

# Instabee's Transparency Act Statement

This statement is published pursuant to Section 5 (§ 5) of the Norwegian Transparency Act (2021) and was approved by the Boards of Directors of Porterbuddy Norge AS, Porter AS and Instabox Norway AS on June 29, 2023, covers the period 2022.01.01-2022.12.31 and covers the Group's entire Norwegian operations, including the wholly owned companies Porterbuddy Norge AS, Porter AS and Instabox Norway AS.

## Our structure, operations and human rights management systems

Instabee is a leading last-mile delivery provider, founded in 2022 through the combination of Budbee and Instabox, including its subsidiary Porterbuddy. We specialise in both home delivery and parcel locker delivery, with consumers across Europe and locations in Norway, Sweden, Finland, Denmark, Germany, the Netherlands and Belgium. Simply put, we are obsessed with simplifying the way people ship and receive parcels.

Within Norway, our delivery workforce consists of external contracted drivers who utilise the Porterbuddy platform (contracted via Porterbuddy Norge AS) and internal drivers who drive under the Instabox brand (employed in Instabox Norway AS). Besides our drivers and terminal workers, we have a small office-based workforce based at our Oslo distribution terminal, where the tech team is employed in Porter AS and the rest in Instabox Norway AS.

Instabee is committed to assessing the human rights and sustainability implications of all our business decisions. We remain committed to respecting internationally recognised human rights, as set out in the International Bill of Human Rights and in accord with the UN Guiding Principles for Business and Human Rights.

Our business partner relationships are governed by our Code of Conduct for Business Partners to Instabee Group (<https://instabee.com/code-of-conduct/>), updated in 2023. This Code includes specific references to respect for human rights and the prohibition of child and forced labour throughout any part of Instabee's own operations and business relationships. Furthermore, protections for non-discrimination, working conditions and occupational environment, health and safety are also included. Instabee maintains a right to information and audit to ensure compliance with the Code and additionally maintains a right to terminate contracts with any business partner for violations of the Code.

Instabee is committed to conducting human rights due diligence in accordance with the Norwegian Transparency Act and OECD Guidelines for Multinational Enterprises. We remain committed to continuous improvement across our own operations and throughout our business relationships.

## Instabee's human rights due diligence

In the first quarter of 2023, Instabee conducted a human rights saliency assessment for our Norwegian operations to identify our most salient human rights to focus our due diligence efforts. This assessment was conducted according to the OECD Guidelines for Multinational Enterprises' severity-likelihood framework and reviewed risks associated with the core operational areas of our Norwegian operations.

Although the assessment did not identify any specific negative human rights impacts, it identified four areas where Instabee should focus its human rights due diligence efforts, being:

- Health and safety
- Wages and hours
- Privacy rights
- Forced/Child labour

Additionally, a high-level review of our supply chain was conducted, mainly related to our box operations in Instabox Norway AS. The assessment concluded that our overall supply chain risks were low because the majority of our supply

chain is based in European countries with lower overall human rights risks connected to our suppliers' industries. Where potential risks are identified, we work to reduce our exposure to these risks.

## Priority issues:

For each priority issue, our aim is to stop or mitigate any actual or potential negative impact on people. We will regularly review our priority issues to ensure that we are tackling those most likely to severely negatively impact people.

### Health and safety risk management

Our delivery operations involve intrinsic risks which may adversely impact our external and internal drivers as well as those drivers employed by our long-haul suppliers including risks stemming from operating vehicles and ensuring driver protection and well-being. Porterbuddy Norge AS is responsible for the relationships with last mile home delivery drivers as well as couriers contracted for line haul and pick up routes. Instabox Norway AS is responsible for the risks related to our directly employed drivers, mainly working with last mile box deliveries.

We have introduced measures to mitigate these risks including specific health and safety training, insurance checks, an established whistleblowing mechanism, working hour limits, and an updated supplier code of conduct inclusive of occupational health and safety terms with auditing rights.

In the upcoming year, we plan to work on updating our onboarding material, invest in additional training for managers, implement our updated Code of Conduct and set up a relevant auditing process. We are also reviewing the business model with independent drivers to ensure good terms and conditions.

### Hours and wages risk management

We are aware that our platform business model (used by Porterbuddy Norge AS) has been criticised for potentially negatively impacting external drivers and have focused on addressing the risks within the platform business model to ensure that Instabee's external drivers are not adversely impacted. The platform business model can lead to increased risks pertaining to wages and labour rights. This business model particularly may lead to drivers operating without insurance, carrying high financial liability, misunderstanding taxation responsibilities, and failing to receive pension accruals, holiday pay and other benefits.

We have introduced measures to mitigate these risks, including minimum guaranteed compensations, tax guidance, limited and clear use of feeds, regular reviews of variable economic costs, quarterly checks of linehaul suppliers, and an updated supplier code of conduct inclusive of terms on remuneration and hours.

In the upcoming year, we plan to implement our updated Code of Conduct and set up a relevant auditing process. We are also reviewing the business model with independent drivers to ensure good terms and conditions. We also seek to continue to work closely with our drivers and their chosen representatives, phase out the use of zero-hour contracts within Instabox Norway AS.

