

Communication on Progress

Opera Software ASA

Communication on Progress – Opera Software ASA

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Statement of continued support by the CEO

To our stakeholders

Two years after we first announced our commitment to the United Nations Global Compact (UNGC), the Opera Software Group is pleased to reaffirm its ongoing support to the initiative and its ten principles in the area of human rights, labor, environment and anti-corruption.

At Opera Software Group, we are shaping an open, connected world. We believe that an open, connected world — powered by great technology and services — is essential to breaking down the barriers that limit access to information, education and fun. In our effort to achieve this vision, we are guided by the principles of the UN Global Compact. We continually strive to make the principles a part of our strategy, culture and day-to-day operations.

In this Communication on Progress, we describe our ongoing commitment, as well as our implementation and outcomes with regard to the ten principles.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Lars Boilesen', with a stylized, flowing script.

Lars Boilesen

Brief description of nature of business

Opera is an independent, Scandinavian company that's been in the business of making web browsers since 1994. Our founders saw the internet as a way of making information free and available to everyone in the world, regardless of where they lived or how they got online.

Ever since, one of the primary driving forces behind our work has been to make web browsers that run on computers, phones or any other device, from TVs to tablets and game consoles. Today, we're proud to say that our products and services connect more of the unconnected than ever, from people in the biggest cities to the most remote villages.

Opera Software has since expanded in the mobile ecosystem through its acquisition of companies such as AdMarvel, Mobile Theory Inc., 4th Screen Advertising Ltd. and Skyfire.

Today, Opera's offices are distributed across 13 countries globally, with more than 55 different nationalities represented.

In the Opera Software Group we work to uphold the following vision:

We are shaping an open, connected world.

- We champion an open internet.
- We strive to bring the web to everyone.
- We enable content and commerce.
- We create value through partnerships.
- We shape with love and craftsmanship.
- We bring technology to life.

We believe that an open, connected world — powered by great technology and services — is essential to breaking down the barriers that limit access to information, education and fun.

Our culture is playful, people-centric and innovation-driven, and our goal is to improve communication for the benefit of everyone.



HUMAN RIGHTS

Principle 1

Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2

Businesses should make sure that they are not complicit in human rights abuses.

Commitment: Opera Software ASA respects and observes internationally proclaimed human rights, including the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights. Opera ensures that it is not complicit in any human right abuses. Respect for human rights is a core value of our company.

All employees must adhere to the existing laws and regulations, contractual obligations, internationally acclaimed human rights and the demands that good business conduct and commonly approved personal conduct require.

Opera believes that people should be treated with respect at all times. We strongly condemn discrimination and focus on promoting tolerance and encouraging freedom of expression.

Implementation, action:

Social commitment

At Opera, we believe that an open, connected world — powered by great technology and services — is essential to breaking down the barriers that limit access to information, education and fun.

Today, only 2.7 billion people are connected to the internet. The cost of getting online is one of the biggest challenges for users worldwide. We want to help get the next five billion online. Opera Mini, which makes it possible to access the web from even the simplest phones, is our most important contribution toward achieving this, and today we have more than 300 million users on Opera Mini, with a majority of them in developing countries.

Human rights as a part of our vision:

Opera helps millions of people across the globe to connect to the internet. Freedom of expression and privacy are fundamental human rights. Moreover, these rights are fundamental to facilitate the meaningful realization of other human rights, such as the right to access information.

At Opera, we strongly believe in these human rights and will strive to protect them for our users, employees, partners and other stakeholders. The open internet, including the web, has true potential as an open communication platform that enables users globally to exercise their freedom of speech. Conversely, new technologies can be used to invade citizens' privacy. Opera will take the required measures to protect its users' basic right to privacy.

This year, Opera participated in two major programs in India and Indonesia to give children access to information and education.

In India, Opera partnered with the Smile Foundation to launch the "Smile with Opera Mini" campaign, to support the basic education of 1000 underprivileged children of the Smile Foundation's Mission Education program for a year.

In Indonesia, Opera ran a similar campaign with the YCAB Foundation, the "Browse for Change" campaign with Opera Mini. However, this time, Opera's employees got even more involved, and they were all invited to apply for two volunteer positions with YCAB. Two volunteers were selected to represent Opera and teach the kids at the YCAB learning centers about technology for a week.

As YCAB volunteers and Opera employees, Albert Sutojo and Greg di Stefano together inspired close to 400 kids from four different schools to stay in school and get a better life. “It was such an honor to talk to the kids and to represent Opera,” says Sutojo, “And, it is very motivating to think that whatever I do while working at Opera is so important for so many users in Indonesia — out of 240 million, more than 30 million use Opera Mini on a daily basis!”

