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# Introduction by the CEO

Cambio is a leading supplier in the Nordic region, with a comprehensive offer of IT solutions for health and medical care organisations and management systems for municipalities.

Our vision is to make a difference for society as a whole, by providing qualitative, open and integrated solutions that enable the healthcare and welfare of the future. Using the potential of digitalisation to change and improve healthcare and welfare, we are contributing to a more sustainable society. We are contributing through technology, digital solutions and tools that can strengthen data and cyber security at the same time as we take responsibility for reducing resource use and emissions.

Cambio's most important asset is our employees. Our unique competence and willingness to continuously improve gives us the power and the tools with which we are building the healthcare solutions of the future. This is also our most important issue for building a sustainable business; how we can contribute to a more sustainable society by providing skills and opportunities for safer and more efficient healthcare.

Our employees should enjoy their work and in order to grow, we want more people to apply to Cambio. Being an attractive employer is therefore one of my most important goals as CEO of Cambio. And this applies not only to my colleagues at Cambio but also to all the people who work in and near our value chain. To all of the people using our systems, To the patients and individuals whose data is managed by our systems. It also applies to how our hardware has been manufactured and the energy that we consume in our business activities

I am proud of the work we do together at Cambio to maintain and strengthen our position as a long-term sustainable company. 2021 was another year of restrictions due to the pandemic, which



has been challenging. Our focus has obviously been for our customers in healthcare and welfare to be able to perform their important duties as smoothly and safely as possible. Much of our business can be carried out remotely from home. This has made it possible to continue to live up to the expectations of our stakeholders.

In 2021 we identified the opportunities and risks for Cambio in relation to Sustainability. We can now report on these. Our ambition is also to quantify our current situation in 2022 and set goals for the most important areas of sustainability that we can influence.

Rami Avidan, CEO, Cambio

# Cambio's business activities

Cambio is a privately owned Swedish limited company, the sole owner of which is Sanolium AB, which in turn is owned by Sanolium Holding AB. In turn, Sanolium Holding AB is 100 percent owned by Sanolium Group Holding AB. Sanolium Group Holding AB is 80.5 percent owned by and part of the multinational investment company Invest-corp's portfolio company structure, and about 20 percent by the founders, employees and other key individuals in Sanolium AB.

Cambio is a market-leading e-health company that supplies services to over 170,000 users in general hospitals and university hospitals as well as specialist and outpatient units. Cambio was founded in 1993 and offers comprehensive IT solutions for healthcare and welfare. Over 800 employees deliver to customers in Sweden, Denmark, the United Kingdom and Iceland.

At Cambio, we want to make a difference for society in general by transforming and improving healthcare. We do this by providing qualitative, open and integrative solutions that enable ecosystems and new e-Health paradigms. By continuously taking account of future challenges, we enable our customers to provide tomorrow's healthcare and welfare today.

#### **OUR SERVICES**

Cambio improves quality and efficiency in healthcare through digitalisation. We support regions and municipalities as well as independent care providers with digital solutions, such as operational support, patient records systems and specialist systems.

Our offer is centred around the following areas and products:

#### • Primary and secondary care

Focussed on daily care and usually the patient's first point of contact with healthcare. Our products include Cambio COSMIC, which is an electronic healthcare information system that provides coordinated and patient-focused operational support across entire regions. MittVaccin is a digital vaccination card with vaccination history, the location of the nearest vaccinator and much more. In light

of the global pandemic, vaccination services have become ever more critical from a societal standpoint.

#### • Emergency medical care

Products that support the active, short-term treatment of a serious injury or acute medical condition. The Cambio Critical Information System (CIS) is a patient management solution that provides real-time, intelligent and contextual information about a patient's condition to all hospital A&E units.

#### Social services

Our products offer all forms of practical help for children, adults and the elderly in need of extra support. Cambio Viva is a management system used to coordinate the activities and processes of the social welfare and healthcare services.

#### Infrastructure

We offer digital tools that use information and communication technology to provide operational support. This includes platforms to ensure effective interaction within the ecosystem; applications for decision support; and digital tools for the efficient management of process flows.

#### **OUR CUSTOMERS AND PARTNERS**

Cambio's customers are mainly municipalities, regions and hospitals. Our customers are found in Sweden, Denmark, Iceland, the United Kingdom, the Faeroe Islands, Greenland and New Zealand. We have a number of strategic partners who, through their products or services, are important suppliers to our customers. We often collaborate by integrating our partners' products with our systems. This leads to an even more cohesive healthcare chain and a more flexible way of working for users and better healthcare and welfare for patients and individuals.

#### **OUR VALUES**

At Cambio we have three core values that guide our day-to-day work, our decision making and our interaction with each other and our customers.



#### Trust

At Cambio, we trust each other's competence. Our customers are to be confident in us as a longterm partner.

#### Care

At Cambio, we act on what is best for our employees, our customers and for society in general.

#### **Together**

At Cambio, we help and support each other. We work closely with our customers and partners to achieve our common goals.

Our fundamental values form the basis of how we want to run our business, and guide us when we make decisions. They permeate our thoughts and actions, creating a community in Cambio in which individuals from different cultures and countries, and with different backgrounds, treat each other with mutual respect and work together.

The company's ethical principles are summarised in our Code of Conduct, the Cambio Code of Ethics and Conduct, which applies to all our employees and everyone else who contributes to Cambio's products, services and other business activities. The code of conduct is compatible with international frameworks and standards, but also with local legislation applicable in the countries in which we operate.

#### IMPORTANT EVENTS DURING THE YEAR

In 2021, Cambio continued the extensive implementation project that began when the group was chosen for the major Sussa procurement in December 2018. This procurement process was conducted by nine regions that together procured new care information support. The focus has been both on new development to meet the

requirements of new customers and on the strategic further development of existing customers.

The efforts to prevent the spread of COVID-19 have highlighted the need for a national vaccination register. In 2021, the subsidiary MittVaccin Sverige AB (acquired in 2020) signed agreements with several of Sweden's regions.

The need to manage stocks of protective equipment in a timely and resource-efficient manner also became clear during the pandemic. Since the first quarter, the group has been part of a joint venture under the name Cambio Vårdlogistik. Through an app, organisations are able to see an overview of their stock status, etc. Cambio sees additional areas of use for this product in the future.

Cambio's vision of greater customer influence in the form of open standards resulted in an agreement with Karolinska University Hospital in the second half of the year on the implementation of a clinical data register.

As the pandemic improved, Cambio was able to see a normalisation of operations during the fourth quarter with increased customer integration.

In October, Rami Avidan took over as CEO. Rami Avidan has 20 years of experience in digitalisation, including from the Internet of Things (IoT) and the IT security industry. Rami has a background as both an entrepreneur and a leader in large companies and was most recently the CEO of Deutsche Telekom's IoT operations. Before that, he was the CEO of Tele2 IoT.

