

Partner Business Ethic Guidelines

1. Introduction

For AutoStore, sustainability is as much about the solutions, products, and services we offer as to how we run our business and treat our employees and partners. It's important that we stay true to those values, which is why we've introduced an Environmental, Social, and Governance (ESG) tracking program.

Making sure we're always accountable and on-task to meet our sustainability goals is now a permanent part of the AutoStore culture. Today, we keep constant watch over our behavior with the goal of releasing an annual report detailing year-over-year progress in key metric categories such as the environment, diversity, and ethics.

We want the partners who market, distribute and implement the AutoStore solutions ("**Distributors**") to join us on the exciting and challenging road ahead. Therefore, we seek to ensure that all Distributors, as well as Distributors' customers utilizing the AutoStore solutions ("**End Customers**"), comply with the fundamental principles of business ethics. On this background, we have established the compliance guidelines below (the "**Guidelines**").

Please find details related to our ESG report here:

<https://www.autostoresystem.com/sustainability>

AutoStore Distributor Business Ethic Guidelines

1. General rules

Distributors shall comply with laws and regulations of all countries in which they operate, deliver and/ or sell goods and services. In case the local legal requirements are less stringent than mentioned here, Distributors are required to comply with the most up to date international standards. Distributors shall respect human rights and minimize the environmental impact their activities or companies may cause. Distributors need to implement the requirements of these Guidelines in relation to their business partners and the End Customers, and carry out reasonable due diligence in order to ensure that their End Customers comply with the requirements set out in these Guidelines.

Labor

2. Labor and social policy Prohibition of Child Labor

AutoStore respects the rights of children to education and their development. Distributors are prohibited from employing children in violation of the International Labor Organization (ILO Convention concerning the lowest age of admission to employment No. 138, 182). The lowest age of admission to employment should be the lowest legal age in the country or the age of completing the compulsory education in that country, where the higher age forms the above shall apply.

3. Prohibition of forced labor

Under no circumstances may Distributors use, promote, or otherwise encourage the use of forced labor. Forced labor may, with no limitation to include limiting the movement of persons; withholding payment of salary or identification documents to keep the person in the workplace; maintaining them in a state of false indebtedness or setting off remuneration which they cannot avoid; loss of social status (see ILO Convention No. 29, 105). Distributors shall ensure that employees understand their rights regarding remuneration, overtime and keeping their identification documents. Distributors shall ensure that employees are treated fairly and that their rights are respected. Distributors shall pay particular attention to compliance with these principles when the employees are employed by third parties.

4. Working hours

Working hours (and overtime) must comply with applicable laws and regulations, collective bargaining agreements and international conventions. Distributors shall reject overtime as a substitute for insufficient regular salary. Overtime payments shall be made based on relevant legal provisions and/or collective bargaining agreements. Threatening the employee with a penalty to force him to perform work or services outside normal daily working hours shall be prohibited.

5. Fair wage

Distributors shall comply with all applicable laws and regulations, including minimum wages, overtime and benefits imposed by law. Distributors shall pay rates that are not lower than the rates specified for the trade or industry in which the work is performed. In countries where there are no legal requirements regarding the minimum wage, the basis for its determination will be paragraph 131 of the ILO Convention. The employees have their rights to fair wage always paid on time.

6. Non-discrimination and equal wage

AutoStore respects cultural differences. Distributors shall not discriminate or marginalize any employees because of their race, skin color, age, sex, sexual orientation, ethnicity, disability, religion, political affiliation,

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trade union membership, ethnic origin, social origin or marital status in their recruitment and employment processes, such as job applications, promotions, awards, access to training, job assignments, salaries, allowances, discipline, termination of employment or retirement (see ILO Convention 100, 111).

7. The right to organize gatherings and the right to association

Distributors shall respect the right of employees to freely associate, create employee organizations and join self-elected employee organizations, use employee representation and collective bargaining agreements in accordance with applicable laws and regulations. Distributors shall ensure that representatives of such employees will not be discriminated (see ILO Convention 87, 98). Distributors must strive for a fair relationship between their economic interests and those of their employees.

8. Health and safety

Distributors shall ensure that the risks to their employees, contractors, and members of the public regarding health and safety arising from their activities are limited.

