

SPOTLIO AS
TRANSPARENCY ACT REPORT

May 2025 to April 2026



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About the Transparency Act

The Norwegian Transparency Act (Åpenhetsloven) came into force on 1st of July 2022. The Act applies to larger enterprises that are resident in Norway and that offer goods or services in or outside Norway as well as larger foreign enterprises that offer goods and services in Norway, and that are liable to tax pursuant to internal Norwegian legislation.

The Transparency Act established requirements for the enterprises to report on fundamental human rights and decent working conditions. The enterprises that the Transparency Act applies to are imposed to carry out due diligence, to publish an account of the due diligence assessment and have a duty to provide information.

The Transparency Act requires enterprises to ensure human rights and decent working conditions are respected in their own operations and supply chain and among their business partners. The Act is meant to lead to improvements in these areas and that the information available will allow consumers to make more informed choices.

The Norwegian Transparency Act is a strong regulation that can contribute to increased transparency and the encouragement of human rights and decent working conditions. At Spotlio, we are dedicated to respecting human rights and we strive to follow the recommended practices by OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.



About Spotlio

In Spotlio (the "Group"), our mission is to empower attractions, waterparks, and ski operators, to increase end user engagement, maximize revenue, and improve operational predictability through digital solutions. We provide customers with a full digital ecosystem through software-based solutions, including solutions for native apps, interactive maps, ecommerce and websites.

Our business model is to develop and sell unique technology, software and apps to the markets of ski resorts, and parks and attractions destinations. Our main markets are in North-America and Europe.

Spotlio AS includes multiple subsidiaries, including Spotlio Inc, Spotlio AG and Spotlio EMEA SL. As of April 2026, the Group consists of 34 employees, mainly working from offices and remotely in the USA, Spain and Norway.

Our ambition is to continue our organic business growth. The Group's growth strategy is focusing on making the overall product offerings more efficient and realizing synergies from cross-selling of products, as well as increasing market share through partnerships and expansion in the market.



Our commitment

The Group is committed to respect human rights and decent working conditions and to act in accordance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

Spotlio's Board of Directors (the "Board") has the oversight responsibility of the management of the Group, including responsibility for risks related to adverse impact on fundamental human rights and decent working conditions, and ensures that Spotlio's policies and business decisions are made to ensure respect for human rights and working conditions. The CEO of Spotlio is responsible for the daily operations of the Group, including policy implementation and ensuring that ESG impacts are taken into consideration as part of daily work.

Our commitment starts with our employees where we make sure the working environment is safe and secure and that all employees are treated equally and fairly. We are committed to ensuring that both employee rights and basic human rights are complied with. The Group's work environment is positive and diverse with employees from many different cultures and backgrounds. We place great emphasis on being an equal opportunity employer. We do not discriminate based on race, color, religion, gender, gender expression, sexual orientation, age, national origin, citizenship, disability, marital status, veteran's status, or any other characteristic protected by law. This applies to all decisions regarding terms, conditions, and privileges of employment.

We strive to ensure that all stakeholders, both employees, customers, suppliers, contractors and consultants adhere to basic human rights and we are committed to creating value for our stakeholders while also operating in a socially and environmentally responsible manner. Further, we acknowledge and comply with employee rights and other applicable social issues in all our management as an employer.



We are committed to creating long-term value for our stakeholders, while at the same time operating in an environmentally friendly, sustainable, and socially responsible way.

Environmental, social and governance (ESG) risks

Spotlio has identified potential environmental, social and governance (ESG) risks associated with our business. These include cybersecurity risks, data privacy risks, energy risks and supply chain risks.

During the reporting period, Spotlio did not identify any actual adverse impacts on fundamental human rights or decent working conditions in its own operations or supply chain. However, the Group has identified potential risks as described below.

As the Group operates within the software business, the overall impact on the environment is considered low. Most of our work is performed and stored electronically and we have limited use and production of paper.

Environmental risks identified are:

- Carbon emissions associated with energy consumption - Computers and servers are vital working tools, which require electric power. This is a risk as our computers and servers consume electricity, leading to increased demands on local power grids and potentially contributing to energy shortages or strain on existing infrastructure.
- Waste generation risk – Improper manufacturing or disposal of our electronic devices could be a risk to the environment although the risk is deemed low.
- Emissions risk from traveling – The Group's employees are spread across Europe and USA, which requires some traveling between offices, resulting in increased carbon emissions.

Social risks identified are:

- Data privacy and security risks associated with handling customer information.



- Employee risks related to personal wellbeing and equal treatment and conditions for all employees across the multiple geographies in which the company operates.

Governance risks identified are:

- Board diversity and composition.
- Risk of legal and regulatory action related to data breaches, privacy, cybersecurity, and software development.

Mitigating actions and tracking progress

Based on the risks identified, the Group has taken various steps to ensure that we operate in compliance with the applicable laws and regulations and that we operate in a way that respects fundamental human rights and decent working conditions.

During the reporting period, Spotlio reviewed its own operations, key business relationships and relevant supplier categories to identify potential risks related to fundamental human rights and decent working conditions.

During the reporting period, Spotlio continued to strengthen its internal processes and employee support initiatives. This included regular follow-up of company and departmental OKRs, the continuation of the Leadership Support Program, the implementation of feedback and development tools such as Spidergap / 360° feedback, and the use of eNPS surveys to better understand employee engagement and areas for improvement. Spotlio also worked on improving onboarding and offboarding processes, ensuring health and safety training where applicable, reinforcing working time registration and labour compliance processes, and maintaining policies and procedures related to privacy, security and data protection. In addition, the Group continued to review key suppliers and business relationships where relevant, with the aim of identifying and mitigating potential risks related to fundamental human rights and decent working conditions.



Environmental risks

We have made sure to have good processes of managing waste from our electric devices to limit the harm to the environment. We strive to offer solutions that are environmentally friendly. Our employees are encouraged to travel only when necessary to limit carbon emissions from international and domestic flights. Our employees are also encouraged to live in a sustainable and environmentally friendly way. We also encourage our suppliers and customers to do the same.

Social risks

We have a focus on enhancing feedback mechanisms, support, stress management, and work-life balance to further enhance the well-being and happiness of all our employees. Further, we are ensuring all of our employees globally receive comprehensive training on health and safety risks and best practices.

The Group has documented policies and procedures in place to ensure that the access, transmission, processing, disclosure, and retention of client scoped data is limited, and in compliance with applicable law.

Governance risks

Spotlio has readily available documentation of policies, procedures or guidelines that describe the privacy incident reporting, notification, communications and post-incident handling regarding unauthorized disclosure or breach of personal information.

Furthermore, the Group also has established documentation regarding the organization's legal or regulatory authorizations, process for handling privacy inquiries, complaints or disputes from individuals; and any publicly available privacy regulator complaints, findings or court ruling(s) concerning privacy.

Through our risk assessments and the establishment of new procedures and processes we have gained a stronger picture of everyone involved in the relevant processes and identified potential process risks. We are dedicated to continually improving existing procedures and processes and establishing new ones. We will



continue to have a clear focus on the risks linked to our business processes, both on vendors and from the perspective of our different stakeholders. This work will be further developed during the upcoming period.

Approved by the Board of Directors of Spotlio AS on 4 June 2026.

Firmado por:

A handwritten signature in black ink that reads "Marc Bigas Bachs".

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Marc Bigas Bachs
Executive Chairman

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A handwritten signature in black ink that reads "Albert Ferrando López".

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Albert Ferrando López
CEO / General Manager