

PUBLIC SAFETY DISCLOSURE

Safety Case Framework

A comprehensive, evidence-based argument that Bot Auto's automated driving system is acceptably safe for driver-out commercial operations on public roads within our defined Operational Design Domain.

PREPARED BY

**Bot Auto
Safety Team**

OPERATING REGION

**Texas
& Southwest Point-to-
Point**

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What this framework contains

The framework moves from why we build safety the way we do, through the standards we align to, to the five claims our safety case rests on and the evidence structure that supports them.

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**Structured argument**

Top-level claims decomposed into measurable requirements, each traced to evidence.

**Evidence-led**

Simulation, repeatable testing, and supervised real-world operations.

**Continuously updated**

A living framework, revised as operational experience grows and the system evolves.

— SECTION 01

Executive Summary

At Bot Auto, safety is not just a priority—it is the foundation of our mission to revolutionize automated trucking through operational excellence and responsible innovation.

BOT AUTO SAFETY TEAM

This Safety Case Framework presents our comprehensive, evidence-based argument that Bot Auto’s automated driving system is acceptably safe for driver-out commercial operations on public roads within our defined Operational Design Domain (ODD).

As we deliver commercialized services across Texas & the Southwest, this framework serves as our commitment to transparency, accountability, and the highest safety standards. Our approach reflects lessons learned from years of industry experience, combined with cutting-edge AI technology and a pragmatic understanding of real-world operational challenges.

Driver-out

The safety case supports commercial operation with no driver aboard, inside a defined ODD.

Commercialized

Services are already being delivered across Texas, not piloted in isolation.

Evidence-based

Every claim traces to simulation, testing or operational data.

Accountable

Transparency and public accountability are treated as safety requirements.

— SECTION 02

Purpose and Scope

Our Safety Case Framework demonstrates how the Bot Auto automated driving system meets the safety requirements necessary for driverless commercial operations. This framework provides four things.

01

A structured safety argument

Supported by comprehensive evidence that our system operates safely within its intended domain.

02

Transparency into methodology

Including hazard and risk assessment, and implementing mitigation strategies.

03

Verification & validation records

Documentation of our processes encompassing simulation, repeated testing, and supervised real-world operations.

04

Evidence of safety culture

And of organizational commitment to responsible automated vehicle deployment.

— THE THREE EVIDENCE STREAMS



Simulation

Scenario coverage at scale, including conditions that are unsafe or impractical to stage on a road.



Repeatable testing

Constant, controlled evaluation of system behaviour against defined performance requirements.



Supervised operations

Real-world point-to-point delivery lanes that produce the operational data our safety case is built on.

— SECTION 03

Safety Philosophy

Bot Auto's safety philosophy is grounded in three core principles.

01 Operational Realism

We focus on solving real-world transportation challenges with practical, proven solutions rather than pursuing theoretical capabilities. Our safety case is built on actual operational data from our point-to-point demonstrations and comprehensive real-world testing.

Practical not theoretical

Point-to-point demonstrations

Real-world testing

02 Evidence-Based Decision Making

Every safety claim in our system is supported by rigorous evidence from multiple sources including simulation, testing, and operational experience. We maintain that "the most predictable breakthroughs are the ones no one predicts" because they are grounded in solid engineering and comprehensive validation.

Simulation

Testing

Operational experience

03 Continuous Improvement

Safety is not a destination but a journey. Our system incorporates continuous learning mechanisms, real-time monitoring, and systematic improvement processes that ensure our safety performance evolves with our operational experience.

Continuous learning

Real-time monitoring

Systematic improvement

— SECTION 04

Regulatory Context and Standards

This Safety Case Framework aligns with industry best practices and established safety frameworks.



STANDARD

UL 4600

Our approach follows the principles outlined in UL 4600 “Standard for Safety for the Evaluation of Autonomous Products,” providing a structured safety case argument supported by evidence.



PRACTICE

Industry Best Practices

Our approach incorporates established safety standards and methodologies while reflecting Bot Auto’s unique operational focus.



