

# Whistleblowing and Investigation Policy

Policy owner: CPIO  
Policy approver: CEO

Rev.date: 17.02.2023  
Rev.no:2.0



# Table of Content

<b>1. Introduction</b>	<b>3</b>
1.1. Purpose	3
1.2. Objective	3
1.3. Scope	3
1.4. Policy ownership and maintenance	3
<b>2. Whistleblowing</b>	<b>4</b>
2.1 What is whistleblowing	4
2.2 Right and duty to report	4
2.3 How to report concerns?	4
2.3 What to report through a whistleblow?	7
2.3 Protection of whistleblowers	7
2.4 Ground principles for handling reports of concern	8
2.5 Process of handling reports of concern	8
<b>3. Investigation and closing activities</b>	<b>12</b>
3.1 Planning of an investigation	12
3.2 Execution of the investigation	13
3.3 Reporting	14
3.4 Closing activities	15
<b>4. Roles and responsibilities</b>	<b>16</b>
<b>5. Non-conformities</b>	<b>16</b>
<b>6. References and definitions</b>	
<b>7. Revisions of this policy</b>	



# 1. Introduction

## 1.1. Purpose

In AutoStore Group we seek to conduct our business with a high ethical standard and to be a respected and trusted business partner for all our stakeholders. We expect high ethical behavior from all our employees by acting in accordance with the Code of Conduct. We encourage employees to speak up about unacceptable conditions within the organization. AutoStore believes that openness and good communication throughout the organization ensures a good business practice and promotes a better work culture. AutoStore wants in the best way possible to facilitate that all employees are granted opportunities to report unacceptable conditions so that these stop. Reporting unacceptable conditions is both desirable and legal. Thus, if you suspect or detect any unacceptable conditions, irregularities or breaches of the Code of Conduct, please speak up.

## 1.2. Objective

There are three main objectives with the procedure for whistleblowing and investigations.

- Secure employees' right to speak up and report unacceptable conditions in the workplace.
- Ensure compliance with applicable laws and regulations.
- Facilitate predictable and concise practices with regards to how reports of concerns are followed up and investigated.

## 1.3. Scope

This policy applies to all employees in AutoStore Group, including permanent, temporary and hired personnel. Workers hired from temporary-work agencies also have a right to report breaches at the hirer's undertaking.

Reports in accordance with this whistleblower policy may also be made by any person affiliated with AutoStore, including business partners, suppliers etc. External persons who have no connection with AutoStore may also report any circumstances they find unacceptable. In such cases these guidelines apply insofar as they are applicable.

## 1.4. Policy ownership and maintenance

This policy is designed and implemented by the Chief People & Information Officer (CPIO). The CPIO is responsible for updating, communicating and monitoring the operational effectiveness of this policy.

This policy is approved by the Chief Executive Officer (CEO).



## 2. Whistleblowing

### 2.1 What is whistleblowing

Whistleblowing or reporting of a concern is the notification of unacceptable conditions within an organization.

Unacceptable conditions are any violation of applicable laws and regulations in the countries in which AutoStore operates. This also includes breaches of company policies or commonly approved ethical norms. Examples of violations include, but is not limited to:

- Circumstances that endanger employees' lives or health
- Damage to the climate or environment (hazardous products, pollution etc.)
- Corruption or other economic crimes (such as embezzlement, theft, fraud, etc.)
- Breach of sanctions
- Abuse of authority
- Unsound working environment (harassment, bullying, sexual harassment, discrimination, racism, etc.)
- Breaches of Personal Data Protection legislation
- Other violations of the Code of Conduct, Supplier Code of Conduct, this Whistleblower Policy and other applicable policies or guidelines.

Issues that only relate to the employees own working conditions or typical HR related problems such as internal conflicts between personnel, will normally not be considered as a violation relevant for whistleblowing.

### 2.2 Right and duty to report

All employees in AutoStore have the right to report violations within the organization. We encourage employees to report without undue delay, so that the violation can be halted or investigated as soon as possible.

