



Transparency Report

Introduction

The Kahoot! Group is subject to the Norwegian Transparency Act and the UK Modern Slavery Act.

The Transparency Act shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services. Further, the Transparency Act aims to ensure the general public access to information regarding how the enterprises address adverse impacts on fundamental human rights and decent working conditions. The UK Modern Slavery Act aims to combat slavery, servitude, and forced or compulsory labor as well as human trafficking.

By way of due diligence in accordance with the OECD guidelines for multinational enterprises, the Group identifies risks for adverse impact, implements measures, monitors and communicates with stakeholders to ensure respect for human rights and decent working conditions.

Our business model

Kahoot! is a global educational technology ("EdTech") and enterprise software-as-a-service ("SaaS") group that develops a digital learning and engagement platform, additionally encompassing the single sign-on portal, Clever, since 2021. Our primary focus is on developing a comprehensive offering of engaging learning tools for enterprises, the educational sector, as well as for personal users. The Kahoot! Platform enables everyone who uses it to unlock their full potential through learning. The Group's offerings are inherently versatile, enabling multiple use cases in a variety of learning contexts, and thus supporting growth in several different directions simultaneously. Included within the portfolio is a tailored product and content offering directed to all user groups, which has been steadily expanded through organic development and strategic partnerships throughout 2024.



Guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions

In the Kahoot! Group, we believe that technology should be used as a force for good in society, to promote engaging learning experiences that empower people globally and ensure fair and equal treatment for everyone using our services

We care for our own people, the K!rew, for people in our value chain, and for our users. Our approach to respecting human rights incorporates international laws, principles, and norms, further supported by our own policies, guidelines and standards to ensure responsible operations.

Our Code of Conduct

Our Code of Conduct establishes appropriate standards of behavior in key areas for all our employees. During 2024, we have revised and enhanced our compliance policies and procedures. In our Code of Conduct, we have expanded on various topics, including human rights and labor rights.

Supporting and respecting internationally proclaimed human rights is an absolute for the Kahoot! Group. We expect ethical behavior in every aspect of the Group companies' processes and professional relationships. Violation of or non-compliance with legal rules, written ethical guidelines or ethical norms are handled in accordance with Group procedure and may involve liability under labor, criminal and tort law. This applies to any person that is employed by, delivers work or services to or is otherwise engaged with the Group.

Kahoot! follows up human rights issues through regular risk assessments.

Working standards

Kahoot! aims to be a purposeful and awesome place to work and applies the highest standards for working conditions. This includes:



- Supporting the rights of freedom of association and to form and join a trade union.
- Empowering children's education while working against unacceptable working conditions in all forms such as any form of forced or child labor.
- Providing equal opportunities for our employees, based on merit and job-related qualifications, and ensuring that no employee is disadvantaged on grounds unrelated to job performance or legal requirements..
- These standards are reflected in international and local laws, as well as our external and internal guidelines and policies.

Whistleblowing

We are committed to conducting our business with honesty, integrity, accountability, and transparency. We expect all staff to maintain high ethical standards and comply with our policies, procedures and values. Anyone in Kahoot! has a right to report censurable conditions at the workplace and Kahoot! encourages our staff to voice their concerns when discovering information that may imply serious malpractice or other censurable conditions in our organization.

All Kahoot! Group companies have implemented a Whistleblowing policy and a channel for employees to voice their concerns.

Visit the [Kahoot! Trust Center](#) to find links to our relevant policies:

- [Code of Conduct](#)
- [Inclusion and Accessibility Policy](#)
- [Acceptable Use Policy](#)
- [Safety Guide for Content](#)
- [Editorial Guidelines](#)
- [Privacy Notice](#)

To enhance awareness of compliance matters within the Kahoot! Group, we have developed training materials covering our various compliance policies, which all relevant employees and representatives are required to complete.



Supplier onboarding

In 2024, we have strengthened the Kahoot! Group's supplier onboarding measures by developing an onboarding questionnaire and a Business Partner Code of Conduct, both of which address various compliance issues, including human rights and working conditions.

Adverse impacts and significant risks of adverse impacts identified through our human rights due diligence

In spring 2024, a risk assessment of Kahoot! Group was carried out to evaluate our exposure to risks related to modern slavery and human trafficking. The assessment indicated the risk level of the Kahoot! Group is low, taking into account the nature of our activities and the jurisdictions in which we operate. However, despite our low risk exposure, we continue our efforts to uphold human rights and ensure decent working conditions within our own operations and supply chain, including the identification and mitigation of potential risks.

The Kahoot! Group has adopted a risk-based approach to the prevention of human rights violations and corruption in our business and value chain. In doing so, we have considered the following external factors:

- The jurisdictions in which we operate;
- The jurisdictions in which our suppliers and business partners operate;
- The industries in which we operate and/or with which we have links;
- The types of transactions we deal in;
- The nature of any business partnerships, joint ventures and other business relationships;
- The nature of any projects in which we are involved; and
- Any other risks which we identify as possibly arising in the course of our usual business.

The risk assessment is reviewed on an on-going basis in light of any changes to our business.



Based on the risk assessments conducted, Kahoot! Group is of the opinion that no occurrences of actual adverse impacts related to human rights and decent working conditions have been identified in the reporting year.

