Report on Due Diligence Assessment pursuant to the Norwegian Transparency Act

1. Background

This report has been prepared 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 of June 18, 2021 relating to enterprise transparency and work on fundamental human rights and decent working conditions (the "**Transparency Act**").

The companies form part of an international group of companies operating worldwide (the "**Opera Group**" or "**Opera**"). In accordance with the aggregation rules set out in the Transparency Act, the assessment of whether the statutory thresholds are met has been carried out on a consolidated basis, taking into account the activities of the Opera Group. Accordingly, this report describes the due diligence work performed in relation to the operations of the Norwegian companies and, where relevant, the wider Opera Group. Further information regarding the Opera Group is available in its Annual Report.

This document constitutes Opera's report on due diligence assessment for the reporting year 2025. The assessment has been carried out in accordance with the Transparency Act and is based on the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct.

The OECD Due Diligence Guidance sets out six steps for responsible business conduct.

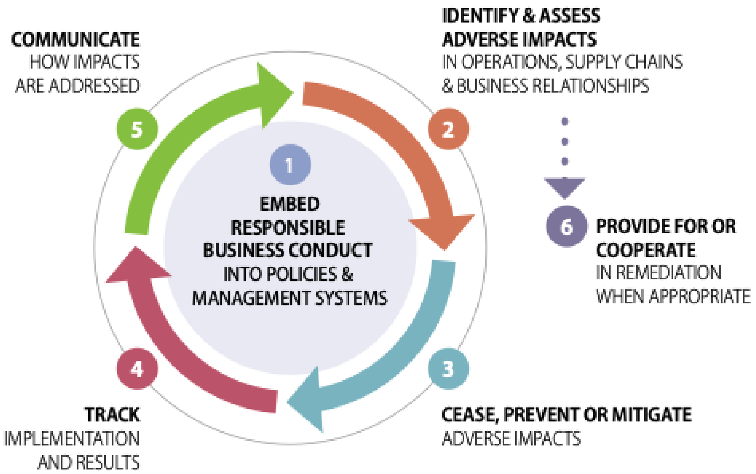

Figure: OECD (2018) OECD Due Diligence Guidelines for Responsible Business Conduct

Opera's due diligence approach is risk-based and proportionate to the nature, size and context of its operations, as well as the severity and likelihood of potential adverse impacts on fundamental human rights and decent working conditions.

This report has been prepared in accordance with Sections 4 and 5 of the Transparency Act and follows the structure and reporting requirements set out therein. In particular, the report describes:

- the Company's organisation, guidelines and procedures for managing actual and potential adverse impacts on fundamental human rights and decent working conditions;
- identified actual and potential adverse impacts and significant risks identified during the reporting period; and
- measures implemented or planned to prevent, mitigate or remedy such impacts and the results achieved.

2. Key information about Opera

2.1. General description of Opera's structure

The Opera Group is an international group of companies operating globally.

Within the group, Opera Norway AS is the primary entity responsible for customer-facing activities, including licensing and distribution of Opera-branded consumer software applications. Other subsidiaries of the Opera Group provide supporting functions and services and are, for the purpose of this assessment, treated as part of Opera Norway AS's supply chain and/or business partners.

Opera Norway AS is responsible for preparing and publishing this report on a consolidated basis for the relevant Norwegian group companies.

Further information about Opera is available at https://www.opera.com/. This report is available at https://www.opera.com/legal/environmental-social-and-governance-esg.

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 established procedures for handling inquiries relating to its management of human rights impacts within its operations and value chain. Requests may be directed to: compliance@opera.com.

Opera Norway AS is subject to the Norwegian Transparency Act based on its consolidated financial and employment thresholds.

2.3. Description of Opera's Operations

Opera is a global technology company developing software products and digital services, including web browsers, digital platforms, content services, and related technologies.

As a software-driven business, Opera does not operate manufacturing facilities or extractive production activities. However, the company relies on a global network of third-party suppliers and service providers, including cloud infrastructure providers, hardware vendors, and specialist service contractors.

Opera Norway AS is located in Norway, a jurisdiction with strong labour and human rights protections. Opera Software International AS has some staff members in Germany with strong human rights protection and in France, where labour standards are well-established but the overall risk environment is assessed as moderate based on external risk indices. Opera Holding AS is a holding entity without employees or operational activities.

Opera maintains internal governance frameworks, including codes of conduct and HR policies, designed to ensure compliance with applicable labour standards and respect for fundamental human rights in its own operations.

Based on the nature of its activities, Opera assesses the inherent risk of severe adverse human rights impacts within its own operations as generally low. This assessment reflects the absence of high-risk production activities, but does not eliminate the need for ongoing monitoring of issues such as working conditions, equality, and non-discrimination within the workforce.

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 does not generally 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.

In 2025, Opera launched the GX Gear project (https://eu.gx.deals), offering branded merchandise through an external online store. While Opera does not itself manufacture physical goods, it engages third-party suppliers for production and fulfillment. These activities introduce higher inherent risk exposure in the value chain compared to purely digital services, and are therefore subject to enhanced due diligence, 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.

