

# Whistleblowing and Investigation Policy

Policy owner: General Counsel

Policy approver: CEO

<b>Responsible:</b> Jenny Sveen Hovda	<b>Approved by:</b> Mats Hovland Vikse	<b>Approved date:</b> 15.12.2025	<b>Revision:</b> 6
<b>Filename:</b> Whistleblowing and Investigation Policy-7.docx	<b>Department:</b> HR General	<b>Process:</b>	

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## 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>3</b>
2.1 WHAT IS WHISTLEBLOWING	3
2.2 RIGHT AND DUTY TO REPORT	4
2.3 HOW TO REPORT CONCERNS?	4
2.3.1 <i>ANONYMOUS WHISTLEBLOWING</i>	5
2.3.2 <i>EXTERNAL WHISTLEBLOWING TO SUPERVISORY BODY OR PUBLIC AUTHORITY</i>	5
2.4 WHAT TO REPORT THROUGH A WHISTLEBLOWER REPORT?	5
2.5 PROTECTION OF WHISTLEBLOWERS	6
2.6 GROUND PRINCIPLES FOR HANDLING REPORTS OF CONCERN	6
2.7 PROCESS OF HANDLING REPORTS OF CONCERN	7
<b>3. INVESTIGATION</b>	<b>10</b>
<b>4. ROLES AND RESPONSIBILITIES</b>	<b>10</b>
<b>5. NON-CONFORMITIES</b>	<b>11</b>
<b>6. REFERENCES AND DEFINITIONS</b>	<b>11</b>
<b>7. REVISIONS OF THIS POLICY</b>	<b>12</b>
<b>APPENDIX 1 – INVESTIGATION GUIDELINE</b>	<b>13</b>
1 PLANNING OF AN INVESTIGATION	13
2 EXECUTION OF THE INVESTIGATION	14
3 REPORTING	15
4 CLOSING ACTIVITIES	16

<b>Responsible:</b> Jenny Sveen Hovda	<b>Approved by:</b> Mats Hovland Vikse	<b>Approved date:</b> 15.12.2025	<b>Revision:</b> 6
<b>Filename:</b> Whistleblowing and Investigation Policy-7.docx	<b>Department:</b> HR General	<b>Process:</b>	

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## 1. Introduction

### 1.1. Purpose

In AutoStore Group we 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.

### 1.2. Objective

This policy is designed to:

- support our values
- ensure that employees can raise a concern in good faith without retribution
- ensure compliance with applicable laws and regulations
- facilitate confidential and concise practices for handling concerns.

### 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 owned by the General Counsel and the General Counsel 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 is the act of reporting information about an illegal, unethical or harmful activity within an organization.

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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, Business Partner 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. Such situations should be taken directly with the employee's line manager or HR.

## 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. To ensure a thorough and effective investigation, it is helpful to include as many factual details and data points as possible, such as dates, times, locations, names of individuals involved, and any supporting documentation.

All employees have a duty to report about criminal offenses, 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 or HR.

## 2.3 How to report concerns?

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 the General Counsel or via Safecall if the employee wishes to report anonymously.

### Contact list

General Counsel	Jenny Sveen Hovda	+47 936 91 555	Jenny.sveen.hovda@autostoresystem.com
Chair of the Audit Committee and Board member	Viveka M. Ekberg	+46 70 262 45 36	<a href="mailto:Viveka.m.ekberg@gmail.com">Viveka.m.ekberg@gmail.com</a>

<b>Responsible:</b> Jenny Sveen Hovda	<b>Approved by:</b> Mats Hovland Vikse	<b>Approved date:</b> 15.12.2025	<b>Revision:</b> 6
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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 in the contact list 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. The portal allows the opportunity to communicate anonymously with AutoStore.
2. **By phone**; Safecall has a free number for all our operating countries (available on The Grid, here: [Speak up!](#)). 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 available on The Grid, here: [Speak up!](#)

Reports of concern communicated through Safecall's external whistleblower channel will be forwarded to the General Counsel and the Chair of the Audit Committee and independent board member, Viveka Ekberg. The General Counsel will decide on the most appropriate action. If the reported incident concerns the General Counsel or a member of her team, the whistleblower report will be sent directly to the Chief Executive Officer (Mats Hovland Vikse) 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.

### 2.3.1 *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.

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

AutoStore's aim is to arrange its procedures so that internal whistleblowing will always be sufficient and encourages employees to raise concerns internally through their line manager, HR or Safecall. 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). If the whistleblower decides to report to the media or public, this is generally only permitted under specific circumstances—namely when the report is made in good faith, the matter is of public interest, and internal reporting channels have either been exhausted or are deemed inappropriate.

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## 2.4 What to report through a whistleblower report?

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.

## 2.5 Protection of whistleblowers

### *Confidentiality*

Reports 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 concerns in good faith. 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.

## 2.6 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
- Whistleblowers reporting in good faith will not be subject to reprisals

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- Non-anonymous whistleblowers will get timely feedback and information about the process
- Any person accused of a breach has the right to be informed of the nature and cause of the accusation against them and to be heard (due process)
- The process is to be documented in writing

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 the General Counsel 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.

## 2.7 Process of handling reports of concern



AutoStore wants to ensure transparency regarding the process of handling reports of concern and all steps shall be logged and documented. Reference is made to Appendix 1 for a more detailed description of the process.

### 1. Receipt

The receiver should confirm receipt of a whistleblowing report within 7 days and inform the whistleblower that it will be handled according to AutoStore’s procedures.

All reports must be managed confidentially, protecting the identities and personal data of all involved, and only disclosing the whistleblower’s identity, if known, when absolutely necessary.

