

NOROFF

School of Technology and Digital Media

TRANSPARENCY REPORT

Financial Year 2025–2026

1 July 2025 – 30 June 2026

This report has been prepared in accordance with the Norwegian Transparency Act (Åpenhetsloven) § 5 and the OECD Guidelines for Responsible Business Conduct and Due Diligence.

Oslo, 29 June 2026

Erik Brandt

Chief Executive Officer (CEO)

1. Introduction

Noroff is Norway's leading private educational institution in the field of technology and digital media. This Transparency Report has been prepared in accordance with the Norwegian Transparency Act (Åpenhetsloven) § 5 and covers all Noroff group companies for financial year 2025–2026 (1 July 2025– 30 June 2026).

Digital transformation is continuous and has become as natural a part of working life as any daily routine. Regular professional development is essential to remain relevant. Noroff offers education adapted to all phases of life — from young students to working professionals and businesses. We are part of the solution.

Our programmes are not only future-ready, but also practical and in demand by today's employers. Through close dialogue with industry we ensure our programmes remain as relevant as possible. Our teaching staff maintain high academic standards combined with practical industry experience, preparing thousands of students each year for roles that employers are struggling to fill.

Noroff has grown to become Norway's largest higher vocational college. Our University College offers bachelor programmes combining practical and theoretical expertise. For working professionals, we also offer specialist top-up programmes in digital subjects.

2. About Noroff

2.1 Group structure

This report covers all legal entities within the Noroff group:

- Noroff Holding AS – Top-level holding company; no employees
- Noroff Fagskole AS – Higher vocational college programmes. Locations: Kristiansand, Oslo and Bergen
- Noroff University College AS – Bachelor-level programmes. Locations: Kristiansand and Oslo
- Noroff Education AS – Shared services provider (Finance, HR, etc.). Locations: Kristiansand, Oslo and Bergen

2.2 Key workforce figures

| | Total | Noroff Education AS | Noroff Fagskole AS | Noroff University College AS |
|---------------------------|-------|---------------------|--------------------|------------------------------|
| Number of employees | 223 | 55 | 134 | 34 |
| Share of female employees | 40% | 44% | 40% | 32% |

3. Vision, Mission and Values

3.1 Vision and mission

Vision

“A world where the education of today meets the needs of tomorrow.”

Mission

“To provide people from all walks of life with the knowledge, skills and competencies required to build next-generation careers.”

The vision and mission are supported by two strategic goals: delivering employability and an outstanding student experience.

3.2 Strategic goals

Employability

All courses are designed to meet industry needs and equip students with up-to-date skills to maximise job-readiness. Industry integration is central to the development, production and delivery of new and existing programmes.

Outstanding student experience

We serve a broad range of people — from young students to businesses and working professionals — and the learning experience must cater to all. This requires us to adopt new technologies to deliver flexibility, engaging and effective learning, strong student communities, and to continuously improve both the digital and physical learning environment.

3.3 Core values

Noroff’s four core values guide everyday decisions and behaviour across the organisation:

- Continuous learning – We believe that the acquisition of knowledge and skills is the fundamental driver of individual and collective progress. Everyone has something to learn and something to teach others.
- Collaboration – Through collaboration we foster an environment of trust and reliability, enabling us to get our work done without worrying about everything else.
- Outstanding work – By delivering outstanding work, we collectively build an organisation that achieves outstanding results for students, partners and colleagues.
- Developing the future – By building the best version of Noroff, we create the conditions for employees and students to grow and contribute to the future.

4. Governing Documents and Governance

4.1 Document framework

Noroff maintains a system of governing documents regulating ethical conduct, due diligence and risk management. Any findings from the annual due diligence assessment may trigger an update to one or more of the following:

- Risk assessment and categorisation
- Code of Ethics and Conduct
- Policy for Unacceptable Behaviour and Actions
- Whistleblowing arrangement and reporting procedures

4.2 Stakeholder engagement

Noroff places significant emphasis on engaging relevant stakeholders in an appropriate manner.

This delivers several valuable outcomes:

- Creates and strengthens awareness throughout the organisation
- Employees and others are informed about relevant regulations, laws and ethical guidelines
- Consequences of breaches are clearly communicated
- Whistleblowing channels and reporting systems are well known and accessible to all

5. Due Diligence and Risk Assessment (OECD)

5.1 Overall assessment

Key findings for financial year 2025–2026

The annual due diligence assessment has not identified any negative consequences or breaches related to human rights, decent working conditions, ethical conduct, or any other OECD due diligence categories. No breaches have been reported.

However, increased risk has been identified in the areas of cyber incidents and export control, which will be subject to enhanced measures and monitoring in the period ahead.