All employees have a duty to report about criminal offenses and circumstances where life or health is endangered, and breaches of the Code of Conduct. Questions relating to the interpretation of the Code of Conduct or their practical application should be addressed to line manager, HR or Chief People & Information Officer.

### 2.3 How to report concerns?

#### *Internal whistleblowing*

At AutoStore we foster an open-door policy and encourage employees to share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's line manager is in the best position to address an area of concern.



If reporting to line manager is deemed inappropriate due to the individual's involvement or the severity of the breach in question, the breach should be reported directly to Organizational Effectiveness Manager (Astrid Standal Aarøe), Chief People & Information Officer (Anette Matre), group CEO (Mats Hovland Vikse) or alternatively the Chair of the Board of Directors (Jim Carlisle).

#### *Contact list*

Organizational Effectiveness Manager	Astrid Standal Aarøe	+47 934 41 385	Astrid.aaroe@autostoresystem.com
Chief People & Information Officer	Anette Matre	+47 959 76 532	Anette.matre@autostoresystem.com
General Counsel	Jenny Sveen Hovda	+47 936 91 555	Jenny.sveen.hovda@autostoresystem.com
Group CEO	Mats Hovland Vikse	+47 928 98 987	Mats.vikse@autostoresystem.com
Chair of the Audit Committee and Independent Board member	Viveka M. Ekberg	+46 70 262 45 36	Viveka.m.ekberg@gmail.com

#### *External whistleblowing*

AutoStore has established an 100% anonymous and untraceable external whistleblower channel. In circumstances where it would be inappropriate to approach any of the persons mentioned above, the external whistleblower channel may be used. AutoStore has engaged SafeCall to be our external whistleblower recipient. Safecall is a professional whistleblowing service provider and a 100% independent organization.

Safecall can be reached in two ways:

1. **Web-based form;** A secure website available in 65 languages - [Safecall](#). The portal allows the opportunity to communicate anonymously with AutoStore.
2. **By phone;** Safecall has a free number for all our operating countries (see table below). You can choose to speak in English or your native language. If the latter, an interpreter will be connected to the call after a few minutes. It takes a bit longer with an interpreter on the call, however, Safecall's experience is that it is worth those extra minutes. The conversation will not be audio recorded. The call handler takes written notes.

Safecall's phone numbers for AutoStore's operating countries are:

Austria	00800 7233 2255
---------	-----------------



France	00 800 7233 2255
Germany	00 800 7233 2255
Italy	00 800 7233 2255
Japan	0120 921067
Korea, South	001 800 7233 2255 (Korea Telecom)
Korea, South	002 800 7233 2255 (Dacom)
Norway	00 800 7233 2255
Poland	00 800 7233 2255
UK	0800 9151571
USA	1 866 901 3295

Reports of concern communicated through Safecall's external whistleblower channel will be forwarded to Organizational Effectiveness Manager (Astrid Standal Aarøe) and Chief People & Information Officer (Anette Matre) in AutoStore who will decide on the most appropriate action. If the reported incident or unacceptable condition concerns HR or Chief People & Information Officer, the whistleblower report will be sent directly to the General Counsel (Jenny Sveen Hovda) and Chair of the Audit Committee and independent board member, Viveka Ekberg.

At AutoStore a report of concern can always be forwarded by letter, email, phone call or in person, openly or anonymously. There are no requirements as to the form of the report, but we encourage employees to do whistleblowing in writing and through the electronic whistleblower channel.

#### *Anonymous whistleblowing*

The whistleblower may report anonymously but must be aware that a proper investigation may prove difficult if the information provided cannot be tested or verified and the investigator is unable to obtain further information from the whistleblower.

#### *Whistleblowing to supervisory body or public authority*

AutoStore's aim is to arrange its procedures so that internal whistleblowing will always be sufficient. However, the whistleblower always has the right to report to a supervisory body or other public authority (for example the Norwegian Labour Inspection Authority, the Data Inspectorate or the Police). The whistleblower can in certain instances report to the media or public, limited to situations when it is done in good faith, the concern has public interest and internal whistleblowing has been exhausted or been deemed not suitable.



