

Procurement Policy

Document Owner: Departments responsible for direct and indirect procurement

Approved by: Board of Directors

Effective Date: 01.08.2025

Next Review Date: no later than 36 months from the date of adoption or earlier, if legislative, organisational, or risk-related changes occur

1. Introduction

1.1. The procurement policy of AUTONOM SERVICES SA (hereinafter "AUTONOM") has been developed taking into account the needs identified across the company's organisational structures. AUTONOM operates in accordance with principles and minimum standards that are essential both within the company and in its relationships with partners, and ensures their application throughout the entire supply chain.

2. Purpose

2.1. The purpose of this policy is to describe how the procurement system operates within AUTONOM.

2.2. At AUTONOM, procurement represents the central corporate function responsible for ensuring an optimal framework for the order-to-payment process and for leveraging key mechanisms to enhance sustainability.

3. Applicability

3.1. This Policy applies to AUTONOM and all its subsidiaries, divisions, and affiliated companies.

3.2. The Policy must be respected and complied with by all employees, associates, directors, and managers of AUTONOM (collectively referred to in this policy as "Employees").

3.3. AUTONOM applies, in its relationship with suppliers, minimum standards regarding respect for human rights, occupational health and safety, business integrity, and legal compliance.

4. Objectives

General Objective

The general objective is to ensure products and services for the achievement of AUTONOM's operational and development goals under sustainable conditions of efficiency and effectiveness.

Specific Objectives

- Increasing the efficiency of procurement processes, namely ensuring the supply of quality products and services at the best procurement prices under sustainable conditions.
- Concluding at least 10 national partnerships with strategic suppliers from key procurement categories. Establishing an annual negotiation calendar for the cost reduction section.
- Conducting benchmarks on significant categories: repairs, utilities.
- Implementing the Pareto model – Creating the approved supplier list with A suppliers (top 80% of turnover).
- Periodic training for employees on Procurement working procedures.

5. Supplier Selection and Classification

Using Porter's model, suppliers are selected based on direct and indirect procurement:

Procurement Category		Subcategory
Type		
Direct	Vehicles	
	Equipment	
Indirect	Services	Vehicle repairs
		IT
		Utilities
		Towing

		Car wash
		Training
		Consultancy
		Courier services
		Hospitality / Protocol
	Investments valued at <2.500 RON used for less than 1 year	Inventory items
	Tyres, parts, vehicle accessories and consumables	
	Fuel	
	Taxes and duties	
	Insurance	
Office consumables and supplies		

Since 2021, the *Approved Suppliers by Category Programme* has been implemented, with the primary goal of creating a list of preferred long-term partners.

Programme objectives:

1. Better visibility over the company’s expenditures;
2. Ensuring the best prices and reducing risks;
3. Reducing the time required for purchasing decisions.

Supplier evaluation is carried out on the basis of a minimum set of operational, compliance, social, environmental, and governance criteria, including at least: relevant authorisations and insurance, health and safety, labour legislation and human rights, data protection, ethics and anti-corruption, waste management, and the existence of related policies, procedures, and training. The evaluation outcome leads to a formal decision of approval, conditional approval, or rejection, and non-conformities are classified by severity and addressed through corrective measures, deadlines, and documented responsibilities.

Supplier selection also takes into account, in addition to the operational criteria above, the human rights risk assessment as set out in Section 8.

6. Supplier Performance Evaluation

GRI 204-1 (Local supplier spending)	ESRS S2 (Workers in the value chain) – no direct equivalent; reported within the value chain description
GRI 414-1 (New suppliers – social criteria)	ESRS S2-1, S2-4 (Policies and measures regarding workers in the value chain)
GRI 414-2 (Negative social impacts)	ESRS S2-3, S2-4 (Remediation, measures regarding material impacts)
GRI 308-1 (New suppliers – environmental criteria)	ESRS E1-IRO-1, E2-IRO-1 etc. (Identification of environmental impacts, risks, and opportunities in the value chain)
GRI 308-2 (Negative environmental impact – supply chain)	ESRS E1–E5 – disclosure requirements regarding impacts in the value chain

7. Reference Framework and Relationship with Other Internal Documents

This Policy is applied together with relevant Romanian legislation, including regulations on labour, equal opportunities, non-discrimination, occupational health and safety, whistleblower protection, data protection, and combating human trafficking, as well as the company’s Sustainability Strategy, Internal Regulations, and other applicable internal policies and procedures.

In applying this Policy, Autonom also seeks alignment with relevant international standards and principles, including the UN Guiding Principles on Business and Human Rights, the fundamental conventions of the International Labour Organisation, the European Convention on Human Rights, and European best practices regarding human rights due diligence in the value chain.

The intensity of checks and the frequency of monitoring the above requirements are determined by the risk level assigned to the supplier, in accordance with the methodology described in Section 8.

Furthermore, this Policy is aligned with the requirements of Regulation (EU) 2022/2464 (CSRD – Corporate Sustainability Reporting Directive) and the European Sustainability Reporting Standards (ESRS), in particular ESRS S1 (Own Workforce) and ESRS S2 (Workers in the Value Chain).

8. Human Rights Risk Assessment in the Supply Chain

A. Principle of the Risk-Based Approach

This approach involves identifying, assessing, and prioritising suppliers according to the level of risk associated with human rights violations, with the aim of proportionally allocating monitoring and due diligence resources.

