

Statement in accordance with the Transparency Act

2025

Introduction

The Norwegian Transparency Act entered into force on 1 July 2022, and this constitutes the Company's fourth report prepared under the Act. The legislation is intended to promote respect for fundamental human rights and decent working conditions within the company's own operations, its supply chain, and its business relationships.

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

We will always, to the best of our ability, respond to all questions in accordance with the Company's duty to provide information under the Transparency Act.

This statement applies to all entities in the AutoStore Group and any third party acting on behalf of AutoStore, and is published in accordance with the requirements of the Norwegian Transparency Act.



Who we are

AutoStore holds a simple yet powerful vision:

**To store and
move things
for everyone,
everywhere.**

Founded in Norway, we've grown into a global technology company. AutoStore develops robotics and advanced software to automate and orchestrate order fulfillment. Our goal is to ensure orders arrive faster than ever, with minimal environmental impact. That's how we help brands exceed customer expectations.

We have more than 1,900 systems in 65 countries, and we grow continuously as a community of customers, integration partners, employees, technology partners, suppliers and investors. Automation should make life easier, and by listening carefully to our community, we innovate to meet the industry's most complex needs. With AutoStore, brands gain speed, efficiency, and improved workplaces. And much more floor space.

Our 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.

The AutoStore Group

The AutoStore Group is made up of 20 subsidiaries. This statement applies to all entities in the AutoStore Group. The subsidiaries of AutoStore Holdings Ltd. are presented in this table:

Consolidated entities	Office	Operations
Automate Intermediate Holdings II S.à r.l.	Luxembourg	Holding-company
Automate HoldCo I AS	Norway	Holding-company
AutoStore Business Services AS	Norway	Sales Office for SMB segment
AutoStore AS	Norway	Operations and admin
AutoStore Technology AS	Norway	Operations and admin
AutoStore Sp. Z o.o.	Poland	Assembly
AutoStore System Inc.	U.S.	Sales Office
AutoStore System Limited	UK	Sales Office
AutoStore SAS	France	Sales Office
AutoStore System GmbH	Germany	Sales Office
AutoStore System K.K.	Japan	Sales Office
AutoStore System Co., Ltd.	South Korea	Sales Office
AutoStore System AT GmbH	Austria	Sales Office
AutoStore System S.r.l.	Italy	Sales Office
AutoStore System S.L.	Spain	Sales Office
AutoStore System AB	Sweden	Sales Office
AutoStore System Pte. Ltd.	Singapore	Sales Office
Locai Solutions Inc.	U.S.	Sales Office
AutoStore Co., Ltd.	Thailand	Assembly
PIO Inc	U.S.	Sales Office for SMB segment

Governance framework and group policies

AutoStore's commitment to respect human rights is 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 [Business Partner Code of Conduct](#) is based on the ILO standards and specifies our 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