Opera Group entities also rely on infrastructure services such as colocation, bandwidth, and electricity sourced from sub-suppliers in Iceland, the Netherlands, USA, Canada, Nigeria, and Singapore. These jurisdictions are assessed using external risk indicators, including the ITUC Global Rights Index and DFØ's high-risk list. Risk classification is used as a screening tool and does not replace supplier-specific assessment.

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.

Human rights due diligence is integrated into Opera's procurement and contract processes. The Compliance function works in coordination with legal and procurement teams to ensure consistent application of risk-based assessment procedures for relevant third-party engagements.

Where appropriate, Opera engages third-party providers, including social audit firms such as V-Trust, to support enhanced due diligence for suppliers assessed as higher risk.

2.6. Key Policies and Governance

Responsibility for compliance with the Norwegian Transparency Act is anchored with management, with operational responsibility delegated to the Transparency Manager.

Opera's approach is supported by the following governance framework:

- **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.

- **Mandatory Compliance Training** is integrated into onboarding and employee development.

- **Supplier Code of Conduct** aligned with the UN Guiding Principles on Business and Human Rights, ILO core conventions, and the Universal Declaration of Human Rights.

- **Contractual clauses** that mandate compliance with our Supplier Code of Conduct were incorporated in certain of our partner contracts. 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.

- **Anti-Harassment Guideline** defines Opera's commitment to a safe, respectful and inclusive workplace for all.

3. Human Rights Impact Assessment

Opera has implemented risk-based processes to identify and assess actual and potential adverse impacts on human rights and decent working conditions across its own operations and value chain.

The risk of human rights violations is generally considered to be very low 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 the risk of human rights violations 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.

Key focus areas include:

- non-discrimination and equal treatment in recruitment and employment;
- potential risks related to gender equality and pay equity;
- employee wellbeing and psychosocial working environment; and
- privacy and data protection impacts related to employees and users.

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.

Opera has not identified any actual adverse human rights impacts within its own operations during the reporting period.

3.2. Adverse Impacts in 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 its value chain in line with the Norwegian Transparency Act, focusing on geographic, sectoral, and supplier-specific risk factors. While Opera primarily engages service providers in software, IT, and consulting services, its value chain also includes:

- hardware and device-related suppliers;
- cloud infrastructure and data centre providers;
- subcontractors involved in merchandise production and fulfilment; and
- other digital and technical service providers.

Opera assesses business partners using external risk indicators, including the ITUC Global Rights Index and DFØ's high-risk category list, combined with internal due diligence processes.During the reporting period, Opera:

- conducted due diligence on key and higher-risk business partners;
- implemented ESG questionnaires for selected suppliers where transparency was limited;
- carried out adverse media screening for relevant counterparties; and
- strengthened contractual requirements for suppliers, including obligations to support human rights due diligence and permit audit rights where appropriate.

Where limited information is available from suppliers, Opera continues to engage through follow-up requests and risk-based monitoring rather than assuming compliance.

Based on the assessments carried out during the reporting period, Opera has not identified actual adverse impacts in its value chain. However, potential risk exposure remains, particularly in lower-transparency segments of the supply chain and in geographically higher-risk jurisdictions. These areas are subject to ongoing due diligence and targeted risk mitigation measures.

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. This commitment is implemented through ongoing due diligence, contractual governance, supplier engagement, and continuous improvement measures.

4.1. **Measures implemented for the present year**

1. Contractual Clauses: Opera has increased the use of contractual clauses requiring suppliers and relevant business partners to comply with Opera's Supplier Code of Conduct and applicable human rights standards, where operationally and commercially feasible. Work is ongoing to further expand standardisation of these clauses across relevant agreement templates.

Not all legacy contracts currently include updated human rights clauses; therefore, remediation is being addressed through renewal processes and contract renegotiations.

4. Due diligence: Human rights due diligence is integrated into Opera's procurement and onboarding processes for new and higher-risk business partners.

During the 2025 reporting period, Opera conducted 21 enhanced due diligence assessments of selected business partners identified through risk-based screening. In addition, standard screening procedures were applied across the broader supplier and business partner base.

5. Opera engaged with business partners that had limited or incomplete disclosure of human rights and labour standards information. These engagements included requests to complete ESG due diligence questionnaires and provide additional documentation where required.

Where appropriate, internal risk flags were applied within Opera's supplier approval system to ensure enhanced monitoring. These flags trigger additional due diligence steps in the event of contract renewal, scope expansion, or increased commercial exposure.

4.2. Ambitions for the coming year

NR.	MEASURE	DESCRIPTION	DEADLINE
1	Contractual Controls	Increasing coverage of contractual human rights clauses across relevant supplier agreements	In progress
2	Due Diligence Integration	Expanding the use of ESG due diligence questionnaires for higher-risk counterparties	In progress
3	Supplier engagement and risk escalation	Strengthening escalation procedures for suppliers with limited transparency; and improving integration between procurement, legal, and compliance functions to ensure earlier risk identification in the contracting process.	In progress

This report is approved by the Board of Opera Norway AS in June 2026.

Simen Stenvik Granly

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Chiletso Skeime

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