

## TRANSPARENCY ACT REPORT 2024

### 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 for the year 2024 (“Report”) describes ZetaDisplay Norway's measures regarding transparency in its supply chain.

The Norway Transparency Act underscores the importance of upholding fundamental human rights and ensuring decent working conditions within private entities. By requiring disclosure of labour practices and efforts to respect human rights, this Act aims to foster a culture of accountability and integrity. Transparent reporting on these aspects enables stakeholders to evaluate a company's commitment to ethical conduct and to ensure fairness and dignity in the workplace.

ZetaDisplay Norway is committed to ethical business practices and continuous improvement. This report covers our due diligence processes, governance framework, supply chain structure, risk assessments, and measures taken to ensure compliance with the Act.

### 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 to 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.



ZetaDisplay Norway AS and LiveQube AS have their registered offices at Grev Wedels Plass 9, NO-0151 Oslo. ZetaDisplay Norway had 43 average employees in 2024.



### **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 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.

#### **OUR SUPPLY CHAIN-**

Zeta Display is committed to adhering to the principles and guidelines enshrined in the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises such as upholding high ethical standards, respecting human rights, maintaining fair labour practices, and preserving the environment. Given that these principles form the base for the Norway Transparency Act, we endeavour to extend these compliance requirements to our supplier relationships as well. ZetaDisplay works closely with a select group of suppliers for its internal operations.

While ZetaDisplay maintains a limited number of trusted suppliers for its internal operations, we engage with additional partners when serving our customers. These collaborations involve hardware suppliers for screens and service providers for system maintenance and installation. Our hardware suppliers are internationally recognized leaders in their field. Our supply chain comprises carefully selected suppliers committed to ethical, transparent, and sustainable practices. Additionally, all suppliers contracted by ZetaDisplay are expected to adhere to the principles set forth in our Code of Conduct. Service providers engaged are either existing suppliers of our customers or reputable companies in this sector.

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

### **4. DUE DILIGENCE**

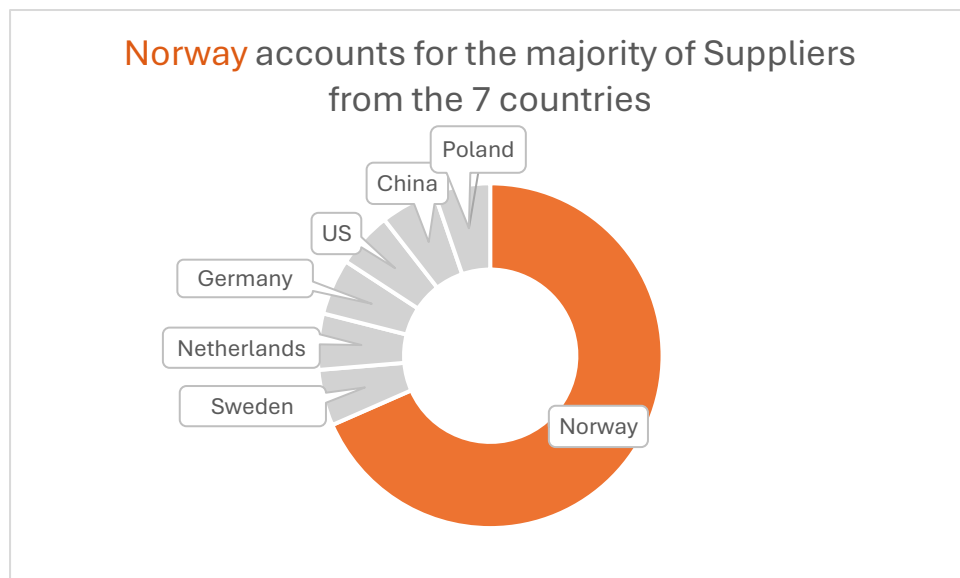
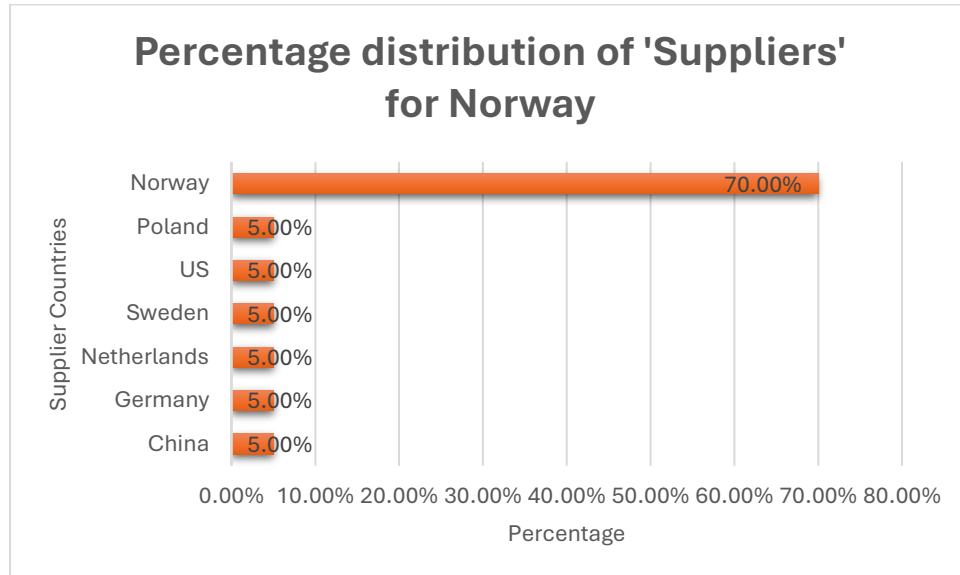
For the year 2024, ZetaDisplay Norway evaluated its most important suppliers together representing a substantial portion of its annual spend. We identified that these suppliers are from Norway, the Netherlands, Sweden, Poland, Germany, US and China. As part of the initial due diligence process, we have adopted the jurisdictional analysis based on the Global Slavery Index, which ensures a systematic risk-based approach to identifying potential human rights risks in our supply chain.