If a meeting is requested, it must be documented (recording or minutes), and the whistleblower must be allowed to review and sign the minutes.

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## 2. Initial assessment

The purpose of the initial assessment is to assess the materiality of the report and decide who needs to be informed.

The receiver must forward the report to the General Counsel (Jenny Sveen Hovda), unless she is implicated—in which case it goes to the CEO (Mats Hovland Vikse) and Chair of the Audit Committee (Viveka Ekberg). The receiver then determines further involvement and responsibility. The General Counsel may escalate to the CEO and/or Chair of the Board (Jim Carlisle) as needed and must promptly notify the CEO of any concerns about accounting, reporting, controls, or auditing. All actions must comply with local data protection laws.

## 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 tailormade process plan will be prepared by the General Counsel, or others as applicable.

The General Counsel (or, if applicable, the CEO and Chair of the Audit Committee) reviews the report's potential impact on AutoStore — including reputation, personnel, operations, finances, and possible sanctions—assuming the report is accurate. The assessment also considers the protection and needs of the whistleblower, with a focus on confidentiality, independence, and due process.

Quality assurance involves gathering additional information from the whistleblower and other sources as needed. Based on these steps, the General Counsel or designated receivers decide if a full investigation is required; if not, this is documented. The whistleblower is normally informed whether a further investigation will proceed.

## 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. Reference is made to Appendix 1 for a more detailed description of the investigation process.

## 5. Summary Report

The investigators shall analyze all collected information and prepare a summary report. Reference is made to Appendix 1 for a more detailed description of reporting.

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

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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 should, at a minimum, receive confirmation that the report has been investigated and concluded 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 CEO is responsible for evaluating whether the company shall report to the relevant governmental control authority, such as the police.

## 6. Actions

### Disciplinary actions

Employee(s) who may be involved in illegal, unethical or harmful activity 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.

## 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 in the investigation guideline, attached as Appendix 1 below.

## 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:

<b>Responsible:</b> Jenny Sveen Hovda	<b>Approved by:</b> Mats Hovland Vikse	<b>Approved date:</b> 15.12.2025	<b>Revision:</b> 6
<b>Filename:</b> Whistleblowing and Investigation Policy-7.docx	<b>Department:</b> HR General	<b>Process:</b>	

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Role	Responsibilities
General Counsel	<ul style="list-style-type: none"> <li>Responsible for updating, communicating and monitoring the operational effectiveness of this policy.</li> <li>Ensure that all reports of concern are taken seriously and reviewed in accordance with this policy.</li> <li>Ensure the whistleblower channel and the duty to report is sufficiently communicated and well known in the entire organization</li> </ul>
Viveka M. Ekberg, Chair of the Audit Committee and Board Member	<ul style="list-style-type: none"> <li>Receives all whistleblowing reports.</li> <li>Oversees 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 reported in the governance quality system and 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
Business Partner Code of Conduct
Code of Conduct
HR Policy

Please find relevant definitions in the table below:

Term	Definition
Whistleblow/ Report of concern	The notification of illegal, unethical or harmful activity within an organization
Due Process	The right to be informed of the nature and cause of the accusation against them and to be heard

<b>Responsible:</b> Jenny Sveen Hovda	<b>Approved by:</b> Mats Hovland Vikse	<b>Approved date:</b> 15.12.2025	<b>Revision:</b> 6
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## 7. Revisions of this policy

Rev No	Issue date	Description of updates
1.0	11.10.2022	Establishment of the policy
2.0	09.02.2023	Revisions to reflect change in CEO, and also include GC as point of receiver.
3.0	07.01.2024	Due to local legislations in Poland, an appendix to the global Whistleblowing and Investigation Policy has been developed and approved by AutoStore Sp and connected workers unions.
4.0	XX.XX.2025	Revisions to reflect General Counsel as receiver and owner and general clean-up for clarity.

<b>Responsible:</b> Jenny Sveen Hovda	<b>Approved by:</b> Mats Hovland Vikse	<b>Approved date:</b> 15.12.2025	<b>Revision:</b> 6
<b>Filename:</b> Whistleblowing and Investigation Policy-7.docx	<b>Department:</b> HR General	<b>Process:</b>	

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## Appendix 1 – Investigation Guideline

This guideline has been created to provide an overview and understanding of the investigation process and what steps will be undertaken during such a process.

### 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 General Counsel or the ultimate receiver(s) 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 General Counsel is responsible for designating appropriate internal and external resources with the relevant background, skills and expertise for the investigation at hand.

#### 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.

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<b>Filename:</b> Whistleblowing and Investigation Policy-7.docx	<b>Department:</b> HR General	<b>Process:</b>	

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## 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 due process"). 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

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- 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.
- 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 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. 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. Legal

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assessments or legal conclusions should only be included when the General Counsel has been involved. Access to the investigation report or other sensitive investigation material shall be determined by the General Counsel.

### Rights to Reply

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, 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.

## 4 Closing activities

### Filing of documentation

Storage of information in an investigation and 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.

Steps shall be taken to prevent information leaks and preserve documentation for potential future court proceedings.

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<b>Filename:</b> Whistleblowing and Investigation Policy-7.docx	<b>Department:</b> HR General	<b>Process:</b>	

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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.

Disciplinary measures

The decision to publicly disclose information about an investigation is taken by the CEO or the Board of Directors.

<b>Responsible:</b> Jenny Sveen Hovda	<b>Approved by:</b> Mats Hovland Vikse	<b>Approved date:</b> 15.12.2025	<b>Revision:</b> 6
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