



Norwegian Transparency Act Report

2025

ELEMENT LOGIC’S REPORT PURSUANT TO THE NORWEGIAN TRANSPARENCY ACT FOR 2025

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 for 2025. 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.

Any inquiries in connection with this report can be directed to:

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Organization and Operations

Organization

Element Logic is a global technology company specializing in intelligent warehouse automation. Since its founding in 1985, Element Logic has grown to employ over 1000 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.

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 innovation and warehousing excellence through a range of solutions, software and services.

Solutions

<p><u>Automated Storage and Retrieval Systems (ASRS)</u></p> <p>combine intelligent design, automation, and software control to increase storage density, improve accuracy, and enable faster order fulfillment.</p>	<p><u>Material Handling</u></p> <p>equipment, software, and processes that move goods efficiently to reduce manual labor, minimize errors, and ensure that every item reaches its destination quickly and accurately.</p>	<p><u>Robotic Piece Picking</u></p> <p>advanced robotics with intelligent software, material handling and AutoStore, goods flow seamlessly while reducing manual handling, increasing accuracy, and maintaining high throughput.</p>	<p><u>Warehouse Control Systems</u></p> <p>software platform designed to optimize and streamline operations, including AutoStore and other ASRS solutions for faster fulfillment, high availability, and seamless ERP/WMS integration.</p>	<p><u>Warehouse Intelligence Software</u></p> <p>eLogiq acts as the intelligent layer that connects systems, people, and equipment to create a warehouse that learns, adapts, and continuously improves.</p>
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Services

<p><u>Automation as a Service</u></p> <p>enables customers to access automation through a flexible, service-based model where Element Logic delivers, operates, and maintains the solution with predictable costs and scalability.</p>	<p><u>Project & System Delivery</u></p> <p>covers the full lifecycle from solution design and engineering to installation, integration, and commissioning, ensuring systems are delivered safely and ready for operation.</p>	<p><u>Managed Services</u></p> <p>focuses on running and maintaining critical IT infrastructure, software, and system integrations, ensuring high system availability, cybersecurity, and stable operations over time.</p>	<p><u>Design & Consulting</u></p> <p>supports customers with data-driven design, simulation, and advisory services to develop efficient, future-proof warehouse solutions tailored to their business.</p>	<p><u>Customer Success</u></p> <p>ensures long-term value realization by continuously optimizing system performance, supporting operations, and helping customers adapt as their business evolves.</p>
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Internal guidelines

Element Logic has several 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. The following documents, guidelines and policies, together with strong governance procedures and access to channels to raise concerns foster a culture of trust and transparency throughout our value chain. They contribute to our risk assessment and mitigation processes and constitute pertinent aspects of Element Logic’s due diligence assessment, including for conducting stakeholder engagement.

External	Internal
<ul style="list-style-type: none"> - Code of Conduct - Supplier Code of Conduct 	<ul style="list-style-type: none"> - Whistleblower Manual - Anti-Corruption Manual - Privacy and Information Security Policy - Recruitment Policy - Employee Handbook - Procurement Policy - Supplier (Pre-) Qualification Process

Ambitions and progress

Element Logic's value chain may be exposed to human rights risks linked to global supply chains, including inadequate working conditions, forced or child labor, and limited transparency in lower-tier suppliers. These risks are particularly relevant in industries and geographies associated with the sourcing and production of metals, electronics, and natural resources, requiring ongoing due diligence and supplier engagement to identify, prevent, and mitigate potential adverse impacts. While many of these risks are removed from Element Logic's direct operations, the company is committed to recognizing its responsibility to address them through risk-based due diligence, transparency, and continuous improvement across its extended supply chain.

Element Logic has enhanced our human rights due diligence process by including a self-assessment of materially relevant and high-risk suppliers in 2025. Our ambitions are to expand the reach of our assessment to include a broader scope of direct and indirect suppliers, across several tiers of our supply chain in the years to come. We want to ensure that this does not come at a cost to the attention given to risk identification and mitigation within our current scope. As our operations continue to expand in both size and geography, our approach to assessing new markets and understanding the human and labor risks that exist within them will be guided by our Code of Conduct and principles of responsible business.

Element Logic is committed to continuously strengthening supply chain sustainability and due diligence by deepening engagement with suppliers and integrating ESG considerations more systematically into procurement and risk management processes. Element Logic is further strengthening its capabilities by moving towards a more integrated supply chain platform approach. Building on the use of Ignite, the ambition is to establish a unified structure for supplier data, risk, performance, and ESG information, integrated with supply chain processes. This will support a shift from periodic assessments to more continuous monitoring and follow-up. Through improved data, governance, and structured dialogue, we aim to enhance transparency, mitigate risks, and increase our ability to drive positive environmental and social impacts across our value chain and in the communities affected by our operations.