#### **RISK-**

We have conducted a due diligence of our top suppliers based on their materiality and found that 95% of our suppliers are from the countries with a good score for human rights compliance index due to which they are identified in the list of “Lowest Prevalence of modern slavery” viz . Norway,

Germany, Netherlands and Sweden. Further, majority of the suppliers are from the countries with highest Government response to tackle slavery viz., Netherlands, US, Norway and Sweden.

We have 70% suppliers based out of Norway.



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

#### **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.



We expect our suppliers to follow responsible business practices aligned with our Code of Conduct and international standards. Suppliers are encouraged to adopt global best practices and to sign an undertaking in this regard. If non-compliance is identified, we may conduct additional due diligence, support remediation efforts or, where appropriate, consider ending the relationship based on the level of risk. Our preferred approach is to engage with suppliers to achieve compliance, with relationship termination considered only as a last resort.

- Continuous supplier training and capacity-building initiatives.
- Clear escalation processes with corrective actions and contract termination protocols.
- Active collaboration and dialogue with suppliers to strengthen compliance and transparency.

## 5. GOVERNANCE FRAMEWORK

ZetaDisplay AB which is the parent company of ZetaDisplay Norway, is a signatory of the 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 the process of implementing other policies and guidelines to strengthen this governance structure further in the year 2024. We will be reviewing the Whistleblower Program for both internal and external stakeholders, have a formalized supplier onboarding process and checklist to ensure we only work with like-minded suppliers.

## 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 objective of our due diligence process is to identify and manage the highest risks of human rights abuses in our supply chain. Our process ensures ongoing compliance with relevant laws and standards, and aligns with the expectations of customers, employees, communities, and other stakeholders. We aim for continuous improvement, actively monitoring and adapting our programs to meet evolving challenges.

Our robust due diligence confirmed that:

- The risk of human rights or labour rights violations in our supply chain is low.
- Suppliers demonstrate strong compliance with international standards.
- No significant adverse impacts were identified during the 2024 reporting period.

This Report was approved and adopted by the Board of Directors on June 26, 2025.

Anders Olin

Chief Executive Officer

Marius Lysholm

Country Director (Norway)