

Transparency Statement 2025

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

Mintra is a leading provider of digital learning and human capital management (HCM) software for safety-critical industries worldwide. Mintra develops and deploys technology solutions that enable our customers to develop and deploy their people, readily demonstrate compliance and maximise operational efficiency. To date, we have helped more than 3 million workers stay safe, develop new skills and verify their competence. Mintra services over 4,000 companies operating under strict legislation and in some of the most challenging environments in the world. These organisations provide crucial energy and transportation services in the supply chain and their employees are classed as key workers.

Guidelines, Procedures & Supplier Audit Processes

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	Statement 2025	1.3	SB	SLT	BOD	21/11/2025

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 2024 & 2025 have not highlighted special areas for concern. Competent governance and Transparency Act compliance baseline was established during 2024 with our Marketplace and Training Management Service Suppliers. A wider rollout of this supplier baseline was rolled out in Q1 2025 to incorporate suppliers across every Mintra department on a risk basis.

Mintra is subject to external audit including to maintain ISO 9001:2015 and ISO 27001:2022 (certified by DNV). During 2024 Mintra updated our management system to include the controls for ISO 27001:2022. We successfully achieved this certificate. 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 is 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.

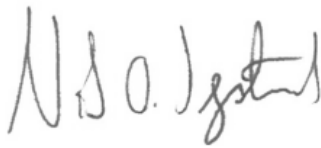
November 2025:




Rúni M. Hansen (Chair of the Board)



Torfinn Kildal (Director)



Nils O. Jegstad (Director)



Jorunn Eldøy (Director - Employee Rep)



Gustav Martinsen (Director)



Tom Ormberg (Director - Employee Rep)



Kevin Short, CEO

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