GUIDANCE

Federal Guidelines

All standards are consistent with guidance from the U.S. Department of Transportation (DOT), National Highway Traffic Safety Administration (NHTSA) and Federal Motor Carrier Safety Administration (FMCSA) for automated vehicle safety.

— AUTHORITIES WE ALIGN TO

DOT

U.S. Department of Transportation

NHTSA

National Highway Traffic Safety Administration

FMCSA

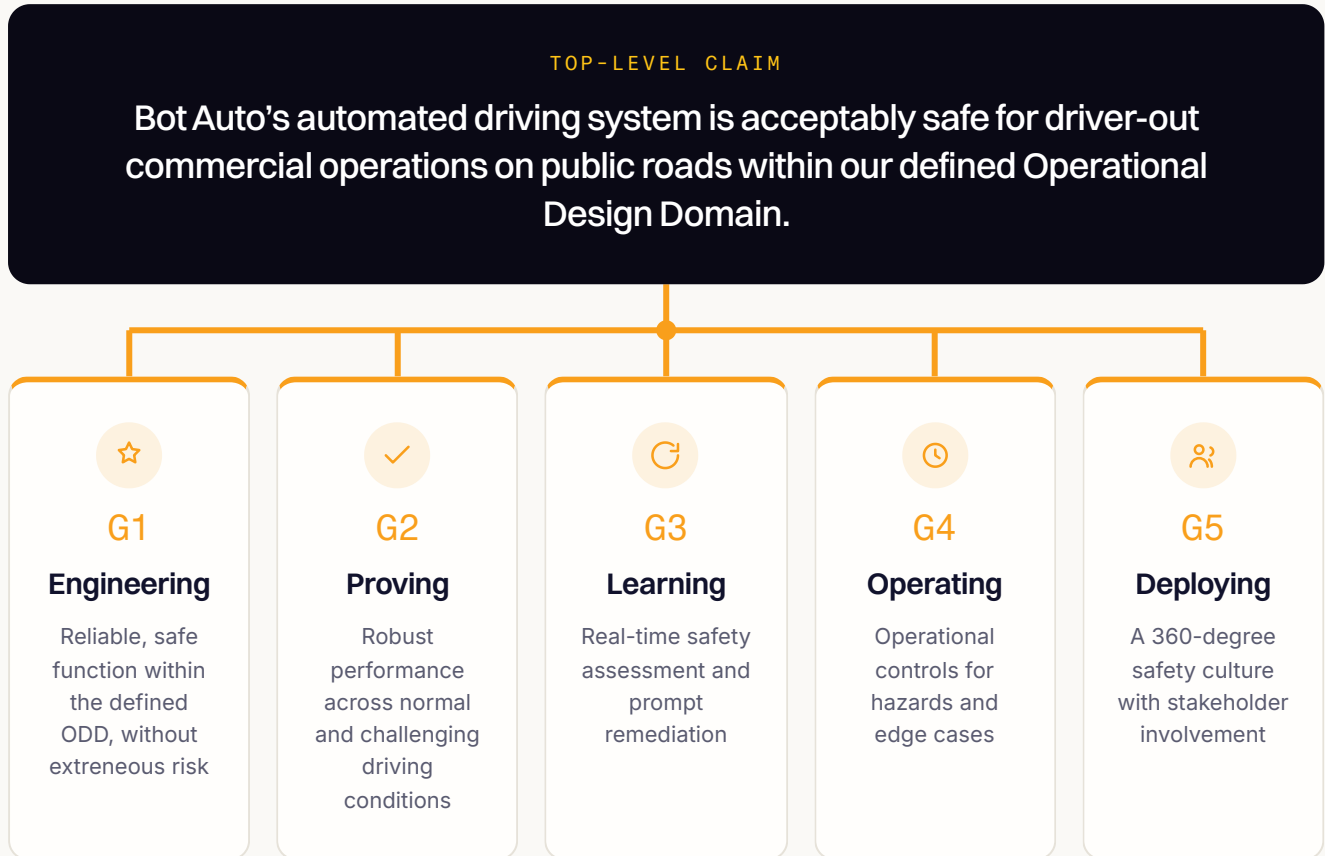
Federal Motor Carrier Safety Administration

Texas context: Bot Auto operates within Texas’s progressive automated vehicle regulatory framework, and engages federal, state and local authorities proactively rather than reactively — see Section 09, Stakeholder Engagement and Transparency. In 2026, Bot Auto became the first autonomous carrier to register with the Autonomous Vehicles Regulatory Program in compliance with Senate Bill 2807 (89R).