# Sustainable business

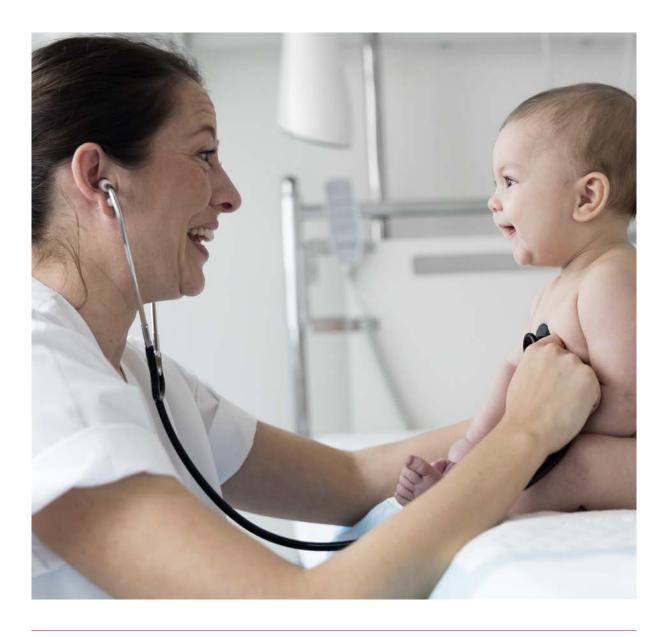
The key to our success is understanding what our stakeholders expect from us. Through close dialogue with our customers, our partners and through our ongoing internal dialogue, we can create insight into the needs, expectations and concerns of our stakeholders. We can identify any new risks earlier, as well as new business opportunities. Ongoing dialogue with our stakeholders helps us to continuously develop and improve the way in which we work.

#### **CAMBIO'S SUSTAINABILITY PROFILE**

We have identified four areas of sustainability for Cambio that in the long-term, for us to continue

as a sustainable business, are particularly important for us and our stakeholders. These areas are Business Ethics, Climate and the Environment, People Success and Economic Sustainability. We then divide these four areas into sub-areas.

All of these sub-areas have been produced based on the expectations of our stakeholders and the requirements of our business operations, as well as our potential to make a significant economic, social or environmental impact. Active responsibility and continuous improvement in these sub-areas is our definition of Sustainable Business.



A description of our sub-areas, and how we manage and work with them, is what constitutes Cambio's Sustainability Profile.

SUSTAINABLE BUSINESS, CAMBIO'S SUSTAINABILITY PROFILE				
Sustainability Work	<b>Business Ethics</b>	Climate and the Environment	People Success	Economic Sustainability
Sub-area	1. Human Rights 2. Collaboration between suppliers and partners, including anti-corruption 3. Responsibility and consideration across the value chain, traceability 4. Cyber security 5. Data Protection (GDPR)	1. Climate impact, CO2e 2. Responsible use of natural resources, including energy and water 3. Circular economy, regarding waste management and recycling, smart design and a holistic perspective, LCA etc.	1. Employee engagement and transparency, as well as inclusion, participation and information 2. Equality and diversity 3. Continuous learning and unique competence building 4. An attractive employer 5. A healthy work environment in balance	1. Long-term profitability
Governance, internal policies	Cambio code of Ethics and Conduct Cambio's environmental aspect matrix Cambio Supplier Code of Conduct Information Security Policy External Privacy Policy Cookie policy Supplier Evaluation SOP	Environmental policy LCA Cambio's environmental aspect matrix Work Environment Policy Quality Policy Purchasing policy/procedures Skype Travelling Policies Internal: Paper and Waste sorting instructions Supplier Evaluation SOP	Work environment policies including: Cambio code of Ethics and Conduct Cambio Whistleblowing Policy Parental Benefits Policy Wellness Benefit Policy Anti-harassment policy Mental Health Policy Personnel policy Strategic initiatives around Leadership and Talent Mgmt	Ownership directive Business plan Budget
Laws and regulations, certificates	TBC, ISO 9001, Global Compact; UN Human Rights Directive, UK Bribery Act, AML, GDPR	ISO 14001, ISO 9001	National laws and regulations, ILO	Annual Accounts Act, IFRS, UN Global com- pact, Nasdaq stock exchange agreement, MAR (Rules on Market Abuse)
The Global Goals	GOAL 3: Good Health and Well-Being GOAL 8: Decent Work and Economic Growth GOAL 10: Reduced inequalities GOAL 12: Responsible consumption and production, including sustainable public procurement GOAL 16: Peace, justice and strong institutions; significantly reduce all forms of corruption and bribery	GOAL 7: Affordable and clean energy GOAL 9: Build resilient infrastructure, promote inclusive and sustain- able industrialisation and foster innovation GOAL 12: Responsible Consumption and Production GOAL 13: Climate Action	GOAL 3: Good Health and Well-Being GOAL 4: Quality Edu- cation GOAL 5: Equal Oppor- tunity GOAL 8: Decent Work and Economic Growth	GOAL 8: Decent Work and Economic Growth
SDG specific sub-goals	Working environment, working conditions, equal rights, health insurance	Reduce climate impact through an increased proportion of renewa- ble energy. Responsible pro- curement and waste management	Knowledge development, contribution to technology development Enabling women to have the opportunity for self-sufficiency; to combine a career and family life	Sustainable economic growth and development A fairer distribution of resources north—south

A description of our sub-areas, and how we manage and work with them, is what constitutes Cambio's Sustainability Profile.

Sustainability Work	Business Ethics	Climate and the Environment	People Success	Economic Sustainability
Long-Term Goals	Zero tolerance for modern slavery and child labour Zero tolerance for giv- ing and taking bribes Non-discrimination Compliance with CoC at 100% of suppliers Work environment, hours and wages ac- cording to the ILO	Environmental goals, reduce CO2 footprint through less travel and a larger proportion of fossil-free energy sources  Proportion of green electricity in data centres and offices  Scope 1 and Scope 2 mapped 2022, Scope 3 measured in 2023  Proportion of hardware reuse	Goals for satisfied employees (KPIs are to be set in 2022). Proportion of women in senior positions (To be determined in 2022) Proportion of employed men/women 60% / 40%  Sick leave rate < 2%  Performance review undertaken quarterly  Employee surveys conducted quarterly	Financial goals Business goals
Monitoring compliance	Customer survey, Supplier evaluations Cyber security testing etc.	Supplier evaluations GHG calculations LCA	Employee survey (External) Leadership through performance reviews and questionnaires/pulse surveys. (Internal) Sick leave, reported incidents and accidents (Internal)	Monthly reporting, internal audit Quarterly reporting to the stock market External audit twice a year
Activities to achieve the goal	Training	Evaluation	Frequent, systematic performance reviews. Commitment index goal based on pulse surveys will be set in 2022. Additional KPIs will be determined and followed in 2022	Work on a joint business plan Business intelligence
Risks	Bribes in Public Procurement, Lack of transparency in the value chain, Data intru- sion, Supplier risks Leadership Team	Landfill, extraction of raw materials, manufacture of elec- tronic equipment in a non-environmentally friendly way	Poor leadership makes it difficult for us to retain and attract talent.	Declining cash flow during growth, reduced production and security of supply, incorrectly costed projects
Responsible for monitoring com- pliance	Chief Security Officer / Peter Kippmark Chief Commercial Of- ficer / Ylva Hennig	Head of Quality Management / Per Sletmo	Head of People Success / Camilla Norander	CFO / Niklas Berglund

