



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 and monitors measures 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 EdTech identity platform, Clever, since 2021. Our primary objective is to develop a comprehensive offering of engaging learning tools for enterprises, educational institutions, and 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 2025.



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 in order to promote engaging learning experiences that empower people globally and to provide fair and equal opportunity 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 2025, we have maintained and refined our compliance policies and procedures, including our Code of Conduct, which addresses various topics such as 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 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 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 related to personal characteristics; and

- Ensuring these standards are reflected in 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 reporting process 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 2025, the Kahoot! Group has continued to apply its supplier onboarding measures, including the onboarding questionnaire and 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 2026, 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

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.

Last year's 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 confirmed that hiring and promotion decisions are based on merit, qualifications, and role requirements. Our review showed that Kahoot! AS maintains gender representation across different organizational levels, with the broader Kahoot! Group demonstrating balanced gender distribution.

As part of our continued efforts following last year's assessment, Kahoot! will introduce a structured job architecture across the organization in 2026. This framework will define and align roles, responsibilities, competencies and salary bands, with the aim of clarifying career paths, ensuring consistent leveling and fair rewards, while supporting structured succession planning and preparation for compliance with the EU Pay Transparency Directive.

Work environment

Our 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 every employee 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 reporting period, we conducted our annual employee engagement survey, with high participation. The results consistently show high and stable scores across key drivers. 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 Policy available to all employees globally for reporting non-compliance concerns.



No adverse impacts or significant risks related to our work environment were identified in 2025.

Use of independent contractors abroad

From time to time, the Group buys services from independent contractors based in other countries, including Guatemala, the Philippines and Sri Lanka, 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 covering key topics such as:

- General recruitment processes and labor practices;
- Salary breakdown and alignment with market standards;
- Confirmation that no recruitment or placement fees are charged to staff;
- Existence of internal policies on retention of personal documentation; and
- Existence of internal policies and contractual provisions addressing human rights, decent working conditions, modern slavery and human trafficking.

Additionally, vendors are required to provide policies or other documents related to human rights, working conditions and anti-slavery.

We continue to use this checklist during the onboarding process and when following up with existing vendors. Based on the responses received from vendors in Guatemala, the Philippines and Sri Lanka, we have not identified any negative findings or red flags. Moreover, throughout 2025, the consultants have not reported any incidents concerning the working environment or their compensation.

During spring of 2026, the Group conducted its annual audit of independent contractor salaries and working conditions in Guatemala, the Philippines and Sri Lanka, including a salary benchmark and adjustments where needed.

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



Privacy and Security

As a SaaS company, the Kahoot! Group is exposed to risks relating to the General Data Protection Regulation (“GDPR”) and privacy issues. The Group remains committed to complying with relevant privacy laws, including but not limited to 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 2021, we strengthened our privacy and security standards by obtaining a SOC 2 report that adheres to the security standards of the American Institute of Certified Public Accountants. In 2022, we achieved ISO 27001 certification. We have since successfully completed the 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 2025, we have continued our efforts in reinforcing our privacy and security standards, maintaining and further developing the compliance practices established in previous years across these areas. This has included continued review and refinement of our privacy-related policies, procedures, and routines, required documentation and internal training programs.

As a result, the Kahoot! Group maintains 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, trained customer service, and a safe nickname generator.

We maintain an automated system with moderation steps for publicly available user generated content (auto-quarantine or auto-flag for review). This system was enhanced in 2025 and now also reviews images.

In 2025, we have continued to strengthen our compliance efforts in line with the EU Digital Services Act ("DSA") and the UK Online Safety Act ("OSA"). As an online platform under the DSA, Kahoot! has maintained its transparency reporting obligations and continued to develop its notice-and-action procedures to facilitate the handling of illegal content notifications. Under the OSA, the Group has conducted risk assessments relating to illegal content and content harmful to children. In addition, we have updated our internal procedures and external-facing policies to align with both the DSA and the OSA requirements.

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