



Report on Due Diligence Assessment according to the Transparency Act

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1. BACKGROUND

This report is prepared for and on behalf of the following Norwegian companies:

- Opera Holding AS, org.nr. 926 419 463;
- Opera Norway AS, org.nr. 916 368 127; and
- Opera Software International AS, org.nr. 887 726 752.

These companies are subject to the Norwegian Transparency Act, enacted on June 18, 2021, which pertains to the transparency of enterprises and their commitment to upholding fundamental human rights and ensuring decent working conditions (referred to herein as the "**Transparency Act**"). These companies are, moreover, part of an international group of companies operating worldwide referred to hereinafter as the "**Opera Group**" or simply "**Opera**". In accordance with the Transparency Act's rule of amalgamation, this report has been prepared for the Opera Group as a whole. Further information about the Opera Group is available in the [annual report](#).

This document serves as the report on the due diligence assessment conducted by Opera for the reporting year 2024. The assessment aligns with the UN Guiding Principles on Business and Human Rights, as well as the OECD model for Due Diligence for Responsible Business Conduct.

The OECD's model outlines six steps that illustrate how companies can promote responsible and sustainable business practices. Opera's commitment to effective due diligence entails transparently addressing challenges and showcasing how they are managed collaboratively with stakeholders to achieve optimal outcomes.

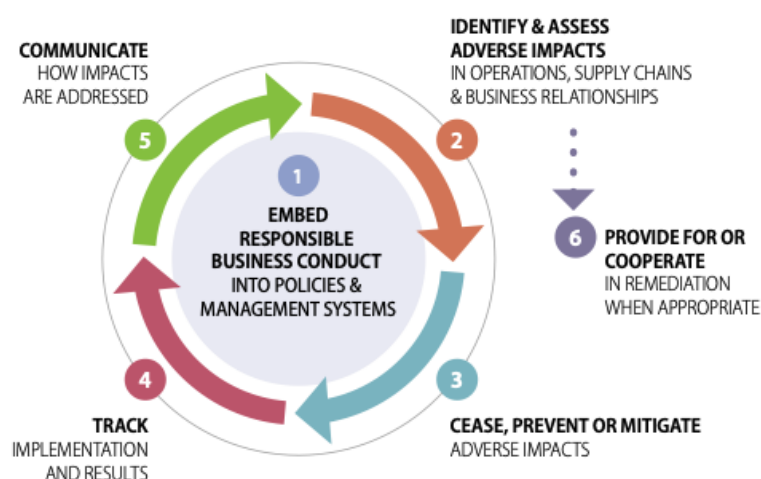


Figure: OECD (2018) OECD Due Diligence Guidelines for Responsible Business Conduct

This report is based on Sections 4 and 5 of the Transparency Act, which outline the duty to conduct due diligence and the requirements for this report, respectively.

Section 4 states that due diligence involves embedding responsible business conduct into policies, identifying adverse impacts on human rights and working conditions, implementing measures to mitigate



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these impacts, tracking implementation and results, communicating with stakeholders, and providing remediation where necessary. The frequency and extent of due diligence should align with the enterprise's size, nature, context, and the severity of adverse impacts.

Section 5 specifies that this report should include a description of the enterprise's structure, guidelines, and procedures for addressing adverse impacts, information on identified impacts and risks, and details of implemented or planned measures and their outcomes.

This report follows the structure outlined in Section 5 of the Transparency Act.



2. KEY INFORMATION ABOUT OPERA

2.1. General description of Opera's structure

The Opera Group is an international group of companies operating worldwide. However, when it comes to customer-facing operations such as licensing and distributing Opera-branded consumer software applications, it is Opera Norway AS that takes the lead. Other subsidiaries within the Opera Group are primarily considered part of Opera Norway AS's supply chain or its business partners. Opera Norway AS assumes the responsibility for preparing and publishing the current report on the consolidated basis for the subsidiaries of the Opera Group.

For more information about Opera, please visit our website at <https://www.opera.com/>. This report can be accessed at:

<https://www.opera.com/legal/environmental-social-and-governance-esg/the-norwegian-transparency-act> .

2.2. Key Information About Opera Norway AS

- Reporting Company Name: Opera Norway AS
- Business Registration Number of the Reporting Company: 916 368 127
- Business Address: Vitaminveien 4, 0485 Oslo
- Opera has implemented a procedure for receiving and addressing inquiries concerning the management of human rights impacts within its organization and supply chain. For any requests seeking information on this matter, please direct them to the following email address: compliance@opera.com.