## 2.3 What to report through a whistleblower report?

As described in section 2.1 whistleblowing is the process of notifying about unacceptable conditions within an organization. Example of unacceptable conditions include, but is not limited to:

- Circumstances that endanger employees' lives or health
- Damage to the climate or environment (hazardous products, pollution etc.)
- Corruption or other economic crimes (such as embezzlement, theft, fraud, etc.)
- Breach of sanctions
- Abuse of authority
- Unsound working environment (harassment, bullying, sexual harassment, discrimination, racism, etc.)
- Breaches of Personal Data Protection legislation
- Other violations of the Code of Conduct, Supplier Code of Conduct, this Whistleblower Policy and other applicable policies or guidelines.

The whistleblower decides what information is to be provided. However, to ensure sufficient information to be able to perform adequate follow-up actions, the report of concern should include as many details as possible and available supporting evidence regarding the censurable condition, such as:

- The period, and date and time if applicable, of the circumstances concerned
- The employees' observations
- The place where the incident occurred
- Other witnesses
- Any supporting documentation.

## 2.3 Protection of whistleblowers

### *Confidentiality*

Reports of unacceptable conditions shall be treated as confidential unless this is an obstacle to managing the issue in a reasonable manner. The whistleblower's identity shall be treated as confidential and shall, insofar as is possible, not be disclosed to the person who is subject to the report, management or colleagues.

### *Protection against retaliation*

Anyone reporting concerns in good faith can do so without fear of retaliation, reprisals or other unfavorable treatment, even if it is later discovered that they were mistaken. Protection in this respect means that AutoStore will not remove, suspend, threaten, harass or discriminate against an employee who reports such conditions. Any breach of this provision should be reported to the CEO.

However, appropriate disciplinary or legal action will be taken against any person who is found to have made a disclosure maliciously that they know to be untrue, or without reasonable grounds for believing that the information supplied was accurate. The burden of proof for documenting that a report has occurred strictly in accordance with this policy rests with the employer.



## 2.4 Ground principles for handling reports of concern

Autostore has established some ground principles for handling whistleblowing reports. These ground principles are:

- All reports of concern are to be taken seriously
- All reports will be sufficiently investigated within a reasonable timeframe and in a fair, open-minded, and objective manner
- Maintain confidentiality and information security
- Protection of whistleblowers
- Whistle-blowers reporting in good faith will not be subject to reprisals
- Non-anonymous whistleblowers will get timely feedback and information about the process
- Any person accused of a breach of the Code has the right to be informed of the nature and cause of the accusation against them and to be heard (contradiction)
- The process is to be documented in writing (notoriety)

All sensitive information shall be handled on a strict “need to know” basis and in accordance with the applicable Data Protection Acts and regulations and guidelines set out by the local data protection authorities, local laws and other applicable regulations.

Please note that there may be specific requirements under local Data Protection Acts, especially if using electronic whistleblowing channels/hotlines. All employees are ordered to maintain duty of confidentiality with regards to sensitive information and shall sign a separate declaration of confidentiality if deemed necessary by HR or external advisors. The log and all other documentation shall be archived with limited access and be maintained in a secure and confidential manner. All physical documents shall be stored securely.

All personal data collected during the investigation, except the final summary report, shall be deleted as soon as the investigation is concluded, unless legal proceedings are expected to take place. If so, personal data can be stored until the legal proceedings have been finalized.

## 2.5 Process of handling reports of concern



AutoStore wants to ensure transparency regarding the process of handling reports of concern. All steps shall be logged and documented to ensure full notoriety. Below is the process described in more detail.

### 1. *Receipt*

The receiver of the whistleblowing report shall, if possible, confirm receipt without undue delay and within 7 days, and inform the whistleblower that the report will be handled in accordance with AutoStore’s procedures for handling reported issues of concerns.



