

OptoScale AS

Statement pursuant to the Transparency Act (English)

Reporting period: 2025 | Published: 30 June 2026

Business	OptoScale AS
Org.nr.	916266219
Industry	Technology for aquaculture / aquaculture
Responsible	Sven Jørund Kolstø, CEO
Date	June 30, 2026

1. About OptoScale AS

OptoScale AS is a Norwegian technology company founded in 2015 in Trondheim. The company develops and delivers AI-powered camera technology solutions for the aquaculture industry, providing fish farmers with real-time data on fish weight, health, and lice infestation. OptoScale currently has over 60 employees and offices in Trondheim and Chile, and serves customers in Norway, Scotland, Canada, Chile, Iceland and Australia.

The product portfolio includes underwater sensors and cameras, AI-based image processing, and SaaS software for production planning.

OptoScale AS is subject to the reporting obligation under the Transparency Act as the company exceeds at least two of the three thresholds set out in §3 of the Act — sales revenue, balance sheet total and average number of full-time equivalents — measured on the balance sheet date of 31 December 2025. This report also includes Optoscale AS subsidiaries, including Optoscale SpA incorporated in Chile (RUT 78.335.868-9), and Optimeering Aqua AS, incorporated in Norway (company registration number 914 458 412).

2. Guidelines and board support

OptoScale AS has anchored its work on human rights and decent working conditions in the company's governing documents. The Board of Directors has adopted guidelines outlining the company's commitment to respect fundamental human rights in line with the UN Guiding Principles on Business and Human Rights (UNGP) and the OECD Guidelines for Multinational Enterprises.

2.1 General principles

- OptoScale shall not contribute to violations of fundamental human rights or decent working conditions, neither in its own operations nor in its supply chain.
- We expect all suppliers and business partners to comply with the same standards.
- Due diligence assessments must be carried out regularly and be proportionate to the company's size, industry and risk profile.
- Findings and measures must be documented and published in accordance with the requirements of the Transparency Act.

2.2 Responsibility and organisation

Responsibility for due diligence under the Act sits with the Board of Directors of OptoScale AS, with delegated operational responsibility to the CEO. The Chief Financial Officer is the executive sponsor for the implementation of the due diligence programme. The following policies and procedures govern how OptoScale identifies and manages adverse impacts on human rights and decent working conditions:

Policy / procedure	Scope	Status
Code of Conduct (employees)	All OptoScale employees and contractors	In place
Supplier Code of Conduct	All suppliers, sub-contractors and business partners	In place, further updates planned for 2026
Whistleblowing / speak-up policy	Employees, contractors and third parties	In Place
Anti-bribery and corruption policy	All employees and third parties acting on behalf of OptoScale	In place
Health, safety and working environment policy	All sites and field deployment activities	In place
Equal opportunity and anti-discrimination policy	All employees and recruitment processes	In place
Data protection and privacy policy	All processing of personal data	In place
Supplier onboarding and due diligence procedure	New and existing suppliers above defined thresholds	To be completed 2026

3. Description of the business and supply chain

3.1 Own activities

OptoScale develops and manufactures advanced camera technology and software. The core activities are:

- Research and development of AI algorithms and optics
- Production and assembly of subsea equipment (partly in Norway, partly via subcontractors)
- Installation, service and support for fish farmers globally
- Development and operation of SaaS platform for production planning

The company's employees are primarily engineers, computer technicians and service technicians. The working conditions are regulated by Norwegian and Chilean labour legislation. Risks identified in OptoScale's own operations relate primarily to equal

opportunity, equal pay and protection from harassment across a growing multi-jurisdictional workforce, and to the use of third-party service technicians in Chile (each addressed further in section 4 below). Beyond these areas, no significant risks of human rights violations or breaches of decent working conditions have been identified in OptoScale’s own operations in Norway or Chile.

3.2 Supply chain

OptoScale's supply chain can be divided into the following categories. The risk of each individual category and its geographical origin is reviewed internally on a case-by-case basis through expenditure in each category, to ensure prioritisation and focus is managed accordingly:

Category	Examples	Geographical origin
Electronics Components	Camera sensors, processors, circuit boards	Asia, Europa, USA
Mechanical Components	Housings, fasteners, cables, optics	Norway, Europe
IT and cloud services	Cloud infrastructure, software tools	USA, Europe
Consulting and services	Recruitment, auditing, legal	Norway, Chile

4. Due diligence

In 2025, OptoScale conducted due diligence in line with the OECD Guidelines for Multinational Enterprises. The assessments are risk-based and have been based on the company’s supply chain.

The OECD framework comprises six steps: (1) embed responsible business conduct into policies and management systems, (2) identify and assess actual and potential adverse impacts, (3) cease, prevent or mitigate adverse impacts, (4) track implementation and results, (5) communicate how impacts are addressed, and (6) provide for or cooperate in remediation where appropriate. Step 1 is set out in section 2 of this report. Steps 2 and the identification activities are described in section 4.1 below. Steps 3, 4 and 5 are addressed through the measures set out in section 5. Step 6 (remediation and grievance mechanisms) is set out in section 5.3.