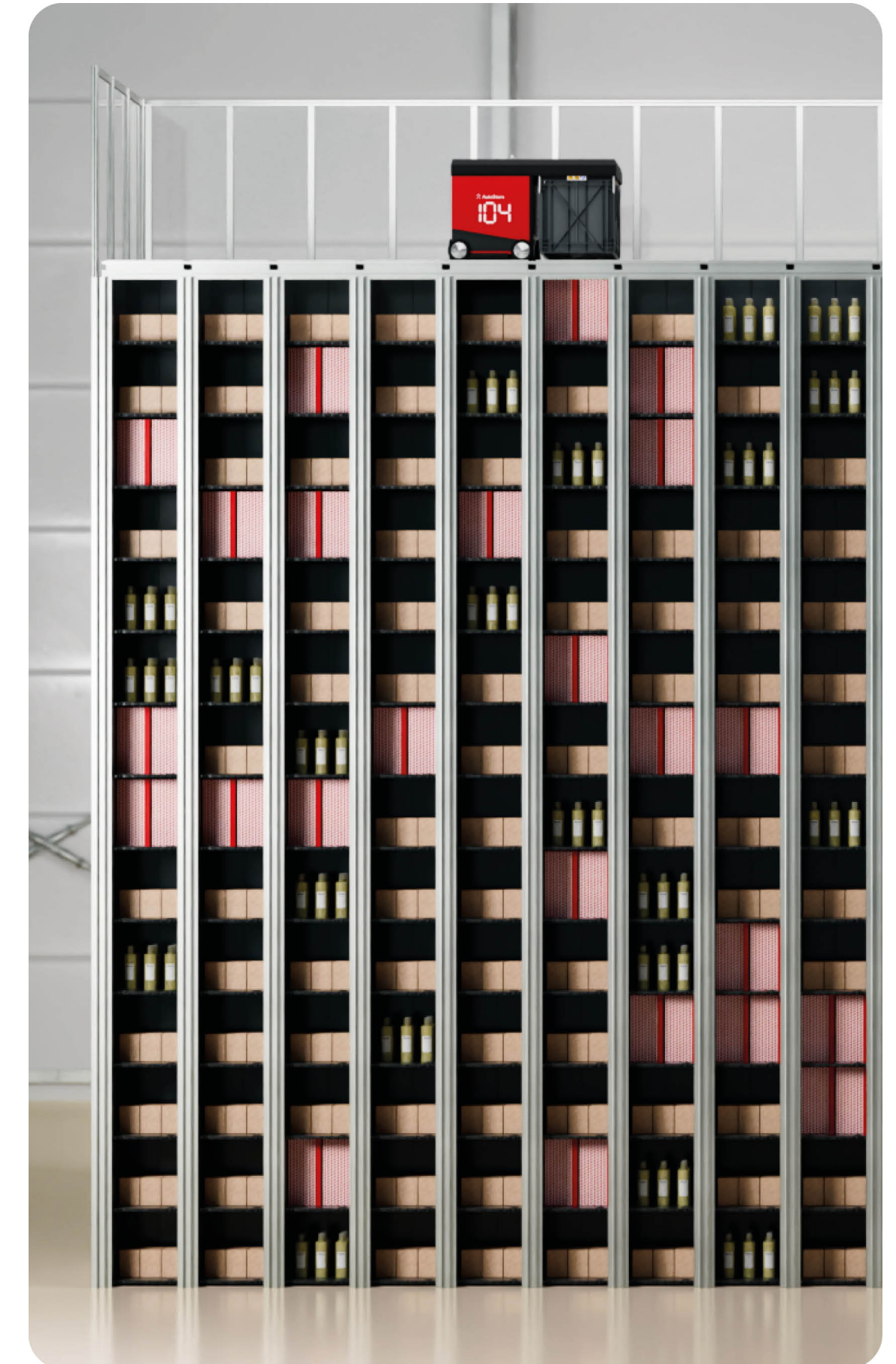
AutoStore has been a member of UN Global Compact since 2021.

An integral part of AutoStore's sustainability reporting process is the annual Double Materiality Assessment (DMA). More information on this process is available in AutoStore's Annual Report. The DMA, conducted in accordance with the ESRS, evaluates sustainability matters from the perspectives of impact materiality and financial materiality. Relevant impacts and risks identified through the DMA also inform the assessments underpinning this Transparency Act report.

Human rights forms a central element of AutoStore's sustainability efforts. The Company's double materiality assessment conducted in 2024 identified workers in the value chain as a material topic, a classification that was reaffirmed in the 2025 review. As a global company, our potential human rights impact relates not only to AutoStore's own employees, but also to its supply chain and partners.

AutoStore's Human Rights Policy outlines the Company's commitment to human rights. The policy is assigned to the Chief Financial Officer (CFO) and approved by the Board. Its purpose is to set out the main principles governing AutoStore's management of its impact on human rights, as well as the requirements for implementing, monitoring, and reporting on compliance with those principles.

For more information on AutoStore's work related to human rights, read our [Human Rights Policy](#).



The AutoStore supply chain

BOM suppliers

The upstream value chain for AutoStore begins with the sourcing of raw materials and components of the AutoStore system, hereunder materials to produce and assemble the modules – Grids, Bins, Robots, Ports, and Controllers. Most materials and components are sourced from several suppliers, and we work closely with a network of trusted suppliers to ensure the raw materials meet the required quality. Our key suppliers include the suppliers delivering aluminum products for our Grids and plastic products for our Bins. Other key suppliers provide materials and customized components necessary for production and assembly of the remaining modules in the AutoStore system. We define these suppliers as ‘bill-of-materials’ (BOM) suppliers within our value chain definition. Transportation suppliers are also included in this category.