Anyone that receives a whistleblowing report shall handle it with necessary confidentiality and in accordance with this procedure, ensuring protection of the personal data of the persons referred to in the report. Such procedures should ensure that the identity of every reporting person, person concerned, and third persons referred to in the report, for example witnesses or colleagues, is protected at all stages of the process. If the identity of the whistleblower is known, it shall only be disclosed to the extent it is absolutely necessary. The whistleblower shall, if possible, be informed that the receiver or others involved in the investigation may be summoned as a witness in a future legal proceeding, and thus be instructed to disclose the whistleblower's identity.

If the whistleblower has requested a meeting to report, the meeting should be documented by making a recording of the conversation in a durable and retrievable form or through accurate minutes of the meeting. The whistleblower shall be offered the opportunity to check, rectify and agree the minutes of the meeting by signing them.

## **2. Initial assessment**

The key objective of the initial assessment is to conduct a preliminary review of materiality to decide who needs to be informed about the report of concern.

The receiver of the report of concern shall always, to the extent appropriate, forward the report of concern to Organizational Effectiveness Manager (Astrid Standal Aarøe) and Chief People & Information Officer at AutoStore Group (Anette Matre). If forwarding the report to either Organizational Effectiveness Manager or Chief People & Information Officer implicates either of the two, the report shall be forwarded to General Counsel (Jenny Sveen Hovda) in addition to either Organizational Effectiveness Manager or CPIO, or subsequently to the Chair of the Audit committee and independent board member Viveka Ekberg and CAO.

The receiver of the forwarded report of concern will conduct an initial assessment and determine who needs to be informed/involved and who should be responsible for handling the specific whistleblower report. Depending on the nature and severity of the whistleblowing report, Organizational Effectiveness Manager and Chief People & Information Officer shall at their discretion inform and advise the CEO (Mats Hovland Vikse) and/or the Chair of the Board of Directors of AutoStore (Jim Carlisle) without undue delay. Organizational Effectiveness Manager and Chief People & Information Officer shall always immediately notify the CEO of any reported concerns or complaints regarding AutoStore's accounting practices, reporting procedures, internal controls or auditing.

At this initial stage one must also ensure that the whistleblower report is reported in compliance with local data protection regulations.

## **3. Risk assessment and quality assurance**

The objective of the risk assessment and quality assurance is to decide how to handle a specific whistleblowing report. A tailored process plan will be prepared by the Chief People & Information Officer, or others as applicable, also taking into account applicable data protection regulation.

The Chief People & Information Officer and Organizational Effectiveness Manager (or receivers, if Chair of Audit committee and CAO are the receivers) shall perform a risk assessment and quality assurance of the whistleblowing report at hand. If needed, the Chief People & Information Officer and/or Organizational Effectiveness Manager (receivers) can confer with an external advisor.

The risk assessment involves a review and assessment of the report's potential consequences for AutoStore, such as reputation, personnel, operations, economy and possible sanctions, based on the assumption that the information in the whistleblowing report is true. The risk assessment shall



also include an assessment of how to attend to the whistleblower. Reports of concerns regarding possible illegal or unacceptable conditions are of a sensitive character that requires a focus on personal protection and the need for confidentiality, and principles of independence, objectivity and contradiction.

The quality assurance involves a preliminary evaluation where a dialogue with the whistleblower to collect complementary information is attempted, and if necessary, data is collected from other sources (i.e. other witnesses, internal governing documents, payments and public registries).

Based on the risk assessment and quality assurance, Organizational Effectiveness Manager and the Chief People & Information Officer (receivers) decides whether a more extended investigation shall take place. If no further investigation is required, this shall be documented in the log and summary report.

The whistleblower shall normally be informed of whether a more extended investigation is decided.



#### **4. Investigation**

Investigations are carried out on a step-by-step basis. Typically, only a small number of reports of concern require a full-fledged investigation. Most reports of concern can be handled without deploying a full investigation.

The Chief People & Information Officer and Organizational Effectiveness Manager (receivers) shall consider whether the investigation should be conducted by an internal team or external advisors. The decision regarding who will conduct the investigation will be based upon the nature of the violation reported and the resources available to conduct the investigation, as well as competence requirements. Generally, less severe cases can be conducted internally by local resources, while more serious cases should be handled by an assigned team or by external advisors. Involvement of external advisors can in certain cases secure impartiality and objectivity.