Opera Norway AS falls under the purview of the Norwegian Transparency Act because its consolidated gross revenue in 2024 exceeded NOK 70 million, consolidated total assets exceeded NOK 35 million, and it employs over 50 full-time equivalents.

2.3. Description of Opera's Area of Operations

Opera is a global web innovator which primarily develops web browsers, as well as several other digital products and services, including but not limited to: video game development platforms; Web3-focused features and services; and content aggregation services. Opera has a long history of innovating in the online technology sector and developing new products and services for people who seek a better internet experience. As a developer of software-based, digital products and services, Opera does not produce (or purchase) physical components for its products or operate factories with a high risk of negative impacts on fundamental human rights and decent working conditions.

Located in Norway, Opera Norway AS operates in a country with strict rules regarding human rights and working conditions. Norway scores 1, according to the ITUC Global Risk Index, indicating an extremely low risk of human rights violations. Opera Software International AS has an office in Poland. Poland scores 3, which indicates moderate risk of human rights violation. Opera Holding AS is a holding company without employees or operations.

Opera places great importance on our impact and working conditions and adheres to a code of conduct that outlines its core values and principles. Opera offers its employees clear and equitable terms of employment. More details can be found in Opera's report on equality and anti-discrimination in the annual financial statement.



Consequently, the nature of Opera's operations indicates a low severity and probability of adverse impacts on fundamental human rights and decent working conditions. Opera has therefore concluded that it will perform due diligence assessments in accordance with the minimum requirements of the Norwegian Transparency Act.

2.4. Opera's Value Chain

Opera Norway AS conducts the majority of the Opera Group's customer-facing business, including licensing and distribution of the Opera branded consumer software applications. Other subsidiaries of the Opera Group, other than Opera Norway AS, are considered to be part of Opera Norway AS's supply chain and/or business partners.

As a software company that develops digital products such as software applications, Opera majorly does not have suppliers in the sense defined by the Norwegian Transparency Act. Instead, Opera may engage software developers as consultants, with whom it generally has individual contracts. Therefore, most of Opera's vendors are classified as business partners under the Norwegian Transparency Act. However, in early 2025, Opera launched the GX Gear project, available at <https://eu.gx.deals>, offering GX-branded merchandise through an online store. While Opera does not manufacture physical goods itself, it sources these items from a number of suppliers located in various countries. Given that merchandise production may pose a heightened risk of adverse impacts on human rights and working conditions, Opera conducted a due diligence assessment of all involved suppliers and business partners. This was done despite the fact that merchandise sales represent a minor part of Opera's overall business, the volume of the physical goods supplied is relatively low, and many of the suppliers are small, privately owned local companies.

Certain of the Opera Group's international affiliates purchase colocation, bandwidth and electricity from sub-suppliers in Iceland, the Netherlands, USA, Canada, Nigeria, South Africa¹, and Singapore.

- Iceland has Rating 1 according to the ITUC Global Risk Index, indicating an extremely low risk of human rights violations.
- The Netherlands and Singapore have Rating 2, which Opera assumes to be a low risk of human rights violation.
- South Africa and Canada have a Rating of 3 or moderate risk of human rights violation.
- Despite having Rating 4 and 5, according to ITUC Global Risk Index, indicating medium and high risk of human right violations, sub-suppliers in the USA and Nigeria are considered serious suppliers because they have strict internal rules regarding employment. Additionally, the DFØ Høyrisikolisten does not list ISPs, telecommunication services, data center colocation, or electric utilities among the product and service categories with a high risk of violating basic human rights.

¹ The data center in South Africa was closed in September 2024. Therefore, it is included in this report, which covers the period from January 1 to December 31, 2024, but it will not be included in next year's report.



2.5. Human Rights in Opera

Opera is committed to respecting internationally recognized fundamental human rights and labor standards, both within our own operations and throughout our supply chain.

We maintain strong relationships with our employees and engage with them regularly. The HR team assesses, and reports on equality and non-discrimination in accordance with applicable legal requirements.

In line with the Norwegian Transparency Act (Åpenhetsloven), Opera has integrated human rights due diligence into its contract approval process. The Compliance team works closely with the procurement team and commercial legal advisors to ensure that due diligence is consistently applied and streamlined across relevant supplier engagements.

To enhance our efforts, in 2024 Opera began collaborating with V-Trust, a third-party provider of social audits. V-Trust may be engaged on an ad hoc basis to assess suppliers or sub-suppliers considered to pose a heightened risk, where reasonably feasible.

2.6. Key Policies and Governance

Opera management will conduct an annual review of the objectives, strategy, and organizational aspects of Opera's compliance with the Norwegian Transparency Act. Supervising and ensuring compliance with the due diligence assessment mandated by the Norwegian Transparency Act falls under the purview of the Transparency Manager at Opera. It is their role to oversee this process and ensure its proper implementation.

