

Report under The Norwegian Transparency Act

1. Introduction

The following report outlines Gelato's due diligence efforts in compliance with the requirements under the Norwegian Transparency Act and the UK Modern Slavery Act

2. Gelato's Business Operations and Supply Chain

Business Operations

Gelato is an enterprise software company with a platform that is transforming global trade and commerce through moving the world from central mass-production to local on-demand production, while empowering creators and ecommerce sellers and fueling local communities. Gelato facilitates production on-demand of personalized products in 27 countries, enabling entrepreneurs, creators and ecommerce sellers to scale their business and reach consumers faster, while reducing waste, costs, and carbon emissions. Our software and network of production hubs give anyone the opportunity to sell globally and produce locally, and our production partners the opportunity to receive volumes destined to consumers living in their countries. Gelato is solving hyper-efficient local production at a global scale, removing over production and reducing transportation distances. Our production enterprise software enables production hubs to efficiently produce micro-orders and be part of driving the change towards local, on demand production. Smarter, faster, greener.

Gelato consists of three businesses:

GelatoCreate gives every entrepreneur and creator worldwide growth opportunities, through software and our network of production- and logistics partners. With Gelato's software, an entrepreneur in for example Kenya, with a great idea and little to no capital, can in minutes be able to produce, ship and get paid for their product sold in, for example, the US, with no upfront investment in inventory, manufacturing or logistics - and achieve similar profit margins as competitors 100 times their size. This levels the global creator and ecommerce playing field and is an enormous economic and social opportunity. With the emergence of new technologies such as 3D printing, Gelato's curated and global marketplace will empower businesses and consumers around the world.

GelatoConnect is a print production enterprise software that connects procurement, workflow, and logistics to optimize production hubs' efficiency, quality, and profitability - all in a single platform. GelatoConnect allows production facilities to quickly increase transparency, automate and streamline operations, letting software replace expensive and unnecessary manual tasks. GelatoConnect is the only product- and machine-agnostic enterprise software solution for print production facilities.

Optimalprint is our consumer business operating across the world. The millions of orders produced by our network of production hubs have refined our production workflow technology and perfected product quality.

Key Numbers 2025

- 150+ Production hubs on 6 continents
- 90+ logistics carrier partners
- 88% of all orders were fulfilled in the same country as the end customer
- 165 Team members, 46 nationalities across the Gelato team
- 16 Offices in 12 countries, HQ in Oslo, Norway

Gelato's supply chain

Gelato has commercial relationships with suppliers and partners across a broad spectrum, from IT solutions to production hubs. Given the nature of the services provided by the majority of our suppliers, it has been determined that the risk of human rights breaches associated with the suppliers of basic services is relatively low. Gelato has decided to focus most of our efforts on our production partners as they are our most strategic suppliers.

3. Overview of Gelato's Social Due Diligence

Gelato aims to maintain high labor and ethical standards in our supply chain. In line with the Norwegian Transparency Act, our goal is to make a positive impact on working conditions and human rights wherever we can, and identify, prevent and mitigate risks related to these aspects.

We deploy several processes and tools to identify, prevent and mitigate risk in our supply chain. All our production partners and suppliers in the supply chain of physical products have signed our Supplier Code of Conduct.

Specific vetting processes for new production partners

Gelato believes in focusing efforts where we have leverage for change. For this reason, we focus our efforts and requirements on our production partners, where our strategic relationships allow us to drive positive change.

Our pre-contract due diligence applies to all potential new production partners. A self-assessment questionnaire is embedded into our evaluation process so that all production partners are assessed also from a social standpoint (in addition to operational evaluations, information security and privacy, environment, product safety and more).

On the social aspect, the questionnaire focuses on the following main areas: working conditions, health and safety and sub-suppliers. Gelato's legal team reviews the questionnaires and follows up with questions if answers are not found to be satisfactory.

Passing of requirements down the supply chain to sub-suppliers

All our production partners who do not have their own supplier code of conduct are required to pass on the requirements of the Gelato Code of Conduct throughout their own supply chain. This enables us to educate our suppliers on the significance of CSR practices within their own sub-supplier networks. By working together, we contribute to creating a cascading effect of ethical practices which enhance transparency, worker well-being, and environmental stewardship throughout our supply chain.

Auditing and improving

The Gelato Supplier Code of Conduct grants us the right to perform visits and audits to ensure compliance and adherence to the established standards. By conducting visits and audits, we can assess our suppliers' performance, identify any areas for improvement, and take appropriate actions to address non-compliance or deviations from the agreed-upon guidelines. The visits and audits serve as a means of accountability, promoting transparency, and fostering continuous improvement within our supplier network.

Training of employees

100% of Gelato employees have signed the Gelato Code of Conduct. To ensure that Gelato employees are well-informed and equipped to navigate social responsibility principles, Gelato has implemented a specialized training module on Environmental, Social and Governance (ESG) aspects. By completing this module, employees who are active in our sourcing operations gain a deeper understanding of the social implications of their decisions. This enables them to make informed decisions that align with the company's broader ESG objectives.

4. Risks detected

During the year 2025, we have not detected that our operations have led to or added to serious risks of human rights abuses or fair working conditions. There have been no major changes in the business or risk environment since the last reporting period.

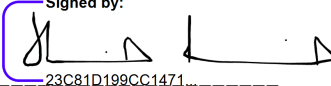
One potential risk was identified through information brought to our attention during the reporting period. We were informed that a supplier employed workers based in a correctional facility. Upon becoming aware of this fact, we conducted an enhanced assessment, including a detailed supplier questionnaire which was reviewed by our internal team and external counsel. Our assessment concluded that the arrangement was compliant from a labour rights perspective, based on the following key factors: the facility operates under a contract with the state, participation by detainees is voluntary and not coerced; remuneration meets the threshold set by the applicable national legislation; and the arrangement does not breach the guidelines of the International Labour Organization (ILO). We will continue to monitor this supplier relationship and the conditions under which the work is performed. Our team also researched this topic and found that prison work programmes, when properly supervised and based on voluntary participation in an EU country as is the case here - can play a meaningful role in the rehabilitation and social reintegration of detainees — providing vocational skills, structured daily routines, and improved employment prospects upon release. We view these potential benefits as a relevant consideration in our overall assessment of the arrangement.

5. Going forward

The self-assessment questionnaires continue to give Gelato a good understanding of the social standing of our strategic partners and suppliers. As we continue to strengthen GelatoConnect Procurement as a powerful tool for the entire printing industry and work to expand our network of suppliers, we plan to actively reinforce the monitoring of the social and ethical performance of the suppliers integrated into the platform leveraging the network effect for the greater good of the entire value chain.

Date, June 2026

On behalf of Gelato ASA

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Chief Executive Officer

The Board of Directors

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