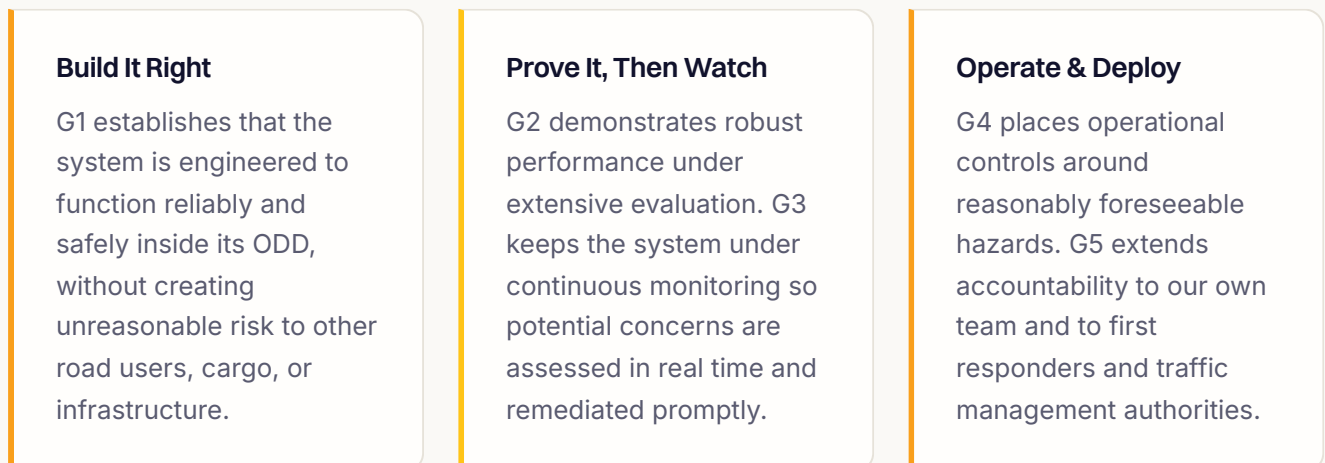
— SECTION 05

Safety Performance Claims

This Safety Case Framework is continuously evolving, built on these five pillars.



— HOW THE PILLARS WORK TOGETHER



Where the evidence sits: Each of the five claims is substantiated through the six-layer evidence structure set out in Section 07 — from decomposed requirements and system design, through hazard analysis and verification, to operational management and organizational safety culture.

— SECTION 06

The Five Claims in Full

Each pillar is stated as a goal that this safety case substantiates with evidence.

G1 Engineering Bot Auto’s automated driving system is engineered to function reliably and safely within its defined ODD (Operational Design Domain) without creating unreasonable risk to other road users, cargo, or infrastructure.

G2 Proving Our system maintains proven robust performance across normal and challenging operating conditions through extensive evaluation of our automated driving system designs.

G3 Learning Our system includes comprehensive monitoring capabilities that enable real-time safety assessment and prompt remediation to any potential concerns.

G4 Operating We have identified, analyzed, and implemented appropriate operational controls to address all reasonably foreseeable potential hazards or losses associated with our automated operations.

G5 Deploying We have nurtured a 360 degree safety culture that empowers team members to proactively improve safety daily and contains protocols for safe system responses in partnership with key stakeholders including first responders and traffic management authorities.

A continuously evolving set of claims: The five pillars are not a one-time certification. As operational experience accumulates, both the claims and the evidence beneath them are revisited — which is why this framework is maintained as a living document.

