

# ZETADISPLAY NORWAY AS

## ÅPENHETSLOVEN [TRANSPARENCY ACT]

### DUE DILIGENCE REPORT – 1<sup>ST</sup> JULY 2022 TO 31<sup>ST</sup> DEC 2022

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#### 1. INTRODUCTION

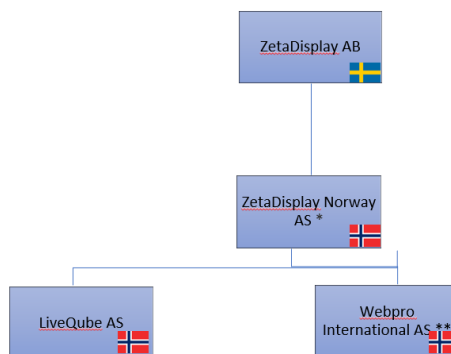
ZetaDisplay Norway AS (Formerly known as ProntoTV AS) is pleased to publish this disclosure under the Norway Transparency Act / Åpenhetsloven (the “Act”) that came into effect on 1<sup>st</sup> July 2022. This Due Diligence Report (“Report”) describes ZetaDisplay Norway’s measures regarding transparency in its supply chain. The Act has two main purposes:

- A. To ensure adequate compliance with human rights; and
- B. To ensure decent working conditions

#### 2. REPORTING ENTITY & CORPORATE STRUCTURE

This Report is provided by and covers ZetaDisplay Norway AS. (Company number: 981 106 431) and LiveQube AS (Company Number: 995 543 478) as the reporting entities under the Act (hereinafter jointly referred as ZetaDisplay Norway).

ZetaDisplay Norway AS is a 100% subsidiary of ZetaDisplay AB headquartered in Sweden and LiveQube AS is a 100% subsidiary of ZetaDisplay Norway AS. Webpro International AS was a 100% subsidiary of ZetaDisplay Norway AS. However, it was dormant and eventually dissolved in October 2022. Hence, Webpro International AS is not relevant for this Report.



\* Formerly known as Pronto TV AS  
\*\* This entity is dissolved as on October 2022.

ZetaDisplay Norway AS and LiveQube AS have their registered offices at Grev Wedels Plass 9, NO-0151 Oslo. ZetaDisplay Norway had 39 average employees in 2022.

#### 3. OPERATIONS & SUPPLY CHAIN

ZetaDisplay enables the digital experience in physical environments through communication solutions and services on a scalable software platform. Our comprehensive solutions, mainly in Digital Signage, enhance the visitor and customer experience and increase sales in retail, service

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trade, restaurants and cafes, enable wayfinding, news distribution and advertising experience in public environments as well as contribute to increased loyalty and commitment in workplaces through visualization. ZetaDisplay operates in a long-term growth market in Digital Signage solutions, software platforms, content services, project planning, service and maintenance.

ZetaDisplay is the leading player in the Nordic region and one of the largest in Europe. ZetaDisplay offers a market-leading turnkey solution that includes concept and software development, installation and after-market including monitoring, operation and support. Internationally, our industry is called Digital Signage.

#### **SUPPLY CHAIN**

Our principles on high business ethics, respect for human rights, labour standards and the environment also apply to our suppliers. ZetaDisplay entities have a limited number of select suppliers for its own business. On behalf of customers however, we collaborate with hardware suppliers of screens and service suppliers for system maintenance and installation. The only hardware suppliers we collaborate with are recognised and internationally leading companies. We take care in ensuring that their principles on business ethics, the environment and human rights are aligned with ours, as stated in our Code of Conduct. Other suppliers who are contracted by ZetaDisplay entities must ensure that they comply with the principles stated in our Code of Conduct. Service providers that are engaged are either the customer's existing suppliers or local, well-established large companies with an excellent reputation.

As we are a part of a larger group, we have a global supply chain shared between group companies. Therefore, the influence we have on these can be limited.

#### **4. DUE DILIGENCE**

ZetaDisplay Norway is committed to preserving human rights. For 2022, ZetaDisplay Norway evaluated its most important suppliers together representing over 90% of its annual spend. We identified that these suppliers are from Norway, Netherlands, Finland, UK and China. As part of initial due diligence process, we have adopted jurisdictional analysis basis global slavery index. This helped us identify any potential risks we may have from our major suppliers.

##### **a. RISKS**

We have conducted a due diligence of our top suppliers basis their materiality and found that 95% of our suppliers are from the countries with good score for human rights compliance index viz. Norway, Finland, Netherlands and UK.

For the one supplier that is not from the country with good score, we will continue to monitor their compliance. This is the only potential adverse impact we have identified for the reporting period.

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#### b. RISK MITIGATION –

In general, our suppliers have committed to adhere to and implement the same principles of responsible business as we do. To this effect, we have also asked these major suppliers to sign an undertaking to conform with global standards of responsible business.

If we find any gaps in their compliance on an ongoing basis, we will conduct further due diligence and rectify the gaps by guiding them towards compliance or changing them basis the materiality of the risk involved. If a breach to Zeta Display's Group Code of Conduct is discovered, the first course of action is engagement with the supplier and if that proves to be unsuccessful, the collaboration is terminated.

#### 5. GOVERNANCE FRAMEWORK

ZetaDisplay AB which is the parent company of ZetaDisplay Norway, is a signatory of UN Global Compact's Ten Sustainability Principles. We also support the work of achieving the Sustainable Development Goals by 2030. Furthermore, we monitor our compliance with local/ international legislation and regulations, as well as various international conventions and principles, such as the ILO Declaration on Fundamental Principles and Rights at Work, the OECD guidelines for multinational companies and others. We neither participate in projects/ assignments, nor collaborate with suppliers, where there is a risk of violating the principles of the Global Compact.

Within the organisation, we have a robust governance structure to oversee all our sustainability efforts, including adherence to all the above-mentioned commitments.

|                       |   |
|-----------------------|---|
| <b>The Board</b>      | Establishes material topics as well as Code of Conduct and monitors risk analyses and mitigation.               |
| <b>The CEO</b>        | Responsible for implementing, communicating, and integrating sustainability in the overall business strategies. |
| <b>The Management</b> | Responsible for smooth functioning as planned and report on the outcome.  |

We have a well-established Code of Conduct which contains the overall principles for ZetaDisplay group's conduct in the areas of business ethics and its treatment of people, including human rights, labour standards and the environment, are based on, for example, the Global Compact. It applies to ZetaDisplay entities, as well as its partners, suppliers and others with ties to the company and its products.

We are in process of implementing other policies and guidelines to strengthen this governance structure further in the year 2023. We will be reviewing the Whistleblower Programme for both internal and external stakeholders, have a formalised supplier onboarding process and checklist to ensure we only work with like-minded suppliers.

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**6. INFORMATION REQUESTS**

If you have any inquiries related to how we address actual or potential adverse impact, please contact us by emailing the following address: [marius@zetadisplay.com](mailto:marius@zetadisplay.com)

In order to allow us to address your request, please provide us with the following information:

Your full name :

Country / Region:

The nature of your request:

*Without this information, we will not be able to address your request.*

We will be able to help you with the information within the guidelines set up under the Act.

**7. RESULTS AND STATEMENT APPROVAL**

The aim of our due diligence process in our supply chain is to understand which suppliers represent the highest risk of human rights abuses and to mitigate that risk. We strive to continuously improve our programs to ensure compliance with applicable laws and policies and to meet the expectations of our customers, our shareholders, our associates, our communities and other stakeholders.

This Report was approved and adopted by the Board of Directors on 30 June 2023.