

# Transparency Statement 2023

Mintra ensures Human Rights and decent working conditions are embedded in our operations and throughout our supply chain and partnerships. By conducting due diligence assessments, we aim to cease, prevent or mitigate against adverse impacts and ensure compliance with the Norwegian Transparency Act.

## About Mintra

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Mintra is a leading provider of digital learning and Human Capital Management (HCM) software solutions to support safety-critical industries worldwide. Our focus is to help protect and improve businesses by protecting and improving their people.

We provide specialist consultancy and complete HR suites including payroll services to support our customers global operations. Our services currently cover more than 3,600 companies, including four out of the top five largest energy companies in the world.

Mintra's delivery model is scalable and focussed on building long-term relationships with our customers and users. Our team include designers, developers, industry consultants, and supporting functions working to the highest standards.

The company is listed at Euronext Growth, Oslo using the MNTR ticker.

## Guidelines, Procedures & Supplier Audit Processes

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Our statement is based on Sections 4 and 5 of the Transparency Act:

- Our policies shall maintain currency and ensure responsible business conduct.
- On a risk basis, we will identify and assess actual and potential adverse impacts on fundamental human rights and decent working conditions.
- We shall implement, track and communicate suitable measures to cease, prevent or mitigate adverse impacts.
- Where able, we shall provide or cooperate in remediation and compensation where required.

Document	Description	Revision	Created	Reviewed	Approved	Date
STR-PO-COR-002 Transparency Statement	New Document 2023	1.0	SB	SLT	BOD	13/06/2023

## Mintra is committed to respect Human Rights.

Through our policies including Ethical Guidelines, Whistleblower, Anti-Slavery, Anti-Bribery, Immigration Compliance, Information Security, Supplier Code of Conduct, Sanction and Export Restrictions and the subsequent processes Mintra maintains a robust framework for compliance with the Norwegian Transparency Act. All Mintra employees are required to complete annual training to ensure awareness and knowledge of our ethical principles including human rights.

Our employees, contractors, vendors and partners are pivotal in protecting our operations and that of our supply chain against the potential erosion of Human Rights or exploitation of workers. Through our Whistleblower Policy, reporting systems or by contacting any of Mintra's Senior Leadership Team all stakeholders of Mintra may raise concerns or queries about any aspects of worker mistreatment, due diligence or assessments.

We have established an internal and external audit programme which features all suppliers and adds additional focus on high risk supply partners. Partners are subject to a rotating annual audit schedule. Whilst auditing our suppliers and business partners improvements which move beyond internal compliance to enhance overall ESG practices are established and discussed.

Audit outcomes may include findings which are tracked through the Action Management System to satisfactory closure and sign-off from our Senior Leadership Team. Our internal audits from 2022 have not highlighted special areas for concern. A wider reach for compliance will be rolled out in 2023 with an increased audit focus.

Mintra is subject to external audit including to maintain ISO 9001:2015 (Bureau Veritas) and ISO 27001:2013 (DNV). During 2022 Mintra undertook a voluntary GDPR compliance audit from DNV with zero findings. To support internal focus and reassure our Customers in our focus to deliver services with flying colors on quality and deliveries we update our ISO certificates and internal control procedures according to best practice.

Mintra's Transparency Statement are reviewed and revised as necessary or annually, whichever comes first, to maintain currency for our operations, the legislation of the countries in which we operate and valued input from employees, supply chain and partners.

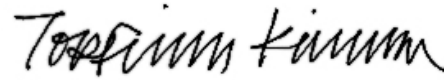
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This transparency statement constitutes Mintra’s compliance to the Norwegian Transparency Act.

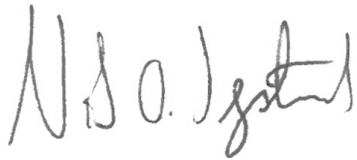
June 2023




Rúni M. Hansen (Chair of the Board)



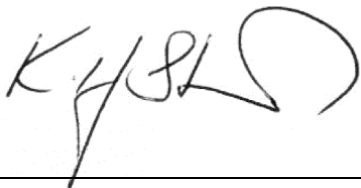
Torfinn Kildal (Director)



Nils O. Jegstad (Director)



Ketil Toska (Director - Employee Rep)



Kevin Short, CEO

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