

Business Partner Code of Conduct



Responsible: Mats Hovland Vikse	Approved by: Board of Directors	Approved date: 22.04.2025	Revision: 1
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INTRODUCTION FROM THE CEO

The AutoStore Code of Conduct (the “**Code**”) is founded on our core values, lean, transparent and bold, and our operational principles. It establishes a framework for ethical conduct, ensuring alignment with our organizational policies and reinforcing our mission and strategic objectives.

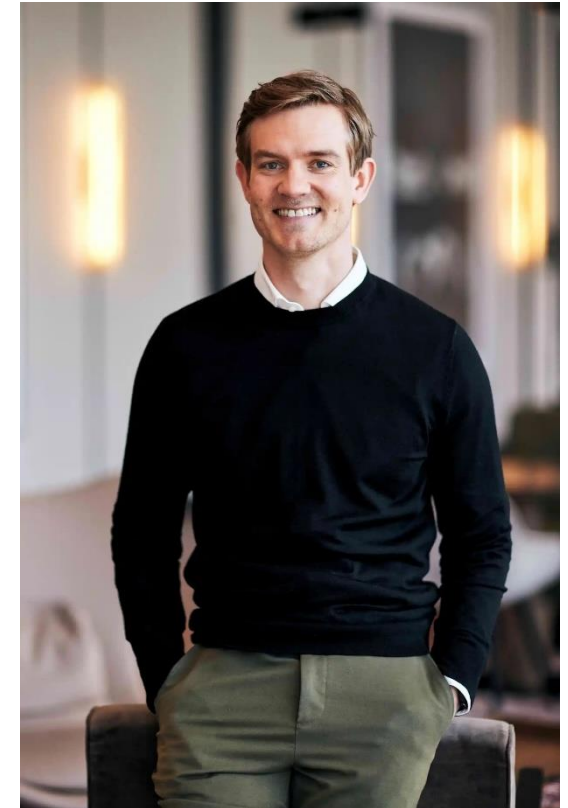
Our community is unique, an ecosystem of employees, suppliers, partners and end-customers with a shared goal of simplifying automation. Our reputation and success depends on strict compliance with all relevant laws, rules, and regulations.

All suppliers, partners or other third parties working with, for or on behalf of the AutoStore Group (“**Business Partners**”) are responsible to understand and comply with this Code. The Code cannot address every potential issue that may arise; therefore, we expect our Business Partners to exercise sound judgment when conducting any business relating to AutoStore. In addition, we expect Business Partners to comply with applicable national laws, international regulations, and standards.

We have high expectations to ourselves, our employees and Business Partners, and we will only cooperate with Business Partners who adhere to the same ethical standards as we do. Should you encounter or suspect violations of this Code or applicable laws, please report it through AutoStore’s whistleblower system, [SafeCall](#).



Mats Hovland Vikse
CEO



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1. Speak Up! Whistleblowing

AutoStore strives to create and maintain a culture where there is a low threshold for reporting unethical or illegal conduct and where all Business Partners are encouraged to report any known or suspected improper actions or violations.

AutoStore has established an agreement with [SafeCall](#), an anonymous and external whistleblower channel, which is also available to our Business Partners.

We do not tolerate any form of retaliation against any person who has raised an ethical or legal concern in good faith. This also applies if your report does not turn out to be an actual violation.

2. Discrimination and harassment

At AutoStore, we strive to maintain a workplace free from discrimination and harassment and believe that every employee has the right to work in an environment where they are treated with dignity and respect.

Our Business Partners must uphold equal rights for all and stand against discrimination, unfair treatment and harassment. This includes, but is not limited to, discrimination, unfair treatment or harassment based on race, ethnicity, gender, age, sexual orientation, disability, religion, or any other characteristic protected by law.

3. Fair wages, working hours and right to organize

Business Partners shall comply with all applicable laws and regulations, including minimum wages, overtime and benefits imposed by law and 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 this determination will be paragraph 131 of the ILO Convention.