For more information regarding investigations in AutoStore see section 3 below.

#### **5. Summary Report**

The investigators shall analyze all collected information and prepare a summary report. The report shall include findings and observations on the reported matter, the procedure and the actions recommended or taken. The summary report shall answer the mandate given. In addition, the summary report shall include a self-evaluation of the process, as to enable learning points and identified changes needed in procedures etc.

As a main rule, parties involved shall receive sufficient information to secure their rights and have the right to contradiction on the factual parts of the summary draft report that concerns them.

AutoStore aims to have a completed investigation and final summary report as soon as reasonable from reception of the whistleblowing report. The summary report will be reviewed by the CEO and/or the Chairman, as decided during the initial assessment.

The whistleblower and the person who has been reported on shall as a minimum receive information that the case is considered and concluded, also in the case that no irregularities or issues of non-compliance are found in the investigation. Whistleblowers that are not parties to the case are in principle not entitled to any information about the execution of the investigation or to the conclusion in the summary report, but shall receive feedback on the final outcome of investigations triggered by the report within three months, or six months in duly justified cases, from the acknowledgment/confirmation of receipt. When deciding what information to share, several issues need to be taken into consideration, such as confidentiality and personal information protection, the whistleblower's need for information, the building of a culture that values whistleblowers, and planned internal and external information on the issue.

The Board will be informed at every board meeting about incident reports received and the outcome of the investigations. If violations of the law come to light, the Board of AutoStore is responsible for evaluating whether the company shall report to the relevant governmental control authority, such as the police.

The summary report shall be filed according to the internal archive routine and data protection acts, hereunder

- the Norwegian Personal Data Act of 15 June 2018
- The EU Directive 2019/1937 on the protection of persons who report breaches of Union law
- other relevant jurisdiction.



## **6. Actions**

### Disciplinary actions

Employee(s) who may be involved in unacceptable conditions or irregularities shall remain innocent until proven otherwise and must be given the opportunity to defend themselves against erroneous accusations. AutoStore's management team is responsible for ensuring that necessary measures/disciplinary action is implemented in cases of unacceptable conditions.

For employees, consequences may involve verbal or written warnings or, if the matter is very serious, termination of, or summary dismissal from their employment according to applicable labor regulations.

Any disciplinary actions shall be decided and implemented by the line management of the person that has been reported on and HR, and where necessary, with approval from Chief People & Information Officer and the CEO. The HR function shall always be involved prior to any disciplinary process. The disciplinary actions taken as a consequence of the conclusion of an investigation must always be proportionate and compliant with applicable laws and regulations as well as AutoStore's policies.

## **3. Investigation**

When a more extended investigation is decided due to the nature and severity of the case certain actions are always required. These actions are described below.

### **3.1 Planning of an investigation**

#### Mandate

A tailor made mandate/scope for the investigation should be prepared, as well as a task and progress plan and communication plan where necessary. The Chief People & Information Officer and Organizational Effectiveness Manager (receivers) is responsible for making a mandate for the investigation. The mandate should be designed to ensure that the investigation will answer important questions based on the character of the case.

#### Staffing the investigation

The Chief People & Information Officer (receivers) is responsible for designating appropriate internal and external resources with the relevant background, skills and expertise for the investigation at hand. Involving external lawyers requires approval from the CEO or the Chair of the Board of Directors.

#### Developing an investigation plan

The designated investigator shall develop an investigation plan for reports of concern where it is considered to be necessary with an investigation. The investigation plan typically includes the following elements:

- Scope and objectives of the investigation
- Actions to be taken
- Responsibilities



- Communication with business units and corporate functions
- An estimate of resources and costs required (internal/external)
- Expertise required
- Estimated schedule and time frame
- Plan for disclosure of information
- Data privacy considerations

#### Communication

If appropriate, the head of the relevant business unit and applicable expert areas may be informed of the allegations and the plan to be followed. They may be updated and consulted during the investigation, at the discretion of the Investigator. He or she should also normally be informed of the result of the investigation, including dismissals.

