

Norwegian Transparency Act Statement

Covers activities undertaken from April 1st, 2023 to March 31, 2024

Vanderlande Industries B.V. Norwegian Branch

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1. INTRODUCTION

This Report is produced by Vanderlande Industries B.V. for its entity Vanderlande Industries B.V. Norwegian Branch. (“**Vanderlande**” or the “**Corporation**” or “**our**” or “**we**”) for the fiscal year starting from April 1st, 2023, and ending March 31, 2024 (the “**Reporting Period**”) This Report constitutes the second report prepared by the Corporation pursuant to the *Norwegian Transparency Act* (the “**Act**”). This statement, prepared for Vanderlande, aligns with Section 5 of the Act.

It outlines Vanderlande’s processes for managing actual and potential adverse impacts on fundamental human rights and decent working conditions. Vanderlande Industries is also reporting entity under the UK Modern Slavery Act 2015, the Canadian Forced Labour Act and Child Labour Prevention Act, and the German Supply Chain Due Diligence Act (SCDDA).

2. REPORTING CONTEXT

Vanderlande Industries Norwegian Branch adheres to the requirements of the Norwegian Transparency Act. This law mandates the publication of a statement. Our statement outlines Vanderlande's processes for managing actual and potential adverse impacts on fundamental human rights and decent working conditions. This Report is made pursuant to the Act and was approved by the Vanderlande Board of Directors (the "**Board**") on 30 June 2024.

Vanderlande Industries B.V. and its subsidiaries are part of Vanderlande Industries Holding B.V. ("**Vanderlande Industries Holding B.V.**"), which is controlled by Toyota Industries Corporation.

3. ABOUT VANDERLANDE

Vanderlande is headquarter based in Veghel, The Netherlands, and is a market-leading, global partner for future-proof logistic process automation in the warehousing, airports, and parcel sectors. Its extensive portfolio of integrated solutions – innovative systems, intelligent software, and life-cycle services – results in the realization of fast, dependable, and efficient automation technology.

We specialize in enhancing our clients' business processes and competitive standing. Through close collaboration, we aim to optimize their operational activities and expand their logistical accomplishments. Our warehousing solutions are the preferred choice for numerous leading global e-commerce companies and retailers in the food, fashion, and general merchandise sectors worldwide. We assist them in fulfilling their commitment to same-day delivery for billions of orders, with nine out of the 15 largest global food retailers relying on our efficient and dependable solutions.

As a trusted global partner in delivering future-proof airport solutions, our industry-leading baggage handling systems facilitate the seamless movement of over 4 billion pieces of baggage worldwide annually. These systems are operational in more than 600 airports, including 12 of the world's top 20.

We are also a prominent provider of process automation solutions that specifically target the complexities within the parcel market. Our systems efficiently sort over 52 million parcels daily, and these installations serve some of the world's foremost parcel handling companies.

Established in 1949, Vanderlande boasts a global workforce of over 9,000 employees spanning more than 100 countries. Our unwavering commitment lies in propelling our customers' businesses forward across diverse locations on every continent. With an ever-growing annual turnover of 1.8 billion euros, we have solidified a worldwide reputation over the past seven decades as a trusted partner in future-proof logistic process automation. In 2017, Vanderlande was acquired by Toyota Industries Corporation, resulting in a strategic alignment that fosters synergies such as cross-selling, product innovations, research, and developments.

4. Building Integrity: A Look into Our Governance Structure for Ethics and Compliance

At Vanderlande Industries, we prioritize embedding human rights considerations into every facet of our operations. Our policies, governance framework, and decision-making processes reflect this commitment. We recognize that effectively managing Environmental, Social, and Governance (ESG) risks and opportunities is not only a responsibility but also a strategic imperative for our long-term success.

To achieve our sustainability goals, we actively track and assess potential risks that shape our operating environment. Our strategies focus on enhancing performance across various sustainability dimensions. Key oversight lies with our Executive Board and our Risk Committee, which diligently monitors our ESG plan, practices, related policies, and disclosures. Additionally, our Supervisory Board and the Audit Committee play an essential role in overseeing specific ESG-related matters and disclosures.

Annually, we publish our Sustainability Report (ESG Report), which provides transparency into our corporate social responsibility performance. This report outlines our sustainability achievements and, in our Sustainability, and ESG goals for 2025. You can access the ESG Report on our website: [Vanderlande ESG Report](#).

