



# Norwegian Transparency Act Report 2024

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## ELEMENT LOGIC'S REPORT PURSUANT TO THE NORWEGIAN TRANSPARENCY ACT FOR 2024

### Introduction

Element Logic conducts due diligence in accordance with the Transparency Act each year and publishes a report on the assessments and findings. The purpose of the Transparency Act is to promote companies' respect for fundamental human rights and decent working conditions.

This report comprises Element Logic's duty to account for the due diligence assessments conducted by Element Logic in 2024. In the report, Element Logic also describes the measures that have been assessed and implemented to reduce the risk of adverse impact Element Logic's activities may have on fundamental human rights and decent working conditions.

### Duty to account for the due diligence

The reporting requirements apply to Element Logic as an enterprise resident in Norway which fulfills the requirements for "larger enterprises" as set out in § 3 of the Transparency Act and as is directly subject to the obligations of the Norwegian Transparency Act. Element Logic is headquartered at Dyrskuevegen 26, Kløfta and is resident in Norway.

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## Organization and Operations

### Organization

The Element Logic group is a global technology company specializing in intelligent warehouse automation. Since its founding in 1985, Element Logic has grown to employ around 900 people across more than 20 countries and has established itself as the first—and leading—AutoStore™ partner worldwide.

Renowned for its commitment to innovation and people-centric approach, Element Logic enhances warehouse performance through a unique combination of cutting-edge technology, AI-powered software, and tailor-made solutions. This enables businesses across industries to improve efficiency, accuracy, and scalability in their logistics operations.

With a proven track record and deep expertise in intralogistics, Element Logic has become the go-to partner for organizations seeking to gain a competitive edge through automation. Element Logic's culture is rooted in bravery, passion, and reliability—qualities that continue to drive its mission of optimizing warehouse performance.



#### Brave

We dare to think different, dream big and challenge the status quo.

This is how we revolutionize warehouses worldwide.



#### Passionate

We genuinely love what we do, and have fun at work!

Our inspiration comes from how we collaborate with our colleagues, interact with partners, and exceed our customers' expectations.



#### Reliable

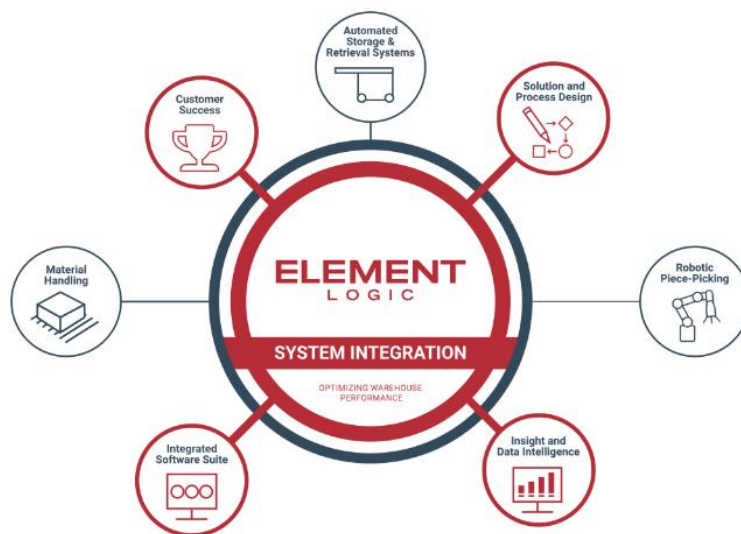
We build our character on trust. We tell the truth and deliver quality in everything we do.

This makes us a partner you can rely on.

An overview of the entities covered by this report can be found in [Appendix 1](#).

## Operations

Element Logic operates with sales, delivery, customer success, marketing and research & development offerings across our global footprint. Element Logic offers the following solutions and services:



- **Automated Storage & Retrieval Systems** - Element Logic's ASRS—such as the cube-based AutoStore—automatically stores and retrieves goods using robotic shuttles, maximizing storage density, boosting throughput, and reducing manual handling in tight spaces
- **Robotic Piece-Picking** - The eOperator robotic arm, powered by AI and vision systems, integrates with AutoStore to pick individual items from bins reliably and continuously, reducing errors, improving ergonomics, and enabling 24/7 operation
- **Material Handling Solutions** - Element Logic's material handling offerings complement ASRS and robotic picking with conveyors, ports, and ergonomic workstations—automating the smooth flow of goods from storage through fulfillment.
- **Solution & Process Design** - Element Logic works closely with customers to design tailored intralogistics systems—choosing the right ASRS types, material flows, and automation mix—ensuring optimal efficiency, scalability, and ROI
- **Insight and Data Intelligence** - Using real-time tracking, analytics, and reporting tools like eManager/eLogiq, Element Logic delivers data-driven intelligence to optimize warehouse performance continuously
- **Integrated Software Suite** – software including warehouse management systems (WMS), the eManager platform, and controller interfaces that seamlessly integrate ASRS and robotics to coordinate operations, maintain uptime, and provide intuitive dashboards .
- **Customer Success** - Element Logic partners with clients end-to-end to providing training, proactive support, long-term upgrades, and performance consulting that ensures systems operate at peak efficiency as business demands evolve.

