

Policy on Responsible Business Conduct and Transparency

1. Purpose and Regulatory Alignment

This policy describes our commitment to responsible business conduct in accordance with Nordic regulatory standards and internationally recognized principles. It is aligned with the **Norwegian Transparency Act (Åpenhetsloven)**, the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights.

As a provider of e-learning courses on Health, Safety and Environment (HSE), we aim to contribute to safe, healthy, and sustainable workplaces through both our operations and our learning solutions.

2. Ethical Business Conduct and Legal Compliance

We conduct our business in compliance with applicable laws and regulations, including legislation on labour rights, health and safety, environment, data protection, and competition. We act with integrity, transparency, and accountability and maintain zero tolerance for corruption, bribery, fraud, or other unethical business practices.

3. Human Rights and Decent Working Conditions

We respect internationally recognized human rights and are committed to preventing adverse impacts on human rights and decent working conditions. This includes:

- Non-discrimination and equal treatment
- Respectful, inclusive, and harassment-free working environments
- Fair working conditions and freedom of association
- Zero tolerance for forced labour, child labour, or exploitation

These principles apply to our own operations and form the basis of our expectations toward suppliers and business partners.

4. Health, Safety and Work Environment

Health and safety are central to our mission and operations. We strive to ensure a safe, healthy, and supportive working environment for employees and contractors, addressing physical, digital, and psychosocial risks. Our e-learning content is developed and maintained in line with recognized HSE standards and good professional practice.

5. Environmental Responsibility

We seek to minimize our environmental impact through responsible resource use, digital-first solutions, and continuous improvement of internal processes. Our course offerings support environmental awareness, regulatory compliance, and preventive approaches to environmental harm.

6. Due Diligence and Responsible Value Chain

In accordance with Åpenhetsloven, we conduct due diligence to identify, prevent, and mitigate actual and potential adverse impacts on human rights and decent working conditions in our own operations and, where relevant, in our value chain.

We expect suppliers and partners to operate in compliance with applicable laws and ethical standards consistent with this policy. Compliance may be followed up as part of customer audits, supplier evaluations, or due diligence processes.

7. Transparency, Reporting, and Complaints Mechanism

We are committed to transparency and will provide information in line with statutory requirements. Requests for information pursuant to Åpenhetsloven will be handled in a timely and responsible manner.

Concerns or suspected violations may be reported without fear of retaliation and will be addressed appropriately.

8. Implementation and Review

Management is responsible for implementing this policy and ensuring it is communicated, understood, and applied throughout the organization. The policy is reviewed periodically to ensure continued relevance, regulatory compliance, and alignment with customer expectations.

Oslo, 1. January 2026

Jarle Hellum
CEO HMS Norge