4.1 Method

- Mapping most significant supplier relationships
- Risk assessment based on geography and type of delivery
- Prioritising further review of suppliers with the highest potential risk of human rights and labour violations.
- Dialogue with selected suppliers, including review of available reports and certifications.

4.2 Risk areas and findings

The following risk areas have been identified:

Risk area 1 – Electronic components from Asia

The supply chain for camera sensors and electronic components includes manufacturers in countries with lower regulatory protection of labor rights. Potential risks associated with long working hours and wage conditions in the lower links of the supply chain have been identified. No specific violations have been uncovered with direct suppliers.

Risk area 2 – Operations in Chile

OptoScale has office operations and service technicians from third parties in Chile. Chilean labor law provides basic labor rights. Working conditions are considered satisfactory. No specific negative consequences have been revealed.

Risk area 3 – Hiring and subcontractors for installation

The use of subcontractors for assembly and service assignments may entail a risk that requirements for pay and working conditions are not complied with throughout the chain. This is an area for further follow-up.

Risk area 4 – Own operations – diversity and equal treatment

As Optoscale and its subsidiaries grow into a multi-jurisdictional workforce, further focus and clear accountability and responsibility on equal pay, equal opportunity, and protection from harassment across the workforce needs to be clearly managed.

5. Measures and follow-up

5.1 Implemented measures

- Prepared and adopted an overall policy for human rights and working conditions, anchored in the board.
- Established standard contractual clause on requirements for compliance with human rights and decent working conditions.

Results to date. The human rights and working conditions policy has been adopted by the Board of Directors and is in force across the group. The standard human rights and decent working conditions clause will be included in all new supplier agreements signed from August 2026.

5.2 Planned measures in 2026

- Conduct internal training on the Transparency Act for all employees.

- Ensure that the new contractual clausings on requirements for compliance with human rights and decent working conditions is included in every new supplier agreement moving forward.
- Map and classify significant suppliers according to geographical and industry risk.
- Review certifications and available documentation from priority suppliers
- Introduce supplier questionnaires based on the OECD's Responsibility Compass for risk assessment of existing and new suppliers.
- Conduct in-depth dialogue with suppliers in high-risk countries, including stopping procurement from suppliers where due-diligence has not been possible.
- Consider the use of third-party supply chain risk assessment tools.
- Update contract terms with clearer requirements and follow-up mechanisms.
- Update this report by 30 June 2027 with the results of the measures taken.

Expected results. By 30 June 2027 OptoScale expects to have delivered Transparency Act training to 100% of employees, completed the risk classification of suppliers covering at least 50% of total supplier spend, reviewed certifications and documentation for all priority suppliers, and updated the standard supplier contract terms to include enhanced follow-up rights. Progress against these targets, together with any findings, will be reported in the 2026 account due by 30 June 2027.

5.3 Remediation and grievance mechanisms

Where OptoScale has caused or contributed to an actual adverse impact on human rights or decent working conditions, the company commits to providing for or cooperating in remediation in line with §4(d) of the Act and the OECD Guidelines. Where OptoScale has not caused or contributed to an adverse impact but is directly linked to one through a business relationship, the company will use its leverage to seek the prevention or mitigation of that impact and, where appropriate, support remediation by the responsible party.

OptoScale's whistleblowing channel is available to employees, contractors, suppliers' workers and other affected third parties and can be accessed via Optoscale's Huma platform. Reports may be submitted anonymously. OptoScale operates a strict no-retaliation policy in respect of any report made in good faith.

6. Duty to provide information

Anyone can make written inquiries to OptoScale AS and ask for information about the company's handling of actual and potential negative consequences. A response will be given as soon as possible, and no later than three weeks from receipt of the inquiry.

Where a request is particularly comprehensive or raises questions that require extensive review, the response time may be extended to a maximum of two months from receipt of the request, in which case OptoScale will inform the requestor in writing within three weeks of the reasons for the extension and the expected date of the response, in accordance with §7 of the Act.

OptoScale may decline a request, in whole or in part, on the limited grounds set out in §6 second paragraph of the Act, including where disclosure would involve trade or business secrets, personal data protected under the data protection legislation, or information that would otherwise be unlawful to disclose. Where a request is declined, the requestor will be informed in writing of the legal basis for the refusal and of their right to seek a review by the Norwegian Consumer Authority (Forbrukertilsynet).

Inquiries should be directed to:

OptoScale AS

Email: info@optoscale.no

Visiting address: Tungasletta 2, 7047 Trondheim,
Norway

7. Authentication and signature

This statement has been considered and approved by the Board of Directors of OptoScale AS and is signed by every member of the Board of Directors and by the Chief Executive Officer, in accordance with §5 third paragraph of the Transparency Act read with §3-5 of the Norwegian Accounting Act.

Signed by:



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Sven Jørund Kolstø
CEO, OptoScale AS
Date: 30 June 2026

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Rachel Geller, Chair of the Board
Managed by OptoScale AS
Date: 7/2/2026

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