In 2013, Opera also joined internet.org, a partnership between Facebook, Opera and other technology companies. The goal of Internet.org is to make internet access available to the two thirds of the world who are not yet connected and to bring the same opportunities to everyone that the connected third of the world has today. Opera is proud to contribute to the project with its competence in internet technology.

Ethical Code of Conduct

Our employees are our most valuable resource. Opera Software will interact with its employees in the same way as it strives to interact with its customers: following the highest ethical standards and respect for individuality. Ensuring employee and human rights and assuming social responsibility have always been integral elements of our corporate policy.

This year, Opera decided to revise its Ethical Code of Conduct. In doing so, Opera reaffirms its commitment to respecting and supporting internationally recognized human rights. The guidelines apply to all staff members, across all Opera Software Group offices and departments. The code has been put in place to help all employees, clients and business partners understand Opera’s values and standards.

The reputation of our company is created by the conduct of each individual staff member. Therefore, all our employees are obliged to study Opera’s Ethical Code of Conduct and to ensure that they perform their duties in accordance with them.

Managers are responsible for making the ethical guidelines known and ensuring that they are followed. Within particularly vulnerable areas of operations, the supervisors in charge must assess the need for further clarification in the form of more extensive guidelines.

Whistleblowing system

Freedom of speech and blowing the whistle on malpractice, fraud, illegality, breaches of rules, regulations and procedures, or raising health and safety issues, is encouraged at Opera.

We strongly encourage and guide our employees regarding how to speak up and take action against abuse and malpractice.

Any Opera staff member making a whistleblowing report is protected from any repercussions, such as dismissal and other forms of reprisals.

To improve communication and ensure that issues do not escalate to the point of becoming a whistleblowing case, Opera focuses on the following aims:

- Communicate the company’s norms, values, and regulations regarding ethical conduct.
- Create an open atmosphere by making sure that staff members have the opportunity to meet and discuss issues in formal and informal settings.
- Discuss and put questions regarding freedom of speech and whistleblowing on the agenda in internal communications.
- Ensure that there is a Work Environment Committee in place that meets regularly to discuss issues.

Measurement of outcome:

Every Opera employee, upon being hired, is handed or given access to the company Ethical Code of Conduct.

No claim regarding human rights was reported in the period covered by the COP.

The revised Ethical Code of Conduct is published on Opera Software’s corporate website at <http://www.operasoftware.com/company/vision/>.



LABOUR

Principle 3

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Commitment: Opera respects and observes the fundamental employment rights set out in the international conventions on human rights, such as the conventions of the International Labor Organization (ILO) and the United Nations (UN).

Opera believes that everyone has the right to freedom of peaceful assembly and to freedom of association with others, including the right to form and join labor unions. Several Opera employees are organized into labor unions.

Implementation, action: Our employees are our most valuable resource. Opera Software will interact with its employees in the same way as it strives to interact with its customers, following the highest ethical standards and respect for individuality.

Freedom of association and recognition of collective bargaining secured through the employment contract

According to Norwegian law (the Working Environment Act § 14-6), the employment contract between employer and employee shall include the right to and the details concerning collective bargaining and freedom of association. Opera aligns its contracts with this provision.

Labor unions represented at Opera:

Several Opera employees are organized into labor unions. By Norwegian law (The Working Environment Act § 13-1) discrimination on the basis of membership in a labor union is prohibited.

Elected representatives to the board

Through elected representatives to the board, we give our employees a voice. Our employees have the right and obligation to elect three representatives to the Board of Directors. The representatives are elected by all Opera employees, globally. Directors ensure the best interests of Opera Software ASA, and a special obligation falls on the employee-elected members to voice the concerns of Opera employees.

Measurement of outcome: Opera Software ASA recognizes the freedom of association and the right to collective bargaining.

Discrimination on the basis membership in labor organizations does not occur at Opera Software.

No claim regarding employment rights has been reported in the period covered by the COP.

Principle 4

Businesses should uphold the elimination of all forms of forced and compulsory labor.

Commitment: Opera respects the ILO Convention concerning Forced or Compulsory Labor.

Implementation, action: We do not directly or indirectly use forced or compulsory labor at Opera.

Measurement of outcomes: No claim regarding forced or compulsory labor was reported in the period covered by the COP.

Principle 5

Businesses should uphold the effective abolition of child labor.

Commitment: Opera respects and observes the ILO Convention concerning Minimum Age for Admission to Employment.

Implementation, action: Opera Software does not directly or indirectly use child labor.

Measurement of outcomes: No claim regarding child labor was reported in the period covered by the COP.

Principle 6

Businesses should uphold the elimination of discrimination in respect of employment and occupation.

Commitment: Opera's Ethical Code of Conduct ensures that employees shall not be subjected to discrimination, harassment or other improper conduct that might be perceived as threatening or demeaning.

Discrimination on the basis of gender, age, religion, political views, nationality, ethnicity, sexuality, living arrangements, disabilities or culture shall not occur at Opera.