## Internal guidelines

Element Logic has a number of policies and procedures that embed our work on human rights and decent working conditions while supporting the OECD guidelines for multinational enterprises and the United

Nations Guiding Principles (UNGP) approach to due diligence. These include our recruitment policies, employee handbooks, supplier qualification and risk processes and incorporate pertinent aspects of Element Logic's due diligence assessment, including stakeholder engagement. The guidelines also contain information about Element Logic's whistleblowing channels that are meant to uncover adverse impact on fundamental human rights and decent working conditions linked with Element Logic's activities through our [Code of Conduct](#) and [Supplier Code of Conduct](#).

## Ambitions and progress

### Overall ambitions and progress

We work continuously on assessment of risks related to Element Logic's activities and make use of our business contacts (suppliers and business partners) in this respect. Furthermore, Element Logic works continuously on implementing measures to achieve the ambitions set by Element Logic. Progress on our ambitions is included in the results, measures and communications resulting from our due diligence processes below.

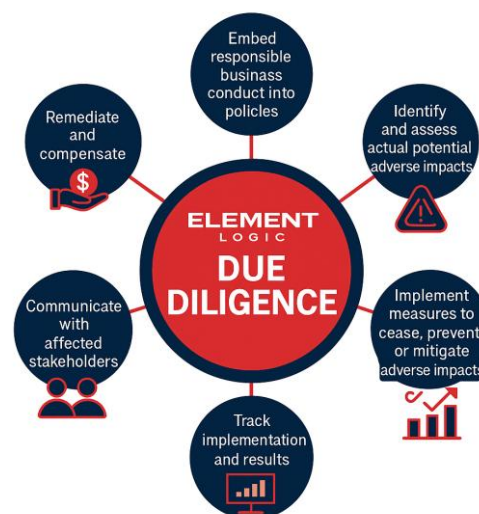
### Ambitions for the coming year

We have several ambitions for the future development and monitoring of our value chain. These include increased frequency of dialogue and transparency with our closest suppliers and business partners, improved access to internal information on supply chain and human rights due diligence, and improvements in governance documents addressing risk assessments and guidelines for how procurement, human resources, and health and safety (HSE) impact human rights due diligence.

## THE DUE DILIGENCE PROCESS

Element Logic continuously makes assessments of the risk<sup>1</sup> of adverse impact on fundamental human rights and decent working conditions linked with Element Logic's activities and business relationships. Element Logic continuously tracks any violations of human rights or violations of decent working conditions that is connected with Element Logic's activities. Element Logic's activity refers to both Element Logic's own operations and the activities of its suppliers and business partners.

In the mapping work, Element Logic utilizes a digital platform developed by Ignite Procurement AS. The platform simplifies the implementation of due diligence assessments in accordance with the requirements of the Transparency Act. Through the platform, Element Logic has obtained a systematic overview of first-tier suppliers, business partners, and other known subcontractors. Based on this overview, the platform has conducted initial assessments of the risk of negative impact on fundamental human rights and decent working conditions. The steps in this assessment are explained in the following:



1. Based on supplier data obtained from finance, procurement and ERP, an overview of Element Logic's first-tier suppliers is created. Element Logic has manually added business partners and

<sup>1</sup> The "risk" in this context means the likelihood of occurring of adverse impact on human rights and decent working conditions, and how severe the adverse impact may be for the affected parties.

other known subcontractors in the platform. The overview of Element Logic's first-tier suppliers is then updated through the platform.

2. In the platform, supplier information is enriched through third-party collaborations with ENIN. The platform gathers information and financial details about Element Logic's suppliers, such as industry codes (NACE) and company structure.
3. The classification tool in the platform has conducted an initial risk classification of Element Logic's first-tier suppliers, business partners, and other known subcontractors based on classification rules created within the platform. Element Logic has established the following classification rules relevant to its supply chain: geography, industry, financial risk (spend). Through the classification tool, suppliers that meet defined risk parameters are classified as having high, medium, or low risk of negative impact on fundamental human rights and decent working conditions.

### Internal Due Diligence

Element Logic is committed to safeguarding fundamental human rights and decent working conditions across our own operations and supply chain. In line with the Norwegian Transparency Act, we have established routines for mapping, assessing, and monitoring potential risks tied to our activities and business relationships.

Within our own operations the monitoring of human rights is maintained through our HR and recruitment policies which ensure freedom from discrimination, freedom from child and forced labour, and adequate wages and working conditions in accordance with local labour law. Element Logic protects the right to freedom of association and ensures that contracts and governance documents are made available in the local or official business languages. Our internal software and trainings ensure that staff are provided with information and access to safe working environments, including their rights to regular days of and breaks during work hours. Health and safety training is available for staff working on project and installation sites and there have been no instances of death or serious injury as a result of workplace injuries in 2024.

### External Due Diligence

Element Logic included 724 commercial relationships with direct suppliers in the reporting year. All suppliers who have been included in the analysis can be seen below according to their country/geographic area as seen in [Appendix 2](#).