### Privacy rights risk management

Our operations as a delivery provider result in the handling of private or otherwise sensitive information. Risks arise both pertaining to the use of delivery tracking systems and access to the private information of end users, notably addresses and telephone numbers. This could lead to the infringement of the privacy rights of end users if this information is not sufficiently safeguarded in the delivery process both in terminal operations and by delivery drivers. This risk is relevant for all three Norwegian companies: Porterbuddy Norge AS, Porter AS and Instabox Norway AS.

We have introduced measures to mitigate these risks including thorough data-protection systems to protect location data, established and secure communication channels and an updated supplier code of conduct with terms pertaining to privacy, information security and confidentiality.

In the upcoming year, we will work to certify all of Instabee Group according to ISO 27001 and hence work on related policies and routines and ensure adequate training with relevant personnel. We will also look into how we can continuously ensure protection of personal data in connection to deliveries and train drivers regarding best practices for handling sensitive information.

## Forced/child labour risk management

Our operations maintain a certain degree of risk related to forced and child labour, although we have not identified any cases of this. The inability to fully monitor any additional individuals present in an external driver's vehicle or fully ensure that it is the registered external driver who is fulfilling the delivery may lead to other individuals (potentially minors) being used to complete deliveries, resulting in either child labour or forced labour. Furthermore, general forced labour risks within the transportation industry may lead to abuses in our line haul value chain. These risks are mainly relevant for Porterbuddy Norge AS and to a very limited extent to Instabox Norway AS.

We have introduced measures to mitigate these risks, including ID checks, use of reputable long-haul suppliers, quarterly checks and controls of line haul suppliers and an updated supplier code of conduct inclusive of terms on the prohibition of forced and child labour.

In the upcoming year, we plan to implement our updated Code of Conduct and set up a relevant auditing process.

## Next steps

No specific human rights violations were raised in the prior reporting period. Nonetheless, we remain committed to continuing to improve our policies and procedures as outlined above to continue to actively mitigate potential rights impacts. If any adverse human rights issues are identified either in our own operations or across our value chain, we are committed to communicating these impacts, seeking appropriate remedy for affected stakeholders, and updating our policies and procedures to avoid future negative impacts. The country manager (or the closest higher ranking person) at Instabee is primarily responsible for this oversight.

Having conducted a saliency assessment to identify our salient human rights issues during this reporting period, we will work towards enhancing policies and management practices in relation to these risk areas in the year ahead. Creating specific action plans for each of these four issue areas will allow us to better manage these human rights risks across our operations.

## Requests for information

Requests for information regarding this Transparency Act statement or Instabee's human rights due diligence policies and practices at large can be made to Ann Sonne, Group Communication & Sustainability, [ann.sonne@budbee.com](mailto:ann.sonne@budbee.com).

---

Signing pages to follow

## Signatories

### Porterbuddy Norge AS

Date: June 30, 2023



---

Alexis Priftis, Chairperson of the Board, Porterbuddy Norge AS

Fredrik Rasmussen Valskaar, Daglig Leder, Porterbuddy Norge AS, no longer works at the company and will therefore not sign the statement

### Porter AS

Date: June 30, 2023



---

Marte Knutsen, Daglig Leder, Porter AS



---

Alexis Priftis, Chairperson of the Board, Porter AS

### Instabox Norway AS

Date: June 30, 2023



---

Marte Knutsen, CEO Instabox Norway AS



---

Tom Englund, Chairperson of the Board Instabox Norway AS



---

Fredrik Nyström, Board member Instabox Norway AS



# Verification

Transaction 09222115557495897648

## Document

Transparency Act Statement Instabee Norway.docx (1),  
v2  
Main document  
4 pages  
*Initiated on 2023-06-30 09:14:59 CEST (+0200) by Sofie  
Koark (SK)*  
*Finalised on 2023-06-30 14:41:48 CEST (+0200)*

## Initiator

**Sofie Koark (SK)**  
Budbee Group AB  
Company reg. no. Budbee Group AB  
*sofie.koark@budbee.com*  
+46736444809

## Signing parties

**Alexis Priftis (AP)**  
*alexis@instabee.com*



*Signed 2023-06-30 13:49:31 CEST (+0200)*

**Marte Knutsen (MK)**  
*marte.knutsen@instabox.no*



*Signed 2023-06-30 13:41:13 CEST (+0200)*

**Tom Englund (TE)**  
*tom.englund@instabox.se*



*Signed 2023-06-30 10:10:50 CEST (+0200)*

**Fredrik Nyström (FN)**  
*fredrik.nystrom@instabox.se*



*Signed 2023-06-30 14:41:48 CEST (+0200)*

This verification was issued by Scrive. Information in italics has been safely verified by Scrive. For more information/evidence about this document see the concealed attachments. Use a PDF-reader such as Adobe Reader that can show concealed attachments to view the attachments. Please observe that if the document is printed, the integrity of such printed copy cannot be verified as per the below and that a basic print-out lacks the contents of the concealed attachments. The digital signature (electronic seal) ensures that the integrity of this document, including the concealed attachments, can be proven mathematically and independently of Scrive. For your convenience Scrive also provides a service that enables you to automatically verify the document's integrity at: <https://scrive.com/verify>

