



Statement in accordance with the Transparency Act



Introduction

The Norwegian Transparency Act entered into force on 1 July 2022 and aims to ensure respect for basic human rights and decent working conditions in businesses' own operations and in the supply chain. The following is AutoStore's second statement in accordance with the Transparency Act.

AutoStore works actively to comply with the demands and expectations set forth in the Transparency Act. The process of carrying out AutoStore's due diligence assessments is an ongoing effort and the company integrates the due diligence assessments into existing assessments of its own operations, partners, suppliers and other business partners.

AutoStore will always, to the best of its ability, answer all written requests for information about how it addresses actual and potential adverse impacts on fundamental human rights and decent working conditions, in accordance with the duty to provide information in the Transparency Act. Requests for information will receive a written response within three weeks from reception.

This statement applies to AutoStore Group and any third party acting on behalf of AutoStore Group



Value proposition

AutoStore is committed to protecting the human rights of people who work throughout its value chain and interact with its products. The company sets high expectations for itself and third parties. AutoStore will only cooperate with partners, suppliers and other stakeholders who adhere to the same ethical standards as AutoStore.

AutoStore's values are what drive decisions and build company culture. The company has these key values:

Lean

We continuously strive to create more customer value with fewer resources and the elimination of waste, while maintaining full focus on quality, delivery and cost.

Transparent

We approach tasks with focused minds and foster teamwork through transparency and open dialogue. We are fair and easy to do business with.

Bold

We are here to change the industry for the better with great innovations. We have the creativity, courage and willingness to take risks.

About AutoStore

AutoStore's purpose is to utilize space, energy, and time in better ways. Compared to conventional storage, cubic storage gives businesses four times the storage capacity within the same footprint. Utilizing space in better ways frees up areas for new activities, and can transform businesses, society, and the environment.

For more information about AutoStore's operational and organizational overview read the company's [Annual Report \(page 6-7 and 11-12\)](#).

AutoStore™ is a technology company that develops order-fulfillment solutions to help businesses achieve efficiency gains through the automated storage and retrieval of goods. Its unique cube based modular storage and retrieval systems utilize state of the art robotics technology alongside software modules to cut the cost, time and space required for warehouse operations. The company offers both hardware and software capabilities and the AutoStore technology is interoperable with other third-party solutions.

Born out of a rural fjord town in Norway in 1996 from an idea to stop air-housing and start warehousing, AutoStore is now the most widely adopted automated fulfillment system on the planet with over 1,400 systems distributed to more than 1000 unique customers across 54 countries.

Standardization is key to AutoStore's scalability and profitability. The AutoStore system is a modular solution that can be built in any shape, form or height and can fit into any space, giving AutoStore's customers great flexibility. The system consists of an aluminium Grid, Robots, Bins, Ports and a Controller.

For more information about our resilient business model read our [Annual Report \(page 22-26\)](#).

Governance framework and group policies

AutoStore's sustainability efforts and commitment to respect human rights are guided by internationally recognized human rights and labor standards, including those contained in the International Bill of Human rights and the ILO Declaration on Fundamental Principles and Rights at work. AutoStore's Supply Chain Business Ethics Code is based on the ILO standards and specifies the company's commitment to protecting human rights.

AutoStore's approach is based on key frameworks that define human rights principles for business.

- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- OECD Due Diligence Guidelines for Responsible Business Conduct
- The UN Global Compact's Ten Principles

AutoStore has been a member of UN Global Compact since 2021.

Human rights are at the core of AutoStore's sustainability efforts. The company's double materiality assessment conducted in 2023 identified human rights as a material topic for all stakeholders. As a global company, its potential human rights impact – both positive and negative – relates not only to AutoStore's own employees, but also to its supply chain and partners.

AutoStore's Human Rights Policy was developed in 2023 and outlines the company's commitment to respecting human rights. The policy is owned by the Chief People & Information Officer (CPIO) and approved by the Board. The purpose of the policy is to outline the main principles governing AutoStore's management of its impact on human rights issues, and to set out requirements regarding implementation and monitoring of, as well as reporting on, compliance with the principles.

The AutoStore Group

The AutoStore group is made up of 22 subsidiaries. All subsidiaries must follow AutoStore’s Governance framework and the group policies. The subsidiaries of AutoStore Holdings Ltd. are presented in this table:

For more information on AutoStore’s work on human rights, read “Human Rights Policy” and the **“Human Rights Statement”** under the **“Sustainability”** tab on the company’s website.