## 3.2 Execution of the investigation

An investigation will normally consist of interviews of affected parties and witnesses, and collection of documentation. Applicable legislation for access to emails and electronic files on employees' computers must be observed. Personal data which are manifestly not relevant for the handling of a specific report shall not be collected or, if accidentally collected, shall be deleted without undue delay.

The person who has been reported on shall as a main rule be informed about the whistleblowing report and its content and be given the opportunity to give his/her version of the case ("the right to contradiction"). The person concerned is not entitled to information about the whistleblower's identity.

#### Documentation

The investigator may inspect and examine any company records and documents reasonably believed to be relevant, subject to data privacy or other confidentiality considerations. In some cases, a document analysis is sufficient to be able to conclude and close the case. If after reviewing the documentation, significant relevant questions remain unanswered, further investigative steps will be taken.

#### Electronically stored information

Subject to local laws (data privacy laws in particular), the investigator can conduct forensic research on all Electronically Stored Information ("ESI"), such as e-mail, internet search history or electronic copies ('images') of hard drives and computers. The investigator shall consider engaging forensic technology specialists to ensure necessary knowledge, experience and tools to search, find (identify), analyze and report on relevant ESI.

#### Interviews

All employees are obliged to provide information and assistance on matters they are involved in as part of their role in the organization. For example, procurement managers shall contribute on matters concerning suppliers and tender processes, and quality personnel shall supply necessary information for concerns about product testing and certificates. This obligation should not lead to self-incrimination, i.e. exposing oneself to criminal prosecution.



For investigations in AutoStore, interviews can range from meetings with a conversational and informal style, to a more formal question-and-answer style. The severity and categorization of the case will determine the level of formality, and the more serious the behavior or situation is, the more formal the interview should be. Keep in mind that even in the most informal settings, the interviewee should be notified that the conversation will be documented as part of the investigation.

When the nature of a matter calls for a formal interview, the following principles should apply:

- A. As far as possible, the interviewee should be informed about the objective of the meeting and should accept in writing the request to attend
- B. The subject(s) and/or interviewee in an investigation is entitled to bringing a support person of their own choice into the meeting. The support person must be independent of the matter under investigation. He/she should primarily observe and not intervene with opinions, or attempt to steer the conversation in a certain direction
- C. If the subject and/or interviewee wishes to have a support person present but does not have a person in mind, the Investigator should mobilize one on his/her behalf, typically a union representative or member of HR. If the subject wishes a lawyer to be present, the investigator should contact the General Counsel who can assist in finding independent counsel.
- D. At the beginning of an interview, the interviewer should communicate:
  - a. how information gathered can or will be used;
  - b. that minutes will be taken to avoid misunderstandings and inaccurate interpretations of what is said during the interview;
  - c. that the minutes will be verified and signed by the interviewee after the meeting is over; and
  - d. that the interviewee has the right to refrain from providing information that may expose them to criminal liability (known as protection from self-incrimination).

All interviews and meetings performed as part of an investigation shall be documented. It may be relevant to prevent interviewees from coordinating their statements. Furthermore, the risk of confidentiality breaches should be prevented.

## 3.3 Reporting

### Draft report

Before issuing a final investigation report, a draft report shall be developed. The factual part of the draft report which is relevant for the subject(s) and witnesses is open to contradiction before finalization (see section below). The objective of an investigation report is to present factual circumstances in an objective, balanced and representative manner. The report should describe where critical and/or corroborating evidence is lacking and describe uncertainties and potentially outstanding activities. The report should not contain any speculation or conclusions which are not supported by evidence.

The report shall contain:

- Management summary;



- Background, objectives and scope;
- Mandate (where relevant);
- Investigative methods (how the investigation was carried out);
- Findings (separating facts from analyses); and
- Conclusions and recommendations.