Opera is committed to adhering to international standards and principles, as enshrined in various policies and procedures within our organization:

- **Code of Business Conduct and Ethics** in conjunction with our **Anti-Corruption Policy** articulates clear expectations for employees concerning privacy, cybersecurity, anti-corruption measures, human rights consideration, discrimination, harassment, and compliance with all applicable laws.
- **Opera Employee Privacy Statement** outlines our commitment to protecting the personal data of our employees. It details the measures we take to ensure that employee information is handled with the utmost confidentiality and in accordance with applicable data protection laws.
- **Whistleblower Procedures** offer Opera employees the opportunity to report instances of employment discrimination or harassment, occupational health and safety concerns, misuse of corporate assets, or any other conduct that violates the Opera Group's Code of Business Conduct and Ethics, Anti-Corruption Compliance Policy, or other relevant policies.
- **Health, Safety and Environment Guidance (HSE)** (Oslo Office) outlines Opera's commitment to comply with applicable health, safety, and environmental laws, regulations, and standards in Norway.
- **Eliminating Bias Policy** ensures that hiring decisions are made fairly, and without bias.



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- In 2023, we developed and launched a new online Compliance and ESG training course for all our staff members. This training is now an integral part of our onboarding process, ensuring that all Opera staff members are informed of our standards and expectations.
- **Supplier Code of Conduct** establishes foundational norms and practices for our suppliers, aimed at protecting labor and human rights, health and safety, environmental concerns, and ethical compliance. This Code is grounded in internationally recognized standards, including the UN Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) International Labour Standards, and the Universal Declaration of Human Rights, in addition to our corporate values.
- **Contractual clauses** were incorporated in our partner contracts that mandate compliance with our Supplier Code of Conduct. Where relevant, these contracts also include performance clauses to safeguard fundamental human rights.
- **Due Diligence process** is in place for conducting third-party due diligence assessments, covering areas such as — but not limited to — corruption, money laundering, sanctions risks, and potential adverse impacts on human rights. In addition, business partners and suppliers that exceed a certain risk threshold are required to complete an ESG due diligence questionnaire.



3. HUMAN RIGHTS IMPACT ASSESSMENT

Opera has undertaken measures to identify and evaluate potential adverse effects on human rights and working conditions within its value chain and own operations.

However, human rights violations is generally considered to be of a very low risk for Opera's core business because of the company's industry, operations, and supply chain characteristics:

1. Opera operates in the software and technology space, developing web browsers, ad tech solutions, and related digital products. These activities are knowledge-based and involve professional developers, engineers, and office staff, minimising the risk of human rights violation within its direct workforce.
2. The majority of Opera's suppliers are likely to provide software, digital services, or IT-related hardware. While human rights violations risks can exist in the hardware supply chain (e.g., raw materials), this risk is indirect to Opera and typically mitigated by partnering with reputable suppliers and adhering to due diligence frameworks.

3.1. Adverse Impacts by Opera

As a software company, Opera acknowledges the significance of upholding international human rights for individuals affected by our operations. While our direct influence on human rights may not be as pronounced as that of companies dealing with physical goods, we recognize the potential implications of our products and services, particularly regarding privacy rights. We approach this responsibility supported by an internal legal and data protection team. We remain well-versed in relevant regulations and guidelines, such as those pertaining to data privacy and protection, to ensure that our offerings do not inadvertently harm any specific groups.

As Norwegian entities, Opera Holding AS, Opera Norway AS, and Opera Software International AS operate in accordance with applicable Norwegian laws and regulations. For our own operations, assessments are informed by regular employee engagement activities, including annual performance evaluations and quarterly anonymous surveys administered through our internal employee feedback system. These surveys cover all employees and provide valuable insights into the working environment, helping us better understand and address potential risks.

In addition, Opera conducts an annual organisational risk assessment, which involves representatives from all departments. This exercise forms part of our risk management and addresses various risk domains, including working conditions, market dynamics, operational risks, geopolitical developments, environmental issues, and cybersecurity.

In 2024, Opera conducted its first double materiality assessment in preparation for upcoming reporting obligations under the EU Corporate Sustainability Reporting Directive (CSRD)². This assessment covered the full scope of Opera's own operations and its value chain. The Double Materiality Assessment was revised in 2025.

Based on the assessments carried out during the reporting period, Opera has not identified any actual or potential adverse impacts on human rights or decent working conditions in its own operations.

² Due to the adoption of the EU "Stop-The-Clock" Directive, Opera's reporting obligations under CSRD have been postponed by two years.