CAMBIO'S CONTRIBUTION TO THE UN GLOBAL GOALS				
UN Global Goals	Development	Cambio's contribution/impact		
3 GODHÁLSA OCH  VALBEFINNANDE	GOAL 3: Good Health and Well-Being	Cambio has an active work environment management programme that promotes a good work-life balance and systems for preventing and treating mental health problems.  We also work according to a strict anti-alcohol and drug policy.		
		All employees have health insurance.		
4 GOD UTBILDNING FOR ALLA	GOAL 4: Quality education	Cambio's operation in Sri Lanka employs people directly. This contributes to an increased demand for higher technical/ICT skills, which has positive effects outside Cambio in the local community, and on local education. In addition, Cambio supports local ICT education at both the university and lower-secondary school levels in Sri Lanka.		
		Cambio sponsors Computer Science Universities in Sri Lanka with computers and offers Internships/Fresh Graduates Programmes to computer science students in Sri Lanka.		
5 JÄMSTÄLLDHET	GOAL 5: Equal Opportunity	The creation, statement and compliance with our governing documents: Anti-Discrimination Policy, Equal Opportunity Policy and the Code of Ethics and Conduct contribute to increased equality.		
•		Cambio strives to enable parenthood for both parents, regardless of gender, to create working hours that can be combined with family life, encourages parental leave, and so on.  Cambio urges and encourages women to apply and train for senior positions.		
7 HALLBARENERGI FÖR ALLA	GOAL 7: Affordable and clean energy	Cambio strives to increase the proportion of renewable energy in its energy supply for all of its offices and with its subcontractors.  Cambio strives to reduce the amount of energy used per employee and floor area.		
- A.		cumbio strives to reduce the amount of energy used per employee and noor area.		
8 ANSTĀNDIGA ARBETSVILIKOR OCH EKONOMISK TILIVĀKT	GOAL 8: Decent Work and Economic	Cambio respects the UN Declaration of Human Rights in all aspects of its activities, as well as in those of our partners. We ensure this by having a clear Supplier Code of Conduct, carrying out Supplier Evaluation and undertaking internal training.		
	Growth	Cambio carries on its work in accordance with the ILO, international rules and requirements on a satisfactory work environment and decent working conditions. In cases where local laws and rules are stricter than international ones (ILO), we follow the strictest, in favour of the employee.		
9 HALLBAR POLISTIR. INVOIGNEEDEN INPASSIBILITR	GOAL 9: Build resilient in- frastructure, pro- mote inclusive and sustainable industrialisation and foster inno- vation	Cambio's presence and the scope of its operation in Sri Lanka have contributed to a general increase in the standard of both energy supply and increased reliability and access to the Internet, as well as competence and awareness.		
10 MPISKAD OJAMLEHET	GOAL 10: Reduced ine- qualities	Compliance across the entire value chain of our Anti-Discrimination Policy, Equality Policy and Code of Ethics and Conduct.		
12 KONSIMITION OCH PRODUCTION	GOAL 12: Responsible Consumption and Production	Cambio has a stated policy of reducing food waste, minimising the use of plastic and paper and, in as far as it is possible, using recycled materials in all of its units and recycling products that are no longer needed in the business. In scope, this is a small contribution to the global goals, but has a significant educational effect that we believe is important outside of our work.		
		Cambio also has a strict policy for the handling of hazardous materials and chemicals.  In addition to meeting legal requirements, the Cambio Sustainability Report is an important instrument in the recruitment of staff, in internal sustainability training, procurement		
		and in raising capital.  Cambio participates in several public procurement processes, in which we advocate respect for transparency and comparability as well as long-term sustainable solutions for		
		all parties.  Cambio's presence and the scope of its operation in Sri Lanka have contributed to a general increase in the standard of both energy supply and increased reliability and access to the Internet, as well as competence and awareness. Our presence also influences the local perception of waste management, as well as equal opportunity and environmental impact.		
13 BEKĀMPAKLIMAT- FÖRÄNDRINGARNA	GOAL 13: Climate Action	While Cambio's contribution to climate change is extremely limited, we take as much responsibility for this contribution as we can. We have, for example, greatly reduced our travel by utilising digitalisation and the potential for digital meetings, as well as always choosing fossil-free alternatives when possible.		
16 FREDERIOCHINOLI-	GOAL 16: Peace, justice and strong institutions	Compliance with our Anti-Corruption Policy and frequent training. Introduction of our whistleblower policy.		
17 SENONFÖRANDE OCH PARTINERSKAP	GOAL 17: Partnerships for the goals	Contributes to increased access to and trust in the internet as well as increased technical expertise. Cambio's core business is also to develop systems for a more efficient and secure healthcare. This is also applicable to more countries than just Sweden.		

# **Governance and monitoring**

#### **CORPORATE GOVERNANCE**

Cambio's governance is based on Sanolium's Ownership Directive, the Company's Articles of Association, the Swedish Companies Act (2005: 551), the International Financial Reporting Standards, IFRS, and other applicable Swedish and external legislation as well as internal rules and guidelines. Cambio is committed to complying with all national legislation and legal requirements applicable to its operations. These include laws and regulations related to employee rights, corporate governance, taxation, data privacy, patient safety, fair competition, export controls, product safety and intellectual property rights, including the following:

#### 1. International declarations and conventions

- UN Universal Declaration of Human Rights (1948)
- The International Labor Organization (ILO) eight Fundamental Conventions on forced labour, child labour, discrimination, freedom of association and collective bargaining (Nos. 29, 87, 98, 100, 105, 111, 138 and 182)
- UN Convention on the Rights of the Child, Article 32
- UN Convention against Corruption

#### 2. National legislation

- Occupational safety and health legislation applicable in the country where the goods are manufactured or work is carried out
- The Public Procurement Act
- Employment Legislation, including provisions on wages, minimum wages and social protection applicable in the country where the goods are produced or work is carried out
- Environmental protection legislation that applies in the country where the goods are manufactured or work is carried out
- The General Data Protection Regulation

#### 3. Industry regulations, where applicable.

- Industry regulations, where applicable, governing all aspects of the industry's relationship with healthcare professionals and healthcare organisations.
- Sweden: Agreements regarding cooperation arrangements between Sweden's Regions, Swedish Medtech, the research-based pharmaceutical industry and Swedish Labtech
- Denmark: QOP-55-02 Policy against bribery 1.0





In addition, the company has adopted internal rules and guidelines that include the Cambio Code of Ethics and Conduct, as well as other internal policies, rules and recommendations, which contain principles and provide guidance for the company's activities and for its employees.

Cambio's shareholders ultimately make decisions about the company's governance by appointing the company's Board of Directors at the annual general meeting. In turn, the Board of Directors is at all times responsible for the company complying with legislation as well as with other external and internal rules and guidelines.

#### **Board of Directors**

The responsibilities of the Board of Directors include setting and reviewing the Company's goals and strategies. In doing so the Board of Directors must take into account the Company's long-term financial and non-financial goals, the risks to which it is exposed and that its compliance with the rules is adequately monitored.