Consolidated entities

Automate Intermediate Holdings 2 S.à r.l.

Automate HoldCo 1 AS

AutoStore AS

AutoStore Technology AS

PIO AS Norway

PIO Inc.

AutoStore Sp. Z o.o.

AutoStore Co, Ltd

AutoStore Systems Inc.

AutoStore System Limited

AutoStore SAS

AutoStore System GmbH

AutoStore System K.K.

AutoStore System Ltd.

AutoStore System AT GmbH

AutoStore System S.r.l.

AutoStore System S.L.

AutoStore System AB

AutoStore System Pte Ltd

Locai Solutions Inc.

AutoStore System Pte Ltd

Locai Solutions Inc.

Office

Luxembourg

Norway

Norway

Norway

Norway

U.S.

Poland

Thailand

U.S.

UK

France

Germany

Japan

South Korea

Austria

Italy

Spain

Sweden

Singapore

U.S.

Singapore

U.S.

Operations

Holding-company

Holding-company

Operations and admin

Operations and admin

Sales Office for SMB segment

Sales Office for SMB segment

Assembly

Assembly

Sales Office

Sales Office

Sales Office

Sales Office

Sales Office

Sales Office

Sales Office

Sales Office

Sales Office

Sales Office

Sales Office

Sales Office

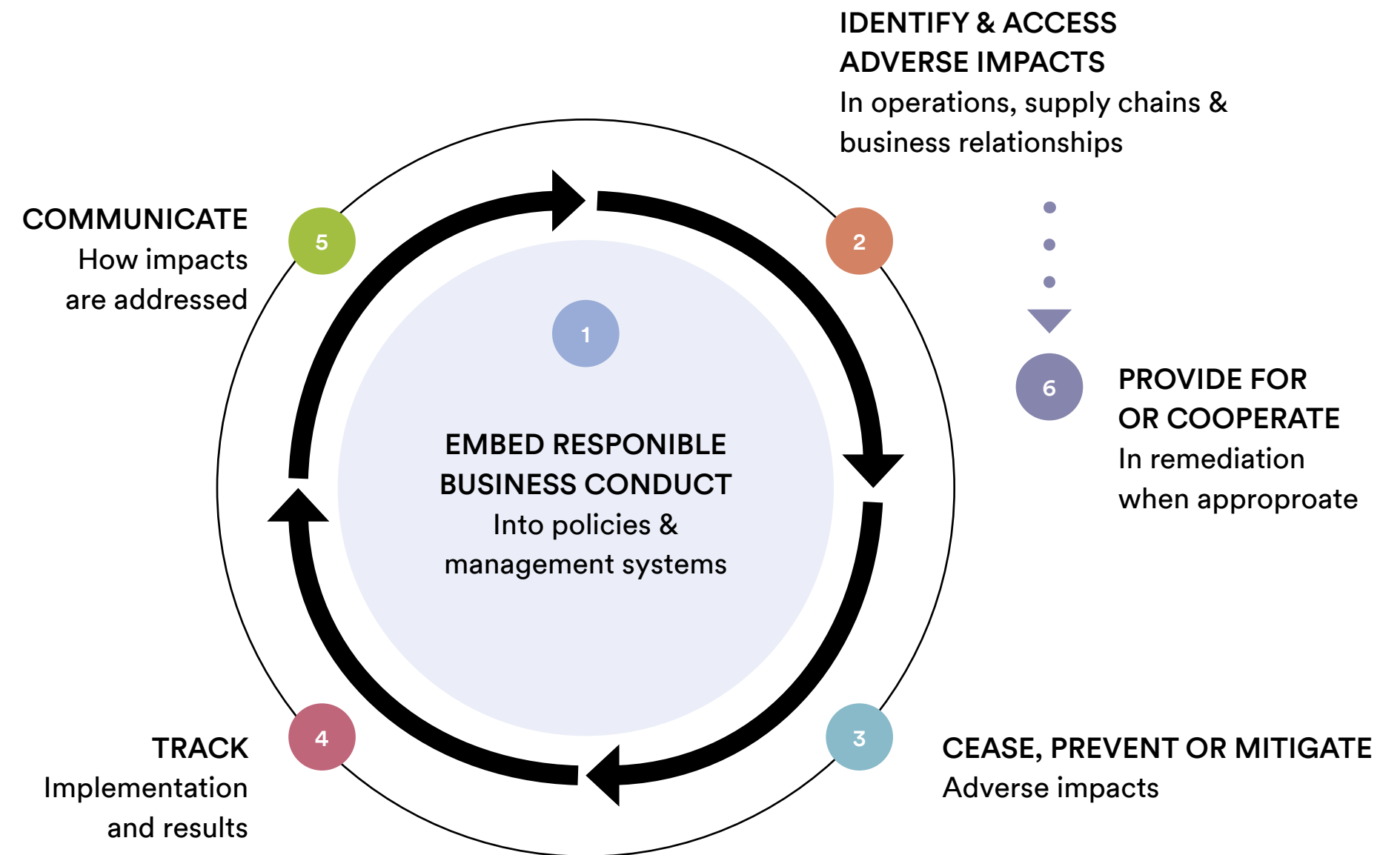
Sales Office

Sales Office

Process for due diligence

AutoStore supports the OECD guidelines for multinational enterprises and the United Nations Guiding Principles (UNGP) approach to due diligence, which recognise the need to have processes in place to identify, prevent, mitigate, and account for how the impact on human rights is addressed. This is part of AutoStore's existing processes for sourcing and enterprise risk management. It is understood that this is an ongoing activity, as risks may change over time in line with operational changes or external influences.

AutoStore follows a five-step model for due diligence assessments, based on the OECD guidance. The five-step model lays the foundation for internal governing procedures and monitoring activities, overview of suppliers and risk assessment.



AutoStore's operation

AutoStore has established a risk management process, and health and safety issues are an integrated part of the annual enterprise risk assessment. Based on these assessments, AutoStore considers that there are no significant risks of negative impact on human rights linked to its own operations and employees. There are no reported HSE incidents resulting in permanent disability, nor have any labor rights violations been reported. However, any HSE risks or incidents will be handled through internal procedures and routines, which are based on AutoStore's Human Resources Policy and Environment and Climate Policy.



Due diligence of the supply chain

Third parties