Through the risk assessment, we have identified the following risks, set forth below along with our mitigation measures.

Gender equality review and assessment

Kahoot! AS has conducted its annual review of gender equality and anti-discrimination practices in accordance with the requirements under chapter 4 of the Gender Equality and Discriminatory Act (Norwegian: “Aktivitets- og redegjørelsesplikten”). This internal assessment examines our current workplace equality status, identifies potential risks of discrimination or barriers to equality, and evaluates both implemented and planned initiatives to promote equal employment opportunities based on merit.

Our assessment involved establishing a standardized job leveling system based on responsibility, experience, and competence, developed in collaboration with management and employee representatives. The analysis focused on employees within Kahoot! AS, with separate consideration given to the broader Kahoot! Group where relevant.

The assessment confirms that hiring and promotion decisions are based on merit, qualifications, and role requirements. Our review shows that Kahoot! AS maintains gender representation across different organizational levels, with the broader Kahoot! Group demonstrating balanced gender distribution. This assessment serves as the foundation for our continued commitment to maintaining an inclusive workplace.

Work environment

The employees are at the heart of the Kahoot! Group. We are committed to making our company an awesome place to work for all our employees, treating all employees with respect. We strive to foster an attractive and fulfilling environment offering exciting opportunities and varied careers.



We conduct surveys to measure employee satisfaction which form a part of our risk assessments relating to our own business operations. During the previous reporting period, we conducted one extensive survey and one simplified survey. There has been high participation in these surveys, and the results consistently show high scores. Although we are pleased with these results, we will continue working to ensure a positive work environment and will continue conducting pulse surveys among our employees.

We maintain our Whistleblower Channel available to all employees globally for reporting non-compliance concerns.

No adverse impacts or significant risks related to our work environment were identified in 2024

Use of independent contractors abroad

From time to time, the Group buys services from independent contractors based in other countries, including Sri Lanka, Guatemala and the Philippines, which have been defined as higher risk countries in our risk analysis.

To uphold human rights and ensure decent working conditions, as well as to identify potential risks, we have developed a checklist for staffing vendors. This checklist includes key questions regarding their recruitment processes and labour practices, such as wage levels and whether they charge a recruitment fee to their staff. Additionally, vendors are required to provide policies or other documents related to anti-slavery.

We have begun implementing this and will continue to use it moving forward during the onboarding process and when following up with existing vendors. In relation to the suppliers with whom we have applied this, we have not identified any red flags. Moreover, throughout 2024, the consultants have not reported any incidents concerning the working environment or their compensation.



During 2024, the Group conducted its annual audit of independent contractor salaries and working conditions in Sri Lanka, Guatemala and the Philippines, including a salary benchmark and adjustments where needed.

For all other independent contractors engaged by the Group, there have not been identified any actual adverse impacts or risks. All independent contractors have flexible, at-will agreements when performing services for Kahoot!

Privacy

As a SaaS company, the Kahoot! Group is exposed to risks relating to GDPR and privacy issues. The Group remains committed to complying with relevant privacy laws, including but not limited to the General Data Protection Regulation (“GDPR”), the Family Educational Rights and Privacy Act (“FERPA”) and the Children’s Online Privacy Protection Act (“COPPA”) where applicable. Our work related to privacy is ongoing and constantly improving, in light of the changes in our products and features and applicable privacy legislation.

In 2023, we strengthened our privacy and security standards through attainment of ISO 27001 certification, obtaining a SOC 2 report that adheres to the security standards of the American Institute of Certified Public Accountants, and successfully completing relevant recertification processes. We also reinforced our security controls throughout the development process and strengthened our engineers’ training in security, identifying and addressing potential security issues at various stages of development, resulting in improved error detection and enhanced security for our company and our users.

In 2024, we continued our efforts in reinforcing our privacy and security standards. In particular, we undertook a comprehensive project to enhance our overall compliance practices across multiple areas, including privacy and data protection. This initiative involved a thorough review and update of our privacy-related procedures and routines, documentation and internal training programs.



As a result, the Kahoot! Group has introduced an enhanced privacy program that further reinforces our strong commitment to safeguarding user data and maintaining stakeholder trust

Acceptable use

The Kahoot! Group is dedicated to protecting the integrity of our platforms as safe environments that make learning awesome and values the creativity and free expression of our users and contributors. At the same time, we recognize how important it is for Kahoot! to be a place for facts, safety, privacy and respectful behavior in line with applicable laws and our policies. Therefore, Kahoot! reserves the right to remove or disable access to any user content that breaches our policies, values, or standards.

We may suspend users who don't respect our rules. In recent years, we have continued to uphold several safety and moderation efforts to help us keep content safe, such as trained moderators, user flagging and reporting, allow/deny listing on content and/or nicknames, customer service response, and a safe nickname generator.

We maintain a list of keywords that result in automated moderation steps (auto-quarantine or auto-flag for review). This list was expanded at the end of 2022 to include terms in multiple languages. In 2023 and 2024, this list was again updated to add additional terms and refine contextual interpretation.

Our Acceptable Use Policy, Whistleblower Channel and Kahoot!'s "Safety guide for content" guide us in this work.