The Board of Directors is also responsible for ensuring that there are written policies, guidelines and instructions that are regularly evaluated. This is carried out to ensure that the Company's operations are conducted in such a way that its ability to fulfil its obligations is not jeopardised; that infringements are reported and followed up; and that its operations are conducted in a satisfactory manner. The Board of Directors is ultimately responsible for Cambio's Sustainability Work and for this report.

The Board of Directors also monitors the Company's financial and sustainable development in the long-term, ensuring the quality of financial

and non-financial reporting and the reporting of supervisory functions.

#### CEO and the company's management group

The CEO has overall responsibility for ensuring that all risk in the Company's business activities are managed in accordance with established policies and guidelines. The CEO's responsibility also includes ensuring that the organisation and work processes follow current regulations at all times. The CEO also leads the Company management group in implementing decisions made by the Board of Directors.

In addition, the Company has a number of Certifications according to standards\* (see Note 1) that stipulate that certain types of governance and system be followed in its work. These verifications are audited annually by a third party.

#### WHISTLEBLOWER SYSTEM

Cambio strives to have an open business climate, a high level of business ethics, and to always see the potential for improvement. Our employees, customers and suppliers are our most important source of insight into any shortcomings that need to be rectified. Anyone who suspects an irregularity contrary to Cambio's values, business ethics policy, legislation or other regulations, shall have the opportunity to be heard without fear of retaliation. The informant can choose to submit their information anonymously. To protect informants, there is Cambio's Whistleblower Policy with its associated reporting function. This policy has been adopted by Cambio's Board of Directors and executive management.

# The objectives of Cambio's Sustainability Work

We see sustainability as both a responsibility and an opportunity. We believe that we have a responsibility to our customers, users, partners, employees, shareholders, to the environment and to society, to conduct business in a sustainable manner. Our sustainable approach is based, among other things, on the UN's Global Compact principles and on the UN Global Goals (Agenda 2030).

Our innovative solutions are contributing to a more sustainable society. We tailor our sustainability work to international standards, frameworks and legislation that include decent working conditions, the efficient use of resources, anti-corruption, the environment and human rights. We offer our employees an attractive and good working environment.

We do all this through dialogue, exchange of knowledge, good leadership, effective governance, compliance, tools and working methods. However, our sustainability work is not just a matter of complying with laws and regulations. We are determined that our innovative solutions will provide sustainable results for our customers and society.



# **Cambio's Sustainability Work**

#### **BUSINESS ETHICS**

Cambio's Code of Conduct, the Cambio Code of Ethics and Conduct, aims to provide guidance on how employees, partners, customers and other stakeholders should be handled in a legal, fair and ethical manner. This policy provides Cambio's employees with guidance on any ethical dilemmas that may arise in their day-to-day work. Cambio always strives to carry on a sustainable business, which means that we are a responsible company, business partner, employer and stakeholder. Cambio will always comply with the applicable laws and regulations in our industry, but it is equally important to follow the ethical standards we have established. Based on our ability to influence, we also want to promote more sustainable business.

Cooperation between the employer and employees is based on mutual loyalty and trust. For the individual employee, this means taking responsibility for their professional identity and reputation, in relation both to their customers and employer. For Cambio as a company, this means that we are creating the conditions for a healthy and long-term development of individuals as well

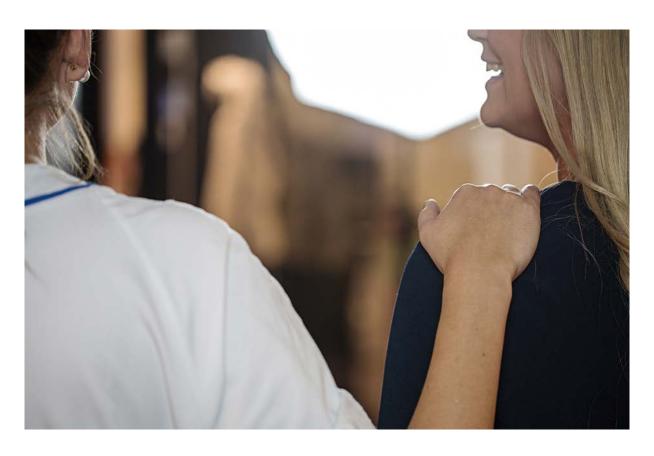
as systems and solutions; that we take responsibility for our entire value chain and ensure transparency and traceability as well as integrity and responsibility.

Our key policies in the areas of business ethics and anti-corruption are the Cambio Code of Ethics and Conduct, the Cambio Supplier Code of Conduct and our Whistleblower Policy.

In addition, we have a number of further policies and guidelines that support our ambitions.

#### **Human Rights**

Cambio is committed to respecting the UN Declaration of Human Rights. This includes our employees, the residents of nearby communities, suppliers and others who may be affected by the use of our products and solutions. Respect for, and a holistic view of human rights, are important factors in achieving the UN's goals for sustainable development by 2030. We comply with human rights reporting requirements in accordance with EU non-financial reporting guidelines and the UK Modern Slavery Act.



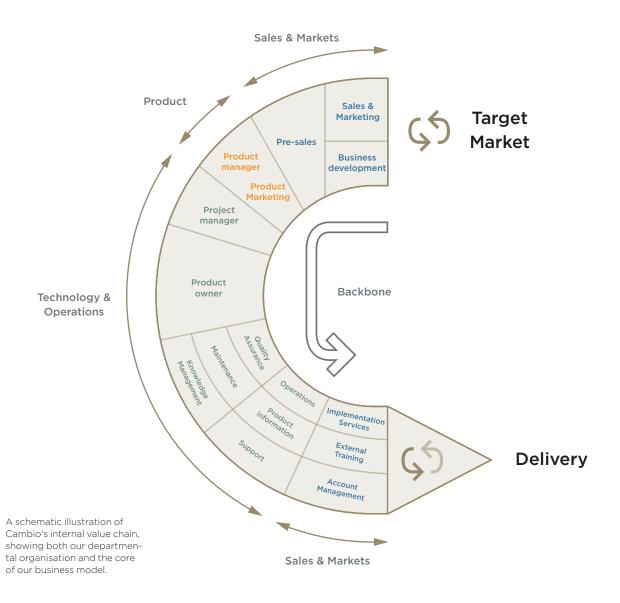
Cambio's code of conduct, code of conduct for suppliers and other policies at a Group level, reflect our commitment to respecting human rights. These guidance documents on our human rights strategy set out and communicate our expectations regarding:

- Mutual respect
- Non-discrimination
- Safe and healthy workplaces
- Working hours and wages
- Zero tolerance for modern slavery and child labour
- Zero tolerance for giving and taking bribes

## Responsibility and consideration across the value chain

From an environmental perspective, as well as from a human and economic perspective, our operations affect the value chain in different ways. Cambio has two main value chains, one for the use of hardware and one for software development. In as far as it is possible, we want to take responsibility for our impact both upstream and downstream in the value chain. We also want, through our presence, to have a positive impact on the value chain, with social responsibility and a reduced climate footprint. Cambio strives for transparency and traceability throughout the organisation. By educating all employees in ethical business, anti-corruption and human rights, as well as resource efficiency, waste management and the circular economy, we ensure sustainable development and the taking of the appropriate level of responsibility.