Employees are expected to practice cultural sensitivity in online and offline communication, with co-workers and customers alike.

Implementation, action: **Equal opportunities**
Opera is an equal-opportunity employer. We insist on fair, non-discriminative treatment for all employees, in recruitment and in selection for promotion or training opportunities, irrespective of race, color, nationality, age, sex, sexual orientation, gender identity, ethnic origin, marital status, disability or religion. Individuals at every level share responsibility for maintaining a culture that is built on open, supportive and positive relationships, free from

prejudice, stereotyping and unfair bias.

Our employees shall not be subjected to harassment or other improper conduct that might be perceived as threatening or demeaning.

Whistleblowing system

Our whistleblowing system enables employees to report and take action against discrimination.

In accordance with the Norwegian Working Environment Act, employees are obligated to ensure that the employer or the work environment representative is notified as soon as the employee becomes aware of harassment or discrimination in the workplace.

The Work Environment Committee

Under Norwegian law, Opera is compelled to maintain a Work Environment Committee. The committee works to ensure a satisfactory working environment for our employees. The organization's manager is also responsible for surveying and documenting all working environment issues related to risks, health hazards and welfare on an on-going basis, as well as implementing necessary measures.

Working environment surveys

Opera's employees regularly participate in anonymous surveys concerning the working environment. This gives Opera the opportunity to discover and deal with problems concerning harassment or discrimination at an early stage.

Disabilities

Discrimination on the basis of any disability shall not occur at Opera. We strive to meet all our employees' needs. Therefore, we offer shorter working hours and other services to accommodate our employees with disabilities.

Measurement
of outcome:

In 2013, more than 81% of the employees participated in the Opera Organizational Survey. In this survey, employees are asked to give feedback on areas such as job satisfaction, participation and teamwork, policy and guidelines, health and safety, management, competence and training. The results are benchmarked against companies in Norway to ensure that we uphold a high level of employee satisfaction and participation in each of these important areas for employee satisfaction.

The results have been very positive and on level with other companies in Norway or higher. As many as 85% of the employees answered that they were proud to work for Opera Software, and as many as 97% reported that they do not experience any harassment or discrimination at Opera. We are very happy to see these results and will continue to work to ensure that employee satisfaction remains high.

Turnover

In 2013, our forecast shows the global turnover to be 12%. This corresponds with the average turnover in the technology industry worldwide.

Low sick leave equals happy employees

In 2011, Opera Software ASA was ranked as one of the companies with the lowest registered sick leave on the Oslo Stock Exchange. These good results have continued in 2012 and 2013, as only approximately 1.4% of our employees were absent from work due to sick leave.

With such a low sick-leave level, we are constantly evaluating our policies. We are also cognizant of our Scandinavian heritage and promote a healthy work-life balance.

In our headquarters in Oslo and our offices in Poland, we provide kids' rooms where employees can bring their children to work for shorter periods of time under their own supervision.

We encourage a healthy lifestyle by serving healthy meals and snacks. At the headquarters in Oslo, employees can get their daily exercise in one of Oslo's most popular recreation areas just outside the office, running in Maridalen or swimming in Nydalsdammen. During the winter, employees can work out in our newly refurbished activity and weight room. Opera also sponsors a yearly sum for gym memberships or other training activities for its employees worldwide.

Diversity

At the end of 2013, Opera had 1039 full-time employees from countries all over the world, of which 21% were women and 79% were men. Opera has two female board members and one woman on the senior executive team. As part of its core values, Opera promotes cultural diversity and gender equality, and Opera is proud to have 55 nationalities represented in the organization.

Equal opportunity to all Opera employees and potential employees is an important factor throughout the organization. When recruiting, we use assessment methods such as programming tests and test cases to give equal opportunity to all qualified applicants. Opera strives to continue improving the company's gender balance. Opera prides itself in aiming to give equal opportunity to employees in both work and personal life. One of the benefits to all male employees is the opportunity to have two weeks of paid father's leave upon the birth of their baby. By doing this, we are emphasizing the importance having a healthy work-life balance, regardless of the geographical location or local labor legislation.

ENVIRONMENT

Principle 7

Businesses should support a precautionary approach to environmental challenges.

Principle 8

Businesses should undertake initiatives to promote greater environmental responsibility.

Principle 9

Businesses should encourage the development and diffusion of environmentally friendly technologies.

Commitment: Opera Software Group understands the importance of supporting the environment. For this reason, Opera has adopted an environmental policy to support the company's mission of preventing any environmental impact of its activities. The policy is a part of our Ethical Code of Conduct.

Opera shall:

- Act according to environmental laws to limit the environmental burden on the earth, air, water supply and ecosystem.
- Commit to using environmentally safe products in the workplace.
- Educate staff about company environmental regulations.
- Evaluate the consumption of energy and other resources to determine means of control.
- Ensure the development of environmentally protective procedures.