Working hours (and overtime) must comply with applicable laws and regulations, collective bargaining agreements and international conventions. Business Partners 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/her to perform work or services outside normal daily working hours shall be prohibited.

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

4. Human Rights

At AutoStore, we are committed to upholding and respecting human rights in all aspects of our operations. We recognize the importance of treating all individuals with dignity and respect, and we adhere to internationally recognized human rights standards, including:

- 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

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4.1. Prohibition of child labor

AutoStore respects the rights of children to education and development. Business Partners are prohibited from employing children in violation of the International Labor Organization (ILO Convention concerning the lowest age of admission to employment No. 138, 182). The lowest age of admission to employment should not be the less than the age of completion of compulsory education and, in any case, not lower than the age 15.

4.2. Prohibition of forced labor

Under no circumstances may Business Partners use, promote, or otherwise encourage the use of forced labor. Forced labor may include but is not limited to restricting 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). Business Partners shall ensure that employees understand their rights regarding remuneration, overtime and keeping their identification documents. Business Partners shall ensure that employees are treated fairly and that their rights are respected. Business Partners shall pay particular attention to compliance with these principles when the employees are employed by third parties.

5. Health, safety and environment (HSE)

At AutoStore, we plan and act to prevent injuries and work systematically to manage risks at all levels of our operations, and no activity is so important that it should be performed at the expense of life and health. We expect that our Business Partners are committed to ensuring that all their employees have a safe and healthy working environment.

Business Partners must ensure that the health and safety risks to their employees, contractors, and members of the public arising from their activities are minimized.

AutoStore requires Business Partners to conduct their operations safely, adhering to all legal requirements, approved codes of conduct and best industry practices.

Business Partners are also expected to demonstrate a clear commitment to health and safety management through effective and proactive policies and procedures. Upon request, Business Partners must provide their health and safety indicators, risk assessments, and improvement plans.

6. Personal data and privacy

Keeping personal data safe represents a critical element of maintaining the trust of employees, customers and other stakeholders. Business Partners are expected to collect, use and store data in compliance with applicable laws.

7. Information security

Business Partners shall adhere to applicable information security and cyber-security regulations and standards, and immediately report to AutoStore any suspected or actual incidents that may impact our business.

8. Intellectual property and confidentiality

Business Partners shall respect and protect the intellectual property rights of AutoStore and our customers. Business Partners must be committed to safeguarding all confidential information in their possession, and shall only use such information for the purpose of the business relationship.

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9. Integrity and ethical conduct

9.1. Anti-corruption and bribery

At AutoStore, we uphold a strict zero-tolerance policy towards corruption in any form. We expect our Business Partners to comply with all applicable laws and regulations pertaining to bribery, corruption, and other illegal business activities.

Business Partners should refrain from offering, promising, or giving any undue advantage, services, charitable contributions, or incentives to government officials, international organizations, or other third parties to secure personal or business advantages. This prohibition applies regardless of whether the benefit is offered directly or indirectly through an intermediary. Giving or accepting gifts and hospitality can be regarded as corruption in certain situations so Business Partners should not offer or accept business courtesies – gifts, hospitality, expenses, or any benefit – where they could constitute, or appear to constitute, an undue influence.

By adhering to these principles, we collectively ensure that our business practices remain ethical, transparent, and in line with our commitment to integrity.

9.2. Anti-money laundering (AML)

Money laundering is the process of concealing illegal proceeds generated through criminal activity, such as terrorism, fraud and drug trafficking, to hide its illegal origin. AutoStore’s Business Partners shall comply with all applicable anti-money laundering laws and terrorist financing laws, and establish measures to prevent our financial transactions from being subject to money laundering or terrorist financing.

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9.3. Competition

Our business success depends upon our ability to foster lasting relationships by acting fair and honest and with integrity. Business Partners are expected to apply high commercial ethical standards and treat their customers, suppliers and other third parties fairly. Business Partners should avoid all actions that can reasonably be construed as being anti-competitive, monopolistic, or otherwise contrary to laws governing competitive practices in the marketplace.