AutoStore works with suppliers and subcontractors from the raw material to the finished product phase which supply or produce goods, services or other input factors as part of the delivery of AutoStore systems. Examples include the provisions of aluminium profiles, electronic assembly, electric equipment, and machine parts relevant to AutoStore's assembly facility. AutoStore has almost 300 suppliers which are delivering products or services directly linked to AutoStore's own operations. Most components in the AutoStore System are sourced from multiple suppliers, while final assembly (the highest value-adding activity) is conducted in-house. Business partners are any suppliers of goods or services directly to the business. These services are important for the day to day running of the business, but not part of the core products or services sold by AutoStore. Examples include consultants, office rent, IT software and outsourced accounting.

Classification of third parties into risk categories

AutoStore's portfolio of suppliers is assessed and classified into different risk categories using DFØ's list of high-risk products and the Norwegian Labor Inspection Authority's overview of industries in Norway. Although the latter lists industry risks specific to Norway, the assumption is that industries that are high risk in Norway most likely are high risk in other countries too. Other relevant elements in the risk assessment include geographical risk, type of service/product, complexity in the supply chain and company structure.



Significant risk of adverse impact

The high risk suppliers have mainly been identified as third-parties providing hardware to AutoStore products as well as transportation suppliers. The risk profiles relate both to human rights and decent working conditions (industry/product risk), with additional country risks.*

*The risk linked to the IT equipment used to build AutoStore's software tool identified in the 2023 report has been reassessed and found not significant.

High Risk overview – Suppliers

Hardware for AutoStore products

Transportation

Human Rights

Local communities

Local communities

Decent working conditions

Workers in the supply chain

Workers in the supply chain

1. Hardware for AutoStore products

Hardware suppliers are key suppliers to AutoStore's operations. Hardware includes aluminium-based products (grids), plastic (bins), motors and electronic equipment (robots and ports). There is significant risk of negative impact on fundamental human rights and decent working conditions for workers and local communities. This indirect risk lies in the supply chain where raw materials, such as metal, plastic and electrical components are extracted and processed. These activities typically take place outside Europe in high-risk countries.

2. Transportation

Transportation is a high-risk industry with significant risk of breaching decent working conditions and labor standards with regards to wage and contracts. A lack of decent working conditions increases the risk of dangerous accidents on the road. A lack of work contracts and minimum wage increases the risk of social dumping, a situation in which the drivers risk exploitation when rights are sub-standard compared to those specified by law or collective agreements in the transport sector. Risks related to the transportation sector can directly affect AutoStore's operations.