AutoStore requires Distributors to carry out their activities in a safety manner, in accordance with all legal provisions, approved codes of conduct and best industry practices. Distributors are also expected to have a clear commitment to health and safety management, as well as effective and proactive policies and procedures. Distributors should support guaranteeing and creating safe working environment. AutoStore will very seriously analyze and actively monitor the occurrence of accidents, as well as require full disclosure of statistics. At the request of AutoStore the Distributors shall provide their health and safety indicators, risk assessment and improvement plan.

Environment

9. Environmental policy

Distributors shall implement actions to improve environmental protection in all aspects of its business operations. AutoStore expects from its Distributors to strive to save valuable resources, less energy usage and create less waste and emissions through sustainable usage. Products and services shall then continue to be exceptionally environmentally friendly in the future. In order to meet international standards Distributors shall cooperate more closely with local offices and relevant state institutions at local level.

9.1. Natural resources protection

Distributors shall be focused on reducing the use of raw materials and resources, as well as eliminating waste generated as part of their activities. Appropriate processes should be implemented.

9.2. Conflict materials

AutoStore expects its Distributors to promote principles and practices of social responsibility through the entire supply chain and to give great importance to ethics in procurement. The delivery and ordering of conflict materials such as tin, tantalum, tungsten or gold require particular monitoring in terms of transparency, security and the latest EU regulations.

9.3. Reduction of CO2 emissions and water consumption

Distributors should support the development of technologies to reduce CO2 emissions and water consumption, as well as recycling solutions and to implement logistic strategies that minimize overall environmental impact.

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10. Fair competition

All Distributors are committed to fair competition and not to distort it, as well as to comply with all applicable antitrust laws. They are required to avoid anti-competitive agreements with competitors, suppliers, Distributors, agents and customers, as well as anti-competitive practices. For the avoidance of doubt, the Distributors shall not engage in activities contrary to the applicable antitrust laws with End Customers.

11. No corruption, bribery and money laundering

Distributors are required to comply with all anti-corruption laws. The use and tolerance of any form of corruption is prohibited. Distributors shall not offer bribes to their business partners or accept bribes, or other illegal benefits, from them. Distributors shall not offer AutoStore employees gifts or other personal benefits resulting from relationships with Distributors. Distributors are required to comply with all money laundering laws. Further, the Distributors shall take the necessary measures to ensure that their End Customers complies with the applicable anti-corruption and money laundering laws.

12. Data protection

Distributors shall comply with all applicable data protection laws. In particular, Distributors shall act in an appropriate manner to ensure the personal data protection of AutoStore employees, clients or other personal data, processed as part of business relations with AutoStore.

13. Respect and protection of intellectual property

Distributors shall respect and protect the intellectual property rights of AutoStore and AutoStore customers. They will protect and use confidential information properly and only for the purpose of business relationship. Distributors shall ensure that they only contract with End Customers who respect and protect the intellectual property rights of AutoStore and AutoStore customers and who protects confidential information in accordance with industry standards.

14. Compliance with international trade regulations

Distributors shall ensure that transactions with third parties do not violate applicable international trade embargoes or regulations, import and export controls or international financing anti-terrorist regulations. The Distributor shall use the appropriate measures to comply with the above, including without limitation to ensure that their End Customers comply with the above.

Distributor shall ensure that at the date hereof and throughout the term of its agreement(s) with AutoStore, neither

(a) the Distributor;

(b) any member(s) of its board of directors, or any of its officers; nor

(c) any individual, government, company or other entity that directly or indirectly owns 50% or more of, or in any other way controls the Distributor;

are subject to sanctions or restrictive measures implemented by or listed on any sanctions list published by the United States, the United Nations, the United Kingdom, the European Union and/or Norway.

Further, the Distributor shall take the necessary steps to verify that its (i) End Customers and (ii) business partners (including contractors and subcontractors) insofar as involved in performance of the agreement(s)

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with AutoStore (or any individual, government, company, organization or other entity that directly or indirectly owns 50% or more of, or in any other way controls, such subcontractors/contractors or their subcontractors/contractors), are subject to sanctions or restrictive measures implemented by or listed on any sanctions list published by the United States, the United Nations, the United Kingdom, the European Union and/or Norway.

The Distributor further undertakes to take any and all necessary steps to ascertain if it has breached its obligations of this clause as at the time of entry into of any agreement(s) with AutoStore and on a continuing basis during the term of such agreement(s), and in the event of such breach, promptly notify AutoStore in writing of such breach.

A breach of the obligation under this clause shall entitle AutoStore to terminate its agreement(s) with Distributor.