THE DUE DILIGENCE PROCESS

Element Logic continuously makes assessments of the risk¹ of adverse impact on fundamental human rights and decent working conditions linked with Element Logic's activities and business relationships.

In 2025, Element Logic continued to use the digital due diligence platform developed by Ignite Procurement AS to maintain an overview of first-tier suppliers, enrich supplier profiles with financial and industry data, and classify suppliers by geographic and sector risk. While the primary focus of this process remains human rights and working conditions, the same structures are increasingly used to identify environmental risk exposure and high impact supplier segments, supporting more targeted dialogue and follow up. 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 due diligence process includes the following steps as part of our assessment:

1. Based on supplier data obtained from finance, procurement and ERP, an overview of Element Logic's first-tier suppliers is created.
2. 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 to then assess and categorize social risks according to geography, industry, and financial dimensions.
3. Element Logic then sent a supplier questionnaire to track and measure supplier-specific risk for:
 - a. Direct suppliers rated as high- or very high-risk based on geography or industry and that were not internally rated with a lower risk profile based on dialogue
 - b. Direct suppliers that include a substantial base of our supplier spend to minimize operational and reputational risk related to human rights issues
 - c. Direct suppliers located in high-risk countries according to the Transparency International Corruption Perceptions Index or Human Rights Index
4. Further need for engagement with suppliers, including to audit, evaluate or mitigate indications of real or potential human rights risks is then identified with a plan for intervention or mitigation.

Human Rights 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.

Engagement with our workforce

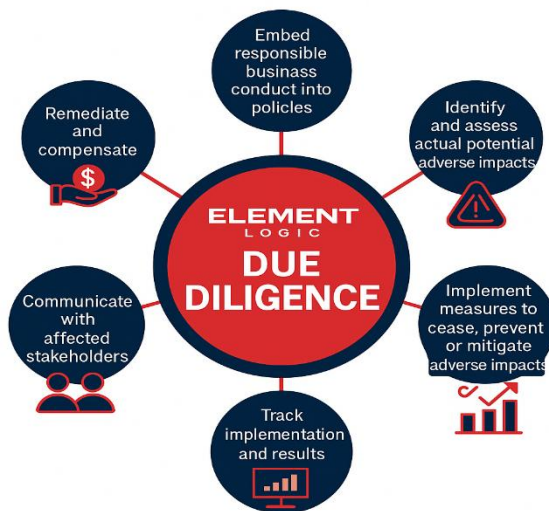
Within our own operations, Element Logic strengthened its human rights due diligence through systematic monitoring embedded in our HR, recruitment, and M&A practices. These processes safeguard non-discrimination, prohibit child and forced labor, and ensure fair wages and working conditions in line with applicable local labor laws. We continue to uphold employees' rights to freedom of association and access to employment contracts and governance documents in relevant local or business languages. Through internal systems and targeted training, employees are informed of their rights and provided with safe and healthy working environments, including entitlements to rest periods and breaks. Dedicated health and safety training is provided to employees working on project and installation sites. In 2025, there were no reported cases of fatalities or serious injuries resulting from workplace incidents.

¹ 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.

Engagement with workers in the value chain

Element Logic included 426 commercial relationships with direct suppliers in the automated risk mapping for the 2025 reporting year. All assessed suppliers can be seen according to their country/geographic area they have been assessed under in [Appendix 2](#). Direct suppliers representing high risk geographies or industries as defined in the due diligence process, and those constituting most of our supplier spend were then sent a self-assessment. The targeted supplier questionnaire addressed 70% of our global direct supplier spend base and included our largest and most critical business partners. The self-assessment reports on labor rights, supply chain compliance, and health and safety. Suppliers were requested to disclose what policies and practices they had in place to prevent or address issues related to human rights, discrimination, minimum wage, working hours and remuneration, and management systems for social accountability, sustainability and health and safety. Across a response rate of 60% it is common that management systems are not ISO certified and specific policies for human rights and supply chain due diligence are reserved for the largest companies. Most suppliers, regardless of geography, indicate that compliance with local legislation is rather governed by principled documents such as Codes of Conduct and employee handbooks that include sections on rights to safeguard their workforce.

Results of the Due Diligence Assessment



Recognizing that Element Logic’s responsibility across our own operations and value chain is to ensure an ethical workforce grounded in protected rights, dignity and equal opportunity, we have continued to strengthen the role of supplier engagement and qualification processes in 2025. While commercial and financial risk does not inherently translate into human rights risk, we actively bridge this gap by focusing on how supplier practices impact our operations. This enables more structured dialogue, stronger partnerships, and additional forums for integrating sustainability, labor standards, and human rights considerations into supplier risk assessments and decision-making.