Measure to prevent and mitigate risk

Code of Conduct for Suppliers

AutoStore requires suppliers to comply with its Supply Chain Business Ethics Code and implement it in their own supply chain. The code of conduct covers topics such as labor and social conditions (including forced and child labor), working hours and compensation, non-discrimination, health, safety and environment (HSE), business ethics (including corruption, bribery and money laundering), and data protection. The Supply Chain Business Ethics Code is communicated to and incorporated into contracts with all new suppliers, and all suppliers are required to sign up to the code of conduct.

Before signing contracts with partners and suppliers, AutoStore conducts risk assessments and due diligence covering anti-corruption, business ethics and human rights. Suppliers are also screened by reference to AutoStore's audit checklist, which covers topics such as management policies, quality management standards (QMS), training and motivation of employees, finance, and product and process safety. During the assessments, AutoStore asks suppliers to submit all required documents to confirm compliance with the Supply Chain Business Ethics Code and audit requirements. In the event of any negative findings during the audit, which is always performed before the first order is placed, the supplier is not approved.

Audits

AutoStore has conducted a stand-alone risk assessment in 2023 to identify and assess human rights impact in the value chain where there is a significant risk of adverse human rights impact. The selection of suppliers that were audited was based on combination of the defined high risk categories and purchase volume during the year. This resulted in a selection of 23 suppliers in the value chain. The audit consisted of an ESG questionnaire that contained topics related to human rights and social practices, climate and environmental practices and governance practices.

All of the suppliers submitted the questionnaires on time. The suppliers were then scored, and seven of the suppliers were found to have unsatisfactory scores or had weak or non-existent policies on human rights. AutoStore will follow up with these suppliers in 2024 with the aim to guide them in the work related to human rights, and to ensure compliance with AutoStore's Supply Chain Business Ethics Code and audit requirements.

AutoStore has not uncovered actual negative impact on fundamental human rights and decent working conditions in our supply chain in 2023.

Conflict minerals program

AutoStore started a conflict minerals program in 2023. A questionnaire regarding the so-called 3TGs (tin, tantalum, tungsten and gold) was sent to approximately 300 suppliers, of which 47% completed it within the set deadline. The focus of this first assessment was to raise awareness among the suppliers on the conflict minerals topic. 72% of the suppliers that submitted had no 3TGs, 9% had 3TGs but not from The Democratic Republic of Congo (DRC), 2% operated in DRC but not in conflict areas and 17% operated in DRC but in an unspecified area.

The conflict minerals program continues in 2024 with the aim of getting a higher response rate. The next step aims to identify which conflict minerals, if any, are directly linked to components in our robots, bins or grids.

Actions in case of actual negative impact

In case of actual negative impact, the supplier shall inform AutoStore without undue delay of any violation of the principles of the Code of Conduct for suppliers, or of such presumptions, as well as provide the recovery plan to remedy such violation, that AutoStore will be able to accept. In addition, AutoStore has the right, to the extent permitted by applicable law, to conduct individual assessments and tests, to a reasonable extent, to confirm that the supplier complies with the Supply Chain Business Ethics Code. If the violation is repetitive or persistent AutoStore will terminate the contract with the supplier.

Whistleblower channel

AutoStore has established internal procedures and external mechanisms to facilitate the submission of anonymous written or verbal reports concerning censurable circumstances.

The company's external whistleblowing channel is fully anonymous and untraceable, and provides an alternative for employees who do not wish to use internal reporting procedures. AutoStore has engaged SafeCall as the whistleblower recipient. SafeCall is a professional, entirely independent whistleblowing service provider.

The Whistleblowing channel is also available for third parties. We encourage all stakeholders to report and express their concerns relating to our activities and suspected violations of our policies. For more information and how to report, please visit our **Whistleblowing and Investigation Policy**. We are committed to ensuring that all reports are appropriately heard, investigated and remediated as required.