5. Human Rights Guidelines and Protocols at Vanderlande

The Norwegian Branch of Vanderlande Industries B.V. maintains strict adherence to the core policies, standards, and procedures established by its parent company; Vanderlande Industries B.V. These guidelines are instrumental in reinforcing the Vanderlande’s unwavering commitment to upholding internationally recognized human rights and fostering decent working conditions.

5.1 Supplier Code of Conduct

In the year 2022, we initiated a comprehensive Supplier Code of Conduct. This code delineates the essential ethical standards and principles that are to be adhered to by all our strategic and preferred suppliers and provides clear guidelines and expectations for our suppliers across various critical areas, including human rights, labour practices, legal compliance, health and safety, environmental stewardship, anti-corruption measures, ethics, and governance. It further amplifies our commitment to the respect and preservation of human- and labour rights. This initiative is a testament to our dedication towards fostering an ethical and responsible business environment.

Our Supplier Code explicitly incorporates respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services:

“Vanderlande is committed to ensuring that working conditions in Vanderlande supply chain are safe, that workers are treated with respect and dignity, and that manufacturing and operations processes are environmentally responsible. By signing this Code of Conduct, the supplier commits and contributes to the same values and acts accordingly”.

5.2 Employee Code of Conduct

As an organization deeply committed to responsibility and integrity, we uphold the highest standards of ethics in all our business endeavours. Our Policy on Good Business (Employee Code of Conduct) embodies Vanderlande’s ONE company philosophy, guiding our actions and decisions. Through our ONE way of working, we empower our people to make informed choices based on our established policies, procedures, and guidelines. These guidelines delineate our business practices and outline the responsibilities of both the Vanderlande and our employees towards the stakeholders.

5.3 Policy Suite

Enclosed are a few of the Vanderlande policies that pertain to human rights and respectable working conditions. For comprehensive details, we kindly request you to refer to each policy individually:

Policy	Overview
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Speak-Up Policy	The purpose of this policy is to explain how you can raise concerns about suspected misconduct in confidence and without fear of negative consequences. It also describes what you can expect from our Company if you Speak Up.
Supplier Code of Conduct	This code delineates the essential ethical standards and principles that are to be adhered to by all our strategic and preferred suppliers and provides clear guidelines and expectations for our suppliers across various critical areas.
Gifts and Hospitality Policy	Provides anti-bribery and anti-corruption rules to prevent, detect and correct bribery and corruption.
Human Rights Policy	Vanderlande’s commitment to conduct business with respect for international human right standards, particularly in accordance with the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights.
Data Privacy Code of Conduct	Sets out Vanderlande’s commitment to uphold the highest standards of integrity in dealing with and protecting personal information.
Third-Party Screening Policy	Sets out Vanderlande’s commitment to doing good business and the screening of our third parties.
Fair Competition Policy	This Fair Competition Policy is a more in-depth Policy on Fair Competition in addition to the Policy on Good Business and provides guidance how to identify and deal with potential competition risks or issues.

We are steadfast in our commitment to detect, mitigate, and prevent any violations of Human Rights within our business activities, operations, supply chain, and the communities where we have a presence. Our aim is to foster a culture of respect and dignity, ensuring a positive impact on society.

6. VANDERLANDE'S HUMAN RIGHTS DUE DILIGENCE PROCESSES AND RISK EXPOSURE

While enhancing operational efficiency, we remain committed to fortifying our processes to mitigate risks related to fundamental human rights and decent working conditions. In alignment with our Third-Party Due Diligence Process, our supply chain organization employs a risk assessment procedure before engaging with new suppliers.

Vanderlande is committed to maintaining ethical practices and responsible business conduct throughout its supply chain. In the context of risk assessment for human rights and decent working conditions, Vanderlande takes a comprehensive approach:

- First, it examines the composition of its supply chain, considering factors such as geographical locations, supplier profiles, and operational practices. Suspected hotspots—such as unauthorized sub-contracting or regions with heightened risks—are closely monitored.
- Second, Vanderlande evaluates supplier awareness regarding human rights and decent working conditions. This includes assessing the systems and capacities that suppliers have in place to address these risks effectively. The organization's commitment extends beyond compliance; it actively strives to create a responsible and sustainable supply chain, emphasizing the human rights and decent working conditions.