— SECTION 07

Safety Structure and Evidence Framework

This Safety Case Framework is organized to provide clear traceability from high-level safety goals to specific evidence.

01

Goals and Requirements

Establishing our top-level safety objectives and decomposing them into specific, measurable requirements.

02

System Architecture and Design

Documenting how safety is built into our automated driving system from the ground up.

03

Hazard Analysis and Risk Assessment

Comprehensive identification and analysis of potential hazards with corresponding mitigation strategies.

04

Verification and Validation

Evidence from our multi-faceted testing and validation program including simulation, closed-course testing, and supervised operations.

05

Operational Safety Management

Procedures and protocols for safe commercial operations, including monitoring, maintenance, and incident response.

06

Organizational Safety Culture

Documentation of our safety-focused organizational structure, training programs, and continuous improvement processes.

Clear traceability, from a **high-level safety goal** at the top, down to the **specific piece of evidence** that supports it.

— SECTION 08

Bot Auto's Unique Approach

Our Safety Case Framework reflects Bot Auto's distinctive approach to automated trucking.

MODEL

Transportation as a Service (TaaS)

Unlike technology-only providers, at Bot Auto we operate our own fleet, giving us direct control over vehicle maintenance, route optimization, safety protocols, and continuous system improvement. This operational ownership ensures safety accountability from development through deployment.

Vehicle maintenance

Route optimization

Safety protocols

System improvement

ARCHITECTURE

Foundation Model-to-All

Our AI system leverages advanced transformer-based neural networks that provide a unified world model capable of handling diverse scenarios with robust generalization capabilities. This approach enables our system to safely manage novel situations while maintaining predictable, rule-based safety constraints.

Robust generalization

Rule-based safety constraints

PLACE

Texas-Centered Excellence

Based in Houston, we benefit from four regional advantages.



Texas's progressive automated vehicle regulatory framework



Direct engagement with local first responders and emergency services



Deep understanding of regional traffic patterns, weather conditions, and infrastructure



Proximity to America's largest freight networks and logistics hubs

Why operational ownership matters to the safety case: Operating the fleet rather than only supplying the technology keeps maintenance, routing, protocol and improvement decisions — and the accountability for them — in one place, from development through deployment.

— SECTION 09

Stakeholder Engagement and Transparency

Bot Auto recognizes that **public trust is essential** for the successful deployment of automated trucking technology.

This Safety Case Framework reflects our commitment to:



01

Regulatory Collaboration

Proactive engagement with federal, state, and local authorities to ensure compliance and safety alignment.



02

First Responder Partnership

Direct collaboration with emergency services throughout our ODD to ensure coordinated response capabilities.



03

Industry Leadership

Contributing to industry-wide safety standards and best practices through transparent sharing of our methodology and lessons learned.



04

Public Accountability

Clear communication about our safety approach, limitations, and continuous improvement efforts.

Transparency is treated as a safety mechanism: Publishing methodology, limitations and lessons learned invites the scrutiny that surfaces problems earlier than internal review alone would.

Closing Statement

The approach presented in this Safety Case Framework demonstrates that Bot Auto's automated driving system is **ready for safe driver-out commercial operations** within our defined Operational Design Domain (ODD).

Our approach combines proven safety methodologies with innovative AI technology, operational excellence, and a deep commitment to responsible deployment.

We continue driving innovation into the next phase of automated trucking, always remaining committed to the principle that **safety is not just what we do—it's who we are**. This framework represents not only our current safety case, but our ongoing commitment to the safe, efficient, and responsible transformation of America's logistics ecosystem.

A living framework. This Safety Case Framework will be updated as our operational experience grows and our system evolves. For questions or additional information, please contact Bot Auto's Safety Team at safety@bot.auto.

HEADQUARTERS

15310 Park Row Blvd
Houston, TX 77084

SAFETY

safety@bot.auto

MEDIA

press@bot.auto

FREIGHT

haul@bot.auto

INVESTORS

investor@bot.auto