary Practices

Employees are treated with respect and dignity. Physical or verbal abuse or other harassment and any threats or other forms of intimidation are prohibited.

2.6 Working Hours

Working hours of employees comply with national laws and are not excessive. Consideration should be given to the type of work performed and the acceptable working hours for the role and the country concerned.

2.7 Payment

Employees understand their employment conditions and fair and reasonable pay and terms are provided. Consideration should be given to the type of work performed and the market wage for the work as well as any statutory minimum wage for the country concerned.

2.8 Individual Conduct

No form of bribery, including improper offers for payments to or from employees, or organizations, is tolerated.

2.9 Health and Safety

A healthy and safe working environment is provided for employees, in accordance with international standards and national laws. This includes access to clean toilet facilities, drinkable water and, if applicable, sanitary facilities for food storage.

Where an employer provides accommodation, it shall be clean, safe and meet the basic needs of employees.

Appropriate health and safety information and training is provided to employees.

2.10 Environment

Processes are in place to actively improve the efficiency with which finite resources (such as energy, water, raw materials) are used.

Appropriate management, operational and technical controls are in place to minimize the release of harmful emissions to the environment.

Appropriate measures are in place to improve the environmental performance of products and services when in use by the end user.

Innovative developments in products and services that offer environmental and social benefits are supported.

2.11 Sanction Compliance

With reference to 1.2 (Applicability) and to comply with all relevant laws, regulations, and standards in all of the countries in which the Suppliers and Sub-Contractors operate, such compliance shall also include any and all Sanction Compliance (including export control) i.e. any and all sanction laws implemented by relevant individual countries (like the US and UK) or multi-state organizations like ex. the EU or the UN.

2.12 Anti Corruption due diligence procedure

Omada will ensure and expects Suppliers cooperation to ensure compliance with anti-corruption laws and maintain ethical business practices, of our suppliers.

Omada will perform a systematic process for conducting due diligence on business partners, including suppliers, agents, distributors, and joint venture partners, to mitigate the risk of corruption and bribery.

This procedure contains of a:

- Risk assessment for all Business Partners and third parties, determine the level of corruption risk associated with each business partner, considering factors such as the

country or region of operation, industry sector, reputation, and prior history of corruption allegations.

- Due Diligence Process, both before and during relationship, obtaining relevant information about the business partner, such as their ownership structure, financial stability, and reputation. Verifying compliance with anti-corruption laws and regulations. On-going periodic reviews on the same parameters for existing business partners.
- Information gathering on business partners on
 - Ownership and management structure, including details of beneficial owners and
 - key personnel.
 - Business licenses, certifications, and registrations.
 - Financial statements, including audited reports if available.
 - Prior history of corruption allegations or legal proceedings related to bribery or corruption.

2.13 Data Privacy

Suppliers and Sub-Contractors take the protection of their suppliers' and subcontractors' Personal Data seriously and will not collect or use Personal Data for another purpose than the one the supplier or subcontractor has given specific consent for.

Suppliers and Sub-Contractors retain their suppliers' and subcontractors' Personal Information only for as long as such information is needed and useful for the purpose for which it was initially collected.

2.14 Reporting of violation of this Supplier Code of Conduct / Whistleblower Policy

If a Suppliers or Sub-Contractors learns of an infraction of this Supplier Code of Conduct, whether this has to do with bribery, corruption, financial infractions, illegal activities, misuse or theft, sexual harassment, discrimination, or any other breach of regulations and/or national and international laws, this must be reported to either the CFO or the Legal team. Every report will be handled with the greatest care and confidentiality. If any of the above-mentioned things should come to your attention, please send an E-mail to: compliance@omadaidentity.com. This is governed by the Privacy notice for Omada whistleblowing scheme to persons reporting to the whistleblowing scheme and reported persons, to be found here: [Omada Privacy Policy | Protection and Processing of Data \(omadaidentity.com\)](#)

2.15 Amendment of the Supplier Code of Conduct

Omada has the right to alter and enhance this Supplier Code of Conduct by publishing an amended Supplier Code of Conduct on its webpage (www.omadaidentity.com). Please visit Omada's website regularly, if you want to make sure you are aware of Omada's most recent Supplier Code of Conduct.

3 References

Code of Ethical Purchasing is based on the following international standards:

- The [United Nations Universal Declaration of Human Rights](#).
- The [Conventions of the International Labor Organization](#).
- The [United Nations Convention on the Rights of the Child](#).

Reference has also been made to:

- Social Accountability International's SA 8000 Standard,
- the Ethical Trading Initiative (ETI) Base Code, and
- the UN Draft Norms of Responsibilities of Transnational Corporations and Other Business Enterprises with Regard to Human Rights (2003).

With respect to the International Labor Organization Conventions on Labor Standards, the following provisions have been referenced in the development of this Code:

- Convention 1 (Acceptable working hours)
- Conventions 29 (Forced and bonded Labor)
- Convention 87, 98, and 135 (Freedom of Association)
- Convention 111 (Discrimination)
- Convention 138 (Minimum Age)
- Convention 135 & Recommendation 143 (Workers' Representatives Convention)
- Convention 155 Article 19 (Health and safety training)