

# Human Rights Policy

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## Table of Content

<b>1. INTRODUCTION</b>	<b>2</b>
1.1. PURPOSE	2
1.2. OBJECTIVE	2
1.3. SCOPE	2
1.4. POLICY OWNERSHIP AND MAINTENANCE	2
<b>2. RESPECT FOR HUMAN RIGHTS PRINCIPLES</b>	<b>3</b>
2.1 LABOR AND SOCIAL PROHIBITION OF CHILD LABOUR	3
2.2 PROHIBITION OF FORCED LABOUR AND HUMAN TRAFFICKING	3
2.3 WORKING HOURS, LIVING WAGES AND BENEFITS	4
2.4 WORKING CONDITIONS AND MATERNITY PROTECTION	4
2.5 NON-DISCRIMINATION AND EQUITY	5
2.6 THE RIGHT TO ORGANIZE AND THE RIGHT TO ASSOCIATION	5
2.7 HEALTH AND SAFETY	5
<b>3. HUMAN RIGHTS DUE DILIGENCE</b>	<b>6</b>
<b>4. REPORTING</b>	<b>6</b>
4.1 REPORTING FOR EMPLOYEES	6
4.2 PUBLIC REPORTING	6
<b>5. ROLES AND RESPONSIBILITIES</b>	<b>6</b>
<b>6. NON-CONFORMITIES</b>	<b>7</b>
<b>7. REFERENCES AND DEFINITIONS</b>	<b>7</b>

<b>Responsible:</b> Anette Matre	<b>Approved by:</b> Board of Directors	<b>Approved date:</b> 13.02.24	<b>Revision:</b> 3
<b>Filename:</b> Human Rights Policy-3.docx	<b>Department:</b> HR - 1002	<b>Process:</b>	

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# Human Rights Policy

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## 1. Introduction

### 1.1. Purpose

The purpose of this policy is to outline the main principles governing AutoStore Group's ("AutoStore") management of its impact on human rights.

### 1.2. Objective

AutoStore is committed to meeting its responsibility to respect human rights are defined by the United Nations Guiding Principles on Business and Human Rights.

This policy is guided by international human rights principles encompassed by the Universal Declaration of Human Rights, including those contained within the International Bill of Rights and the International Labor Organization's (ILO) 1998 Declaration on Fundamental Principles and Rights at Work.

The objective of this policy is to describe:

- The commitment to respect international human rights and labor standards
- Ensures employees are aware of the Human Rights Policy through training and an annual certification process.

The Human Rights Policy is aligned with AutoStore's Code of Conduct.

### 1.3. Scope

The policy applies to AutoStore Group (hereafter "AutoStore") and any third party acting on behalf of AutoStore Group.

It also applies, as far as is reasonably achievable, to our upstream and downstream supply chain through partners, suppliers and third party contractors. In joint ventures where AutoStore does not have overall control, the management of those businesses are strongly encouraged to adopt the same or similar standards.

### 1.4. Policy ownership and maintenance

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

This policy is approved by the Board of Directors.

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# Human Rights Policy

## 2. Respect for Human Rights principles

Human Rights Principles
<ul style="list-style-type: none"> <li>• Labor and social prohibition of Child Labour</li> <li>• Prohibition of forced labour and human trafficking</li> <li>• Working hours, wages and benefits</li> <li>• Working conditions and maternity protection</li> <li>• Non-discrimination and equity</li> <li>• The right to organize and the right to association</li> <li>• Health and safety</li> </ul>

### 2.1 Labor and social prohibition of Child Labour

Child labor shall not be used. There is no recruitment of child labour. AutoStore respects the rights of children to education and their development. Suppliers are prohibited from employing children in violation of the International Labour Organization (ILO Convention concerning the lowest age of admission to employment No. 138, 182).

A child means any person under 15 years of age, unless national laws and regulations stipulate a higher mandatory school leaving or minimum working age, in which case the higher age shall apply. “Child labour” means any work by a child, unless it is considered acceptable under the International Labour Organization’s Minimum Age Convention 1973 (No. 138).

Under no circumstances shall Suppliers let a child under the age of 18 perform hazardous work, including work likely to risk their health, safety, or development.

If any incidence of child labour is identified in the supplier’s industry and region, the supplier shall initiate, or participate in, a program to transfer any children involved in child labour into quality education until they are no longer children.

### 2.2 Prohibition of forced labour and human trafficking

Under no circumstances may AutoStore or suppliers use, promote, or otherwise encourage the use of forced labour, modern forms of slavery and any form of human trafficking. Forced labour 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).

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# Human Rights Policy

AutoStore shall ensure that employees understand their rights regarding remuneration, overtime and keeping their identification documents. AutoStore shall ensure that employees are treated fairly and that their rights are respected. AutoStore shall pay particular attention to compliance with these principles when the employees are employed by third parties.

## 2.3 Working hours, living wages and benefits

Working hours and overtime must comply with applicable laws and regulations, collective bargaining agreements and international conventions. The employees have their rights to fair wage always paid on time.