AutoStore's responsible path into the future

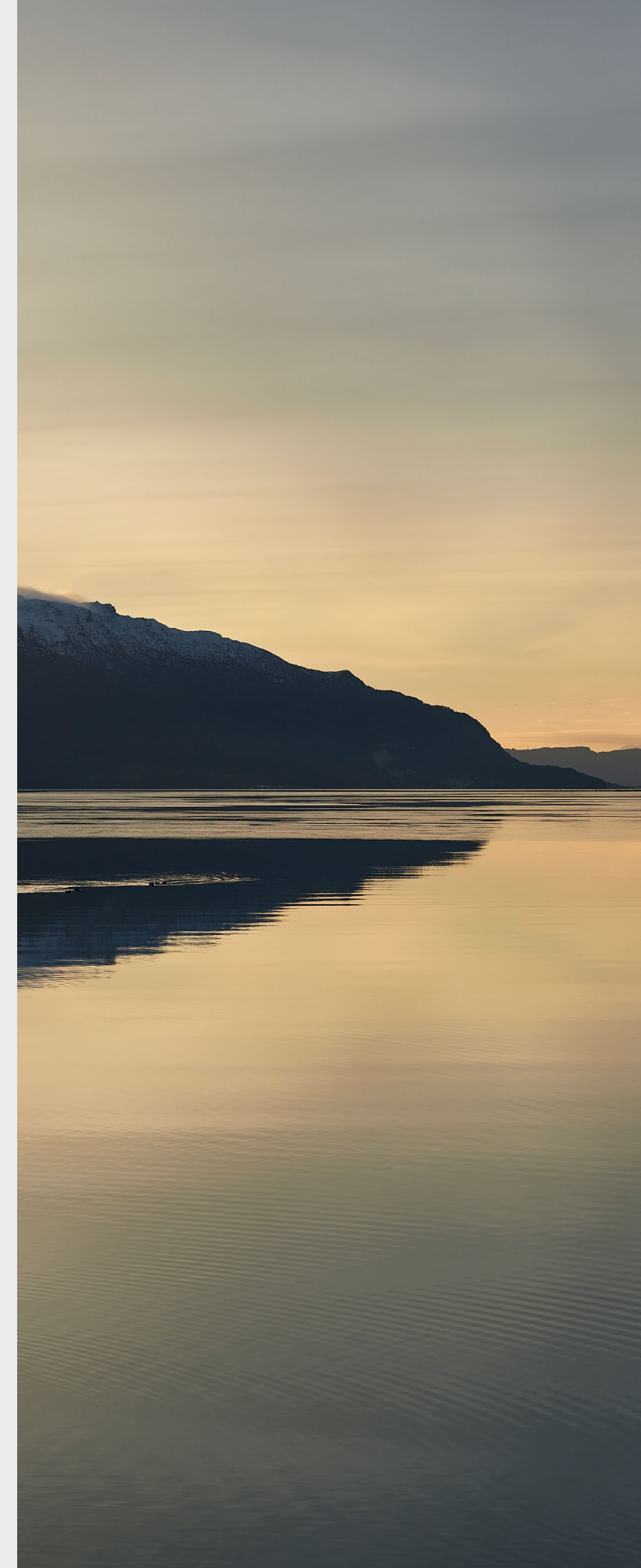
AutoStore's human rights ambitions are embedded in the company's Code of Conduct and Human Rights Policy, and the company is committed to respecting human rights and decent working conditions in accordance with the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and UN Global Compact. As part of AutoStore's responsibility to respect human rights, and in accordance with internal policies, all business units are required to conduct and document human rights due diligence to identify, address and manage human rights related risks and impacts resulting from the company's own activities and those in the value chain.

In 2023, AutoStore built awareness about human rights and due diligence both internally and externally. The scope for existing supplier audits was expanded with the aim to be more specific on human rights. A cross-functional working group was established to strengthen collaboration and coordination of the work going forward. The group consist of SVP Supply Chain, VP Sustainability and Internal Control Manager.

The Group Procurement process was updated in 2023 and AutoStore will implement the process throughout 2024. Furthermore, AutoStore made thorough assessments regarding a third-party system to investigate, track and better monitor the company's value chain. The system will be implemented in 2024. This will be an important tool to measure and reduce risk in AutoStore's supply chain. When the system is implemented the scope for the company's assessments will be increased.

In 2024 the supply chain department will staff up with the aim to ensure compliance with regulations and continue to integrate the work on due diligence on human rights in supply chain processes.

In case of significant changes to AutoStore's risk assessments during the course of the year, this will be updated on the company's website.





From the Board of Directors and CEO of AutoStore

Oslo, April 24, 2024

The Board of Directors of AutoStore Holdings Ltd.

James C. Carlisle
Co-chair

Vikas J. Parekh
Co-chair

Michael K. Kaczmarek
Board member

Hege Skryseth
Board member

Kjersti Wiklund
Board member

Sumer Juneja
Board member

Viveka Ekberg
Board member

Andreas Hansson
Board member

Mats Hovland Vikse
Chief Executive Officer