Business Partners shall have sufficient control mechanisms in place, such as conducting sanctions screening and obtaining all necessary trade controls licenses and authorizations, to ensure that transactions with third parties do not violate applicable financial or trade sanctions and import, export and trade controls.

Any known or suspected violations related to sanctions and trade control shall be immediately reported to AutoStore at sanctions@autostoresystem.com.

10. Sanctions and trade controls

AutoStore is committed to complying with all applicable sanctions and trade controls laws and regulations (including the sanctions and trade controls imposed by the European Union, Norway, the United Kingdom, the United Nations and the United States) and expects its Business Partners to do the same.

AutoStore’s Business Partners shall not engage in any business or activities on AutoStore’s behalf with individuals or entities targeted by, or owned or controlled by persons targeted by, applicable sanctions laws or with individuals or entities from countries or territories that are targeted by comprehensive country-wide or territory-wide sanctions.

Similarly, in connection with any business or activities on AutoStore’s behalf Business Partners shall not export, re-export, or transfer “dual-use” or otherwise controlled goods, technology, and software without appropriate licenses or authorizations under applicable trade controls laws and regulations. Furthermore, Business Partners shall provide relevant export jurisdiction and classification information with respect to items procured by AutoStore so that AutoStore can ensure its own compliance with applicable sanctions and trade control laws and regulations.



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11. Environmental impact

AutoStore is committed to managing its environmental impacts in a responsible manner. AutoStore aims to make a strong contribution to sustainable development. We are committed to ensuring that our strategy and business model align with the transition to a sustainable economy by offering energy-efficient warehouse solutions and optimizing storage density.

Business Partners shall implement actions to improve environmental protection, to promote principles and practices of social responsibility through the entire supply chain and to give great importance to ethics in procurement. The delivery and ordering of conflict materials such as tin, tantalum, tungsten or gold require particular monitoring in terms of transparency, security and the latest EU regulations.

Business Partners shall be focused on reducing the use of raw materials and resources, as well as eliminating waste generated as part of their activities.

Business Partners shall work to actively reduce CO2 emissions and water consumption, support recycling initiatives, and implement logistics strategies that minimize environmental impact.

12. Audit

At AutoStore’s request, Business Partners shall submit all necessary and/ or required documents confirming compliance with this Code of Conduct. In addition, Business Partners give AutoStore the right, to the extent permitted by applicable law, to conduct audits to ensure that Business Partners comply with this Code of Conduct.

13. Requirements applicable to suppliers only

AutoStore is dedicated to a transparent and competitive sourcing process, ensuring fair and responsible dealings with suppliers. Suppliers must procure goods and services responsibly and require their own suppliers (including labor agents, material suppliers, and sub-suppliers) to adhere to this Code. Suppliers are expected to communicate these principles throughout their supply chain and verify compliance. If a supplier suspects a violation, AutoStore must be informed immediately. Suppliers must work with their suppliers to prevent and address violations and remediate past issues. AutoStore reserves the right to conduct joint audits at sub-supplier sites.

For the purpose of this section 12, “supplier” means any company that supply goods, services and/or materials that are incorporated into the end-products sold by AutoStore.

14. Consequences of breaches

Violations of this Code or the law can result in serious consequences for our Business Partners, AutoStore and any individuals involved. We expect that our Business Partners are committed to upholding this Code and the law. Any breaches should be reported to AutoStore immediately, and will be taken seriously and addressed appropriately.

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15. Business Partner Confirmation

The following confirmation is provided to AutoStore on behalf of the undersigned Business Partner and any and all legal entities in its group:

The Business Partner hereby confirms the receipt of the AutoStore Business Partner Code of Conduct, and commits to comply with the principles and standards outlined in the Code throughout the duration of the business relationship with AutoStore. Alternatively, the Business Partner confirms that it meets these requirements by applying its own equivalent Code of Conduct.

Business Partner (full legal entity name): _____

Place, date: _____

Name: _____

Title: _____
being a duly authorized signatory of the Business Partner.

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