As of end of year 2025 AutoStore has approximately 400 BOM suppliers which are delivering products or services directly linked to AutoStore’s own operations.

Non-BOM suppliers

Additionally, our upstream value chain includes suppliers of goods and services not directly linked to the production of the AutoStore system. These are defined as ‘non-bill-of-materials’ (non-BOM) suppliers. Non-BOM suppliers include, but are not limited to, software services, providers of IT equipment, and consulting expertise that support the Company's operations, innovations, and digital infrastructure.

Indirect suppliers

While suppliers beyond tier 1 is a topic actively monitored and explored internally at AutoStore, we acknowledge that the understanding and comprehensive oversight needed to achieve full visibility remains at an early stage.

AutoStore aims to further enhance its mapping and overview of indirect suppliers. A current priority initiative for mapping risks related to indirect suppliers is the Conflict Minerals Program, which aims to strengthen the due diligence in relation to minerals from mines, smelters and refiners.

While AutoStore does not purchase minerals directly from mines, smelters, or refiners, and remains layers removed from these upstream stakeholders, the group is committed to support responsible sourcing practices. AutoStore conducts risk mitigation and due diligence appropriate to the nature of the risks as it pertains to our products, suppliers, or services. This program is managed by an external service provider in collaboration with AutoStore’s supply chain and compliance teams.

Distribution partners

AutoStore currently has 23 customers – our distribution partners. Creating partnerships with distribution partners involves a thorough due diligence process, covering both commercial aspects and adherence to our standards for ethical business conduct, compliance, and sustainability.



Engaging with value chain workers

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 aluminum profiles, electronic assembly, electric equipment, and machine parts relevant to AutoStore's assembly facilities. Alongside conducting due diligence and risk assessments, AutoStore maintains direct engagement with several suppliers. The Group uses a risk-based approach to engagement and has conducted audits through ESG questionnaires and surveys in 2023, 2024 and 2025. The survey conducted in 2025, along with the planned survey for 2026 is further detailed in subsequent chapters. AutoStore aims to engage with stakeholders at least annually, and conducts yearly revisions of our value chain due diligence in accordance with reporting on the Transparency Act.

AutoStore has approximately 400 BOM-suppliers 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. AutoStore acknowledges the limitations and challenges in engaging with certain parts of our upstream value chain, particularly workers who are several tiers removed from our direct suppliers.

For the purpose of this value chain definition, and assessments made in the double materiality assessment process, the main focus has been on suppliers AutoStore is in direct contact with, hereafter referred to as 'direct suppliers' or 'tier 1 suppliers'. While considerations relating to suppliers beyond tier 1 have been assessed, transparency remains limited in certain parts of our

upstream value chain. AutoStore is committed to strengthening visibility and understanding across all tiers of the supply chain, and this work represents a sustained effort to enhance due diligence and risk management beyond tier 1.

As part of our due diligence and double materiality assessments, AutoStore has also assessed inherent risks identified in its downstream value chain relating to business partners and transporters. Furthermore, AutoStore maintains frequent engagement with distribution partners in general and has strengthened its engagement with key distribution partners and end customers in 2025. The operational responsibility for ensuring that stakeholder engagement occurs, and that the results from such engagement inform AutoStore's further approach, lies with the Chief Financial Officer (CFO).

Based on due diligence and the double materiality assessment, AutoStore has concluded that the workers that are most vulnerable to impacts in our value chain are located in the part of our value chain relating to hardware suppliers and transporters.

AutoStore also monitors the non-BOM suppliers in our value chain, such as consultants, office rental agencies, software suppliers and accounting agencies. These services are important for the day-to-day operations of the business, but not part of the core products or services sold by AutoStore. These suppliers are assessed to have a lower degree of risk exposure.



Process for due diligence

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 is an ongoing effort and the company integrates the due diligence into existing assessments of its own operations, suppliers, distribution partners, and other business relationships. This process is continuously under development.