3.2. Adverse Impacts by Opera's Value Chain

Opera is a software company specializing in digital product development. In the context of the Norwegian Transparency Act, the definition of “suppliers” generally does not apply to Opera’s operations in a conventional sense. Instead, Opera primarily engages individual software developers and consultants under direct contracts. Consequently, most of our external engagements fall under the category of “business partners” as defined by the Act.

Opera applies a risk-based approach to evaluate its business partners, with a focus on those operating in jurisdictions identified as high or very high risk—specifically, countries rated 4 (medium risk), 5 (high risk), and 5+ (very high risk) under the ITUC Global Rights Index. We also consider sector-specific risks, including product and service categories flagged as high-risk by the DFØ Høyrisikolisten (Norwegian Government Agency for Financial Management’s High-Risk List).

A high-level risk assessment of Opera’s value chain was conducted to identify partners potentially exposed to risks related to human rights and decent working conditions. This assessment considered geographic exposure, the nature of the business model (particularly those relying on low-cost or vulnerable labor), and industry-specific risks.

Opera conducts human rights due diligence for all major business partners, as well as for new and existing partners deemed high-risk (mostly suppliers of physical goods, hardware). All key partners have demonstrated strong transparency and alignment with our human rights expectations. However, we identified a small number of minor partners—mostly small private companies—that currently do not report on sustainability or human rights practices. To address this, Opera has engaged with these partners by distributing our ESG due diligence questionnaire and conducting adverse media screenings.

In 2024, Opera took further steps to mitigate risks by increasing the use of contractual clauses requiring suppliers to support Opera’s human rights due diligence, with suppliers of physical goods—a category identified as posing higher risks. These include granting Opera the right to commission social audits of sub-suppliers, to be conducted by V-Trust or similar accredited audit firms.

Based on the assessments carried out during the reporting period, Opera has not identified any actual adverse impacts on human rights or decent working conditions in the value chain. However, the potential risk of human rights breaches in the value chain remains.



4. MEASURES AND PROGRESS

Opera is committed to ensuring respect for human rights and decent working conditions within our operations and across our supply chain. We recognize that this commitment requires ongoing effort and continuous improvement, including the implementation of measures aligned with the company's standards.

4.1. Measures implemented for the present year

1. Human Rights Policy: Opera's Human Rights Policy is woven into our Code of Conduct, specifically within the Environment, Health & Safety and Employment Practices & Working Conditions sections. This framework establishes expectations not only for our employees but also for our suppliers and business partners, ensuring a unified commitment to upholding fundamental human rights. To ensure seamless integration, the Supplier Code of Conduct has been incorporated into our supplier onboarding process. Furthermore, we have developed an Environmental, Social, and Governance (ESG) due diligence questionnaire and checklist, which are utilized by our GX Gear procurement team in cooperation with the Compliance team to evaluate and monitor supplier compliance.

2. Due Diligence Guidelines: The due diligence guidelines were updated on February 1, 2024, to include sanction screening procedures. In addition, the Legal Standard was revised to incorporate a relevant contractual clause, a reference to the ESG checklist, and the requirement to involve the Compliance team when assessing potential human rights risks related to suppliers of physical goods, waste disposal services, and office lease agreements.

3. Contractual Clauses: The utilization of contractual clauses to enforce minimum standards has been increased where feasible by December 30, 2024. Collaboration with commercial lawyers to further enhance the implementation of contractual clauses is ongoing. This measure will be carried forward to the subsequent year, as not all contracts currently comply with this requirement.

4. Due diligence: human rights due diligence is integrated into review of new customers and suppliers.

5. Opera engaged with business partners who had not disclosed their human rights and labor standards to ensure alignment with Opera's expectations. This engagement process is ongoing. Partners considered potentially high-risk due to limited transparency, were asked to complete Opera's ESG due diligence questionnaire. In some cases, a red-flag tag was applied in Opera's internal approval system, indicating the need for additional due diligence if the contract is renewed, a new agreement is initiated, or order volumes increase.

4.2. Ambitions for the coming year

NR.	MEASURE	DESCRIPTION	DEADLINE
1	Contractual clauses	Continue to improve and progress in increasing the number of contractual clauses on minimum standards where the opportunity is available to do so	In progress
2	Due Diligence	Human rights due diligence is integrated into the approval process of contracts; however, the Compliance team will continue working with the commercial team and commercial lawyers to address the identified gaps and to enhance due diligence and on-site social audits of high-risk suppliers to	In progress



This report is approved by the Board of Opera Norway AS in June 2025.

Simen Stenvik Granly

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