### The result of the due diligence assessment

Element Logic has identified, through its global presence, that potential significant risk exposure to human rights violations may occur across a number of countries and industries where we operate or do business. The foundation for understanding Element Logic's results is based in the UN Declaration of Rights (1948) and the ILO Declaration on Fundamental Principles and Rights at Work (1998). Element Logic recognizes the need to add a focus on the right to freedom from forced labour and child labour, the right to safe and healthy working conditions, and the rights to rest, wages and freedom from discrimination as they are protected within international and internal statutes.

Element Logic sees that their supplier qualification process and required commitment to the values and business principles in the Supplier Code of Conduct are effective tools for increasing dialogue and openness. Self-reporting acceptance of human rights principles will continue to require additional follow up from Element Logic and it is why Element Logic includes the right to audit our suppliers and business partners for compliance with our contracts and Codes. As Element Logic uses a large number of



subcontractors for installations, it is pertinent that information about labour rights is maintained and made available to both suppliers and their sub-suppliers.

Element Logic is working to improve the detail and accuracy of the social assessments through updating and expanding the suppliers included, as well as refreshing social and geographical measures according to changing political and socio-economic contexts in their markets. Ensuring that social risk and human rights assessments are a part of procurement processes will allow increased transparency, both through self-assessments and stakeholder dialogue. Risk profiles for both established and new suppliers according to their geography, industry and commercial impacts will form the basis of a continual due diligence process.

## MEASURES TO CEASE, PREVENT OR MITIGATE THE ADVERSE IMPACT

In the following, Element Logic will describe the measures we have implemented to prevent, mitigate or cease the impact and risks identified in the section above.

Within Element Logic's own operations, we continue to focus on employees guided by principles of non-discrimination and employee engagement as described in the sections on Diversity, Equity & Inclusion, and Great Place to Work in this report. Element Logic has also received third-party support to review and update our employment contracts and employee handbooks to ensure continued compliance with local labour law.

Further, Element Logic has embedded supplier risk management into our pre-qualification procedures, our updated procurement policy, and via regular data collection on financial, quality, and commercial risks. Together with the due diligence assessment on social risks conducted we have not been made aware of any known human rights abuses and will continue to monitor existing and potential suppliers through dialogue and stakeholder engagement. Element Logic's ambition to foster a healthy work environment with decent working conditions extend to our value chain and we will continue to improve dialogue with our suppliers and business partners to ensure human rights are protected throughout our operations. We foster transparency through voluntary disclosure of our sustainability and ESG performance to both upstream and downstream assets. We value the opportunity for improvement inherent through this openness and dialogue and use it to continually strengthen our due diligence processes.

## COMMUNICATION WITH AFFECTED STAKEHOLDERS AND RIGHTS-HOLDERS

Element Logic has not uncovered any violations of human rights or decent working conditions in the reporting year, nor has Element Logic uncovered any significant risk of violations as mentioned. Element Logic has not uncovered any cases requiring remediation in the reporting year however will continue to monitor risks for actual and potential adverse impacts in the value chain and will maintain dialogue and engagement with suppliers to cease, prevent, or mitigate said impacts, including their remediation where necessary.

Signed by:



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Ankush Malhotra, Group CEO

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Dag-Adler Blakseth, Chairman

## Appendix 1

This report applies to the following legal entities:

Element Logic AS
Element Logic Belgia BV
Element Logic Benelux BV
Element Logic BidCo AS
Element Logic Canada Ltd
Element Logic Czech Republic SRO
Element Logic Denmark A/S
Element Logic Finland OY
Element Logic France SARL
Element Logic Germany GmbH
Element Logic Germany Holding GmbH
Element Logic Germany, Austrian Branch
Element Logic Holding AS*
Element Logic Ireland Ltd (under incorporation)
Element Logic Italy SRL
Element Logic MidCo AS
Element Logic Poland Sp. z.o.o
Element Logic SA (Chile)
Element Logic SA de C.V. (Mexico)
Element Logic SAS (Colombia)
Element Logic Singapore Pte Ltd
Element Logic Spain SL
Element Logic Sweden AB
Element Logic Sweden Holding AB
Element Logic UK Ltd
Element Logic US BidCo Inc
Element Logic US Inc
Pierce Street Acquisitions Inc
S&P Computersysteme GmbH
SDI do Brazil sistemas de automacao Ltda (Brazil)
SDI Investments Inc
SDI Peru SAC

Appendix 2

Element Logic’s direct suppliers included in the report for 2024 have the following geographic distribution by country/area:

Country	Number of Suppliers
United States of America	341
Germany	88
Norway	73
Sweden	31
Brazil	19
Denmark	19
United Kingdom	18
Netherlands	16
France	15
Colombia	14
Mexico	13
Czechia	11
Poland	9
Finland	8
Canada	5
Austria	4
Switzerland	4
Spain	4
Italy	4
Romania	4
Australia	3
China	3
Chile	2
Hungary	2
Luxembourg	2
Slovenia	2
Slovakia	2
Belgium	1
Bulgaria	1
Croatia	1
Ireland	1
Iceland	1
Japan	1
Peru	1
Taiwan	1