5.2 Risks with heightened focus in 2025–2026

Procurement and supply chain

- Lack of objectivity in the assessment of offers and contracts — potentially resulting from corruption or undue influence on staff
- Vendors not complying with OECD due diligence requirements, e.g. use of employees with indecent working conditions or pay
- Contracts lacking clauses for termination, renegotiation or other relevant remedies — risk of being locked into a prolonged negative relationship

Third-party risk

- Third parties not adhering to OECD principles, potentially influenced by external parties to conduct non-compliant activities
- Contracts that do not comply with the Working Environment Act and/or GDPR requirements
- Vendors with unacceptable ownership structures or ties to illegal entities

International employees

- Employment contracts not in accordance with OECD principles or the legal requirements of the employee's country of residence
- Outdated staff handbook containing incorrect or misleading information for internationally based employees

6. Actions and Results

6.1 Summary of actions taken

The table below summarises the key actions carried out during the reporting period and the results or changes achieved:

| Risk Area | Action Taken | Result / Status |
|-------------------------|---|---------------------------------|
| Procurement | Supplier due diligence: systematic collection of publicly available information, clarifying questions during contract negotiations, review of suppliers' own transparency reports, and cross-checks with other institutions and the wider group | No breaches detected |
| Third-party risk | Contractual requirements: GDPR compliance and employment law obligations embedded in all third-party contracts. Assessment of a dedicated third-party risk tool (Risk Ledger or similar) is ongoing | Increased control and oversight |
| International employees | Onboarding and staff handbook: revised and updated with country-specific information, guidelines and relevant policies | Increased control; no breaches |
| Cyber security | Internal training and awareness campaigns to reduce the risk of accidental information security breaches (phishing, etc.) among staff | Ongoing; reduced exposure |

6.2 Procurement

All new suppliers and project partners are evaluated from an OECD perspective. The evaluation includes:

- Collection of publicly available information about the company
- Clarifying questions during the contract process
- Review of the supplier's own transparency reports
- Cross-checks with other schools in the sector and/or the wider Noroff group

To further strengthen oversight, Noroff is assessing whether to implement a dedicated third-party risk management tool (e.g. Risk Ledger) during the coming period.

6.3 Third-party risk

All contracts with third parties include requirements for:

- Adherence to OECD responsible business conduct principles
- Compliance with working conditions, data security and privacy legislation

- Assessment of ownership structures and connections to countries, organisations or companies that are not acceptable under applicable national regulations

6.4 Employees and working conditions

All Noroff employees are contracted in accordance with Norwegian law and on terms comparable to similar positions in the sector. For internationally based employees, Noroff ensures a decent level of pay and conditions appropriate to their country of residence.

As our operations are primarily conducted in an office environment, physical risk elements are limited. Work environment and work-life balance are monitored closely through the annual Work Environment Survey, and results are shared across the organisation as a basis for improvement actions.

The Noroff Work Environment Committee (AMU) meets at least quarterly to ensure any irregularities are detected and handled responsibly.

7. Risk Management

7.1 Risk categories

Noroff maintains a structured approach to risk management with continuous monitoring and reporting across the following 15 categories:

| | | |
|---------------------------------------|---|-------------------------------|
| Anti-Bribery & Anti-Corruption (ABAC) | Cybersecurity | Data Privacy |
| Environmental Risk | Financial Fraud | Governance & Reputation |
| External Political & Economic Risk | Intellectual Property & Education Quality | Licence to Operate |
| Operational Resilience | Responsible Employer | Responsible Sales & Marketing |
| Student Health & Safety | Third-Party & Intermediaries Management | Responsible AI |

7.2 Improvements since the previous report

Among the most significant improvements made since the previous reporting period:

- Increased internal training and awareness for cyber security and reduction of accidental information security breaches among staff
- Increased awareness of and initial implementation of improved document control and information security principles
- Each risk category has been assigned a dedicated “Risk Owner” at senior management level, ensuring organisational anchoring and the authority to act swiftly on any issue that arises

8. Implementation and Reporting

8.1 Governing principles

Noroff’s staff handbook provides all employees with an introduction to what Noroff expects and requires, as well as access to governing documents and forms for reporting any irregularity or misconduct.

All employees are expected to uphold the following general principles in their daily work and conduct:

| | |
|--|--|
| Honesty and integrity | Transparency and openness |
| Equality, non-discrimination and impartiality | Loyalty, fairness and good faith |
| Compliance with all applicable laws and regulations | Respect for individuals |
| Adherence to the highest standards of conduct in public administration | Protection of the environment, health and safety |
| Clarity in communication | |

8.2 Reporting channels

Four reporting channels are available to employees and other stakeholders:

| # | Channel | Description |
|---|-----------------------------|--|
| 1 | External “Si fra” | External concerns are reported through the external ‘Si fra’ arrangement and/or directly to our support system |
| 2 | HSE form | Internal employee matters (not whistleblowing) are reported directly to the HSE service |
| 3 | Whistleblowing | Concerns about serious misconduct are reported directly to the Whistleblowing Committee |
| 4 | Occupational health service | Where complete anonymity is required, employees may report via the company’s occupational health service |

8.3 Whistleblowing and follow-up

Noroff monitors the whistleblowing system for unacceptable behaviour on a daily basis. All reported cases are handled by a dedicated committee following a strict procedure that ensures fair treatment of all parties. The CEO sits on the committee to ensure the authority to act responsibly and swiftly. Breaches of the Code of Ethics and Conduct may result in consequences ranging from a verbal warning through to termination of employment in serious cases.

9. Contact and Signature

9.1 Contact information

For enquiries related to this report, its contents or any related questions, please contact us via our support system at noroff.no.

9.2 Signature

This report has been approved and signed by:

Oslo, 29 June 2026

Erik Brandt

[Erik Brandt \(Jun 29, 2026 14:58:19 GMT+2\)](#)

Erik Brandt

Chief Executive Officer (CEO), Noroff







2026 v2.4 Noroff-Transparency-report-2025-2026

Final Audit Report

2026-06-29

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