We require that all our suppliers sign and comply with our Cambio Supplier Code of Conduct.



# Collaboration between suppliers and partners, including anti-corruption

Cambio's contacts with business partners are characterised by impartiality and follow good business practice. Based on our Code of Ethics and Conduct, we guarantee the integrity of our business partners with regard to commercial confidentiality and all other confidential business-related information that we acquire in the course of our business activities. Our employees must also not offer business partners any rewards or other benefits. Cambio's employees are also not allowed to receive gifts or compensation from outside parties with business relationships.

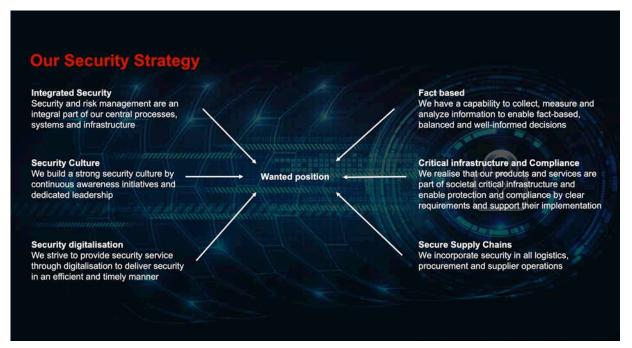
Our Supplier Code of Conduct contains the expectations and requirements we have for our suppliers and partners. This makes clear, among other things, that free and open competition is one of the cornerstones of our approach. Competition legislation aims to protect free competition in the market, by regulating relationships between business partners and competitors. Although there is no uniform global set of competition laws in force, certain fundamental principles apply everywhere to prohibit collusion or unfair business conduct that restricts free competition. We expect our suppliers and partners to share our views and respect laws and regulations regardless of where their business is conducted.

Corruption is the abuse of entrusted power for private gain. It can be considered to be one of the biggest threats to the market and social development. Corruption disrupts competitive markets, misallocates resources and can lead to human rights violations. It undermines the rule of law and the confidence in business and its leaders. It is the responsibility of the supplier as a company, and its employees as individuals representing the supplier, to prevent corruption in all its forms, including bribes, facilitated payments and inappropriate gifts, hospitality and services. We have a zero tolerance policy against all forms of giving and taking bribes.

As stated in our Code of Conduct, our suppliers must carry on commerce in a fair manner. We include in this, that

- The supplier may not seek competitive advantage through illegal or unethical business practices; and
- The supplier's employees are expected to act fairly towards others. No one should take unfair advantage of another through manipulation, concealment, misuse of privileged information, misrepresentation of essential facts or other unfair business practices.





Schematic description of how Cambio works with cyber security

#### **Cyber security**

We want our products and services to be available so that anyone can receive the right healthcare when they need it. Customers, citizens and employees must feel confident that the information in our products and services is correct and protected from unauthorised access.

Our data security work rests on five foundations:

- Business-oriented: It shall provide guidance to the business
- Balanced: It shall provide a balance between security, economic and operational requirements based on the determined risk exposure
- Relevant: We are looking for information and knowledge to provide support and set the right requirements
- Fact-based: Our goals and our work are based on the analysis of threats, risks, vulnerabilities and incidents
- Value creation: Security will create value for Cambio and enable future business

Our overall approach to security and data confidentiality includes the confidentiality, integrity and availability of IT services and data. It is updated on an annual basis and approved by our CEO. The policies cover risk, information security and integrity measures, and include the following:

- Cambio Code of Ethics and Conduct
- Cambio Supplier Code of Conduct
- Cloud Supplier Policy
- · Information Security Policy
- Access Control Policy
- Acceptable Use of Assets
- Cyber Risk Management
- Password Management
- Requirements on Cryptographic functionality
- Cambio Security Requirements
- Classification of Information
- Handling of information

Roles and responsibilities are defined within the Group. The responsibility for security at group level is handled by our Chief Security Officer and the central risk management function. Our Data Protection Officer ensures, independently, that the organisation complies with the laws that protect an individual's personal information.

#### **Data Protection (GDPR)**

Cambio's ambition is always to respect and ensure data protection for our customers and our employees. Cambio's policy documents state that we must comply with data protection laws and regulations in all countries in which Cambio conducts business. This also reflects the demands on us from our stakeholders such as the customers, investors, suppliers and employees of Cambio. In a number of cases, these individuals also expect

us to be a market leader in data protection. Cambio has invested heavily in training, both for new employees and through short films, training courses and tests that are emailed to our employees. Cambio has a robust data protection organisation and good systemic support for data protection activities.

To support our work, we have adopted a number of policies:

- External Data Protection Policy
- Cookie Policy
- MittVaccin and MinHälsa, description of the processing of personal data for consumers
- Internal Data Protection Policy

These policies are updated annually. The CEO is responsible for these. Our Data Protection Officer monitors compliance with our policy. The Data Protection Officer further contributes by providing updates and proposing continuous improvement, as well as ensuring awareness of these policies by our employees through training and communication.

Our work on data protection at Cambio was audited in 2021 by an external consultancy. This audit resulted in a gap analysis that covered five areas of improvement that will be dealt with and followed up continuously in 2022.

#### **CLIMATE AND THE ENVIRONMENT**

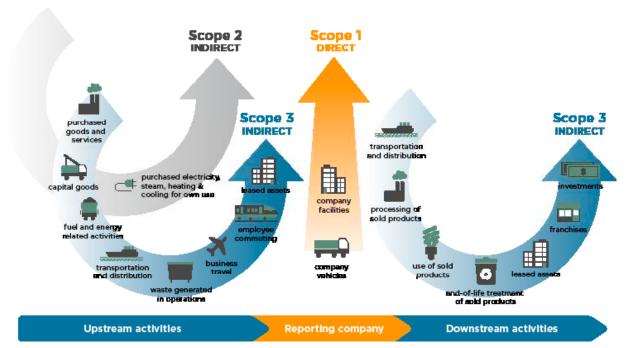
Cambio is a software company that provides e-health solutions and although our type of business does not have a significant impact on the environment, our responsibility is to streamline our business and reduce those emissions that the business does generate. Current rules in the environmental sphere must always be followed, and goods and materials that pose environmental and health risks must be avoided. We can also contribute initiatives in our customers' activities, providing advice on how they can reduce their climate impact through digitalisation. Cambio is also certified according to the ISO 14001 Environmental Management System.

#### Climate change, GHG emissions

It is Cambio's stated ambition to reduce our climate footprint. In 2022, we will therefore be calculating our complete climate footprint (CO2e) across the value chain. We should be able to get a complete understanding of our footprint as early as 2022, using the GHG protocol scopes 1 and 2.

## Responsible use of natural resources, including energy and water

Natural resources are finite and need to be used with consideration and respect. Cambio strives to avoid a negative impact on the environment and to reduce its climate footprint, by reducing



Definition of upstream and downstream climate impact factors according to the GreenHouseGas protocol.



the use of fossil fuels for cooling and heating our premises; having in place good waste management; buying products that can be reused; in as far as it is possible choosing renewable sources of energy for our activities; and imposing equivalent requirements on our suppliers. We also choose to travel as climate smart as possible.