AutoStore supports the OECD guidelines for multinational enterprises and the United Nations Guiding Principles (UNGP) approach to due diligence, which recognize the need to have processes in place to identify, prevent, mitigate, and account for how the impact on human rights is addressed. AutoStore aims to follow the five-step model for due diligence, based on the OECD guidance. The five-step model lays the foundation for internal governing procedures and monitoring activities, including maintaining an overview of suppliers and assessing which suppliers may pose the greatest risk.

BOM supplier

In recent years, AutoStore has maintained its focus on further enhancing and strengthening the contractual supplier agreement process towards BOM suppliers. Certain BOM suppliers are screened by reference to AutoStore's audit checklist, which covers topics such as management policies, quality management standards, finance, and product and process safety. During the assessments, AutoStore asks suppliers to submit all required documents to confirm compliance with the Business Partner Code of Conduct and audit requirements.

Non-BOM supplier

During 2025, AutoStore has further strengthened due diligence considerations in its supplier sourcing process for non-BOM suppliers, by integrating requirements into our Procurement Policy and thereby ensuring that all our direct suppliers are aware of, and aligns with, the company's principles. AutoStore's procurement process specific for non-BOM suppliers is also detailed and documented within our quality management system.

As part of the procurement and due diligence process, new non-BOM suppliers undergo sanctions screening, sign the Business Partner Code of Conduct, complete a supplier assessment form, and sign a non-disclosure agreement (NDA).

Procurement process

In 2025, the supplier management and legal teams have focused on further enhancing and strengthening our contractual supplier agreement process towards BOM suppliers.

Our internal Procurement Policy outlines the process for entering into new contracts with BOM suppliers. This includes, but is not limited to, principles for competition, non-discrimination, treatment of conflict of interest, and confidentiality.

The procurement process is further described and documented in our quality management system. All new suppliers must sign an NDA, are screened for sanctions and must fill out a Self-assessment questionnaire. In this questionnaire the suppliers must accept and sign our Business Partner Code of Conduct. The Business Partner Code of Conduct addresses how AutoStore's suppliers shall respect

human rights and minimize the environmental impact their activities or companies may cause. The Code explicitly addresses prohibition of forced labor and child labor. Furthermore, the Code states that in case local legal requirements are less stringent than defined in international standards, suppliers are required to comply with the most up to date international standards.

The potential supplier is evaluated based on its responses to the self-assessment questionnaire, and together with the sanction screening, this forms AutoStore's procurement-related supplier risk assessment. In 2025, the procurement department also selected a small number of high-risk suppliers for additional follow-up to help ensure compliance, a practice that will continue in 2026. This is further described on the following page.

The process outlined above for BOM suppliers was extended to also cover non-BOM suppliers in 2025, thereby ensuring alignment with the company's principles for all our direct suppliers. The process means that new non-BOM suppliers, or existing non-BOM suppliers that AutoStore negotiates renewed engagements with, will need to adhere to AutoStore's Business Partner Code of Conduct and undergo the same steps as BOM suppliers.

AutoStore introduced a new procurement and travel system in 2025 to streamline global procurement processes and consolidate data for non-BOM suppliers into one centralized platform.

Human rights due diligence program

As part of our ongoing supply chain due diligence and commitment to human rights protection, AutoStore initiated a renewed assessment of its suppliers in the fourth quarter of 2024. The assessment was conducted as a series of surveys where 395 BOM suppliers were included in the scope of the first round of assessment. Survey 1 was distributed and initiated with the intention of identifying inherent human rights risks in our supply chain. Suppliers were asked to submit details about their industry and countries of business operation. Questions related to business operations included information on produced goods and country of production, as well as procured goods and country of procurement.

Based on the results from survey 1, the identified high risk suppliers were issued a more comprehensive survey in Q1 2025. The objective of survey 2 was to contribute to an extensive review of our suppliers' practices and policies and aimed to ensure adherence to shared principles of responsible business conduct. The survey focused on our suppliers' commitments to conducting human rights due diligence, the outcomes of their own human rights risk assessments, and their processes for managing the mitigation and prevention of these risks.