As Element Logic continues its global expansion, our supply chain has grown in scale during 2025, reinforcing the importance of proactive supplier qualification and ongoing engagement. Although the number of suppliers has increased, this has not significantly altered the geographic or sector-related risk profile identified in 2024. A targeted review of our direct suppliers confirmed that 0.18% are registered in countries identified as higher risk for corruption and/or human rights violations. These suppliers have been included in the self-assessment request and will remain a focus of evaluation based on their geographical and geopolitical context. Dialogue with these suppliers can result in a lower risk profile if appropriate mechanisms are in place to address human rights-related concerns in their operations.

There have been no reported incidents of ethical or human rights-related disputes involving Element Logic in 2025 and we have identified no cases of forced or compulsory labor within our immediate supply chain. Furthermore, no instances requiring remediation were identified during the reporting year.

Element Logic remains committed to strengthening supplier partnerships through increased dialogue, clearer expectations, and enhanced qualification processes. This includes embedding human rights, labor standards, and sustainability considerations more systematically into supplier onboarding and performance follow-up. Through this approach, we aim to support responsible business conduct not only

within our own workforce, but also across our value chain and in the communities impacted by our operations.

MEASURES TO CEASE, PREVENT OR MITIGATE 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.



Governance

Element Logic has established a governance framework that embeds human rights and supply chain due diligence across key business functions, including procurement, HR, and legal processes. These structures ensure that risks related to human rights and working conditions are systematically identified, escalated, and addressed across both our own operations and value chain. By integrating due diligence into contracts, onboarding, and operational controls, we strengthen accountability, transparency, and ethical business conduct throughout our organization and supplier relationships.



Materiality & High-Risk Suppliers

Element Logic applies a risk-based and engagement-driven approach to materiality and the identification of high-risk suppliers, recognizing that meaningful due diligence is built on continuous dialogue and transparency. Suppliers identified with elevated risk profiles—based on geography, industry exposure, and operational impact—are prioritized for more frequent interaction through structured follow-ups, targeted questionnaires, and ongoing review of supporting documentation, including policies, certifications, and self-assessments. This enables Element Logic to move beyond static risk classification and instead foster active partnerships that support alignment on human rights, labor standards, and responsible business practices. In addition to initial supplier qualification, Element Logic maintains mechanisms for continuous monitoring and verification, including contractual audit rights, performance evaluations, and review cycles supported by internal supplier management tools. These processes are complemented by broader external scanning of geopolitical developments, industry trends, and publicly available information, allowing the company to identify emerging risks and respond accordingly. Together, these measures ensure that high-risk suppliers are not only identified but actively assessed and engaged to support improving their practices.



Continuous Improvement

Element Logic is committed to continuously strengthening its due diligence processes through improved data quality, supplier coverage, and engagement practices. This includes expanding the scope of assessed suppliers, refining risk methodologies, and integrating both social and environmental considerations into supplier evaluations. Regular supplier performance reviews, audit rights, and deviation tracking mechanisms provide a structured basis for identifying gaps and implementing corrective actions where needed. By fostering ongoing dialogue and collaboration with suppliers, Element Logic supports progressive improvements in human rights, labor standards, and sustainability performance across the value chain.

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.

FROM THE BOARD CHAIR AND GROUP CEO OF ELEMENT LOGIC

Kløfta, 18th June 2026

Signed by:

Dag-Adler Blakseth

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Dag-Adler Blakseth

Board Chair

Signed by:

Ankush Malhotra

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Ankush Malhotra

Group Chief Executive Officer

Appendix 1

This report applies to the following legal entities:

Element Logic AS

Element Logic Belgia BV

Element Logic Benelux BV

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 Ireland Ltd

Element Logic Italy SRL

Element Logic Lithuania UAB

Element Logic Malaysia Sdn

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

ABCO Systems LLC

FastFetch LLC

BS8888 Ltd

BS Handling Systems Ltd

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 2025 have the following geographic distribution by country/area:

Country	Number of Suppliers
United States	90
Germany	64
Norway	31
Sweden	28
Denmark	15
Netherlands	14
United Kingdom	11
Poland	10
Finland	10
France	6
Italy	5
Czech Republic	6
Belgium	3
Ireland	2
Hungary	2
Slovakia	1
Bulgaria	1
Romania	1
Singapore	1
Spain	1
Austria	1
Australia	1
Switzerland	1
Slovenia	1
Japan	1
Croatia	1
Thailand	1
No geographic assessment	117