The result of Cambio's work provides more efficient solutions for healthcare and welfare, which can contribute to a significant reduction in emissions in our customers' ongoing activities.

At present, however, most of Cambio's offering to its customers is associated with economic activities that are not currently covered by the EU's new taxonomy regulation.

It is important to understand the impact on the environment that different actions have. To achieve a better understanding, and thereby to contribute to achieving our goal of reducing our impact on the environment and reducing our climate footprint, we have created a training course for our employees.

#### **Circular economy**

A circular economy is about being resource efficient. For example by increasing the service life of software and hardware, increasing the repairability of products and increasing the proportion and amount of recycled products coming onto the market. Cambio has identified relevant environmental aspects, such as purchasing products and materials that can be reused, enabling recycling and minimising the use of paper and plastic in all parts of the business. We also undertake lifecycle

analyses to understand how we can reduce these Environmental Aspects, and we regularly review them.

#### **PEOPLE SUCCESS**

Our employees are Cambio's main asset. Our competence, ability to innovate and long experience in e-health, healthcare and welfare, are fundamental to realising Cambio's goal of being able to offer comprehensive IT support across the entire healthcare and welfare chain. Over time and on the basis of our vision, we have together achieved our position as a leading company in the field of eHealth.

The competition for qualified employees is fierce. We are therefore active on work environment issues, so as to be able to offer a secure, healthy and inspiring workplace, in which our employees can develop together with the company.

We are growing continuously, and now have almost 800 employees in our offices in Stockholm, Linköping, Motala, Kalmar and Aarhus and Copenhagen in Denmark, Reading in England and Colombo in Sri Lanka.

To make continued growth possible, it is crucial to have a clear recruitment strategy and to support this with established processes. Cambio has refined this recruitment process by giving our leaders professional support; ensuring the quality of our preboarding and onboarding process by providing both managers and employees with digital tools, methods and procedures.

Owners, the Board of Directors and our customers want to see that our staff are motivated and committed, as this is crucial for the organisation's efficiency, and in the long run key to delivering the objectives of the business and our customers' demands.

A good and safe working environment is an important strategic issue for Cambio. For us the goal of work environment management is to create a physically, psychologically and socially healthy workplace that allows all employees to develop, and where there is no risk of work-related injury or ill health. It is the company's policy that employees should be able to maintain a work environment that encourages mutual respect, promotes good relations between employees and is free from all forms of harassment and violence.

Cambio continuously evaluates its work environment programme in order to allow continuous improvement to day-to-day work environment management. Work requirements are to be adapted to human circumstances in both physical and mental terms. Measures that improve the work environment have a positive effect for both the individual and the company.

The company has a number of governing documents and guidelines that support the creation of the work environment and the commitment we strive for. These governing documents include:

- Cambio Code of Ethics and Conduct
- Work environment policy
- Gender equality policy
- Anti-discrimination policy
- Anti-harassment policy.docx
- Policy on internal communication
- · Goal setting and Goal review template
- 1-2-1 template

Cambio's People Success department facilitates and develops our workforce. It ensures that our methods improve along with the experience of our employees. This department is led by our Chief People Success Officer. Leaders and employees in all countries are also responsible for living our culture and acting as good role models.

An important part of our ambition is providing information to our employees. The Chief Marketing & Communication Officer is responsible for communication and information issues.

Over the years, we have conducted employee

surveys. In recent years, this has been undertaken through the Great Place to Work survey. In 2021, we changed survey companies and so we did not conduct an employee survey in 2021.

## Employee engagement and transparency as well as inclusion, participation and information

The majority of our employees want to feel that they contribute to the development of society and healthcare. This has clearly emerged in our employee surveys. Common for many is that we feel that our jobs should be meaningful and have purpose. Employees have an expectation of receiving regular information about what is happening in the company.

So information is an important tool for involving our employees, and we work actively to maintain an information-rich culture. Together, this contributes to an increased commitment among our employees.

This is also important for Cambio's stakeholders.

Every employee must have clear, realistic goals that give them involvement. Each employee must also receive continuous and constructive feedback that is given with respect for the individual and with equal value for everyone.

During the pandemic, several joint activities, that were previously carried out physically, are now carried out digitally. Some of the activities we undertook over the course of the year include:

- Continuous department meetings
- Individual meetings between managers and employees
- Mentoring programme younger employees receive support from more senior employees
- Weekly letter from the CEO, "In the head of our CEO" - to all employees
- Other employee activities Cambio supports initiatives where employees can meet and exchange information or just socialise

#### **Equality and diversity**

Cambio's overall goal is for equal opportunity work to be a natural and integrated part of our entire business. This applies to all our workplaces and at all levels within the company.

The conditions, rights and development opportunities of women and men shall be equal through-

out the company, and shall not be dependent on gender, religious affiliation, sexual orientation or origin. An equal workplace is attractive for both customers and employees. No employee shall be subjected to abusive treatment such as bullying, psychological violence, social exclusion or harassment.

#### **Training and skills development**

A general goal is that there should be equal training and skills development opportunities for both women and men. Furthermore, training is to be informed by an equal opportunity perspective.

#### **Salaries**

Our starting point is that there are to be no wage differentials based on gender. We conduct annual wage surveys in accordance with the provisions of the Discrimination Act. This is to map and analyse the regulations and best practices related to wages and other terms of employment, wage differentials between women and men who perform work that is considered to be equal or equivalent, and to assess whether any wage differentials are directly or indirectly related to gender. Differentials that cannot be explained by anything other than gender must be remedied.

#### **Sexual harassment**

An obvious starting point is that no one should be subjected to sexual harassment. This also means that no one should have to feel offended or feel uncomfortable due to statements, pictures or text in any form in the workplace. To ensure that sexual harassment does not occur, we train managers in actively counteracting the occurrence of sexual harassment, as well as how they should act if there is a suspicion that it is occurring, and we disseminate information about the company's guidelines regarding sexual harassment.

# CONTINUOUS LEARNING AND UNIQUE COMPETENCE BUILDING

The competence and commitment of each employee is crucial for the efficiency of the organisation. By creating the conditions needed to take advantage of the power and knowledge of employees, miracles can be achieved, which can exceed the objectives of the business. All employees must be given the knowledge, skills and practical opportunities required to actively participate in designing their work. To succeed, leader-

ship at all levels is important. Good leaders drive commitment in all organisations. For this reason, Cambio defines and adapts leadership ambitions to enable people to grow and deliver value to our customers.

Cambio encourages and supports continuous skills development and wants to offer all employees the opportunity for personal and professional development. This covers a large spectrum, and there are a number of different initiatives that contribute to development and learning in the business - everything from leadership training and career advancement activities to on-line training, specific courses and onboarding programmes for new employees. There is a groupwide strategy of offering continuous development, however, execution can vary between countries. Cambio has worked to further develop skills in several ways, including through the introduction of a group-wide leadership programme and a career support programme for all employees. This captures the need for development and support for the individual employee's career.

# AN ATTRACTIVE EMPLOYER INCLUDING THE RECRUITMENT OF NEW EMPLOYEES

Employees and potential new employees expect a workplace that can encourage growth, with rewarding work duties, and an attractive job offer with benefits on market terms. They expect an attractive comprehensive offering from their employer.