The report shall provide an adequate account of the evidence and facts supporting the conclusions. Where possible, the report should also point to root causes, enabling effective recommendations to remedy the situation at hand. Legal assessments or legal conclusions should only be included when the General Counsel has been involved and has approved the wording of such legal assessments and conclusions in the report. Access to the investigation report or other sensitive investigation material shall be determined by HR / CPIO.

#### Contradiction

Normally, subjects of an investigation shall be informed about relevant statements and accusations made by witnesses and given access to relevant documentary evidence. If the whistleblower or witnesses have requested anonymity, the information provided should not contribute to disclosing their identity. The subjects' right to review investigation documents must be determined by considering the subject's need to protect his/her legal interests, his/her right to a fair process, and the severity of the case. Where appropriate, the subject may be requested to sign a confidentiality declaration before access to the report is given.

The subject(s) should be able to comment on the relevant factual parts of the draft, before a final report is issued. The subject is not entitled to commenting on the investigator's assessment of the facts. The investigator reserves the right to independently assess the facts against the requirements in AutoStore's governing documents and other applicable laws and regulations. Access to the investigation report draft may be restricted when there is a risk that confidential or sensitive information could be wrongly shared, or the information from the report can be misused.

#### Final report

Following input from all affected parties in the contradiction phase, a draft report is finalized. The final investigation report shall set out recommended corrective actions and clarify responsibilities and timeframes for follow-up. The subject(s) and/or witness(es) are not necessarily entitled to a copy of the final report. However, they shall be informed about the outcome of the investigation.

## 3.4 Closing activities

#### Filing of documentation

Storage of information in an investigation shall follow data protection principles for storage of confidential or sensitive information. Steps shall be taken to prevent information leaks and preserve documentation for potential future court proceedings.



When criminal and/or highly unethical behavior is substantiated, a copy of the investigation report and any supporting documentation should be stored according to local applicable procedures and regulation.

#### Notification

Relevant parties should be notified when the investigation is completed. Relevant parties are typically line management, HR and executive management.

#### Disciplinary measures

General Counsel may be consulted when considering disciplinary measures. Furthermore, General Counsel shall be consulted prior to any decision to report a matter to the police or other public authority. The decision to publicly disclose information about an investigation is taken by the CEO or the Board of Directors, supported by General Counsel and CPIO/ corporate communications.

## 4. Roles and responsibilities

The key roles and responsibilities defined to ensure an effective and efficient system for whistleblowing and investigation are defined in the table below:

Role	Responsibilities
Chief People & Information Officer (CPIO)	<ul style="list-style-type: none"><li>• Responsible for updating, communicating and monitoring the operational effectiveness of this policy.</li><li>• Ensure, together with Organizational Effectiveness Manager, (or receivers) that all reports of concern are taken seriously and reviewed in accordance with this policy.</li></ul>
Organizational Effectiveness Manager	<ul style="list-style-type: none"><li>• Ensure the whistleblower channel and the duty to report is sufficiently communicated and well known in the entire organization</li><li>• Ensure, together with CPIO, that all reports of concern are taken seriously and followed-up in accordance with this policy.</li></ul>
Board of Directors (BoD)	<ul style="list-style-type: none"><li>• Ensure that AutoStore has appropriate internal control and effective risk management.</li></ul>
All employees	<ul style="list-style-type: none"><li>• Individual responsibility to report risks and incidents, and to execute necessary risk mitigation activities as needed or requested.</li></ul>

## 5. Non-conformities

Implementing the Whistleblower and Investigation policy and performing the different activities and controls described in the policy document are mandatory for all areas in AutoStore. A request for non-conformity with the Whistleblowing and Investigation Policy shall be addressed to the policy owner. The policy owner is required to keep a record of all approved non-conformities.



## 6. References and definitions

Please find references to relevant governing documents in the table below:

Document name
Code of Conduct
HR Policy

Please find relevant **definitions** in the table below:

Term	Definition
Whistleblow/ Report of concern	The notification of unacceptable conditions within an organization
Contradiction	The right to be informed of the nature and cause of the accusation against them and to be heard

## 7. Revisions of this policy

Rev No	Issue date	Description of updates