Based on the results from survey 2, the procurement department conducted a closer review of eight suppliers. No breaches were identified, and no actions were taken towards any of the suppliers.

At the end of 2025 a new list of suppliers was identified for the next round of surveys planned for Q1 2026. 20 suppliers were identified based on various risk criteria and will receive a survey in Q1 2026, similar to survey 2 used in 2025. Based on experience from the previous surveys, a set of actions are planned to ensure a higher participation rate from the suppliers in 2026. This includes an e-mail from their AutoStore contact person with information about why, when and who the e-mail will originate from, ensuring it's not mistaken for any phishing attempt.

Measures to prevent and mitigate risk

Tone from the top - founding principles

Our relevant policies, including our Code of Conduct and Business Partner Code of Conduct, require that all involved parties in our business operations are treated fairly and that their rights are respected. This lays the foundation for how we conduct business and what we expect from our business relationships. AutoStore expects that its suppliers comply with the Business Partner Code of Conduct and implement it in their own supply chain.

In 2025, our Code of Conduct was revised and updated, ensuring that it reflects the latest standards and practices. Employees' review and confirmation of the Code of Conduct was a mandatory exercise, which the company commenced in 2025. In addition, employees are now required to review and confirm compliance with the Code of Conduct annually. As part of this update, we also updated our Business Partner Code of Conduct, which incorporates elements from our previous Supply Chain Business Ethics Code. This initiative aims to strengthen alignment of expectations across our organization and throughout our value chain.

Remediation and channels to raise concerns

AutoStore encourages all stakeholders to report and express their concerns relating to our activities and suspected violations of our policies, including these statements. There shall be a low threshold for reporting unethical or illegal business conduct, and we do not tolerate any form of retaliation against anyone who has raised an ethical or legal concern in good faith. We are committed to ensuring that all reports are appropriately heard, investigated, and remediated as required.

We provide a fully anonymous and untraceable whistleblowing channel through SafeCall, an independent professional service provider. This channel is accessible to both internal and external stakeholders. Our [Whistleblowing and Investigation Policy](#), available on our external website, includes comprehensive details about accessing SafeCall for external users. The General Council (GC) regularly reports issues identified via this channel to the Audit Committee.

AutoStore supports the availability of such channels in the workplace of value chain workers, but has not formalized a requirement for this to be in place. AutoStore's own whistleblowing channel and grievance mechanisms are also available for third parties. AutoStore aims to strengthen the awareness of this channel for value chain workers, in its continuous work with ensuring trust in these structures.

In cases of identified actual negative impacts, the supplier shall inform AutoStore without undue delay of any violation of the principles of the Business Partner Code of Conduct, 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 reasonable individual assessments and audits, to confirm that the supplier complies with the Business Partner Code of Conduct. If the violation is repetitive or persistent, AutoStore will explore its options to terminate the contract with the supplier.

Improvements of procurement processes, including updated contractual agreements and risk assessments

During 2025, the procurement department worked diligently to further improve the procurement process for both BOM and non-BOM suppliers. This included an updated Business Partner Code of Conduct, and updates to our procurement process to ensure sanctions screening in accordance with our sanctions policy.

AutoStore ensures that expert teams contribute to internal projects on procurement and due diligence in an adequate manner. This approach embeds human rights and working condition considerations into formalized processes. Collaboration across Supply Chain, ESG, HR, and Legal departments provides robust oversight and reinforces alignment with our commitments to responsible business conduct.

High risk suppliers

Transportation is generally regarded as a high-risk industry, with potential risks related to breaches of decent working conditions and labor standards, particularly regarding wages and contractual terms. On this basis, several transportation suppliers were identified for inclusion in the 2026 survey. Furthermore, hardware suppliers are key suppliers to AutoStore's operations. These include suppliers of aluminum-based products (Grids), plastics (Bins), motors, and electronic equipment (Robots and Ports). We recognize a potential risk of negative impact on fundamental human rights and decent working conditions for workers and local communities in our value chain. This indirect risk is most prevalent in the part of our upstream supply chain where raw materials, such as metal, plastics, and electrical components are extracted and processed. These activities are typically more likely to take place in high-risk countries and outside of Europe.