6.1 Handling actual and potential adverse impacts on Human Rights and Decent Working Conditions

As an organization deeply committed to responsibility and integrity, we uphold the highest standards of ethics in all our business endeavours. Our Policy on Good Business (Employee Code of Conduct) embodies Vanderlande's ONE company philosophy, guiding our actions and decisions. Through our ONE way of working, we empower our people to make informed choices based on our established policies, procedures, and guidelines. To facilitate this process, we offer multiple channels for reporting potential breaches:

- Employees can reach out to colleagues, including supervisors, human resources representatives, legal services, internal audit personnel, or next-level management. At Vanderlande, we foster an environment where open and honest communication is not merely encouraged—it is the expectation. We want every employee to feel comfortable approaching their supervisor or management whenever they suspect violations of policies or standards.
- Our dedicated Ethics and Compliance Officer (based at the Legal and Risk Department) is accessible via email or phone, serving both employees and suppliers across all major sites.

- Additionally, our Ethics Line—a free and confidential hotline—operates 24/7, globally, allowing employees and third parties to report concerns by phone or online (called EthicsPoint). People are encouraged to submit reports related to violations outlined in our Policy on Good Business (Employee Code of Conduct).

7. Third-Party Due Diligence: Assessing and managing the risks

In its commitment to ethical business practices, Vanderlande adopts a risk-based approach to assess and manage the potential risks associated with human rights and decent working conditions within its supply chain. This strategic methodology allows Vanderlande to prioritize its efforts effectively and make informed decisions.

Vanderlande conducts thorough due diligence on its suppliers. This process involves evaluating several factors, including country-specific risk indicators, supplier categories, and the nature of products or services provided by each supplier. By assessing suppliers, Vanderlande identifies potential risks related to human rights and decent working conditions. Based on the data collected, Vanderlande assigns a risk score to each supplier, which determines the level of additional due diligence required. Suppliers with higher risk scores undergo closer scrutiny. Vanderlande maintains continuous monitoring of its suppliers, conducting regular reviews to ensure compliance with ethical standards. The frequency of these reviews varies based on risk scores and other relevant factors. Based on the due diligence conducted by the company, Vanderlande has concluded that the Vanderlande's business in Norway entails a limited risk of potential negative consequences on fundamental human rights and decent working conditions.

8. Metrics

According to Section 5, paragraph B of the Act, the duty to account for due diligence; information regarding actual adverse impacts and significant risks of adverse impacts that the enterprise has identified through its due diligence: for the last reporting period, zero reports were made via the Speak Up process related to human rights and decent working conditions. Any future actual and potential adverse impacts on human rights and decent working conditions will be investigated and managed in accordance with the relevant policies, described above. Vanderlande seeks to continuously reinforce and enhance its practices regarding internationally recognized human rights and decent working conditions.

9. Evaluating the Effectiveness of Implemented Measures

According to Section 5, paragraph C of the Act, the duty to account for due diligence; information regarding measures the enterprise has implemented or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts, and the results or expected results of these measures: Vanderlande has implemented several measures to mitigate the risk of human rights and decent working conditions in our operations and supply chains. Although we have not yet evaluated the effectiveness of these measures, we plan to assess their impact on preventing and reducing such risks at a later point.

10. Training

In the year 2023, we have conducted a comprehensive training program on “Anti-Bribery & Corruption” that has been disseminated to all our employees across the globe. In our commitment to fostering a culture of integrity, we have facilitated comprehensive training program focusing on good conduct. This initiative is designed to equip our team with the knowledge and understanding of the principles of good conduct, thereby promoting a positive work environment.


In addition, we have extended our educational efforts to the new members of the Vanderlande team. Recognizing the importance of good business practices, we have conducted specialized training sessions in this area, named the “Good Business Training.” These sessions are aimed at providing our new colleagues with the necessary insights into the standards of good business practices that Vanderlande upholds.

Our goal with these training programs is to ensure that all team members, both existing and new, are aligned with our core values and principles, thereby contributing to the overall success and reputation of our organization.

Concurrently, we are in the process of developing a more extensive training module that will encompass critical aspects of product compliance and human rights. This initiative underscores our commitment to fostering a culture of integrity and ethical conduct within our organization.

11. APPROVAL AND ADOPTION

This Policy Statement has been approved and adopted by the management board on:


Patrick Verhoeven (Jul 22, 2024 08:06 GMT+2)

Signature

Patrick Verhoeven
Executive Managing Director Vanderlande Norway branch

Vanderlande

Vanderlandelaan 2
5466 RB Veghel
The Netherlands

Phone: +31 (0)413 49 49 49

Fax: +31 (0)413 36 29 10

Email: info@vanderlande.com

> vanderlande.com









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