Owners, the Board of Directors and customers also have an interest in our being an attractive employer in order to recruit and retain the right competence, now and in the future.

Our point of departure is the aim of an even distribution of women and men. This means that teams that have not reached a 60/40 distribution must actively work to achieve a more even gender distribution. This applies to all our workplaces and at all levels within the company.

We have developed a number of guidelines to support our recruitment process. To make it easier for managers, there are specially devised checklists, descriptions of the recruitment process and documents to help in interviews.

We also conduct ongoing follow-up interviews with our newly recruited employees.

#### A healthy work environment in balance

The overall goal of work environment management is to achieve a long-term efficient business operation that at the same time results in employees having good physical and mental health, gives them a sense of well-being and job satisfaction, and that prevents accidents from occurring.

At Cambio, we attach great value to the work-life balance of our employees. It is important that people have a certain amount of freedom in their daily schedule, to allow personal and family issues space in their lives. Freedom with responsibility and focus on the individual are important cornerstones of our ability to retain existing employees and to attract new ones. This means that we stand behind flexible working hours and choice of workplace, while at the same time advocating some freedom in how work duties are planned and structured.

All employees have the technical competence and the necessary tools to achieve flexibility in their day-to-day work. All employees also have the opportunity to work from home when necessary.

Cambio also encourages a healthy, sustainable and active lifestyle.

Ongoing inspections of workplace ergonomics are carried out by recognised ergonomic consultants and, if necessary, employees are provided with additional facilities to prevent work-related injuries.

In addition to the above measures, we conducted a number of surveys over the course of the year to gain insight into how our employees have felt in the particular circumstances caused by the pandemic. We have also offered and encouraged our employees, where necessary, to contact our health insurance provider, where employees can receive counselling support and healthcare if they need it. We have arranged training for our managers on how to lead at a distance, and how mental health problems in employees can be detected during remote working.

The work environment and working conditions must be tailored so that both women and men can work in all positions within the company. We promote skills development and internal mobility with the aim of the development of individuals and the business.

No one may be under the influence of alcohol or drugs during working hours. All employees



are obliged, if someone is under the influence of alcohol or other drugs, to immediately report this to their line manager who is responsible for taking the necessary measures.

Work adaptation and rehabilitation issues are an important part of work environment management. The goal is for the employee to be able to return to their workplace as soon as possible. If necessary, external expertise should be used.

In different ways we must make it easier for our employees to reconcile parenthood and working life. It is our goal that working conditions are such that parents' work can be reconciled with their responsibilities as parents. This applies to working hours, staff conferences, meetings, training and travel. It is of particular importance that both women and men are given ample opportunity to be on parental leave or to take leave for childcare.

#### **ECONOMIC SUSTAINABILITY**

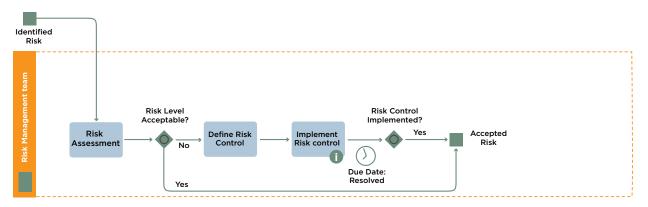
#### Long-term profitability

Cambio has a strong position in the e-health market and our growth potential is deemed to be very good both in Sweden and internationally. Health-care and welfare has a significant requirement for investment in digitalisation. That need will exist for the foreseeable future, which creates a long-term perspective for us.

Cambio has a sustainable and long-term strategy for the company's profitability. We have had good control over our revenues over several years and an adaptability in our cost structure to be able to meet variations in capacity and demand.

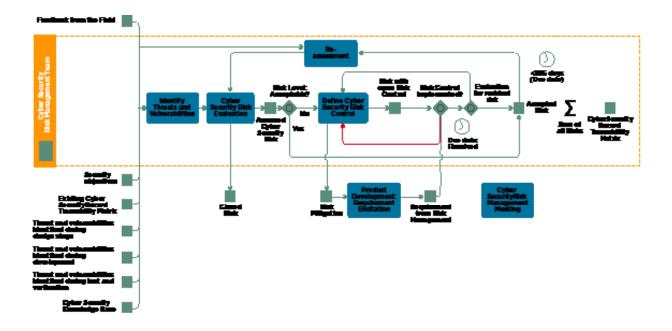
# Risk management

Risk Management is crucial to our success. We have a structured approach with regard to risk, and we use this throughout to identify and manage risk. In general, our risk management work can be described according to the sketch below:



Depending on the nature of the risk, how likely it is that the risk will occur and what consequences this could have. Responsibilities are clearly distributed within the organisation. We also have a clear procedure for the level at which risk is to be reported. The Board of Directors receives regular reports on the highest assessed levels of risk.

As a market-leading e-health company that delivers IT solutions across the entire healthcare value chain to over 170,000 users in general hospitals and university hospitals as well as specialist and outpatient units, we put particular emphasis on cyber security. Through our risk management work, we continuously evaluate risk, decide how it should be managed and monitor that the measures we have taken manage the identified risk.



Our approach to managing cyber security risk also forms the basis of how we work with all other risk within Cambio.

# Social benefit outside the core business

#### We support MSF

As a friend of Médecins Sans Frontières, we contribute to life-saving care - regardless of who, where and why.



#### Computer reuse in Sri Lanka

An initiative is currently under way to replace all company desktop PCs with laptops. This is aimed primarily at reducing the environmental impact of energy use and also at giving team members better mobility at work when necessary.

Many of the older desktops are fully usable, giving us the opportunity to reuse them to the benefit of the community in which we operate.

We have provided Children Home Moratuwa in Sri Lanka with a number of computers. Children aged 5 to 17 live in the home. While Covid-19 forced schools to close, the children could still be offered education digitally. The children really appreciated this opportunity for education.

Thanks to our collaboration with former students at Richmond College in Sri Lanka, we have also been able to hand over a Data Lab to Diyalape Kanishta Vidyalaya and Ibulgoda Kanishta Vidyalaya, respectively. The project went by the name "We are changing the world together with the technology".



# Results of Cambio's Sustainability Work

#### **BUSINESS ETHICS - RESULTS**

96% of our employees have undergone Code of Ethics and Conduct training, which includes Anti-Corruption training.

The data security department has been tightened up and a Chief Security Officer, has been appointed. Necessary policies and governing documents have been created or substantially revised as Cambio has begun a transformation into becoming a service provider. A Security Awareness and Compliance tool has been implemented and a comprehensive Security Awareness programme has been created for our employees.

The Security Awareness programme was introduced in 2021 and all employees are being trained in this on an ongoing basis. Metrics will be reported for 2022.

An internal data phishing simulation programme, to continuously measure the risk of data phishing has been implemented. The goal is for our employees to open or click on emails that may contain malicious code as little as possible.