AutoStore is part of a global supply chain, and there is limited transparency in the parts of our supply chain that are several tiers removed from our direct suppliers. Although our double materiality assessments in 2024 and 2025 focused on direct suppliers for reporting purposes, indirect suppliers remain an important area for AutoStore and is included as a potential risk. While the risk is currently described at a high level, it underscores the significance of this matter to us.

Process and mitigating actions for high risk suppliers

The human rights due diligence process described in the preceding sections outlines how suppliers are identified. The approach for addressing the identified suppliers is described below. This process applies to all identified high risk suppliers, including non-BOM suppliers and our distribution partners.

AutoStore's work with the Transparency Act has resulted in the following list of mitigating actions for identified high risk suppliers:

- Supplier must sign the Business Partner Code of Conduct
- Supplier must provide necessary reassurances that the identified potential human rights issue is addressed
- Supplier must inform their workforce about AutoStore's whistleblowing channel and how to access it.
- Supplier must commit to answering AutoStore's annual human right due diligence surveys
- Supplier must accommodate and participate in audits on human rights issues if AutoStore deems this necessary

This approach has been tested by AutoStore in 2024 and 2025, and in 2025 AutoStore further formalized this process within the company's internal management system and applied it to potential high risk suppliers that are identified through the human rights due diligence process described in the preceding section.

The overall steps in the process is presented below:

1. Identify high risk suppliers using the surveys in our human rights due diligence program
2. Investigate the potential critical high risk suppliers
3. Conduct mitigating actions deemed necessary for the specific suppliers
4. If deemed necessary, conduct audits on the critical high risk suppliers
5. In case of identified actual negative humans rights impact, the supplier is required to provide a recovery plan to remedy the impact. If the negative impact is repetitive, persistent or the remediation actions are not in line with expectations, AutoStore will explore its option to terminate the contract with the supplier.

Beyond our direct suppliers

Companies in the technology software and hardware industry typically operate within complex, globally dispersed value chains that extend far beyond their direct (tier 1) suppliers. As the value chain becomes more multi-tiered, transparency generally decreases, making it increasingly difficult to identify and assess practices among upstream actors. The highest inherent risks are often concentrated in parts of the chain with low visibility and limited governance or regulatory oversight. This is particularly relevant for deeper tiers involving raw material extraction, processing, and component manufacturing.

Supply chains for these materials may be linked to significant human rights and labor-related risks. Raw material extraction can involve risks related to hazardous working conditions, heightened exposure to forced or child labor, and risks to the rights of Indigenous Peoples and local communities.

Even though tier 1 suppliers are the main focus in the double materiality assessments, AutoStore aims to further enhance its mapping and overview of indirect suppliers. A current priority initiative for mapping risks related to indirect suppliers is the Conflict Minerals Program, which aims to strengthen the due diligence in relation to minerals from mines, smelters and refiners.



From the Board of Directors and CEO of AutoStore

Nedre Vats, April 22, 2026

The Board of Directors of AutoStore Holdings Ltd.

Jim C. Carlisle
Co-chair

Angela Du
Board member

Sumer Juneja
Board member

Vikas J. Parekh
Co-chair

Kjersti Wiklund
Board member

Viveka Ekberg
Board member

Andreas Hansson
Board member

Kevin Mok
Board member

Mats Hovland Vikse
Chief Executive Officer



From the Board of Directors of additional group entities subject to obligations under the Transparency Act

Nedre Vats, April 22, 2026

The Board of AutoStore AS

Mats Hovland Vikse
Chief Executive Officer and Chair

Gro Anita Klungtveit
Board member

Jenny Sveen Hovda
Board member

Ole Alexander Mæhle
Employee-elected Board member

Jonas Neraal Jacobsen
Employee-elected Board member

Nedre Vats, April 22, 2026

The Board of AutoStore Technology AS

Mats Hovland Vikse
Chief Executive Officer and Chair

Gro Anita Klungtveit
Board member

Jenny Sveen Hovda
Board member

Nedre Vats, April 22, 2026

The Board of AutoStore Business Services AS

Mats Hovland Vikse
Chief Executive Officer and Chair

Gro Anita Klungtveit
Board member

Jenny Sveen Hovda
Board member