AutoStore 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.

AutoStore shall comply with all applicable laws and regulations, including living wages, overtime and benefits imposed by law. AutoStore 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.

## 2.4 Working conditions and maternity protection

AutoStore shall treat all employees fairly and honestly regardless of where they work. All employees shall have a written contract of employment, with agreed terms and conditions. All employees are entitled to reasonable rest breaks, access to toilets, rest facilities and portable water at their place of work, and holiday leave in accordance with the legislation of the country where they work. All employees shall be provided with appropriate job skills training.

AutoStore shall ensure maternity protection. A pregnant woman or nursing parent is not obliged to perform work which has been determined to be harmful to her health or that of her child, and provides for protection from discrimination based on maternity. AutoStore shall not terminate the employment of a woman during pregnancy or absence on maternity leave, or during a period following her return to work, except on grounds unrelated to pregnancy, childbirth and its consequences, or nursing. Women returning to work must be returned to the same position or an equivalent position paid at the same rate (see Maternity Protection Convention (Revised), 1952 (No. 103)).

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# Human Rights Policy

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## 2.5 Non-discrimination and equity

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

AutoStore shall promote equity and put in place better protection against discrimination for everyone. Equity recognizes that each person has different circumstances, and allocates the exact resources and opportunities needed to reach an equal outcome. AutoStore shall challenge gender stereotypes, draw attention to bias, and seek out inclusion.

## 2.6 The right to organize and the right to association

AutoStore respect the right of employees to associate, create employee organizations and join self-elected employee organizations, use employee representation and collective bargaining agreements in accordance with applicable laws and regulations.

AutoStore will ensure that representatives of such employees will not be discriminated (see ILO Convention 87, 98). AutoStore must strive for a fair relationship between their economic interests and those of their employees.

## 2.7 Health and safety

AutoStore shall ensure that the risks to employees, contractors, and members of the public regarding health and safety arising from their activities are limited. This requires AutoStore to carry out their activities in a safety manner, in accordance with all legal provisions, approved codes of conduct and best industry practices.

AutoStore are shall have a clear commitment to health and safety management, including health and safety indicators, risk assessment and improvement plan. AutoStore shall very seriously analyze and actively monitor the occurrence of accidents, as well as require full disclosure of statistics.

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## 3. Human Rights Due Diligence

Recognizing the United Nations Guiding Principles of Business and Human Rights, the OECD guidelines for Multinational Enterprises and the Transparency Act, AutoStore are required to perform due diligence of human rights and working conditions. Considering the impacts human rights violation can cause, AutoStore shall prioritize appropriate actions to identify, prevent or mitigate those impacts in our value chains.

AutoStore will regularly review and update the progress on our efforts, and annually communicate the results through our CSR report and other communication tools. Where we identify that we have caused or directly contributed to adverse human rights impacts, we would engage in appropriate remediation processes by ourselves or in cooperation with other stakeholders.

## 4. Reporting

### 4.1 Reporting for Employees

AutoStore shall strive to create workplaces in which open and honest communications among all employees are valued and respected. If any employee believes that someone is violating the Human Rights Policy or the law, they are asked to report it immediately to their local manager, Human Resources, or Company legal counsel. Employees can also report suspected policy violations through the Whistleblowing channel, Speak Up!

AutoStore will investigate, address and respond to the concerns of employees and will take appropriate corrective action in response to any violation.

### 4.2 Public Reporting

AutoStore shall report to the public on human rights-related commitments, efforts and statements, consistent with this Human Rights Policy, as part of our Human Rights Report and annual Sustainability Report. This reporting cross references the UN Guiding Principles Reporting Framework.

## 5. Roles and responsibilities

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

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Role	Responsibilities
Policy owner	<ul style="list-style-type: none"> <li>Responsible for designing, implementing, updating, communicating and monitoring the operational effectiveness of this policy</li> <li>Distribution of the policy to all legal reporting entities</li> <li>Provide necessary instructions and training to ensure that all entities are made familiar with and understand the content</li> <li>Oversee compliance with the policy and performing yearly compliance reporting to the AutoStore Group</li> </ul>
Legal reporting entity	<ul style="list-style-type: none"> <li>Local implementation of and compliance with AutoStore Group Human Rights Policy</li> <li>Ensure that employees are aware of and have understood the main principles and action steps in policies and related procedures. This includes necessary information and training</li> <li>Perform local monitoring activities</li> <li>Annually perform an assessment of the compliance with the main principles and procedural action steps and report the results to the policy owner.</li> </ul>

## 6. Non-conformities

Implementing the Human Rights 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 Human Rights Policy shall be addressed to the policy owner and reported in the governance system. The policy owner is required to keep a record of all approved non-conformities.

## 7. References and definitions

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

Document name
Code of Conduct
HR Policy

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# Human Rights Policy

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Supply Chain Business Ethic Code
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Whistleblowing and Investigation Policy
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