Implementation, action: Opera has incorporated our environmental policy as a part of our Ethical Code of Conduct. We focus on raising awareness among our employees, to ensure that everybody contributes to reducing the burden our company leaves on the environment.

Everyday efforts make a difference

At Opera, every employee is responsible for recycling his/her own paper and plastic waste. To facilitate paper recycling, Opera cooperates with Fretex, a social enterprise owned by the Salvation Army in Norway.

As a part of our environmental commitment, Opera this year effectively removed all disposable cups and glasses from our offices. Instead, each employee received a personal thermos coffee mug and water bottle.

As a software company, Opera has a particular responsibility to limit the impact our industry has on the environment. For several years, Opera has made data-center efficiency, low-power CPUs in our servers and procuring power from renewable energy sources the key components of our hosting expansion strategy. This has both reduced the cost per transaction and reduced our environmental impact. Opera also has participated in programs to dispose of electronic equipment responsibly and encourages employees to use this service for any personal electronics they are retiring.

Reducing the amount of paper produced during normal business practices and recycling what we do create are also visible examples of Opera's environmental commitments, as well as keeping lights out after hours and in unused areas.

Measurement of outcome:

All employees are asked to familiarize themselves with the Ethical Code of Conduct, and all employees recycle their own trash, according to our recycling program. We are continually evaluating our green technology data centers and taking care to reduce our environmental impact.

ANTI-CORRUPTION

Principle 10

Businesses should work against corruption in all its forms, including extortion and bribery.

Commitment:

Opera Software abstains from and works actively to combat corruption and bribery. Corruption distorts economic decision-making, deters investment, undermines competitiveness and, ultimately, weakens economic growth.

There is no single, comprehensive and universally accepted definition of "corruption". Therefore, each Opera employee must adhere to the existing laws and regulations in his/her country of operation. At a minimum, the Opera employees must follow the guidelines set out in our Ethical Code of Conduct.

Implementation, action:

As a part of our Ethical Code of Conduct, Opera has implemented the following policies:

Bribery

No person acting on behalf of Opera shall attempt to influence persons in the conduct of their post, office, or commission by offering an improper advantage. Nor shall improper advantage be offered to anyone for the purpose of influencing third parties in the conduct of their post, office or commission. This includes all forms of facilitation payments.

Correspondingly, no persons acting on behalf of Opera shall request, accept or receive improper advantage in connection with their position or assignment, or for the purpose of influencing a third party.

Improper advantage can take different forms, including but not limited to money, objects, credits, discounts, travel, accommodation and other services.

The use of middlemen

Opera Software could be held responsible for corrupt and fraudulent activities carried out by our middlemen. For this reason, we need to ensure that our middlemen do not commit corrupt or fraudulent acts on our behalf.

In cases where it is necessary for Opera Software to be represented locally by an independent sponsor, consultant, broker, agent or any other middleman it shall be done in accordance with the Internal Authority Guidelines for Opera Software ASA.

Insider trading

Opera employees are prohibited from trading in Opera securities based on information that is material, nonpublic information; that is, the public does not yet have access to this information, and this information may be deemed interesting for an investor to use when deciding whether to buy or sell securities. This rule also applies to other companies, where Opera employees may have access to such nonpublic information. Please note that even a tip to family and friends is considered illegal, if this should be used as a basis for buying or selling securities.

Money laundering

Money laundering is the process of concealing illicit sources of money. Opera employees are forbidden to engage knowingly in transactions that facilitate money laundering or result in unlawful diversion.

Gifts

It is a normal part of business life to exchange business courtesies, such as meals, transportation, recreation, facilities or small gifts. Such an exchange of business courtesies must always follow local laws and regulations and not put any Opera employee in the position of a sense of obligation to return the favor, compromise professional judgment or create the appearance of compromise or corruption. Opera employees should always check with their manager or the HR department, if in doubt, and consider whether the exchange of business courtesy would be acceptable if it should become publicly known.

No person acting on behalf of Opera is allowed to accept any amount of cash or cash equivalents (such as gift certificates or market securities and similar), regardless of sum. Correspondingly, cash or cash equivalents may never be offered by Opera employees as a business courtesy, regardless of sum.

Political contributions

The company must, as a main rule, not make any contributions in support of political parties. Exceptions to this rule may be made only by the company's CEO. If such a contribution is made, it will be done in a transparent way.

Whistleblowing system

Employees can report any issues to a member of the Work Environment Committee at Opera. This can be done in writing via email, in person and/or via telephone.

Controls:

Controls are in place to ensure that the rules are followed.

Measurement of outcome:

Every Opera employee, upon being hired, is handed or given access to the Company's Ethical Code of Conduct.



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