B. Risk Assessment Criteria

The human rights risk assessment is carried out on the basis of the following factors:

- a. Volume and strategic importance of the relationship – annual procurement value and degree of dependence on the supplier;
- b. Compliance track record – existence of previous incidents, complaints, or non-conformities identified in prior assessments;
- c. Geographical factors – the supplier operating in countries or regions identified as presenting a high human rights risk, according to recognised international indices and reports;
- d. Sectoral factors – the supplier operating in sectors with high exposure to specific risks (e.g. construction, agriculture, transport, and the oil industry);
- e. Workforce-related factors – the use of temporary workers, migrants, subcontractors, or a high proportion of unskilled labour.

C. Supplier Classification by Risk Level (Tiering)

Based on the assessment set out in point 8, paragraph B, each supplier is classified into one of the following risk levels:

Risk Level	Description	Indicative Examples
High	Suppliers operating in high-risk geographical areas, in sectors with significant exposure to human rights risks, or with a history of non-compliance.	Suppliers from third countries with weak labour protection legislation; suppliers in sectors with intensive use of unskilled labour.
Medium	Suppliers presenting one or two risk factors, but without a history of non-compliance and with an adequate local legislative framework.	Local suppliers in moderate-risk sectors; new suppliers with no evaluation history.
Low	Suppliers with a verified compliance history, operating in areas with a solid legislative framework and in low-exposure sectors.	Suppliers with whom we already have a good collaboration history; national strategic suppliers in categories such as: IT, utilities, mobility, and related services.

In the selection and periodic evaluation process, AUTONOM prioritises partnerships with suppliers whose main activity is carried out on the territory of Romania and within the European Economic Area (EEA).

From the perspective of the human rights risk methodology, suppliers operating in Romania are classified in the Low Risk category. This classification is based on the following compliance arguments:

- Aligned Legislative Protection: National legislation (Labour Code, Occupational Health and Safety regulations) is harmonised with European Union Directives, providing superior procedural safeguards against forced labour, discrimination, and exploitation of minors.
- Oversight Mechanisms: The existence of active regulatory authorities (e.g. the Labour Inspectorate, the National Council for Combating Discrimination) ensuring constant monitoring of human rights in the business environment.
- Legal Transparency: Easy access to official information regarding labour incidents or social-related litigation of suppliers registered in Romania.

D. Corrective Actions and Escalation:

- a. Where non-conformities are identified, AUTONOM requests the supplier to develop and implement a corrective action plan within a maximum of 90 days.
- b. Serious non-conformities (forced labour, child labour, conditions endangering workers' lives) result in the immediate suspension of the commercial relationship and an assessment of the permanent termination of the collaboration.
- c. Evaluation results and corrective actions are documented and reported periodically to AUTONOM's management.

E. Periodic Review:

The risk classification of suppliers and the evaluation methodology are reviewed at least once every 3 years or whenever significant changes occur in the suppliers' risk profile, in the geopolitical context, or in the applicable regulatory framework.

9. Autonom's Principles Regarding Suppliers

Health and Safety

AUTONOM continuously takes all steps to ensure a safe and healthy working environment for all employees. Our suppliers must make every effort to ensure that they comply with all legal responsibilities arising from the legislation of the countries in which they operate. Suppliers must ensure that all employees understand and apply health

and safety policies. We encourage suppliers to take all reasonable measures to prevent accidents and bodily injuries.

Labour and Human Rights

AUTONOM is guided by the fundamental principles set out in the Universal Declaration of Human Rights and the fundamental standards of the International Labour Organisation. All work must be carried out voluntarily and not under the threat of penalties or sanctions.

AUTONOM prohibits the use of forced or compulsory labour in all its forms and will take all necessary measures to cease any collaboration with its suppliers in the event that there is a reasonable suspicion that any of them is violating the fundamental principles set out in the Universal Declaration of Human Rights or the fundamental standards of the International Labour Organisation.

Suppliers must not require workers to provide deposits or financial guarantees and must not retain identity documents (passports, identity cards, etc.) or make salary deductions in the absence of a legal contractual agreement.

Bonded labour is prohibited.

Suppliers must:

- refrain from using any form of bonded labour and must not allow or encourage workers to become indebted through recruitment costs, fines, or by any other means;
- respect workers' right to leave their workplace with reasonable notice;
- respect workers' right to leave the workplace at the end of their working hours.

Suppliers must comply with the national minimum working age and must refrain from hiring any person below the legal age limit under national legislation.

Suppliers shall not allow children to work nor exploit them in any way. If it is established that children are working directly or indirectly for a supplier, the supplier shall seek to find a solution that is both humane and effective, giving priority to the child's best interests.

Suppliers must not employ young workers under 18 years of age at night or in conditions that endanger their health, safety, or moral integrity and/or that could affect their physical, mental, spiritual, or social development.

Antitrust and Competition

Our business partners commit to conducting business strictly in accordance with applicable antitrust and competition laws. This includes the requirement that goods and services offered to us be free from anti-competitive practices, such as price-fixing with competitors.

Anti-Corruption and Bribery

We require our business partners to strictly refrain from any corrupt practices and/or bribery. Furthermore, they must not allow any conflict of interest that could affect AUTONOM's business.

Data Protection

We require our business partners to ensure adequate protection of employees' personal privacy rights and personal data, as well as compliance with legal provisions on data protection.

Environmental Impact Management

AUTONOM requires its business partners to identify, prevent, reduce, and, where possible, remedy significant negative environmental impacts generated by the activities, products, and services provided within the commercial relationship with AUTONOM. Suppliers must carry out their activities in compliance with applicable environmental legislation and adopt reasonable measures to protect the environment throughout their entire operational chain.

Minimum Documentation Requirements

The supplier must be able to present, as applicable:

- valid authorisations;
- relevant insurance;
- policies and procedures;
- evidence of training;
- evidence of waste management;
- evidence of data protection and consent;
- evidence of complaints / incidents.