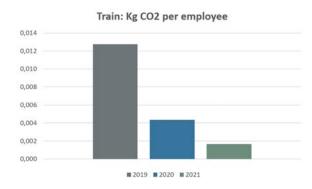
Results 2021: 8% click Goal: < 5%

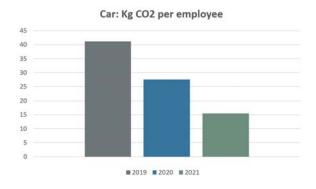


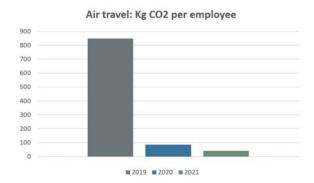
# CLIMATE AND THE ENVIRONMENT - RESULTS

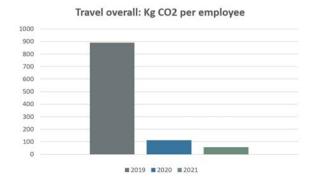
#### **Electricity consumption:**

Colombo: 484,856 KWh (all electricity) Motala: 41,209 KWh (all electricity) Stockholm: 103,703 KWh (not heating)









Linköping: (no separate utility agreement as electricity is included in the rent)

Reading: (no separate utility agreement as electricity is included in the rent)

#### **SATISFIED EMPLOYEES - RESULTS**

New employee hires and employee turnover:

13.4% Target <10%

Workplace accidents during the year: 0 Target 0 Sick leave at the end of the year: 2.0% Target < 2.0%

# The breakdown between men/women globally as a %:

41.9% women, 58.1% men

Our target is 60%/40%, i.e. no gender with more than 60% and nothing under 40%

Proportion of managers to the total number of employees, globally: 10.0%

Breakdown of men/women in senior positions: Men 15 / Women 8.

A survey to recognise wage differentials, that cannot be explained by anything other than gender, has been carried out and shows that there are no wage differentials due to gender.

All managers have undergone training in actively counteracting sexual harassment.

#### **ECONOMIC SUSTAINABILITY**

Results are reported in the annual report.

# **Future development**

#### **BUSINESS ETHICS**

We will continue to contribute to the safer and simpler day-to-day lives of our customers and users of our systems, through better user-friendliness and greater security, while rewarding traceability and transparency.

Data security requirements and processes have been put in place. During this and future years, we will work hard to implement technical controls to meet requirements and raise our overall level of security.

Cambio is since 2018 certified according to ISO standard 27001 in order to ensure compliance in connection with the updating of other ISO certifications on a regular basis.

We are also adapting to the increased threat picture that the Swedish Security Police and Swedish Armed Forces have communicated due to the changed security situation in Europe. It is uncertain at present what this will mean for us, but we continually adapt our security to the current situation.

We will hire a new data protection officer who will expand our work mapping all Data Sub-Processors and their impact on Cambio's processing of personal data.

We have also appointed a new Head of Purchasing. In 2022, our ten most important suppliers will be audited to ensure their compliance with our Supplier Code of Conduct.

#### **CLIMATE AND THE ENVIRONMENT**

Increase responsibility in the value chain through requirements on increased transparency and presence.

Cambio will continue to review the possibility of further streamlining operations and reducing our impact on the environment and climate.

We can also help our customers reduce their negative climate impact, both through more efficient digitalised solutions and by sharing our knowledge and insight.

It should be noted that the extremely low CO2 footprint values reported for 2021 (and 2020) for business travel, are largely due to the restrictions brought about by the pandemic. Because of this, these are expected to increase now that the restrictions have been lifted in large parts of the world

#### **PEOPLE SUCCESS**

We will continue to work on implementing our preboarding and onboarding procedures for all our countries globally and will continue to work on ensuring the quality of the recruitment process based on the ongoing training and coaching of managers in the area.

From 2022, we will significantly change and improve how we follow up the success of our ambition to continue to be an attractive workplace with committed and competent employees. We will conduct employee surveys on a quarterly basis so as more rapidly to be able to remedy any problems and shortcomings that our employees may experience. Through the employee surveys, we will focus on diversity and equal opportunity issues. In connection with this, we will also decide which of the relevant KPIs we will focus on to ensure that we fulfil the company's stated ambitions.

#### **ECONOMIC SUSTAINABILITY**

Our 2021 annual report shows our ambition to continue to be a financially sustainable company.

# Legislation, rules and documents

#### **LEGISLATION, RULES AND CERTIFICATES**

Business Ethics	Climate and the Environment	People Success	Economy
ISO 9001     Global Compact     UN Human Rights Directive     Work Environment Act     UK Bribery Act     GDPR	• ISO 9001 • ISO 14001	National laws and regulations     ILO	The Annual Accounts Act IFRS UN Global compact Nasdaq stock exchange agreement MAR (Market Abuse Regulation)

#### **POLICIES AND GOVERNING DOCUMENTS**

Business Ethics	Climate and the Environment	People Success	Economy
Cambio code of Ethics and Conduct Cambio's environmental aspect matrix Cambio Supplier Code of Conduct Information Security Policy External Privacy Policy Cookie Policy Supplier Evaluation SOP	Environmental Policy     LCA     Cambio's environmental aspect matrix     Work Environment Policy     Quality Policy     Purchasing policy/procedures     Skype Travelling Policies     Internal: Paper and Waste sorting instructions     Supplier Evaluation SOP	Work environment policy including:  Cambio code of Ethics and Conduct  Cambio Whistleblowing Policy  Parental Benefits Policy  Wellness Benefit Policy  Anti-harassment Policy  Mental Health Policy  Personnel policy  Strategic initiatives around Leadership and Talent Mgmt	Ownership directive    Business plan    Budget

# tainability Report has been drawn up together with Hållbar Tillväxt AE

# **Standards**

#### **COMPANY STANDARDS**

- Environmental Management System (ISO 14001)
- Information Security Management Systems (ISO 27001 and 27002)
- Security techniques Extension to 27001 and 27002 for privacy information management (ISO 27701)
- Security techniques Code of practice for information security controls based on ISO / IEC 27002 for cloud services (ISO 27017)
- Security techniques Key management (ISO 11770-1)
- Quality Management Systems (ISO 9001 and 13485)
- Service Management System (ISO 20000)

#### **PRODUCT STANDARDS**

- Medical device software Software life-cycle processes (IEC 62304 2006+ AMD1\_2015) and the amendment (IEC 62304:AMD1 2015)
- Health software Part 1: General requirements for product safety (82304)
- Medical devices Application of usability engineering to medical devices (IEC 62366) and the amendment (SS-EN 62366-1 A 1)

- Medical devices Part 2: Guidance on the application of usability engineering to medical devices (IEC-TR 62366-2)
- Medical devices Application of risk management to medical devices (ISO 14971:2020)
- Health informatics Information security management in health (ISO 27799:2016)
- Information supplied by the manufacturer of medical devices (SS-EN 1041:2008 A1:2013)
- Medical devices Symbols to be used with medical device labels, labelling and information to be supplied (ISO 15223-1:2016)
- Guidance on the application of ISO 14971 to medical device software IEC 80002-1:2009
- Health software and health IT systems safety, effectiveness and security IEC 81001-5-1:2021

#### **TECHNICAL REPORTS**

 Medical devices – Post-market surveillance for manufacturers (ISO/TR 20416:2020)

# MEDICAL DEVICE REGULATION (CE-MARKING)

- MDR (EU 2017 745)
- MDR Guidance documents